# Appendix A

# **Consultation comments**

Table A.1: Responses to the consultation comments received on the Regulation 18 Integrated Impact Assessment

Respondent	Section of the IIA Scoping Report	Representation	Response
Environment Agency	Chapter 2 – Air Quality	Consideration should be given to the impacts of unenclosed waste facilities on dust and particulate pollution, this is particularly important where facilities are located in less industrialised areas. We recommend that this be identified as a key issue and incorporated into the proposed air quality objective.  London Plan Policy SI 8 (waste capacity and net waste self-sufficiency) should be referenced in the IIA Scoping Report.	AECOM  London Plan Policy SI8 has been added as a bullet point in Paragraph 2.11 and within key issues.  This has not been included in the chapter's objective as the new facilities granted planning permission at Edmonton EcoPark are proposed to have an improved air quality performance than current facilities.  LUC  In the June 2021 IIA produced by LUC, Table 3.1 'Key sustainability issues for Enfield Borough and likely evolution without the Local Plan' makes reference to the impacts of unenclosed waste facilities.  As highlighted by AECOM, reference to London Plan Policy SI 8 was added to the IIA Scoping Report.
		Paragraph 3.13 – Reference is made to air quality in error.	AECOM  Amended to read 'biodiversity'  LUC  As highlighted by AECOM, this amendment was made to the IIA Scoping Report.
		Paragraph 3.17 – Enfield Development Management Document (DMD) Policy 63 requires that 'new development should be set back from main rivers and ordinary watercourses [and] maintain a minimum 8 metre buffer strip, which should be free of development and naturalised where feasible'. This policy should be included in the local context review, it presents an important opportunity to increase the health of watercourses in the borough, enhance biodiversity, and increase habitat connectivity.	AECOM  DMD 63 has been added to paragraph 3.17:  "DMD 63: Protection and Improvements of Watercourses and Flood Management: Requires that new developments should be set back from watercourses and maintain a minimum 8 metre buffer strip that should be naturalised, i.e. to support biodiversity and habitat connectivity. This policy should ignite watercourse habitat improvements and offers an important opportunity to enhance biodiversity and habitat connectivity."

Respondent	Section of the IIA Scoping Report	Representation	Response
			LUC
			As highlighted by AECOM, amendments were made to the IIA Scoping Report.
		Paragraph 3.20 – The Lee Valley Biodiversity Action Plan has	AECOM
		recently been released and should be considered as a key baseline document	See Paragraph 3.22 for the inclusion of the Lee Valley BAP.
			LUC
			As highlighted by AECOM, the Lee Valley BAP was added to the IIA Scoping Report.
		Paragraph 3.33 – We welcome the reference to future growth	AECOM
		opportunities and the application of biodiversity initiatives at a	The following wording has been added to
		strategic scale. Opportunity mapping could be designed to identify areas where green space/ habitat creation would be most beneficial to generate connectivity and prevent habitat fragmentation. This could also be used to highlight areas of high value for future connectivity and ensure that they are adequately protected.	Paragraph 3.34:
			"Opportunity mapping could be utilised to identify areas that would provide the most benefit from improved connectivity. These could also be used to highlight areas of high value for future connectivity and ensure they are adequately protected".
			LUC
			As highlighted by AECOM, wording on opportunity mapping was added to the IIA Scoping Report.
		Core Policy 35 is referenced previously under Paragraph 3.16, but	AECOM
		the theme of waterway restoration and enhancement is not continued throughout this chapter. Watercourses provide habitat to support water and land based wildlife, while at the same time	Paragraph 3.8 a new bullet has been added to show NPPF consideration of watercourse habitats:
		providing valuable recreational space. Under the Water Framework Directive the UK is required to prevent the deterioration of any water body. Additionally it requires each water body to reach 'Good	"Consider river basin management plans when developing planning policies as a means to support an protect water habitats that support water and land based wildlife."
		Ecological Status/ Potential' by 2027. To achieve this, actions and measures have been identified through the Thames River Basin Management Plan. Both documents should be referenced in this	Paragraph 3.16 has been included for reference to the Thames RBMP which notes the river bed improvements on the River Lea to deliver improved biodiversity benefits.

Respondent	Section of the IIA Scoping Report	Representation	Response
		chapter and the opportunities they present for biodiversity gains recognised. Paragraph 174 of the NPPF encourages the consideration of river basin management plans when putting planning policies and development proposals together. The Environment Agency's Catchment Data Explorer provides access to the actions and measures needed across the waterbodies in the borough and should be referenced in this section. However, while we strongly support proposals to restore and enhance waterways, it is important to recognise the land contamination implications of restoring waterways and potential interaction with groundwater quality and quantity.	The Environment Agency's Catchment Data Explorer has been utilised to develop Table 14.1 which lists the main watercourses in LBE, their ecological status and current water quality concerns.  LUC  The importance of watercourses and water bodies has been cited numerous times in the June 2021 IIA produced by LUC, including in Table 3.1 'Key sustainability issues for Enfield Borough and likely evolution without the Local Plan'. IIA objective 18: Minimise water use and protect water quality specifically covers water storage and quality. Reference is made to the Water Framework Directive in the 'Sustainability context' section of the report, in addition to the 'Cumulative effects' section. The Thames River Basin Management Plan is referenced throughout the report.
		Paragraph 3.35 sets out the emerging key issues from the context and baseline review. We believe that the final bullet point is ambiguous and should be reworded. It refers to ensuring that 'the Local Plan leads to a biodiversity net gain overall', which implies that it is not the responsibility of each individual development to achieve biodiversity net gain, inferring that others could be used to make up any short-fall. While on-site net gain may not always be possible it is the responsibility of each individual developer to apply the mitigation hierarchy and thereafter apply the principles of net gain on a site by site basis. This does not however prevent the Council from establishing some strategic borough-wide net gain aspirations for those developments which, after having correctly applied the mitigation hierarchy, must resort to offsite compensation to achieve measurable net gain.	AECOM  This is sufficiently covered by the preceding sentence:  "ensure that development is delivered in such a way that impacts to biodiversity are avoided, mitigated and compensated for in order to ensure that the Local Plan leads to a biodiversity net gain overall".  LUC  As highlighted by AECOM, this was considered to be sufficiently covered in the IIA Scoping Report.
		The condition of the borough's main rivers and the opportunity presented by their improvement, both in terms of biodiversity and habitat connectivity, should be recognised as a key issue, in line with our comments above.	AECOM  Paragraph 3.36 has been included to cover this issue, evidence has been taken from the EA's Catchment Data Explorer to support this inclusion.

Respondent	Section of the IIA Scoping Report	Representation	Response
		We recommend that the wording of the objective be revisited and clarified for a number of reasons;  The objective puts emphasis on 'land that contributes to ecological connectivity', however biodiversity net gain should be applied much more widely, by individual developers and at wider functional scales (as referred to in Paragraph 3.7).  The objective (and the final bullet point of 3.35) implies that biodiversity net gain is to be achieved by avoiding and mitigating impacts on existing habitats. This will not in itself achieve measurable net gain. Policies must be designed to ensure that developments go above and beyond this to deliver habitat enhancements, only in this way can net gain, as opposed to no net loss, be achieved.	A new bullet point under Paragraph 3.38 has been added:  "There is a clear opportunity to deliver biodiversity improvements through efforts to improve the ecological status of theses watercourses through restoration and enhancement efforts.".  LUC  Water quality has been recognised as a key issue in Table 3.1 'Key sustainability issues for Enfield Borough and likely evolution without the Local Plan' of the June 2021 IIA produced by LUC.  AECOM  Objective wording changed to:  Deliver biodiversity net gain at an ambitious scale through individual development contributions and a wider strategic focus on avoiding/mitigating impacts  LUC  In the June 2021 IIA produced by LUC, the wording of IIA objective 13 was changed back to its original wording, but with the appraisal question "Will the Local Plan deliver biodiversity net gain through individual development contributions?" added to provide clarity on this objective.
	Chapter 4 – Climate Change Adaptation	in our response to the Regulation 18 consultation we raised concerns regarding the lack of a revised Strategic Flood Risk Assessment (SFRA) to support the new Enfield Local Plan, this should form a key part of the evidence base.  We will likely find any future local plan submission unsound unless it is supported by up to date SFRAs sites. We will expect all updated SFRAs to include model reruns with the most up to date climate change allowances. Therefore our existing Lee model should be updated to reflect these allowances. We will be able to provide you with any modelling that we hold, including some modelling already	AECOM  Noted – This comment has been passed onto LBE and the Borough will respond accordingly.  LUC  As above.

Respondent	Section of the IIA Scoping Report	Representation	Response
		including the most up to date climate change allowances for certain areas of Enfield (for example Meridian Water).	
		Paragraph 4.4. – Reference is made to the 2007 floods, as an example of the impacts of climate change, more recent flooding	AECOM
		events (2019 and 2020) or those with a specific impact on Enfield (2014) may be more appropriate examples	Paragraph 4.4 has added text to incorporate the flooding of 2019-20:
			"Events such as these are likely to become more frequent and severe as the climate changes, as demonstrated in a four month period between 2019-2020 where the UK suffered consistent flooding, which cumulated in significant damage caused by Storms Ciara and Dennis, in total this is estimated to have cost the insurance industry between £435 million - £535 million".
			LUC
			As highlighted by AECOM, reference to more recent flooding events was added to the IIA Scoping Report.
		Paragraph 4.8 – We are pleased to see that reference has been made to a number of key NPPF paragraphs aimed at mitigating and adapting to a changing climate however we feel that an important paragraph has been omitted. Therefore we recommend Paragraph 157 of the NPPF is included within the national context review for this section of the IIA.	AECOM
			The context review is a summary of the key policy documents, it gives the reader an understanding of the rhetoric of the policy – Paragraph 157 is sufficiently covered through the current wording.
			LUC
			In the June 2021 IIA produced by LUC, the NPPF is referenced broadly in relation to climate change adaptation and mitigation, energy efficiency and waste minimisation in paragraphs 3.12-3.14.
		Within the national context review section we also recommend	AECOM
		referencing the Flood Risk and Coastal Change guidance, as found on the gov.uk website - https://www.gov.uk/guidance/flood-risk-andcoastal-change.	See paragraph 4.2 which has been added to include this reference.
			LUC
			In the June 2021 IIA produced by LUC, national policy on flood risk and coastal change is referenced in paragraph 3.12.

Respondent	Section of the IIA Scoping Report	Representation	Response
		We therefore recommend that the Draft London Plan (2017) Policy SI 17 is acknowledged within this section, and that any objective takes account of the measures set within it.	AECOM Paragraph 4.17 includes a bullet point for Policy SI17 LUC The 2021 London Plan is referenced in the June 2021 IIA produced by LUC. Accordingly, Table 3.1 includes a point regarding Policy SI 12: Flood Risk Management.
		Paragraph 4.18 – Two key local polices have been omitted from this section, which focuses predominantly on water and waste infrastructure. These are Core Policy 28 and DMD Policy 63, referring to the borough's approach to flood risk (directing development to areas of lowest risk) and watercourse accessibility (providing an 8m setback from new developments for access and maintenance of flood defences).	AECOM  See additional bullets added to Paragraph 4.19 (Core Policy 28) and Paragraph 4.23 has an additional bullet point: 'Watercourse accessibility'.  LUC  In the June 2021 IIA produced by LUC, Core Policy 28: Managing flood risk through development has been referenced in Table 3.1. Although no reference is made to DMD Policy 63: Protection and improvement of watercourses and flood defences, reference has been made to DMD 59: Avoiding and reducing flood risk, in Table 3.1.
		Paragraph 4.19 – Reference has been made to a Level 1 SFRA (2008) and Level 2 SFRA (2013) within this section. As noted above these SFRAs are now out of date and require revising with the most up to date information to determine an accurate baseline to inform the new local plan.	AECOM  Noted – This comment has been passed onto LBE and the Borough will respond accordingly.  LUC  As above.
		It is important that other areas in the borough are not overlooked that are also at risk. This level of risk is likely to increase further as a result of climate change, therefore it is essential that the SFRAs are updated to reflect the most up to date climate change allowances, to establish an accurate baseline.	AECOM  Noted – this will have to be considered by LBE under the development of an updated SFRA.  LUC

Respondent	Section of the IIA Scoping Report	Representation	Response
			As above.
		Section 4.29 recognises the benefits of using SuDs, however other	AECOM
		measures such as holding water upstream through the use of NFM could also play a role in helping the Council to prepare for the effects of climate change. Therefore, these measures should also be explored where appropriate.	Paragraph 4.30: See the additional bullet point: "Natural Flood Management (NFM) techniques such as holding water upstream can provide alternative methods of preparing for climate change and flood risk, as well as delivering cobenefits, these should be considered where appropriate."
			LUC
			As highlighted by AECOM, reference to NFM was added to the IIA Scoping Report.
		We recommend that the proposed objective be separated into three,	AECOM
		one for each of the main areas of concern – heat, flood risk and drought. This is because the resilience measures will vary significantly between these three areas, and therefore the assessment criteria and indicators for each will differ.	Noted – The objectives have been created as an overarching aim based on a summary of all the information collected through the Scoping Report. Therefore we understand the Environment Agency's point, however, do not believe this will add any further value to the objective, given the purpose of it.
			LUC
			As above.
		New local plan policies should be designed to ensure that not only	AECOM
		is flood risk not increased but also aiming to reduce it overall.  Policies should seek to ensure that development is steered to areas of the lowest flood risk and, where this is not possible, ensure that	Noted – This information will be considered by LBE upon developing the draft Local Plan policies.
		development is designed to cope with heightened future risk.	LUC
			As above.
		The following could be used to inform any assessment criteria for	AECOM
		flood risk policies and site allocations:	Noted – This information will be considered by LBE upon developing the draft Local Plan policies and site allocations.

Respondent	Section of the IIA Scoping Report	Representation	Response
		<ul> <li>Flood risk policies should firstly aim to steer any future development away from areas of greatest flood risk. In other words, development should be directed towards flood zone 1 first, then flood zone 2, and finally where all other options have been exhausted flood zone 3. This assessment criteria should also be applied to any site allocation document. It is essential that the current and future impacts of climate change are factored in to this assessment, therefore SFRAs must be updated. This element of the assessment criteria is supported by Paragraph 160 of the NPPF.</li> <li>The sequential approach should be applied where all options to allocate development outside of areas of highest flood risk have been exhausted (as per part 1 of this assessment criteria). Therefore all policy and site allocations should aim to move more vulnerable development to areas of lowest flood risk within a site. This could involve locating more vulnerable development in areas of a site at lower risk of flooding (if a site has areas of flood zone 1 or 2). Other options include locating more vulnerable development, such as housing, above less vulnerable development, such as offices or shops. This part of the assessment criteria is supported by Paragraph 161(d) of the NPPF.</li> <li>Should development be allowed to go ahead in areas at risk of flooding then it must be designed to be safe for its lifetime without increasing flood risk elsewhere. This is supported by Paragraph 163 of the NPPF.</li> <li>Any flood risk policy must aim to reduce flood risk overall. Therefore, all policies should maximise opportunities to restore rivers to more natural states, aim to reconnect rivers with their floodplains, and promote development-free buffer strips around main rivers. This is a requirement of Paragraph 161b of the NPPF and Policy SI 17 of the Draft London Plan.</li> </ul>	This comment relates more specifically to policy wording in the Local Plan than the IIA. However, the IIA framework against which the Local Plan will be appraised contains the following relevant questions relating to flood risk:  Will the Local Planminimise the risk of flooding to people, property and infrastructure from rivers?  Will the Local Planavoid development in locations at risk from flooding or which could increase the risk of flooding elsewhere, taking into account the impacts of climate change?
		The environmental impact of developments should be minimised through sustainable design and management of resource	AECOM

Respondent	Section of the IIA Scoping Report	Representation	Response
	Chapter 5 – Climate Change Mitigation	consumption. For example, reducing water consumption to 105 litres per head per day or less, in line with the London Plan, and setting water efficiency standards for commercial development in line with BREEAM (the BRE Environmental Assessment Method).	See the inclusion of Paragraph 5.46. <b>LUC</b> Table 3.1 makes reference to Core Policy 20: Sustainable Energy Use and Energy Infrastructure, and Policy DMD 49: Sustainable Design and Construction, which both detail that the environmental impact of developments should be minimised through sustainable design and management.
		Proposals to improve sustainable modes of transport will require associated potentially contaminative infrastructure, e.g. refuelling stations or depots. It is important that these are appropriately located away from environmentally sensitive locations, for example away from Source Protection Zones (SPZs).	AECOM  This is a very specific point, more appropriate for inclusion into a Local Plan policy. This point has been noted and will be considered in the development of Local Plan policies.  LUC  As above.
		We strongly recommend encouraging the use of flood proofing and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways to help reduce flood damage. The Department for Communities and Local Government guidance 'Preparing for floods' and 'Improving the flood performance of new buildings' should be referred to.	AECOM  Noted – This information will be considered by LBE upon developing the draft Local Plan policies and site allocations.  LUC  As above.
		Paragraph 5.46 refers to carbon sequestration through tree planting and other environmental interventions. Enfield Council have already been very proactive with rewilding projects, especially in the upper Salmons and Turkey Brook catchments. This could be built into the assessment criteria or indicators for this topic	AECOM  Noted – These examples can be considered as a case study to show how carbon sequestration efforts can be built on within the draft Local Plan policy.  LUC  As above.

Respondent	Section of the IIA Scoping Report	Representation	Response
	Chapter 8 – Economy and employment	Growth, business, industry, and regeneration are key to this chapter of the IIA Scoping Report. However, this should not be at the expense of the environment. Care should be taken to crossreference these aspirations with environmental constraints, this should be included in the key objectives set out in Paragraph 8.18. It should also be raised in the key issues section under Paragraph 8.25. The 'right interventions' need to be located in the right place to limit adverse impacts on the environment, water	Paragraph 8.1.8 now has the additional bullet point below. This has been taken directly from the objectives if the Issues and Options 2036 document:  "Managing significant change whilst protecting and enhancing the borough's heritage and natural environment."
	quality, biodiversity and flood risk. There are a number of paragraphs in the NPPF that support this approach and shincorporated into this chapter, for example those regarding	paragraphs in the NPPF that support this approach and should be incorporated into this chapter, for example those regarding the use of suitable brownfield land for homes (Paragraph 118.) These	Paragraph 8.25 bullet point 1 now reads:  With the right interventions and investment, there is significant opportunity for growth and development in Enfield, such that the borough can support the government's Industrial Strategy aim to boost the productivity and earning power of people across the UK. Interventions should carefully consider the environmental sensitivities within the borough and should be located in places which limits adverse impacts on the environment, water quality, biodiversity and flood risk.
			LUC In the June 2021 IIA produced by LUC, the appraisal of policies takes into consideration growth, business, industry, and regeneration alongside environmental considerations.
	Chapter 11 – Housing	As above	AECOM  Paragraph 11.21 includes a third bullet point:
			"Furthermore, development proposals should carefully consider the environmental sensitivities within the borough and should be located in places which limits adverse impacts on the environment, water quality, biodiversity and flood risk".
			LUC
			In the June 2021 IIA produced by LUC, the appraisal of policies takes into consideration housing delivery alongside environmental considerations.

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	Chapter 12 – Landscape and Green Infrastructure  Chapter 14 – Water	Paragraph 12.32 refers to a green, blue, and grey infrastructure study, please let us know if this is something you would like Environment Agency input into.  Land contamination and water quality are closely linked, and as outlined in our response to the Regulation 18 consultation we were disappointed that a draft land contamination policy was not provided. The London Borough of Enfield has a long-established history of industrial uses and a high prevalence of Source Protection Zones (SPZs).	AECOM  Noted – LBE will be notified to consider this point.  LUC  As above.  AECOM  Paragraph 14.23 has been amended to include this localised context:  "Following consultation with the Environment Agency, it became clear that land contamination was a central issue in LBE. Land contamination and water quality are closely linked and LBE has a longestablished history with industrial uses and is significantly affected by source protection zones (SPZs). This is particularly noticeable in the east and centre of the borough. There are nine SPZ1s that run through the borough, these are surrounded by and connected by three SPZ2s, there are no SPZ3s in the borough boundaries  LUC
			This comment relates more specifically to the Local Plan than the IIA. However, the site assessment assumptions (Appendix B of the June 2021 IIA) include Source Protection Zones and use this data to inform what effect sites receive in relation to IIA objective 18: Minimise water use and protect water quality.
		With regards to our remit we are particularly concerned with development on land where a previous use of the site may have caused contamination, and where potentially contaminating development is proposed within a SPZ. The risk that new development creates a pollution pathway between the two is high. We would therefore support a revised IIA Scoping Report where	AECOM  Paragraph 14.35 has been added to address this. No amendments have been made to the key issues as bullet point 3 (under Paragraph 14.32) covers this concern.  LUC

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		water quality and land contamination considerations are closely aligned and crossreferenced.	Reference to water quality and land contamination and the correlation between the two is provided in Table 3.1 of the June 2021 IIA produced by LUC.
		Paragraph 14.3 – 14.4 Disposal of treated wastewater has a knock- on effect on receiving waterbodies in a variety of biological and chemical ways, combining with multiple other sources of pollution such as agricultural runoff, infiltration, exisiting land contamination and urban runoff to impact on the overall quality of watercourses.	AECOM  Paragraph 14.4 has been amended to read:  "multiple other sources of pollution such as agricultural runoff, infiltration, exisiting land contamination and urban runoff to impact on the overall quality of watercourses."  LUC  The importance of wastewater treatment facilities to protect and improve water quality in the Borough is emphasised in Table 3.1.
		Paragraph 14.12 –The following legislation should be clearly referenced in this section; Part 2A of the Environmental Protection Act 1990: Part 2A: Contaminated Land; The Water Supply (Water Quality) Regulation 2018; The Private Water Supply (England) Regulations 2016; and reference to NPPF Paragraph 174 regarding remediation of contaminated land	AECOM  Paragraph 14.17 now includes references to all regulations stated in the comment. Paragraph 14.18 includes a bullet point summarising the Paragraph 174of the NPPF.  LUC  As above.
		Paragraphs 14.17 and 14.19 – We are pleased to see that DMD Policy 63 has been recognised relating to watercourse improvement and accessibility (providing an 8m setback from new developments for access and maintenance of flood defences). However, Core Policy 32 (water quality) and DMD Policy 66 (contamination and remediation) should also be referenced in this section. These policies reference the impacts of 'high risk' activities, highlighting the links between land contamination, SPZs, and water quality.	AECOM  Core Policy 32 was already referenced in the scoping report. Paragraph 14.24 has a new bullet point summarising DMD 66.  LUC  As above.
		Paragraph 14.20 – This section lists the main rivers that run through the London Borough of Enfield, however each has a different classification, status, and set of requirements under the Water	AECOM  See amendments to Paragraph 14.25 and the inclusion of table 14.1, which sets out the hydromorphological designation, current

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		Framework Directive (WFD). These should be clearly set out to form part of the baseline, outlining the generalised water quality issues	overall status and reasons for not achieving 'Good' status, for the main water courses that run through Enfield.
		that each river suffers from	LUC
			As highlighted by AECOM, the additional information on each river has been added to the IIA Scoping Report.
		Paragraph 14.29 – It is highlighted here that the Environment	AECOM
		Agency is concerned about the quality of discharged effluent from Deepham's Sewage Treatment Works. However it should be noted	Paragraph 14.35 has been included to respond to this comment.
		that this is not the only water quality issue prevalent in the borough.  Development in London represents an opportunity to rectify a	LUC
		number of issues relating to water quality, including surface water diffuse issues, run-off and misconnections, none of which have been highlighted in the IIA Scoping Report baseline as existing issues.	Table 3.1 provides examples of opportunities to improve water quality.
		We would like to see this section revised to put an emphasis on the borough's industrial history and the implications of this in terms of land contamination and water quality. It should be recognised that part of the borough is a Drinking Water Surface Water Protected Area and is located over a principal aquifer (also protected for drinking water purposes under the WFD).	AECOM
			Paragraph 14.31 has been added to reference the Drinking Surface Water Protected Area and the principal aquifer.
			The industrial history of the borough has been sufficiently referenced in Paragraph 14.28.
			LUC
			As above.
		We recommend, in light of our earlier comments that the key issues	AECOM
		for this topic area be revised and expanded upon to include other water quality issues. Developments should be directed toward suitable locations to minimise the risk to the water environment (i.e. set back from watercourses and away from areas with heavily contaminated soils above protected groundwater assets).	A fifth bullet point has been added to the 'Key Issues' section to reference the further exploration into water quality issues.
			The second point about the location of developments has been noted and will be considered in the development of Local Plan policies

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			LUC
			Key issues for this topic area are provided in Table 3.1. Further to this, the IIA framework against which the Local Plan will be appraised contains the following relevant questions relating to water quality:
			Will the Local Planensure that development does not lead to the deterioration of groundwater, surface water or river water quality?
			■ Will the Local Plan…locate development where adequate foul drainage, sewage treatment facilities, adequate potable water supply and surface water drainage can be made available?
		It should be highlighted, in light of the borough's industrial history,	AECOM
		that development in some areas could impact the underlying principal aquifer, waterways, and the associated potable/ drinking water supply. New local plan policies must be designed to ensure	Noted – this point will be considered in the development of Local Plan policies.
		that development is correctly located so as to minimise impacts of water resources and current infrastructure must be retrofitted or upgraded to bring it in line with future water supply resilience targets. This will help to strengthen the scope of this chapter to include the wider water environment.	LUC  This comment relates more specifically to the Local Plan than the IIA. However, Table 3.1 in the June 2021 IIA produced by LUC states "Although there are a number of existing policies that address the Borough's water resources which would continue to apply in the absence of the Local Plan, there is an opportunity to build on these overarching policies through more specific policy wording that addresses the insufficient supply of water in the Borough and the provision of water infrastructure and upgrades to water resource services, specifically Deephams STW."
		Development adjacent to rivers, and above SPZs and aquifers, has the potential to adversely impact water resources and quality. Development in these areas also represents an opportunity to engage with stakeholders and ensure the actions of the WFD and RBMPs are carried out.	AECOM  Noted – this detail is better suited in the development of Local Plan policies and will be considered through this process.  LUC

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			This comment relates more specifically to the Local Plan than the IIA. However, the site assessment assumptions (Appendix B of the June 2021 IIA) include Source Protection Zones, watercourses and water bodies and use this data to inform what effect sites receive in relation to IIA objective 18: Minimise water use and protect water quality.
Natural England	Chapter 2 – Air Quality	NE agrees with the acknowledgement in para 2.29 of the impact of air pollution from development in Enfield Borough on Epping Forest SAC as an issue.  We would suggest that this is further underlined as a key issue by adding it to the bullet point list in 2.33	AECOM  This has been added to the sixth bullet point in Paragraph 2.34 as an example of why developments need to consider impacts on air quality caused by increased traffic flow.  LUC  The effects of future development on the Epping Forest SAC have been referenced in Table 3.1 'Key sustainability issues for Enfield Borough and likely evolution without the Local Plan' of the June 2021 IIA.
	Chapter 3 – Biodiversity	Paragraph 3.36 appears to aggregate avoidance and mitigation measures required to satisfy the Habitats Regulations with the NPPF commitment to ensure biodiversity net gain. Please note that biodiversity net gain is additional to measures taken for designated site i.e. measures cannot be double counted.	AECOM  The statement is considered appropriate, as avoidance / mitigation is the first step in securing net gain.  LUC  Noted.
		We encourage Councils to incorporate biodiversity net gain into their strategic documents and Local Plans. Biodiversity net gain is strongly supported by the NPPF (paras 174, 179, and 180) and features prominently in the government's 25 Year Environment Plan. When delivering the final Local Plan, we therefore recommend policy inclusion of biodiversity net gain and the use of an approach based on the Defra biodiversity metric.	AECOM  Noted – this point will be considered in the development of Local Plan policies. It should also be noted that the policy documents highlighted and the focus on biodiversity net gain are key elements of Chapter 3's content.  LUC  This comment relates more specifically to policy wording in the Local Plan than the IIA. However, IIA objective 13 seeks to "Deliver"

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			biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks". All policies will be appraised against this objective.
		The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment.	AECOM  Noted – this is a consideration for the development of the Local Plan so has not resulted in amendments to the IIA Scoping report.  LUC  This comment relates more specifically to the Local Plan than the IIA. However, IIA objective 13 seeks to "Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks". All policies will be appraised against this objective.
		A strategic approach for networks of biodiversity should support a similar approach for green infrastructure. Planning policies and decisions should contribute and enhance the natural and local environment, as outlined in para 174 of the NPPF. Plans should set out the approach to delivering net gains for biodiversity. Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure.	AECOM  Noted – this is a consideration for the development of the Local Plan so has not resulted in amendments to the IIA Scoping report.  Furthermore, net gain at an individual development level has also been highlighted in Chapter 3's objective.  LUC  This comment relates more specifically to the Local Plan than the IIA. However, IIA objective 13 seeks to "Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks". All policies will be appraised against this objective.
	Chapter 4 – Climate Change Adaptation	Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SUDs to achieve this. In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's	AECOM  Noted – this is a consideration for the development of the Local Plan and SPDs so has not resulted in amendments to the IIA Scoping report.

Respondent	Section of the IIA Scoping Report	Representation	Response
		resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation. If creating a Green Infrastructure Strategy for the borough, there is opportunity to think of climate change within this strategy.	<ul> <li>LUC</li> <li>This comment relates more specifically to the Local Plan than the IIA. However, three IIA objectives specifically address flood risk, green infrastructure and climate change adaptation, respectively. It is noted that there is a lot of overlap between them:</li> <li>IIA objective 17 seeks "To manage and reduce the risk of flooding", with reference to Sustainable Drainage Systems (SuDS) in the appraisal questions.</li> <li>IIA objective 13 seeks to "Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks".</li> <li>IIA objective 2 seeks to "Ensure resilience to climate change particularly mindful of the likelihood of climate change leading to problematic high temperatures, worsened flood risk and increased risk of drought.</li> <li>All policies will be appraised against these objectives.</li> </ul>
	Chapter 12 – Landscapes and green infrastructure	would be useful to further conceptually link biodiversity net gain (discussed in Section 3) and GI together, as they complement each other and can help deliver environmental net gains.	Figure 12.1 was used to demonstrate the plethora of co-benefits green infrastructure can provide, including the biodiversity benefits.  LUC  The following appraisal question has been added under IIA objective 13: Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks.  Will the Local Plansafeguard and strengthen local ecological/green infrastructure networks that contribute to ecological connectivity both within Enfield Borough and their links with ecological networks in neighbouring boroughs?

Respondent	Section of the IIA Scoping Report	Representation	Response
		When delivering the Local Plan, a strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 175 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Evidence of a strategic approach can be underpinned by Green Infrastructure Strategy. We encourage the provision of green infrastructure to be included as a specific policy or priority for the Local Plan or alternatively it can be integrated into relevant other policy areas, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure. Please see Chapter 8 of the draft London Plan for further policy guidance.	AECOM  Noted – this is a consideration for the development of the Local Plan and SPDs so has not resulted in amendments to the IIA Scoping report.  LUC  This comment relates more specifically to the Local Plan than the IIA. However, IIA objective 13 seeks to "Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks" and asks the following appraisal question "Will the Local Plansafeguard and strengthen local ecological/green infrastructure networks that contribute to ecological connectivity both within Enfield Borough and their links with ecological networks in neighbouring boroughs?". All policies will be appraised against this objective.
Historic England	Chapter 10 – Heritage and townscape	the Planning (Listed Buildings and Conservation Areas) Act 1990 should be the principal point of reference in terms of the built heritage	AECOM  Paragraph 10.6 has been added in the National context section of Chapter 10 to reference this piece of legislation.  LUC  As above.
		Historic England has produced a number of other advice notes that should also be included here.  These include (please see here)  GPA 1 Local Plan Making  GPA 3 Managing Significance in Decision Making in the Historic Environment  HEAN 3 The Historic Environment and Site Allocations  HEAN 4 Tall Buildings	AECOM  As these are guide notes these resources have not been included in the policy baseline review.  However the point has been acknowledged and these documents will be considered during the development of relevant Local Plan policies.  LUC  Not referenced in IIA Report.

Respondent	Section of the IIA Scoping Report	Representation	Response
		We note paragraph 10.23, and would agree that new development has the potential to affect heritage assets through inappropriate design and layout. However, potential adverse effects on the historic environment go much further than simply design – they could arise in other ways such as the inappropriate reuse of heritage assets, new development simply being located in the wrong place or the visual or noise effects of transport development.	AECOM  Noted – this is a consideration for the development of the Local Plan policies so has not resulted in amendments to the IIA Scoping report.  LUC  Noted.
		We recommend that the concept of adverse effects on significance is therefore reflected in the objective for townscape and heritage – this could be done by inserting at the beginning 'Sustain and enhance the significance of heritage assets, support a strong' to reflect NPPF para 190.	AECOM This text has been added to the objective in Paragraph 10.28.  LUC This text has been added to the historic environment IIA objective.

Table A.2: Responses to the consultation comments received on the Regulation 18 Integrated Impact Assessment

Respondent	Section of the IIA Report	Representation	LUC's response
Northaw & Cuffley Parish Council	Chapter 2: Good growth in Enfield, SS1: Spatial Strategy, IIASA/SEA, SA27: Land at Crews Hill	The Parish Council understands that the purpose of a Reg 18 consultation is to seek views from stakeholders on what the emerging local plan ought to contain, and that a Reg 18 consultation is an early stage in the plan-making process where all reasonable options should be on the table and tested through the Sustainability Appraisal ("SA") process to identify the environmental effects (positive and negative) from the allocations (see Town and Country Planning (Local Planning) (England) Regulations 2012). The Council will be aware that the Planning Court will quash Green Belt allocations where the case for exceptional circumstances has not been made and alternatives to Green Belt allocations has not been justified without a rigorous assessment of reasonable optins (Aireborough Neighbourhood Development Forum v Leeds City Council & Ors [2020] EWHC 1461 (Admin) (8 June 2020)) or where all reasonable alternatives have not been tested through the SEA	The consideration of reasonable alternatives has been a key focus of attention within the IIA process. As outlined in Chapter 2 and detailed in Appendix D of the Reg 18 IIA report, the IIA has appraised numerous spatial strategy options, some of which involve release of Green Belt land and others that do not.

Respondent	Section of the IIA Report	Representation	LUC's response
		process (see e.g., Save Historic Newmarket [2011] EWHC 606 (Admin); Heard vs Broadlands District Council [2012] EWHC 344 (Admin).	
Northaw & Cuffley Parish Council	Chapter 2: Good growth in Enfield, SS1: Spatial Strategy, IIASA/SEA, SA27: Land at Crews Hill.	It is therefore surprising that this Reg 18 consultation is characterised as a "Main Issues and Preferred Approaches" consultation, while in other places the consultation documentation reads as a fledged draft local plan1 reliant on substantial very high value land removed from the Green Belt. The justification is captured in various places in the consultation documents and can be gleaned inter alia at Table 2.3 of the Integrated Impact Assessment report prepared by LUC, dated June 2021, ("the IIA 2021") which describes an overall hierarchy. In terms of an emerging spatial strategy, Priority 6 suggests it may be appropriate to allocate Green Belt/greenfield land in areas of high performing accessibility. As set out below at paras. 15-17 in a comprehensive response in February 2019 when the issue of Green Belt release at Crews Hills was first mooted, the Mayor for London told the Council that he considers Crews Hill to have a poor accessibility rating. Some 30 months later there is no updated transport assessment to show the capacity for betterment on the Network Rail line that would change the poor sustainability position of the settlement at Crews Hill. As such PL9/Crews Hill fails to meet to the high performing sustainability basis that formed the nascent justification releasing greenfield Green Belt land back in 2018-2019.	The hierarchy outlined in Table 2.3 of the Reg 18 IIA was used by LBE in Stage 2 of their Site Selection methodology to help identify sites that could form part of an emerging spatial strategy that provides a sustainable pattern of development. As stated in paragraph 2.34 of the Reg 18 IIA, "The hierarchy seeks to ensure that previously developed land in the urban area will be given the highest priority, with isolated greenfield sites in the Green Belt given the lowest priority". As explained in paras 2.34-2.35 of the Reg 18 IIA, all site options that emerged from Stage 1: Identification and initial sift of sites were subject to IIA as reasonable alternatives, except those that were assessed by the Council as being isolated Green Belt sites (priorities 7 and 8).  Crews Hill (Site PL9) was assessed by the Council as priority 6 and was therefore subject to IIA as a reasonable alternative. It should be noted that priority 6 corresponds to the site typology "Greenfield in accessible, high performing Green Belt location". The 'high performance' in this description refers to the extent to which the site was assessed by the Council as performing the purposes of Green Belt set out in the NPPF  rather than the site's accessibility, which is assessed as 'accessible' rather than 'isolated'. Accessibility of the site was judged by reference to Transport for London's PTAL ratings. It iss important to note, however, that it is stated in the Site Selection methodology that PTAL ratings are a starting point for accessibility and other factors will also be taken into account when considering accessibility. According to Appendix C of the Main Issues and Preferred Approaches document, the site has a PTAL rating of 1a-1b (a score of 0 is very poor access to public transport). Although this is a low PTAL rating, the Council acknowledge that Crews Hill has both a train station and regular direct bus route connecting it to Enfield Town.

Respondent	Section of the IIA Report	Representation	LUC's response
			The performance of the site with regards to the Green Belt can be found in Appendix B of the 2021 Green Belt and Metropolitan Open Land Study¹. Site PL9 comprises a number of parcels, each of which has been assessed in terms of the harm it would have if it were released from the Green Belt. The different harm ratings range from very high to low depending on their location. The IIA of the allocated site (see Appendix E of the Reg 18 IIA) identified mixed effects in relation to IIA objective 12 – positive effects due to its proximity to Crews Hill railway station and a bus stop but negative effects in relation to the lack of proximity to a Major, District or Local Centre. The Council's reasons for allocating the site (documented in Appendix F of the Reg 18 IIA) were: "Site is located within the Green Belt, but has good accessibility due to train station, and large areas are previously developed land, where the contribution to the green belt purposes/harm of release is moderate or less." The Council refer here to the harm of release of the site from Green Belt being 'moderate or less', yet the site is categorised as a priority 6 'high performing Green Belt location'. The broad location of Crews Hill was assessed as a single site by the Council, yet the Site Selection methodology recognises that larger locations may fall across multiple categories. In this instance, the proportion of brownfield parcels comprising the site considered to have moderate or low harm were minimal compared to the high performing areas, which gave the site an overall priority rating of 6.
Northaw & Cuffley Parish Council	Chapter 2: Good growth in Enfield, SS1: Spatial Strategy, IIASA/SEA, SA27: Land at Crews Hill	According to the IIA, which forms part of this Reg 18 consultation, the Council undertook two previous stages of consultation on the emerging Local Plan between December 2015 and 2016 and December 2018 and February 2019. At neither stage did the Council propose releasing a large parcel of very high value Green Belt land at Crews Hill for housing growth. On the contrary, the 2018 consultation very clearly spelled out that "the option of Green Belt review to support growth needs to be explored once all brownfield options have been exhausted" 2 There are genuine concerns this	Not explicitly a comment on the IIA and does not indicate the need for any change to its findings.

<sup>&</sup>lt;sup>1</sup> LUC (2021). Green Belt and Metropolitan Open Land Study. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf\_file/0007/12112/Green-Belt-and-MOL-Assessment\_Appendices\_Part1-LUC-2021-Planning.pdf</a>)

Respondent	Section of the IIA Report	Representation	LUC's response
		has not happened to justify the significant Green Belt release, principally parcel CH1.	
Northaw & Cuffley Parish Council	Chapter 2: Good growth in Enfield, SS1: Spatial Strategy, IIASA/SEA.SA27: Land at Crews Hill	The Parish Council notes that Crews Hill was mentioned in the 2018 Reg 18 consultation, but this was in the context of the expectation stated at 9.3.7 of the December 2018 consultation documents that the Council committed to undertaking a Green Belt assessment, and to do so before deciding to seek to release land from the Green Belt. We can find no record of any Green Belt assessment to accompany the 2018 Reg 18 consultation. Self-evidently, the purpose and function of the Green Belt assessment is to identify and classify Green Belt land before decisions are made. The present Green Belt assessment for Crews Hill shows the allocation includes numerous parcels, some of which have limited Green Belt function. However, and critically so, the largest parcel identified in the Green Belt assessment as parcel CH1, is acknowledged by the Council to be a visually sensitive sloping location, which makes a very high contribution to Green Belt purposes.3 The position of CH1 is such that, if built on the new settlement, it would extend the settlement boundary significantly into the Green Belt and fail to create a future defensible boundary contrary to the NPPF para 142 (e). It is therefore a startling suggestion that CH1 can be justified.	A Green Belt and Metropolitan Open Land Study <sup>2</sup> was produced by LUC in June 2021 to inform the plan-making process.
Northaw & Cuffley Parish Council	Chapter 2: Good growth in Enfield, SS1: Spatial Strategy, IIASA/SEA, SA27: Land at Crews Hill	Further, the Parish Council considers that the failure to objectively assess brownfield capacity at this stage suggests that the SA/SEA assessment of alternatives to the release of parcel CH1 to be legally flawed and not to comply with the SEA duties to test all reasonable alternatives. SEA failures to consider alternatives is a sound basis to challenge a plan. See e.g. Save Historic Newmarket; Heard v Broadland DC.	The consideration of reasonable alternatives has been a key focus of attention within the IIA process. As outlined in Chapter 2 and detailed in Appendix D of the Reg 18 IIA report, the IIA has appraised numerous spatial strategy options, including those that involve development on brownfield land. As explained in Chapter 2 of the Reg 18 IIA (see Table 2.3 and accompanying text), the Council prioritised brownfield sites over greenfield sites and sites in the urban area over sites in the Green Belt when selecting sites for allocation.
Northaw & Cuffley Parish Council	Chapter 2: Good growth in Enfield, SS1: Spatial	The Parish Council appreciates that the SA report contains numerous references to the lack of brownfield sites because of the need to protect Strategic Industrial Land ("SILs"). What the SA	It is reasonable and standard practice for the IIA to rely on the HELAA process to identify sites that are reasonable alternatives for the purposes of the IIA. Capacity estimates for all sites, including

<sup>&</sup>lt;sup>2</sup> LUC (2021). Green Belt and Metropolitan Open Land Study. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf\_file/0007/12112/Green-Belt-and-MOL-Assessment\_Appendices\_Part1-LUC-2021-Planning.pdf</a>)

Respondent	Section of the IIA Report	Representation	LUC's response
	Strategy, IIASA/SEA, SA27: Land at Crews Hill	report fails to do – and this failure is fatal to the reliability of the SEA - is to objectively test the value of the four SILs within Enfield. The Parish Council's position is that the SIL at Brimsdown is low value industrial land, has poor road connections to main trunk roads and is not well-placed for employment. The Brimsdown site could be a candidate for redevelopment as a mixed-use housing allocation. Slavish adherence to and not testing this industrial site because that land is identified as a historic industrial site and therefore is a SIL has no place in an SA/SEA assessment at this stage when all options should be on the table. The Parish Council notes the CPRE update report also lists Brimsdown as a brownfield land suitable for redevelopment.	brownfield sites, were included within the HELAA which was the starting point for identifying reasonable alternative options to be subject to IIA.  The Council has undertaken and produced detailed evidence reviewing employment land in the borough, namely the Employment Land Review <sup>3</sup> , Industrial Intensification Study <sup>4</sup> and Employment Topic Paper <sup>5</sup> . These documents informed the proposed preferred options within the Regulation 18 Draft Local Plan and all evidence was published alongside the consultation.  As there is a great need for continued retention of SIL as well as an increase in industrial floorspace over the plan period, it is the Council's position that there should be no net loss in employment floorspace within designated employment areas. This is consistent with London Plan policies E7 and E1. As such, SIL release was not identified as a preferred option within the Draft Local Plan.
Friends of Firs Farm	Chapter 6: Blue and green Enfield, BG10: Burial and crematorium spaces, IIA	The Integrated Impact Assessment (IIA) accompanying the draft plan8 indicates that, regarding Policy DM BG10: Burial and crematorium spaces, that the sites allocated for crematoria (i.e. Firs Farm and Church Street Recreation Ground) would have similar effects when assessed against the IIA objectives. This clearly does not properly consider the ecological and flood prevention role of Firs Farm when compared with Church Street Recreation Ground. This is also not consistent with the assessment of cumulative effects presented in Table 7.4 of the IIA document, which identifies differential effects for the two proposed sites in terms of flood risk.	Firs Farm Recreation Ground (Part) and Church Street Recreation Ground both receive uncertain significant negative effects in relation to IIA objective 13: biodiversity and geodiversity. This is due to the fact both sites are within close proximity of biodiversity assets.  Firs Farm Recreation Ground (Part) is incorrectly recorded as having a significant negative effect in relation to IIA objective 17: flooding when it should have been recorded as having a minor negative effect. This is because it has a predicted peak flood depth of greater than 100mm. The justification text for this site against IIA objective 17 in Appendix E should instead read "Site has a predicted peak flood depth of greater than 100mm and is on greenfield land. However, the site does not fall within Flood Zones 2 or 3". The justification text for Church Street Recreation Ground should be the same. Table 7.4 in Chapter 7 of the IIA should

<sup>&</sup>lt;sup>3</sup> AECOM (2018). London Borough of Enfield Employment Land Review. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0016/4921/enfield-employment-land-review-report-aecom-planning.pdf)

<sup>4</sup> AECOM (2020). Enfield Industrial Intensification Study. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0022/5890/aecom-final-draft-enfield-industrial-intensification-report-2020-planning.pdf)

<sup>5</sup> Enfield Council (2021). Enfield Local Plan: Employment Topic Paper. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0020/11576/Enfield-Employment-Topic-Paper-2021-Planning.pdf)

Respondent	espondent Section of the IIA Report Representation		LUC's response
			instead identify minor negative effects for both sites in relation to IIA objective 17.
			The site assessment criteria in Appendix B of the Reg 18 IIA Report incorrectly refers to "a predicted peak flood depth of greater than 150m" when it should instead read "a predicted peak flood depth of greater than 100m". The site assessment criteria has since been amended.
Friends of Firs Farm	Chapter 6: Blue and green Enfield, BG10: Burial and crematorium spaces, IIA	The site appraisals reported in Appendix E to the IIA for Site SA59 (Firs Farm) acknowledges that the proposal would have significant adverse environmental impacts in terms of health and wellbeing, air quality, biodiversity, efficient use of land and materials, flooding and water quality, even with mitigation. This identifies that the Firs Farm site would have greater adverse environmental impacts than site SA61: Church Street Recreation Ground, which is the other site identified for cremation/burial use. In Appendix F to the IIA, it is reported that the crematorium use proposed on Site SA59 at Firs Farm could be considered appropriate use in the Green Belt/MOL. This is incorrect, as is noted above.	Firs Farm Recreation Ground (Part) receives the same effects as Church Street Recreation Ground against IIA objectives 4: health and wellbeing, 11: air pollution, 13: biodiversity and geodiversity, 16: efficient use of land and materials and 18: water. As noted above, both sites should receive a minor negative effect in relation to IIA objective 17: flooding.  Appendix F of the IIA presents the audit trail of the Council's site selection process 2021. In accordance with paragraph 149 (b) of the National Planning Policy Framework, it is of the Council's view that a crematorium at Firs Farm Recreation Ground (Part) is considered an appropriate use.
Friends of Firs Farm	Chapter 6: Blue and green Enfield, BG10: Burial and crematorium spaces, IIA	Overall, Enfield Council has failed to demonstrate either the need for additional cremation capacity in the borough or that, even if such need exists, the proposed site at Firs Farm identified in the draft Local Plan is an appropriate place or the best option available when compared with the available alternatives.	Not explicitly a comment on the IIA and does not indicate the need for any change to its findings.
Friends of Firs Farm	Chapter 6: Blue and green Enfield, BG10: Burial and crematorium spaces, IIA	The IIA published alongside the draft Local Plan indicates that the traffic implications of the proposal to site cremation/burial use at Firs Farm have been considered as part of the appraisal applied to the site. The IIA concludes that the proposal would have a positive effect as the site is located within 350m of at least one bus stop. The site is also within 200- 400m of Firs Lane, which is a Local Centre. It also concludes that the proposal will not affect the achievement of the IIA objective of a focus on delivering the 'Vision Zero' target for road safety. This analysis clearly takes no account of the likely additional traffic that would be generated by an incinerator at this location. Firs Lane is potentially a very busy road,	The Strategic Transport Assessment will provide an analysis of likely additional traffic at this site and where relevant, be reflected in the IIA at Regulation 19 stage.  The IIA acknowledges that development at this site could worsen air quality. The site receives a significant negative effect in relation to IIA objective 11: air pollution, as it scored 2 in the air quality appraisal. All adverse effects against this objective are recorded as uncertain, as the air quality assessment has not taken into account measures that will improve future air quality (such as the expansion

Respondent	Section of the IIA Report	Representation	LUC's response
		providing a link between the North Circular Road and the northern areas of Enfield. This conflicts with the mainly residential uses and green spaces along Firs Lane, and the presence of several schools in the area. Enfield Council has implemented several measures in recent years to discourage car traffic along Firs Lane and to encourage the use of more sustainable travel modes. For example, traffic calming measures have been implemented along much of the length of Firs Lane, and access gates have been placed just north of the junction with Barrowell Green to prevent larger vehicles travelling along it. At Firs Farm specifically, Transport for London has provided finance for the provision of cycle routes, which would be partly lost should the proposal for cremation/burial use be implemented. Most recently, the 456 bus route between Crews Hill and North Middlesex Hospital has been provided to improve public transport services.	of the Ultra-low Emissions Zone to the North Circular Road in 2021 or petrol and diesel car ban in 2035 <sup>6</sup> ), or site specific mitigation.
		Traffic assessments for similar types of development10 acknowledge that a high proportion of people visiting the site will do so by private car, due to the nature of crematoriums, and people from out with the local area are unlikely to walk, cycle or take public transport to travel to and from a crematorium. This source also indicates that a proposed crematorium could generate approximately 40 two-way vehicle trips per hour during the weekday development AM and PM peak periods. The assessments reported by Enfield Council appear not to have taken this into account. Friends of Firs Farm believe that the additional traffic on Firs Lane resulting from this proposal, should it go ahead, would worsen noise and air pollution, and reduce road safety. This would also impact adversely and unacceptably on the amenity of Firs Farm, both in terms of biodiversity and enjoyment of the open spaces.	
LBE Conservative Group	Chapter 13: Movement and connectivity, T1: Promoting sustainable transport, IIA	The Integrated Impact Assessment has not set out the reality of the proposals on Enfield's roads.	The Strategic Transport Assessment will provide a detailed analysis of the impacts of development on LBE's road and its findings will be used to ensure growth is phased alongside transport improvements.

<sup>&</sup>lt;sup>6</sup> Prime Minister Rishi Sunak confirmed in a speech on 20 September 2023 that the planned ban on the sale of petrol and diesel cars would be pushed back five years from 2030 to 2035

Respondent	Section of the IIA Report	Representation	LUC's response
Enfield Climate Action Forum (Encaf) Land Use Working Group	Chapter 12: Culture, leisure and recreation. CL2: Leisure and tourism, IIA	DMCL2 explains that the Council "considers that the leisure and visitor experience in the borough has the potential to contribute significantly to Enfield's economic growth. It can contribute to enhancing quality of life through delivering experiences for visitors and a greater variety of jobs and training opportunities. Importantly, it can help support regeneration, and diversify and develop the rural economy". The Integrated Impact Assessment (IAA) Chapter 12 identifies as an issue "the need to protect valued landscapes, including designed landscapes and extensive semirural landscape character areas in the north of the borough, and avoid loss of Green Belt that contributes to the established Green Belt purposes"	Policy DM CL2: Leisure and tourism receives a significant positive effect in relation to IIA objective 9: economy, for the reasons outlined by the respondent. The policy receives a minor positive effect in relation to IIA objective 15: landscape and townscape, as tourism and leisure developments are required to respect the size, character and function of their setting.
Enfield Climate Action Forum (Encaf) Land Use Working Group	Chapter 3: Place, PL9: Crews Hill, IIA	<ul> <li>The Integrated Impact Assessment (IAA) scoping report proposes a heritage related objective to:</li> <li>Sustain and enhance the significance of heritage assets, support the integrity, special interest, character, appearance and historic setting of historic settlements and heritage assets, both designated and non-designated;</li> <li>facilitate enhancements to the fabric and setting of the historic environment;</li> <li>support access to, interpretation and understanding of the historic environment (including through investigations and studies which better reveal the significance of archaeological assets).</li> <li>CL9 Crews Hill, CL10 Chase Park and PL1 Enfield Town do not do this.</li> </ul>	Policies SP PL1: Enfield Town, SP PL9: Crews Hill and SP PL10: Chase park all receive uncertain mixed minor positive and minor negative effects in relation to IIA objective 14: historic environment for the reasons outlined in Chapter 5 of the IIA.
Natural England	Chapter 14: Environmental protection, ENV1: Local environmental protection, SA/HRA	In accordance with the paragraph 175 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside	The consideration of reasonable alternatives has been a key focus of attention within the IIA process. The site assessment criteria in Appendix B of the Reg 18 IIA Report contain a number of objectives relating to the environment. IIA objective 13: biodiversity and geodiversity looks at the proximity of sites to Sites of Special Scientific Interest, Sites of Importance for Nature Conservation, Local Nature Reserves, Priority Habitats and Ancient Woodland, whilst IIA objective 4: health and wellbeing looks at the proximity of sites to areas of open space, Metropolitan Open Land, Green

Respondent	Section of the IIA Report	Representation	LUC's response
		designated boundaries and within the setting of protected landscapes.	Chains, walking paths and cycling paths. Consideration is given to the Agricultural Land Classification under IIA objective 16: efficient use of land and materials. Landscape is dealt with under IIA objective 15: landscape and townscape where consideration is given to development within a settlement, on the edge of a settlement or within a rural area, in addition to any loss of Metropolitan Open Land or Green Chains.
Natural England	Chapter 2: Good growth in Enfield, SS1: Spatial Strategy	The Local Plan should be underpinned by up to date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.	IIA objective 13: biodiversity and geodiversity in the site assessment criteria in Appendix B of the Reg 18 IIA report looks at the proximity of sites to Sites of Special Scientific Interest, Sites of Importance for Nature Conservation, Local Nature Reserves, Priority Habitats and Ancient Woodland.
London Diocesan Fund re: Land Opposite Jolly Farmer's Pub	Chapter 2: Good growth in Enfield, SS1: Spatial Strategy, IIA, GB assessment, LHNA/SHMA and WPV assessment and Chapter 8: Homes for all, H1: Housing development sites, IIA/SA	We consider that the SA only assesses growth of options of 25,000 dwellings, 55,000 dwellings or lower. There needs to be a mediumhigh assessment of around 35,000 dwellings, as 55,000 dwellings is not considered to be a reasonable alternative and produces distorted negative results. A more reasonable higher figure above the London Plan target which optimises delivery might arrive at similar levels of harm as the 25,000 figure.	Since the spatial strategy options were appraised at Regulation 18 stage in 2021, the Council has identified three additional spatial strategy options. These options propose the following level of housing: (1) 28,000 new homes; (2) 32,500 new homes; and (3) 29-30,000 new homes. Therefore, a medium-high assessment has now been undertaken.
NHS London Healthy Urban Development Unit			The IIA framework in Chapter 3 of the Reg 18 IIA report contains a number of objectives and appraisal questions relating to the environment and health, which the Plan has been (and will be) appraised against throughout the plan-making process. IIA objectives 1: climate change mitigation, 2: climate change adaptation, 11: air pollution, 12: sustainable transport, 13: biodiversity, 16: efficient use of land and materials and 17: flooding relate to the environment, whilst IIA objectives 2: climate change adaptation, 3: housing, 4: heath and wellbeing, 5: services and facilities, 6: social inclusion, 7: crime and community safety, 8: road safety, 9: economy, 11: air pollution, 12: sustainable transport and 17: flooding relate to health.

Respondent	Section of the IIA Report	Representation	LUC's response
			Appendix C of the Reg 18 IIA report sets out the IIA findings for the options presented in the December 2018 Issues and Options consultation document, including seven spatial distribution options. One of these options proposes a strategic plan-led approach to the Green Belt, specifically development within the Crews Hill area (Option 7). In the IIA, this growth option received more negative effects than positive effects in relation to the environment and health. With regard to the environment, the option is recorded as receiving adverse effects in relation to IIA objectives 1: climate change mitigation, 11: air pollution, 12: sustainable transport, 13: biodiversity, 16: efficient use of land and materials and 17: flooding. With regard to health, the option is recorded as receiving adverse effects in relation to IIA objectives 4: health and wellbeing, 5: services and facilities, 7: crime and community safety, 9: economy, 11: air pollution, 12: sustainable transport and 17: flooding.
			Appendix E of the Reg 18 IIA report presents the IIA findings for the reasonable alternative site options considered by the Council, some of which were selected for allocation.
			Site SA27 (Land at Crews Hill) is recorded as having more negative effects than positive effects in relation to both the environment and health, the reasons of which are outlined in the appraisal matrix for this site in Appendix E. With regard to the environment, it is expected to have adverse effects in relation to IIA objectives 11: air pollution, 12: sustainable transport, 13: biodiversity, 16: efficient use of land and materials and 17: flooding. With regard to health, it is expected to have adverse effects in relation to IIA objectives 4: health and wellbeing, 9: economy, 11: air pollution, 12: sustainable transport and 17: flooding.
			Site SA28 (Land at Chase Park) is recorded as having more negative effects than positive effects in relation to the environment, but is recorded as having more positive effects than negative effects in relation to health. The reasons behind this are outlined in the appraisal matrix for the site in Appendix E. With regard to health, the site is expected to have adverse effects in relation to IIA objectives 11: air pollution, 13: biodiversity, 16: efficient use of land and materials and 17: flooding. With regard to health, the site is

Respondent	Section of the IIA Report	Representation	LUC's response
			expected to have adverse effects in relation to IIA objectives 4: health and wellbeing, 9: economy, 11: air pollution, 12: sustainable transport and 17: flooding. With regard to the environment, the site is expected to have adverse effects in relation to IIA objectives 9: economy, 11: air pollution and 17: flooding.
			At Reg 18 stage, LUC provided some recommendations on changes to policy wording to address adverse effects identified, as outlined in Table 2.4 of the Reg 18 IIA report. Although these recommendations did not specifically address Policies SP PL9 (Land at Crews Hill) and SP PL10 (Chase Park), they did in general recommend mitigation to address flood risk and the impact of development on climate change, in addition to policy wording to specifically identify how people's health and wellbeing could be improved. At Reg 19 stage, further consideration will be given to whether the policies of the proposed plan taken as a whole adequately mitigate any adverse effects of the chosen spatial strategy on the environment and people's health.
Hadley Wood Neighbourhood Planning Forum	Chapter 8: Homes for all, H1: Housing development sites, site selection, SA45: Land between Camlet Way and Crescent West, Hadley Wood	The updated Plan includes the Hadley Wood site but fails to evidence what alternatives were considered to the release from the Green Belt of the site. The Inspector's Examination of the East Herts Local Plan makes it clear that justification must be provided for each site, and notes that East Herts Council's Review was at a strategic level - so as to justify large parcels as a whole - with its applicability to small sites adjacent to urban areas being debatable. Enfield has made that same mistake. (https://www.welhat.gov.uk/media/12878/EX39-Green-Belt-review-note-December-2017/pdf/ED39 Green_Belt_review_note_Dec_2017.pdf?m=636489409149570000)	The consideration of reasonable alternatives has been a key focus of attention within the IIA process. The hierarchy outlined in Table 2.3 of the Reg 18 IIA was used by LBE in Stage 2 of their Site Selection methodology to help identify sites that could form part of spatial strategy that provides a sustainable pattern of development. As stated in paragraph 2.34 of the Reg 18 IIA, "The hierarchy seeks to ensure that previously developed land in the urban area will be given the highest priority, with isolated greenfield sites in the Green Belt given the lowest priority". As explained in paras 2.34-2.35 of the Reg 18 IIA, all site options that emerged from Stage 1: Identification and initial sift of sites were subject to IIA as reasonable alternatives, except those that were assessed by the Council as being isolated Green Belt sites (priorities 7 and 8).
			Green Belt is a policy designation and not an environmental or sustainability designation, therefore the IIA has not assessed sites against the purposes of Green Belt. The performance of potential development locations in Green Belt terms was subject to a separate assessment. The Council appointed LUC to produce a

Appendix A
Consultation comments

Respondent	Section of the IIA Report	Representation	LUC's response
			Green Belt and Metropolitan Open Land Study <sup>7</sup> , which can be found on their website. The Study draws out strategic variations in the contributions of Green Belt land to the five Green Belt purposes set out in the National Planning Policy Framework, and assesses the potential harm to the designation if any land were to be dedesignated from the Green Belt through the Local Plan process. The Green Belt and Metropolitan Open Land Study informed Stage 2 of the Site Selection process.

<sup>&</sup>lt;sup>7</sup> LUC (2021). Green Belt and Metropolitan Open Land Study. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf\_file/0007/12112/Green-Belt-and-MOL-Assessment\_Appendices\_Part1-LUC-2021-Planning.pdf</a>)

# Appendix B

**Site assessment assumptions** 

Appendix B
Site assessment assumptions

Enfield Local Plan: Integrated Impact Assessment December 2023

Table B.1: Site assessment criteria and assumptions

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and	Significance scoring
						related notes	

IIA objective 1: Ensure the Local Plan serves to minimise LBE's per capita CO<sub>2</sub> emissions such that the Council will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040

#### All types of site options

The extent to which the location of development sites would facilitate the use of sustainable modes of transport in place of cars is considered separately under IIA objective 12 below. The location of development will not otherwise significantly affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage. Those policies in the Local Plan have been appraised separately to the site options. This IIA objective has therefore been scoped out of the site options assessment.

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

#### All types of site options

The extent to which flood risk can be managed and reduced is considered separately under IIA objective 17 below. The location of development will not otherwise significantly affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage. Those policies in the Local Plan have been appraised separately to the site options. This IIA objective has therefore been scoped out of the site options assessment.

IIA objective 3: Deliver housing to meet agreed targets and support an appropriate mix of housing types and tenures, including affordable and specialist housing, including housing for the elderly and disabled people

#### Residential/mixed-use (incl. residential uses) site options

All residential site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites will provide opportunities for the development of a larger number of homes and so would have significant positive effects.

3a Housing provision	Capacity for	Capacity for <100	N/A	N/A	N/A	Contained v	vithin Scoring of significance
	>=100 housing	housing units				the shapefil	e for will match the major and
	units					each site	minor effects.

#### Industrial/employment site options

The location of industrial/employment/mixed-use sites is not considered likely to affect this objective; therefore this objective has been scoped out for industrial/employment/mixed-use sites.

IIA objective 4: Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the Borough

Residential/mixed-use (incl. residential uses) site options

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and	Significance scoring
						related notes	

Residential sites that are close to existing healthcare facilities (i.e. GP surgeries) will help to ensure that residents have good access to healthcare services. Other factors not captured by the assessment of site options include there being capacity at those healthcare facilities to accommodate new residents and whether new residential development supports the provision of additional healthcare capacity.

Public health will also be influenced by the proximity of sites to open spaces, walking and cycle paths, easy access to which can encourage participation in active outdoor recreation.

		y or sites to open spaces,		· · ·	<del> </del>		<u> </u>	T
4a GP surgeries	<=400m from nearest NHS GP	401-800m from nearest NHS GP	N/A	>800m from nearest NHS GP	N/A		LBE GP surgeries	Each criterion 4a to 4c is scored:
	surgery	surgery		surgery			cargonico	■ Major positive +3
4b Access to recreation	<=800m from open space, including Metropolitan Open Land and green loops/links <sup>8</sup> AND <=400m from walking or cycle path	<=800m from open space, including Metropolitan Open Land and green loops/links OR <=400m from walking or cycle path	N/A	>800m from open space, including Metropolitan Open Land and green loops/links AND >400m from walking or cycle path	N/A	-	LBE open spaces (excluding cemeteries, churchyards and civic spaces) LBE Metropolitan Open Land LBE green loops	<ul> <li>Minor positive +1</li> <li>Minor negative -1</li> <li>Major negative -3</li> <li>Scores totalled and then averaged (i.e. total score divided by 3). Overall, significance is scored as follows:</li> <li>Significant positive &gt;=2</li> </ul>
4c Loss of recreation	N/A	N/A	All other sites.	N/A	Contains existing open space, including Metropolitan Open Land and green loops/links	•	LBE green links LBE Lee Valley Regional Park LBE Public Rights of Way Sustrans National and	<ul> <li>Minor positive &gt;0 to &lt;2</li> <li>Minor negative &lt;0 to &gt;-2</li> <li>Significant negative &lt;=-2</li> </ul>

<sup>&</sup>lt;sup>8</sup> Green Chains are areas of linked open spaces accessible to the public which provide way-marked paths and other pedestrian and cycle routes. They also enable flora and fauna to migrate around the Borough and beyond. Some Green Chains are designated as Metropolitan Open Land. The definition covers anything from open spaces, footpaths, river corridors, canals/ towpaths, bridleways, disused railways and railway sidings and can predominantly be found in or adjacent to the New River, Turkey Brook, Salmons Brook and Pymmes Brook and in the vicinity of Boxers Lake.

Appendix B
Site assessment assumptions

Enfield Local Plan: Integrated Impact Assessment December 2023

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
					Contains walking or cycle path	Regional Cycle Routes	
						<ul><li>LBE local cycle routes</li></ul>	

#### Industrial/employment site options

The location of industrial/employment/mixed-use sites is not considered likely to affect this objective; therefore this objective has been scoped out for industrial/employment/mixed-use sites.

IIA objective 5: Support good access to services, facilities and wider community infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.

#### Residential/mixed-use (incl. residential uses) site options

The effect of residential site options on the educational element of this objective was assessed on the basis of the access that they provide to existing educational facilities. Other factors not captured by the assessment of site options include to there being capacity at those schools to accommodate new pupils and whether new residential development supports the provision of additional school places. The access a site has to more general services and facilities is considered separately under IIA objective 10 below.

5a Education	<=800m from one	<=800m from one	N/A	>800m from	N/A	LBE primary	Scoring of significance
	existing primary	existing primary school		existing primary		schools	will match the major and
	school	OR		or secondary		LBE secondary	minor.
	AND	<=800m from existing		school		schools	
	<=800m from	secondary school					
	existing secondary						
	school						

#### Industrial/employment site options

The location of industrial/employment/mixed-use sites is not considered likely to affect this objective; therefore this objective has been scoped out for industrial/employment/mixed-use sites.

### IIA objective 6: Encourage social inclusion, promotion of equality and a respect through diversity

### All types of site options

The London Borough of Enfield contains a number of Lower-Layer Super Output Areas (LSOAs) that fall within the most deprived areas in England. Therefore, site options that fall within the most deprived areas of the Borough can help regenerate those areas through residential, industrial and mixed-use development and the delivery of supporting infrastructure.

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
6a Deprivation	Any part of the site is located within one of the 10% most deprived areas in England	Any part of the site is located within one of the 10-20% most deprived areas in England	All other sites	N/A	N/A	<ul><li>ONS Index of Multiple Deprivation</li></ul>	Scoring of significance will match the major, minor and negligible effects.

### IIA objective 7: Reduce crime and increase community safety

#### All types of site options

The effects of new development on levels of crime and fear of crime will depend on factors such as the incorporation of green space within development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of development sites; rather they will be determined through the policies in the Local Plan and detailed proposals for each site. This objective was therefore scoped out of the site options assessment.

### IIA objective 8: Focus on delivering the 'Vision Zero' target for road safety

### All types of site options

The location of development will not significantly affect the achievement of this objective as effects will depend largely on the detailed proposals for sites, such as the incorporation of walking and cycling routes, which would be influenced by policies in the Local Plan and details submitted at the planning application stage. The policies in the Local Plan were appraised separately to the site options. This objective was therefore scoped out of the site options assessment.

### IIA objective 9: Support a strong, diverse and resilient economy that provides opportunities for all

#### Residential site options

The location of residential sites will influence the achievement of this objective by affecting how easily residents would be able to access job opportunities in existing employment areas.

9a Access to employment	<=100m of	N/A	N/A	>100m of	N/A	LBE Strategic		ach criterion 9a to 9b is
	Strategic Industrial			Strategic		Industrial	SC	ored:
	Location or			Industrial		Locations		Major positive +3
	Locally Significant			Location		LBE Locally		Negligible 0
	Industrial Site			or Locally		Significant		Minor negative -1
				Significant		Industrial Sites		•
				Industrial Site				Major negative -3
9b Safeguarding employment land	N/A	N/A	All other sites	N/A	Any part of the site is located			ores totalled and then eraged (i.e. total score

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
					within a Strategic Industrial Location or a Locally Significant Industrial Site		divided by 2). Overall, significance is scored as follows:  Significant positive >= 2  Minor positive >0 to <2  Negligible 0  Minor negative <0 to >-2  Significant negative <=-2
Mixed-use (incl. residential	uses) site options						X=-Z
The location of residential and are provided to match popula	d mixed-use sites will a			o opportunities in exis	ting employment area	as, in addition to ensurin	ng new job opportunities
9a Access to employment	<=100m of Strategic Industrial Location or Locally Significant Industrial Site	N/A	N/A	>100m of Strategic Industrial Location or Locally Significant Industrial Site	N/A	<ul> <li>LBE Strategic Industrial Locations</li> <li>LBE Locally Significant Industrial Sites</li> <li>GIS</li> </ul>	Each criterion 9a to 9c is scored:  Major positive +3  Minor positive +1  Negligible 0  Minor negative -1
9b Safeguarding employment land	N/A	N/A	All other sites	N/A	Any part of the site is located within a Strategic Industrial Location		Major negative -3 Scores totalled and then averaged (i.e. total score divided by 3). Overall,

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
					or a Locally Significant Industrial Site		significance is scored as follows:  Significant positive
9c Employment provision	Large site (>=10ha)	Small site (<10ha)	N/A	N/A	N/A		>=2  Minor positive >0 to <2  Negligible 0  Minor negative <0 to >-2  Significant negative <=-2
Industrial/employment site	options						
The provision of new industripopulation growth that is being	• •	-	•	<u>-</u>			-
9c Employment provision	Large site (>=10ha)	Small site (<10ha)	N/A	N/A	N/A	■ GIS	Scoring of significance will match the major and minor effects.
IIA objective 10: Support th	ne vitality of the Bord	ough's town and local co	entres				
All types of site options							
The London Borough of Enfice Centres and Local Centres <sup>9</sup> . this contribution is considere	New development loc	cated within or near to one					ugh as Major Centres, District te is assessed individually,
10a Major, District and Local Centres	/ N/A	<=100m of Major, District or Local Centres	>100m of Major, District or Local Centres	N/A	N/A	LBE Major     Centres	Scoring of significance will match the major,

<sup>&</sup>lt;sup>9</sup> Local Centres include Large Local Centres, Small Local Centres and Local Shopping Parades.

Enfield Local Plan: Integrated Impact Assessment December 2023

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						<ul><li>LBE District Centres</li></ul>	minor and negligible effects.
						<ul><li>LBE Local Centres</li></ul>	

### **IIA objective 11: Minimise air pollution**

## All types of site options

The assessment of effects of site options in relation to air quality focuses on the variation across the Borough in baseline concentrations of key air pollutants and how residential development at different locations would result in different levels of exposure to these pollutants.

In 2021, the WHO updated its recommended guidelines for air pollutants ("WHO global air quality guidelines: particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide" - <a href="https://www.who.int/publications/i/item/9789240034228">https://www.who.int/publications/i/item/9789240034228</a>). The new air quality guidelines reflect the best available health evidence and WHO's recommendations continue to be recognised globally as the targets that should be met to protect public health. Minor negative effects are assumed to occur when residential development would occur in a location where the current baseline annual mean concentration of a pollutant (per LAEI 2019 data) exceeds these 2021 WHO guidelines. Major negative effects are assumed to occur in locations where current annual mean pollution exceeds both the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK's national air quality objectives (see <a href="https://uk-air.defra.gov.uk/assets/documents/Air\_Quality\_Objectives\_Update\_20230403.pdf">https://uk-air.defra.gov.uk/assets/documents/Air\_Quality\_Objectives\_Update\_20230403.pdf</a>).

We do not give consideration to whether a site is within or outside of an Air Quality Management Area (AQMA) under this objective, as the whole Borough has been declared an AQMA. This is as a result of a 2011 air quality assessment that showed the 1 hour mean objective of 200µg m-3 (not to be exceeded more than 18 times a year) for NO<sub>2</sub> and 24 hour mean objective of 50µg m-3 (not to be exceeded more than 35 days in one year) for PM<sub>10</sub> to have been exceeded in parts of the Borough. If the assessment of site options was to give consideration to the AQMA, all site options would receive the same effect, which would not help in identifying which ones perform better or worse in air quality terms.

The assessment of site options has not taken into account planned measures that will improve future air quality (such as the expansion of the Ultra Low Emissions Zone across all London boroughs in 2023 or the ban on sale of new petrol and diesel cars in 2035<sup>10</sup>), or site-specific mitigation.

The effect of the Plan as a whole on air quality will be assessed elsewhere, within the cumulative effects section of the IIA. This will be informed by air quality modelling being carried out on behalf of the Council by third party consultants.

<sup>10</sup> Prime Minister Rishi Sunak confirmed in a speech on 20 September 2023 that the planned ban on the sale of petrol and diesel cars would be pushed back five years from 2030 to 2035

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
11a NO <sub>2</sub> pollution	N/A	N/A	0-10 μg/m3	10-40 μg/m3	>40 µg/m3	LAEI annual mean ground level concentration 2019 Source: https://data.london.g	Each criterion 11a to 11c is scored:  Negligible 0 Minor negative -1 Major negative -3
11b PM <sub>10</sub> pollution	N/A	N/A	0-15 μg/m3	15-40 μg/m3	>40 µg/m3	ov.uk/dataset/london -atmospheric- emissions-inventorylaei2019 (this also includes the WHO Guidelines for air quality)	<ul> <li>Major negative -3</li> <li>Scores totalled and then averaged (i.e. total score divided by 3). Overall, significance is scored as follows:</li> <li>Negligible 0</li> </ul>
11c PM <sub>2.5</sub> pollution	N/A	N/A	0-5 μg/m3	5-20 μg/m3	>20 µg/m3	https://www.enfield.g ov.uk/ data/assets/ pdf file/0011/30143/ Air-quality-status- report-2022- Environment.pdf https://www.iqair.co m/uk/england/enfield	<ul><li>Minor negative &lt;0 to &gt;-2</li><li>Significant negative &lt;=-2</li></ul>

# IIA objective 12: Minimise the need to travel and support a modal shift away from the private car

## All types of site options

Enfield's facilities and services are concentrated within the Borough's Major, District and Local Centres and sites located close to these will help to reduce the need to travel. In addition, the proximity of development sites to sustainable transport links will affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour. Public Transport Accessibility Levels (PTAL) provide a detailed and accurate measure of the accessibility of a point to the public transport network, taking into account walk access time and service availability. It is possible that new services and facilities and transport links such as bus routes or cycle paths will be provided as part of new developments, particularly at larger sites, but this was not assumed in assessing site options.

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
12a Sustainable transport	PTAL = 5 or 6a	PTAL = 4	PTAL = 3	PTAL = 2	PTAL = 0, 1a or 1b	<ul><li>London</li><li>Datastore PTAL</li><li>ratings</li></ul>	Each criterion 12a to 12b is scored:  Major positive +3
12b Services and facilities	<=200m of Major, District or Local Centres	201-400m of Major, District or Local Centres	N/A	401-800m of Major, District or Local Centres	>800m of Major, District or Local Centres	<ul> <li>LBE Major Centres</li> <li>LBE District Centres</li> <li>LBE Local Centres</li> </ul>	<ul> <li>Minor positive +1</li> <li>Minor negative -1</li> <li>Major negative -3</li> <li>Scores totalled and then averaged (i.e. total score divided by 2). Overall, significance is scored as follows:</li> <li>Significant positive &gt;= 2</li> <li>Minor positive &gt;0 to &lt;2</li> <li>Negligible 0</li> <li>Minor negative &lt;0 to &gt;-2</li> <li>Significant negative &lt;=-2</li> </ul>

# IIA objective 13: Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks

Sites that are close to internationally, nationally or locally designated conservation sites have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, or increased recreation pressure.

Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, it is generally not proportionate to attempt to identify the particular biodiversity assets present at different locations and their sensitivity to different types of development (although Impact Risk Zones defined by Natural England provide a useful

Enfield Local Plan: Integrated Impact Assessment December 2023

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
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proxy for this in relation to SSSIs and internationally designated sites). Instead, this would be determined once more specific proposals are developed and submitted as part of a planning application.

Open space, including Metropolitan Open Land and Green Chains, is addressed below under IIA objective 15.

Speri space, including Metro	1			,				
Residential site options								
13a International and national biodiversity and geodiversity assets	N/A	N/A	All other sites	Intersects with 'all planning applications', 'residential' or 'rural residential' IRZ <sup>11</sup>	Intersects with internationally or nationally designated site	SS Ri Na Sp	atural England SSI Impact isk Zones atural England pecial Area of	If any of the criteria receive a major negative effect then the score is significant negative.
				IKZ.		■ Na Sp Pr ■ Na	onservation atural England pecial rotection Area atural England amsar site	If both criteria 13a and 13b receive a minor negative effect then the score is significant negative.
						The 'al applica 'rural re IRZs o develo	atural England ational Nature eserve Ill planning ations' and residential' only relate to opment outside ending outside	If only one of criteria 13a and 13b receive a minor negative effect then the score is minor negative. For all other sites the score is negligible.

<sup>&</sup>lt;sup>11</sup> Impact Risk Zones defined by Natural England are used to provide an initial assessment of the potential risks posed by development proposals to: Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites and Sites of Special Scientific Interest (SSSIs). Note that all SACs, SPAs and Ramsar sites are also designated as SSSIs, in addition to National Nature Reserves. Therefore, SSSIs are used as a proxy for all these designations in the IIA.

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						of existing settlements/urban areas.  Use the following dwelling capacity categories to establish relevance of IRZ:  - 500+ - 100+ - 50+ - 10+	
						<ul><li>GIS settlement boundaries</li></ul>	
13b Locally designated wildlife sites, Priority Habitat Inventory and Ancient Woodland	N/A	N/A	All other sites	<=250m from a locally designated site, Priority Habitat or Ancient Woodland	Intersects with a locally designated site, Priority Habitat or Ancient Woodland	LBE Local Wildlife Sites (also referred to as Sites of Importance for Nature Conservation, Sites of Nature Conservation Interest, Sites of Metropolitan/Bor ough/Local Importance, or	

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						other locally- specific terms)  Natural England Local Nature Reserves  Natural England/LBE Priority Habitat Inventory  Natural England Ancient Woodland Inventory	
Mixed-use (incl. residential	uses) site options						
13a International and national biodiversity and geodiversity assets	N/A	N/A	All other sites	Intersects with 'all planning applications', 'residential', 'rural residential', 'rural non-residential', 'air pollution' or 'water supply' IRZ	Intersects with internationally or nationally designated site	<ul> <li>Natural England SSSI Impact Risk Zones</li> <li>Natural England Special Area of Conservation</li> <li>Natural England Special Protection Area</li> <li>Natural England Ramsar site</li> <li>Natural England National Nature Reserve</li> </ul>	If any of the criteria receive a major negative effect then the score is significant negative.  If both criteria 13a and 13b receive a minor negative effect then the score is significant negative.  If only one of criteria 13a and 13b receive a minor

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						The 'all planning applications' and 'rural residential' IRZs only relate to development outside or extending outside of existing settlements/urban areas.	negative effect then the score is minor negative. For all other sites the score is negligible.
						Use the following dwelling capacity categories to establish relevance of IRZ:  - 500+ - 100+	
						<ul><li>50+</li><li>10+</li><li>GIS settlement boundaries</li></ul>	
13b Locally designated wildlife sites, Priority Habitat Inventory and Ancient Woodland	As for residential site options					■ LBE Local Wildlife Sites (also referred to as Sites of Importance for Nature Conservation, Sites of Nature	

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						Conservation Interest, Sites of Metropolitan/Bor ough/Local Importance, or other locally- specific terms)  Natural England Local Nature Reserves  Natural England/LBE Priority Habitat Inventory  Natural England Ancient Woodland Inventory	
Industrial/employment site	options			_	,		
13a International and national biodiversity and geodiversity assets	N/A	N/A	All other sites	Intersects with 'rural non- residential', 'air pollution' and 'water supply' or 'all planning applications' IRZ	Intersects with internationally or nationally designated site	<ul> <li>Natural England SSSI Impact Risk Zones</li> <li>Natural England Special Area of Conservation</li> <li>Natural England Special Protection Area</li> </ul>	

Enfield Local Plan: Integrated Impact Assessment December 2023

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						<ul><li>Natural England Ramsar site</li></ul>	
						<ul><li>Natural England National Nature Reserve</li></ul>	
						The 'rural non-residential' and 'all planning applications' IRZs only relate to development outside or extending outside of existing settlements/urban areas. Therefore, only sites falling within these two IRZs that are outside or extend outside of existing settlements/urban areas rate minor negative.  GIS settlement boundaries	
13b Locally designated wildlife sites, Priority Habitat Inventory and Ancient Woodland IIA objective 14: Sustain and	As for residential site options						

IIA objective 14: Sustain and enhance the significance of heritage assets

Criteria Major positive Minor positive Negligible Minor negative Datasets and related notes Significance
--

#### All types of site options

The NPPF states that the "significance [of a heritage asset] can be harmed or lost through alteration or destruction of the heritage asset or development within its setting". However, development could also enhance the significance of the asset, provided that the development preserves those elements of the setting that make a positive contribution to or better reveal the significance of the asset. In all cases, effects from a Local Plan site allocation will be subject to a degree of uncertainty as the actual effects on heritage assets will depend on the particular scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features, for example where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect.

The proximity tests outlined below are intended to provide a basis for screening for the potential for adverse effects on heritage assets but in the absence of a separately commissioned historic environment sensitivity study or similar of all reasonable alternative site options they are subject to a high degree of uncertainty. Distances used are based on professional judgement. Longer screening distances are used for site options outside of existing settlements to reflect typically longer sightlines in rural vs. urban areas.

14a Proximity to historic assets: sites within existing settlements	N/A	N/A	All other sites	101-250m	<=100m	•	Historic England listed buildings	Scoring of significance will match the major, minor and negligible effects. However, all
14b: Proximity to historic assets: sites outside of existing settlements	N/A	N/A	All other sites	501-1,000m	<=500m		Historic England scheduled monuments Historic England parks and gardens LBE conservation areas LBE locally listed heritage assets LBE archaeological priority areas	effects to acknowledge uncertainty (?) in the absence of a heritage impact assessment:  All other 0?  Minor negative -?  Major negative?

Criteria	Major positive	Minor positive	Negligible	Minor negative	•	Datasets and related notes	Significance scoring
						<ul><li>GIS settlement boundaries</li></ul>	

#### IIA objective 15: Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes

### All types of site options

Enfield's 'Character of Growth' informed the IIA of most site options at Regulation 19 stage. The study provides recommendations on the acceptable level of development and change in landscape and townscape terms for different areas of the Borough. Some site options were located in parts of the Borough located outside of the Character of Growth Study's scope (broadly those in the Green Belt or open spaces). IIA of these site options in landscape/ townscape terms fell back on a more simplistic appraisal method used at Regulation 18 stage, based on the size of sites and whether they are located in urban or more rural areas. Actual effects on landscape and townscape will also depend on the design, scale and layout of development within the site, which may help mitigate and/or enhance effects on the existing townscape.

15a Landscape and townscape	N/A	N/A	Site falls within an area where 'Transformative Change' is recommended.	Site falls within an area where 'Medium Change' is recommended.	Site falls within an area where 'Limited Change' is recommended.	LBE 'Character of Growth' study, specifically:  'Scale of Change Recommendatio	If any of the criteria receive a major negative effect then the score is significant negative.  If only one of criteria 15a
15b Open space	N/A	N/A	All other sites	N/A	Contains existing open space, including Metropolitan Open Land and Green Chains	n' map layer  LBE open spaces (excluding cemeteries, churchyards and civic spaces)  LBE Metropolitan Open Land  LBE green loops  LBE green links	and 15b receive a minor negative effect then the score is minor negative.

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						LBE Lee Valley Regional Park	

#### IIA objective 16: To achieve efficient use of land and materials

### All types of site options

Appraisal of site options in relation to this IIA objective considered whether the site is greenfield or brownfield and also what quality of agricultural land it contains.

Development on brownfield land represents a more efficient use of land in comparison to the development of greenfield sites. Larger scale sites may also have more of an impact and therefore sites above 3 hectares have been used as an indication of larger scale development. The effects of development on waste generation will depend largely on residents' behaviour. However, where development takes place on previously developed land there may be opportunities to reuse onsite buildings and materials, thereby reducing waste generation. Although open spaces may contain a small number of buildings to maintain recreational use, they are largely undeveloped and considered greenfield land.

Furthermore, all new development will result in the increased consumption of minerals for construction but this will not be influenced by the location of the development. The location of development sites can influence the efficient use of minerals as development in Minerals Safeguarding Areas may sterilise mineral resources and restrict the availability of resources in the Borough. However, there are no Minerals Safeguarding Areas within LBE so this issue was scoped out of the IIA of site options.

16a Brownfield/greenfield land	>=3ha on brownfield land	<3ha on brownfield land	N/A	<3ha on greenfield land	>=3ha on greenfield land	GIS area LBE	If criterion 16a receives a major positive effect the
16b Agricultural Land Classification	N/A	N/A	All other sites	Greenfield land classed as Grade 3 agricultural land	Greenfield land classed as Grades 1 or 2 agricultural land	Natural England Agricultural Land Classification	site scores significant positive, irrespective of criterion 16b.  If criterion 16a is not major positive, then each criterion 16a to 16b is scored:  Major positive +3  Minor positive +1  Negligible 0  Minor negative -1  Major negative -3

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
							Scores totalled and then averaged (i.e. total score divided by 2). Overall, significance is scored as follows:
							<ul><li>Significant positive &gt;=2</li><li>Minor positive &gt;0 to &lt;2</li></ul>
							<ul><li>Minor negative &lt;0 to &gt;-2</li><li>Significant negative &lt;=-2</li></ul>

# IIA objective 17: To manage and reduce the risk of flooding

## All types of site options

Site options were assessed by reference to the distribution of flood risk areas in the Borough.

The effects of new development on this IIA objective will also depend to some extent on its design, for example whether it incorporates sustainable drainage systems (SuDS), which is unknown and cannot be addressed at this stage. Where site options are located in areas of high flood risk, it could increase the risk of flooding in those areas (particularly if the sites are not previously developed) and would increase the number of people and assets at risk from flooding. These factors are outside the scope of the site options appraisal.

1 /			3	<u>'</u>	<u>'</u>			
17a Flood zones	N/A	N/A	All other sites	>=25% within Flood Zone 2	>=25% within Flood Zone 3		Environment Agency Flood Zones 2 and 3	If any of the criteria receive a major negative effect then the score is
17b Surface water flood risk	N/A	N/A	All other sites	Contains land with a 1 in 100 year risk of surface water flooding	Contains land with a 1 in 30 year risk of surface water flooding	•	Environment Agency Surface Water Flooding (1 in 30 year risk and 1 in 100 year risk)	If both criteria 17a and 17b receive a minor negative effect then the

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
							score is significant negative.
							If only one of criteria 17a and 17b receive a minor negative effect then the score is minor negative.
IIA objective 18: Minimis	e water use and proted	t water quality					
All types of site options							
	uction depending on its	proximity to watercourses	-	•			n of development could affect y affected would depend on
18a Water quality	N/A	N/A	All other sites	N/A	Site contains a watercourse, water body or falls within a Source Protection Zone	<ul> <li>Environment         Agency Source         Protection         Zones</li> <li>OS Open Map         Local</li> </ul>	Scoring of significance will match the major and negligible effects.

Table B.2: Amendments to the site assessment assumptions

	Change	Reasoning
IIA1: Climate change mitigation	In the previous Regulation 18 iteration of the IIA (June 2021), the likely effects of all site options on this objective were negligible. In this Regulation 19 iteration of the IIA, the objective has instead been scoped out.	As all sites receive negligible effects in relation to this objective anyway, the decision was taken to instead scope this objective out of the site assessment assumptions.
IIA 2: Climate change adaptation	In the previous Regulation 18 iteration of the IIA (June 2021), the likely effects of all site options on this objective were negligible. In this Regulation 19 iteration of the IIA, the objective has instead been scoped out.	As all sites receive negligible effects in relation to this objective anyway, the decision was taken to instead scope this objective out of the site assessment assumptions.
IIA3: Housing	No change.	N/A
IIA4: Health and wellbeing	No change.	N/A
IIA5: Services and facilities	No change.	N/A
IIA6: Social inclusion	No change, but clarity provided on sites being in one of the 10-20% most deprived areas (not 20% most deprived areas).	To provide clarity.
IIA7: Crime and community safety	In the previous Regulation 18 iteration of the IIA (June 2021), the likely effects of all site options on this objective were negligible. In this Regulation 19 iteration of the IIA, the objective has instead been scoped out.	As all sites receive negligible effects in relation to this objective anyway, the decision was taken to instead scope this objective out of the site assessment assumptions.
IIA8: Road safety	In the previous Regulation 18 iteration of the IIA (June 2021), the likely effects of all site options on this objective were negligible. In this Regulation 19 iteration of the IIA, the objective has instead been scoped out.	As all sites receive negligible effects in relation to this objective anyway, the decision was taken to instead scope this objective out of the site assessment assumptions.
IIA9: Economy	No change.	N/A
IIA10: Town and local centres	No change.	N/A
IIA11: Air pollution	Criteria amended to look at NO <sub>2</sub> , PM <sub>10</sub> and PM <sub>2.5</sub> pollution levels in relation to the latest WHO air quality guidelines for air pollutants (2021), as well as the UK's national air quality objectives.	To take account of latest air quality guidelines.

	Change	Reasoning
IIA12: Sustainable transport	Criteria regarding proximity to railway stations, tube stations, bus stops and cycle routes replaced with Transport for London's Public Transport Accessibility Levels (PTALs).	Transport for London's PTALs are a more detailed and accurate measure of accessibility of a point to the public transport network, taking into account walk access time and service availability.
IIA13: Biodiversity	Criteria regarding proximity to Sites of Special Scientific interest (SSSIs), Sites of Importance for Nature Conservation and Local Nature Reserves replaced by intersections with internationally or nationally designated sites, and Natural England's SSSI Impact Risk Zones (IRZs). Proximity to Local Nature Reserves dealt with under existing criteria regarding proximity to Priority Habitats and Ancient Woodland.	Use of SSSI IRZs allows sensitivities of individual SSSIs to be taken into account in the IIA, indicating the types of development that could have adverse effects. Note that all Special Areas of Conservation, Special Protection Areas and Ramsar sites are also designated as SSSIs and therefore SSSIs are used as a proxy for all these designations in the IIA.
IIA14: Historic environment	Criteria replaced with proximity-based approach inside and outside of settlement boundaries within the Borough.	Historic environment evidence not available for all reasonable alternative site options. Therefore, proximity basis used as a proxy to ensure consistent basis of appraisal for all site options.
IIA15: Landscape and townscape	Regulation 18 site assessment criteria relating to the size of site options and their location in relation to settlement boundaries were replaced with Regulation 19 criteria that drew on Enfield's Character of Growth Study. That study provides recommendations on the acceptable level of development and change in landscape terms for different areas across the Borough. The exception to this was the areas of the Borough not within the Character of Growth Study scope – broadly Green Belt and open spaces.	Character of Growth Study was subject to change until Regulation 19 stage.
IIA16: Efficient use of land and materials	Uncertainty no longer applied for sites comprising Grade 3 agricultural land.	Previous uncertain effect based on the fact that no split available between grade 3a and grade 3b agricultural land. However, although grade 3b land is not 'best and most versatile' its loss to development nevertheless represents a minor negative rather than uncertain effect in relation to this objective.

	Change	Reasoning
IIA17: Flooding	Criteria regarding predicted peak flood depth replaced with Environment Agency's 1 in 30 year and 1 in 100 year risk of surface water flooding data.	Predicted peak flood depth not available for all reasonable alternative site options.
IIA18: Water	No change.	N/A

# Appendix C

Plans, policies and programmes

Enfield Local Plan: Integrated Impact Assessment December 2023

# Air and water quality

## International

**C.1** The **2030 Agenda for Sustainable Development** (2015)<sup>12</sup> adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 3: Good Health and Well-Being;
- SDG 6: Clean Water and Sanitation;
- SDG 7: Affordable and Clean Energy;
- SDG 11: Sustainable Cities and Communities;
- SDG 12: Responsible Consumption and Production; and
- SDG 14: Life Below Water.

### **National**

**C.2** The **NPPF** (2023) states that air quality and subsequently public health can be improved by focusing development in locations that can be made sustainable through limiting the need to travel or offering a genuine choice of transport modes. It further states that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones. Furthermore, the NPPF seeks to improve air quality of mitigate impacts through traffic and travel management and green infrastructure provision and enhancement. The NPPF also makes reference to contaminated land under paragraphs 183-184, stating that where appropriate despoiled, degraded, derelict, contaminated land should be remediated and mitigated. The NPPF is supported by Planning Practice Guidance relating to:

- Air quality (2019)<sup>13</sup> provides guidance on air quality considerations planning needs to take into account.
- Water supply, wastewater and water quality (2019)<sup>14</sup> advises on how planning can ensure water quality and the delivery of adequate water and wastewater infrastructure.

**C.3 The Environment Act 2021**<sup>15</sup> sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. Regarding air quality, the Act sets out legislation which covers:

- Local air quality management frameworks and the recall of motor vehicles etc.
- Plans and proposals for water resources, drainage and sewerage management, storm overflows, water quality and land drainage.

**C.4 Establishing the Best Available Techniques for the UK (UK BAT)** (2022)<sup>16</sup> sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group

<sup>&</sup>lt;sup>12</sup> United Nations Department of Economic and Social Affairs (2015) The 2030 Agenda for Sustainable Development. (<a href="https://sdgs.un.org/2030agenda">https://sdgs.un.org/2030agenda</a>)

<sup>&</sup>lt;sup>13</sup> Ministry of Housing, Communities and Local Government (2019). Air quality. (see https://www.gov.uk/guidance/air-quality--3)

<sup>&</sup>lt;sup>14</sup> Ministry of Housing, Communities and Local Government (2019). Water supply, wastewater and water quality. (see <a href="https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality">https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality</a>)

<sup>&</sup>lt;sup>15</sup> HM Government (2021) Environment Act 2021. (see <a href="https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted">https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

to oversee the work of the Standards Council and the delivery of the requirements under this new framework. It is anticipated that the BAT for the first four industry sectors will be published in the second half of 2023.

C.5 Clean Air Strategy 2019 (2019)<sup>17</sup> sets out the comprehensive action that is required from across all parts of government and society to meet these goals. New legislation will create a stronger and more coherent framework for action to tackle air pollution. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2030. The goal is to reduce the harm to human health from air pollution by half.

C.6 Of the key areas in the 25 Year Environment Plan<sup>18</sup> around which action will be focused in terms of the protection of air quality are:

- Using and managing land sustainably:
  - Embed a 'net environmental gain' principle for development, including natural capital benefits to improved and water quality.
- Increasing resource efficiency and reducing pollution and waste:
  - Reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals.

C.7 The Road to Zero (2018)<sup>19</sup> sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

C.8 The Water Supply (Water Quality) Regulations 2018<sup>20</sup> outlines guidelines and standards for maintaining the quality of water in a given water supply system. This regulation aims to ensure the safety and potability of water that is provided to the public. It covers various aspects related to water quality, including monitoring, testing, treatment, and reporting of water quality data. The regulation also sets out specific parameters for different contaminants and substances in the water, such as microbiological organisms, chemicals, and physical characteristics.

C.9 The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017<sup>21</sup> focuses on ensuring good qualitative and quantitative health, i.e. on reducing and removing pollution and on ensuring that there is enough water to support wildlife at the same time as human needs.

C.10 The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017)<sup>22</sup> provides the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles (ULEVs), a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the national road network.

C.11 The Environmental Permitting Regulations 2016<sup>23</sup> streamline the legislative system for industrial and waste installations into a single permitting structure for those activities which have the potential to cause harm to human health or the environment.

<sup>&</sup>lt;sup>17</sup> DEFRA (2019). Clean Air Strategy. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/770715/clean-air-strategy-2019.pdf)

<sup>&</sup>lt;sup>18</sup> HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/693158/25-year-environment-plan.pdf) HM Government (2018). The Road to Zero. (see

 $<sup>\</sup>underline{\text{https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/739460/road-to-zero.pdf)}$ 

<sup>&</sup>lt;sup>20</sup> HM Government (2018). The Water Supply (Water Quality) Regulation (see https://www.legislation.gov.uk/wsi/2018/647/made)

<sup>&</sup>lt;sup>21</sup> HM Government (2017). The Water Environment (Water Framework Directive) (England and Wales) Regulations. (see https://www.legislation.gov.uk/uksi/2017/407/contents/made)

Department for Environment Food and Rural Affairs and Department for Transport (2017). UK plan for tackling roadside nitrogen dioxide concentrations. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/633270/air-quality-plandetail.pdf)

23 HM Government (2016). The Environmental Permitting Regulations. (see https://www.legislation.gov.uk/uksi/2016/1154/contents/made)

Enfield Local Plan: Integrated Impact Assessment December 2023

They set out how to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment and human health.

- **C.12 The Air Quality Standards Regulations** (2016)<sup>24</sup> set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO<sub>2</sub>). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMAs).
- **C.13** The **Water White Paper** (2012)<sup>25</sup> provides the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It outlines the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.
- **C.14 National Policy Statement for Waste Water** (2012)<sup>26</sup> sets out Government policy for the provision of major waste water infrastructure. The policy set out in this National Policy Statement is, for the most part, intended to make existing policy and practice in consenting nationally significant waste water infrastructure clearer and more transparent.
- **C.15 Future Water: The Government's Water Strategy for England** (2008)<sup>27</sup> sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, while discharge from sewers will be reduced.
- **C.16 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland** (2007)<sup>28</sup> sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the Strategy are to:
- Further improve air quality in the UK from today and long term.
- Provide benefits to health quality of life and the environment.
- **C.17 The Environmental Protection Act 1990**<sup>29</sup> makes provision for the improved control of pollution to air, water and land by regulating the management of waste and the control of emissions. The Act seeks to ensure that decisions pertaining to the environment are made in an integrated manner, in collaboration with appropriate authorities, non-governmental organisations and other persons.
- **C.18** The Environmental Protection Act 1990: Part 2A: Contaminated Land Statutory Guidance<sup>30</sup> establishes a framework for identifying and remediating land that has been polluted by hazardous substances. The Guidance provides detailed instructions and criteria for assessing and managing contaminated sites to ensure environmental protection and public health.
- **C.19 The Private Water Supplies (England) Regulations 2016** apply to all private water supplies intended for human consumption and water used for food preparation purposes. The Regulations require the local authority to carry out a risk assessment of every relevant supply in the district or borough. This involves a survey of the source of the supply and surrounding area to see if any contamination is possible. It includes checking any storage tanks, treatment systems and pipework associated with the supply. This will identify any actual and potential hazards that may affect the health of those drinking the water and what action is needed to mitigate those hazards.

<sup>&</sup>lt;sup>24</sup> HM Government (2016). The Air Quality Standards Regulations.(see <a href="https://www.legislation.gov.uk/uksi/2010/1001/contents/made">https://www.legislation.gov.uk/uksi/2010/1001/contents/made</a>)

<sup>&</sup>lt;sup>25</sup> Department for Environment, Food and Rural Affairs (2012). The Water White Paper. (see <a href="https://publications.parliament.uk/pa/cm201213/cmselect/cmenvfru/374/374.pdf">https://publications.parliament.uk/pa/cm201213/cmselect/cmenvfru/374/374.pdf</a>)

<sup>&</sup>lt;sup>26</sup> HM Government (2012). National Policy Statement for Waste Water. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/69505/pb13709-waste-water-nps.pdf)

<sup>&</sup>lt;sup>27</sup> HM Government (2008). Future Water: The Government's water strategy for England (see

https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/69346/pb13562-future-water-080204.pdf)

28 Department for Environment Food and Rural Affairs (2007). The Air Quality Strategy for England, Scotland, Wales and Northern Ireland.

<sup>&</sup>lt;sup>29</sup> HM Government (1990). Environmental Protection Act 1990. (see <a href="https://www.legislation.gov.uk/ukpga/1990/43/contents">https://www.legislation.gov.uk/ukpga/1990/43/contents</a>)

<sup>&</sup>lt;sup>30</sup> Department for Environment, Food, and Rural Affairs (1990). The Environmental Protection Act 1990: Part 2A: Contaminated Land Statutory Guidance (see <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/223705/pb13735cont-land-guidance.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/223705/pb13735cont-land-guidance.pdf</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

### **Sub-national**

**C.20 The London Plan** (2021)<sup>31</sup> is the statutory Spatial Development Strategy for Greater London. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The London Plan is prepared by the Mayor of London in accordance with the Greater London Authority Act 1999 (as amended) and associated regulations. The London Plan is legally part of each of London's local planning authorities' Development Plan. As a result, planning applications, Development Plan Documents and Neighbourhood Plans must be in 'general conformity' with the London Plan. In reference to air quality, the Plan seeks to create a healthier city by seeking to "*improve London's air quality reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution*". In relation to water quality, the Plan seeks to "*promote improvements to water supply infrastructure to contribute to security of supply*", as well as promoting development that seeks to "*facilitate river restoration, including opportunities to open culverts, naturalise river channels, protect and improve the foreshore, floodplain, riparian and adjacent terrestrial habitat*".

**C.21 Air Quality Positive (AQP) guidance** (2023)<sup>32</sup> aims to maximise benefits to local air quality in and around large-scale development sites and masterplan areas while also minimising exposure to existing sources of poor air quality. It requires planners, designers, architects and air quality experts to demonstrate what measures have been taken during the design stages to achieve the best possible outcomes for air quality.

**C.22 Air Quality Neutral (AQN) guidance** (2023)<sup>33</sup> sets air quality benchmarks for all development, in order to ensure that their transport and building emissions do not worsen air quality in London. The guidance also outlines a simplified approach for minor developments.

C.23 The Control of Dust and Emissions Supplementary Planning Guidance (SPG) (2021)<sup>34</sup> seeks to reduce emissions of dust, PM<sub>10</sub> and PM<sub>2.5</sub> from construction and demolition activities in London. It also aims to control nitrogen oxides (NOx) from these same activities by introducing an Ultra Low Emissions Zone (ULEZ) for non-road mobile machinery.

**C.24** The **Thames River Basin Management Plan** (2022)<sup>35</sup> seeks to manage and protect the Thames River Basin's water resources and aquatic ecosystems. It outlines measures and actions to achieve specific environmental objectives, focusing on water quality improvement, ecological health, and sustainable water use. The Plan incorporates various stakeholders and sectors to collaboratively address water-related challenges and maintain a healthy and sustainable water environment.

**C.25 The London Environment Strategy** (2018)<sup>36</sup> seeks to address environmental challenges and promote sustainability in London. The strategy focuses on key areas including air quality, green spaces, waste reduction, energy efficiency, and transportation. It sets ambitious goals for improving air quality, increasing green cover, reducing waste, and transitioning to a low-carbon economy.

# Implications of the policy review

**C.26** In order to align with the international and national policies outlined above, the Local Plan should help to minimise the contamination of air and water, as well as ensure their effective management. The IIA is able to respond to this through the inclusion of IIA objectives relating to air pollution and the efficient use of land.

<sup>&</sup>lt;sup>31</sup> Greater London Authority (2021) The London Plan. (see <a href="https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents">https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents</a>)

Greater London Authority (2023) Air Quality Positive (AQP) guidance. (see <a href="https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/air-quality-positive-aqp-guidance">https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/air-quality-positive-aqp-guidance</a>)
 Greater London Authority (2023) Air Quality Neutral (AQN) guidance. (see <a href="https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan-guidance/air-quality-positive-aqp-guidance">https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan-guidance/air-quality-positive-aqp-guidance</a>)

<sup>&</sup>lt;sup>33</sup> Greater London Authority (2023) Air Quality Neutral (AQN) guidance. (see <a href="https://www.london.gov.uk/programmes">https://www.london.gov.uk/programmes</a>
strategies/planning/implementing-london-plan/london-plan-guidance/air-quality-neutral-aqn-guidance)

<sup>&</sup>lt;sup>34</sup> Greater London Authority (2021) Control of Dust and Emissions. (see <a href="https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance-and-spgs/control-dust-and">https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance-and-spgs/control-dust-and</a>)

<sup>35</sup> Environment Agency (2022) Thames River Basin District River Basin Management Plan. (see <a href="https://www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022">https://www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022</a>)
36 Greater London Authority (2018) London Environment Starter (2018)

<sup>&</sup>lt;sup>36</sup> Greater London Authority (2018) London Environment Strategy. (see <a href="https://www.london.gov.uk/sites/default/files/london\_environment\_strategy\_0.pdf">https://www.london.gov.uk/sites/default/files/london\_environment\_strategy\_0.pdf</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

# **Biodiversity**

## International

**C.27 United Nations Declaration on Forests and Land Use (COP26 Declaration)** (2021)<sup>37</sup> is an international commitment to halt and reverse forest loss and land degradation by 2030 while delivering sustainable development and promoting an inclusive rural transformation.

**C.28** The **2030 Agenda for Sustainable Development** (2015)<sup>38</sup> adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 13: Climate Action;
- SDG 14: Life Below Water: and
- SDG 15: Life on Land.

**C.29** The International Convention on Biological Diversity (1992)<sup>39</sup> is an international commitment to biodiversity conservation through national strategies and action plans.

**C.30 European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention)** (1979)<sup>40</sup> aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

**C.31 International Convention on Wetlands** (Ramsar Convention) (1976)<sup>41</sup> an international agreement with the aim of conserving and managing the use of wetlands and their resources.

#### **National**

**C.32** A requirement of the **NPPF's** (2023)<sup>42</sup> environmental objective is that the planning system should contribute to protecting and enhancing the natural environment including helping to improve biodiversity and using natural resources prudently. In support of this aim the framework states that Local Plans should "identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks" and should also "promote the conservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity".

**C.33** The framework requires that plans should take a strategic approach in terms of "maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries".

C.34 The NPPF is supported by Planning Practice Guidance relating to:

■ **Natural environment** (2019)<sup>43</sup> highlights key issues in implementing policy to protect and enhance the natural environment, agricultural land, soils and brownfield land of environmental value, green infrastructure, biodiversity, geodiversity, ecosystems and landscapes.

<sup>&</sup>lt;sup>37</sup> COP26 United Nations Declaration on Forests and Land Use (2021)

<sup>&</sup>lt;sup>38</sup> United Nations Department of Economic and Social Affairs (2015). The 2030 Agenda for Sustainable Development. (see <a href="https://sdgs.un.org/2030agenda">https://sdgs.un.org/2030agenda</a>)

<sup>&</sup>lt;sup>39</sup> Convention on Biological Diversity (1992). International Convention on Biological Diversity.

<sup>&</sup>lt;sup>40</sup> Council of Europe (1979). Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention).

<sup>&</sup>lt;sup>41</sup> Ramsar Convention on Wetlands of International Importance (1976)

<sup>&</sup>lt;sup>42</sup> Department for Levelling Up, Housing and Communities (2023). National Planning Policy Framework.

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/1182995/NPPF\_Sept\_23.pdf)

<sup>43</sup> Ministry of Housing Communities and Lead Control (2015). National Planning Policy Framework.

<sup>&</sup>lt;sup>43</sup> Ministry of Housing, Communities and Local Government (2019). Natural Environment. (see <a href="https://www.gov.uk/guidance/natural-environment">https://www.gov.uk/guidance/natural-environment</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

**C.35 The Environment Act 2021**<sup>44</sup> sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. Biodiversity elements in the Act include:

- Strengthened biodiversity duty. Both onsite and offsite enhancements must be maintained for at least 30 years after completion of a development.
- Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity
- Local Nature Recovery Strategies to support a Nature Recovery Network.
- Duty upon Local Authorities to consult on street tree felling.
- Strengthen woodland protection enforcement measures.
- Conservation Covenants.
- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature.
- Prohibit larger UK businesses from using commodities associated with wide-scale deforestation.
- Requires regulated businesses to establish a system of due diligence for each regulated commodity used in their supply chain, requires regulated businesses to report on their due diligence, introduces a due diligence enforcement system.

**C.36** The key areas of the **25 Year Environment Plan**<sup>45</sup> of relevance in terms of the protection and promotion of biodiversity are recovering nature and enhancing the beauty of landscapes, securing clean, productive and biologically diverse seas and oceans, and protecting and improving our global environment. Actions that will be taken as part of these three key areas are as follows:

- Recovering nature and enhancing the beauty of landscapes:
  - Develop a Nature Recovery Network to protect and restore wildlife, and provide opportunities to re-introduce species that have been lost from the countryside.
- Securing clean, healthy, productive and biologically diverse seas and oceans:
  - Achieve a good environmental status of the UK's seas while allowing marine industries to thrive, and complete our
    economically coherent network of well-managed marine protected areas.
- Protecting and improving our global environment:
  - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
  - Support and protect international forests and sustainable agriculture.

**C.37 The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019**<sup>46</sup> protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

**C.38** The **England Biodiversity Strategy Climate Change Adaptation Principles** (2008)<sup>47</sup> sets out principles to guide adaptation to climate change. The principles are: take practical action now, maintain and increase ecological resilience, accommodate change, integrate action across all sectors and develop knowledge and plan strategically. The precautionary principle underpins all of these.

<sup>&</sup>lt;sup>44</sup> HM Government (2021) Environment Act 2021. (see <a href="https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted">https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted</a>)

<sup>&</sup>lt;sup>45</sup> HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/693158/25-year-environment-plan.pdf)

46 HM Government (2019). The Conservation of Habitats and Species Regulations. (see

https://www.legislation.gov.uk/ukdsi/2019/9780111176573/schedules)

<sup>&</sup>lt;sup>47</sup> Department for Environment, Food and Rural Affairs (2008). The England Biodiversity Strategy Climate Change Adaptation Principles. (see <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/69270/pb13168-ebs-ccap-081203.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/69270/pb13168-ebs-ccap-081203.pdf</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

C.39 The Natural Environment and Rural Communities Act 2006<sup>48</sup> places a duty on public bodies to conserve biodiversity.

### **Sub-national**

C.40 The London Plan (2021)<sup>49</sup> seeks to ensure that green space designations remain strong to protect the environment and improve biodiversity. The Plan states that it seeks to "protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains".

C.41 The London Environment Strategy (2018)<sup>50</sup> seeks to address environmental challenges and promote sustainability in London. The strategy focuses on key areas including air quality, green spaces, waste reduction, energy efficiency, and transportation. It sets ambitious goals for improving air quality, increasing green cover, reducing waste, and transitioning to a low-carbon economy.

C.42 The All London Green Grid (2015) policy framework comprises the London Plan policies on green infrastructure and urban greening - and those relating to open spaces, biodiversity, trees and woodland, and river corridors - plus the All London Green Grid Supplementary Planning Guidance and a series of All London Green Grid Area Frameworks.

C.43 The Tree and woodland strategies SPG (2013)<sup>51</sup> provides guidance on the London Plan policies regarding trees and woodland, providing a step-by-step approach to their management.

C.44 Urban Greening Factor (UGF) guidance (2023)<sup>52</sup> helps support boroughs and applicants in meeting the requirements of Policy G5: Urban greening (London Plan Policy G5 requires all major developments to include urban greening as a fundamental element of site and building design). It provides guidance to boroughs to inform the local application of the policy and information to help applicants to apply the UGF to proposed developments.

C.45 The Lee Valley Regional Park Biodiversity Action Plan 2019-2029<sup>53</sup> provides a framework for biodiversity action for the regional park. The overarching vision of the Plan is "to work with partners and communities to conserve, create, restore and enhance the habitats of the Regional Park, providing access to and appreciation of this area".

# Implications of the policy review

C.46 In order to align with the international and national policies outlined above, the Local Plan should help to ensure that ecological features and biodiversity is managed, protected and enhanced and that opportunities for habitat restoration or creation are encouraged. The Local Plan should also help to ensure that environmental pollution is minimised in order to protect land, water and air quality. The IIA is able to respond to this through the inclusion of IIA objectives relating to the protection and enhancement of biodiversity, air pollution, water quality and contaminated land.

# Climate change adaptation and mitigation

### International

C.47 United Nations Paris Climate Change Agreement (2015)<sup>54</sup> is an international agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

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<sup>51</sup> Greater London Authority (2013). Tree and woodland strategies. (see https://www.london.gov.uk/programmes-

strategies/planning/implementing-london-plan/london-plan-guidance-and-spgs/tree-and-woodland)
52 Greater London Authority (2023). Urban Greening Factor (UGF) guidance. (see https://www.london.gov.uk/programmesstrategies/planning/implementing-london-plan/london-plan-guidance/urban-greening-factor-ugf-guidance)

<sup>53</sup> Lee Valley Regional Park Authority (2019). Lee Valley Regional Park's Biodiversity Action Plan 2019-2029. (see

https://www.leevalleypark.org.uk/biodiversity-action-plan)

54 United Nations Climate Change The Paris Agreement (2015)

<sup>&</sup>lt;sup>48</sup> HM Government (2006). Natural Environment and Rural Communities Act 2006. (see: https://www.legislation.gov.uk/ukpga/2006/16/contents) <sup>49</sup> Greater London Authority (2021) The London Plan. (see <a href="https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-l

Greater London Authority (2018) London Environment Strategy. (see https://www.london.gov.uk/sites/default/files/london\_environment\_strategy\_0.pdf)

Enfield Local Plan: Integrated Impact Assessment December 2023

**C.48** The **2030 Agenda for Sustainable Development** (2015)<sup>55</sup> is an initiative adopted by all United Nations Member States to provide a shared blueprint for peace and prosperity for people and the planet, and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SGD 7: Affordable and Clean Energy;
- SDG 11: Sustainable Cities and Communities;
- SDG 12: Responsible Consumption and Production;
- SDG 13: Climate Action:
- SDG 14: Life Below Water; and
- SDG 15: Life on Land.

### **National**

**C.49** The **NPPF** (2023) contains as part of its environmental objective a requirement to mitigate and adapt to climate change, "including moving to a low carbon economy". The document also states that the "planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change". To achieve these aims, new development should be planned to ensure appropriate adaptation measures are included (including green infrastructure) and should be designed, located and orientated as to help to reduce greenhouse gas emissions.

**C.50** The revised framework also requires that development is directed away from areas which are at highest existing or future risk of flooding. Where development is required in such areas, the "development should be made safe for its lifetime without increasing flood risk elsewhere".

**C.51** In relation to coastal change in England, planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Furthermore, plans should "reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast".

### C.52 The NPPF

**C.53** is supported by Planning Practice Guidance relating to:

- **Flood risk and coastal change** (2021)<sup>56</sup> provides guidance on how the planning process can assess, avoid, manage and mitigate the risks associated with flooding and coastal change.
- **Climate change** (2019)<sup>57</sup> advises how to identify suitable mitigation and adaptation measures in the planning process to address the impacts of climate change.
- **Renewable and low carbon energy** (2015)<sup>58</sup> outlines guidance for developing a strategy for renewable and low carbon energy, and particular planning considerations for hydropower, solar technology, solar farms and wind turbines.

**C.54 The Environment Act 2021**<sup>59</sup> sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. The Environment Act will deliver:

- Long-term targets to improve air quality biodiversity, water, and waste reduction and resource efficiency.
- A target on ambient PM2.5 concentrations.
- A target to halt the decline of nature by 2030.

<sup>&</sup>lt;sup>55</sup> United Nations Department of Economic and Social Affairs (2015). The 2030 Agenda for Sustainable Development. (see <a href="https://sdgs.un.org/2030agenda">https://sdgs.un.org/2030agenda</a>)

<sup>&</sup>lt;sup>56</sup> Ministry for Housing, Communities and Local Government (2021). Flood risk and coastal change. (see <a href="https://www.gov.uk/guidance/flood-risk-and-coastal-change">https://www.gov.uk/guidance/flood-risk-and-coastal-change</a>)

<sup>&</sup>lt;sup>57</sup> Ministry of Housing, Communities and Local Government (2019). Climate change. (see https://www.gov.uk/guidance/climate-change)

<sup>&</sup>lt;sup>58</sup> Ministry of Housing, Communities and Local Government (2015). Renewable and low carbon energy. (see <a href="https://www.gov.uk/guidance/renewable-and-low-carbon-energy">https://www.gov.uk/guidance/renewable-and-low-carbon-energy</a>)

<sup>&</sup>lt;sup>59</sup> HM Government (2021) Environment Act 2021. (see <a href="https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted">https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

- Environmental Improvement Plans, including interim targets.
- A cycle of environmental monitoring and reporting.
- Environmental Principles embedded in domestic policy making.
- Office for Environmental Protection to uphold environmental law.

**C.55** The **British energy security strategy** (2022)<sup>60</sup> sets out how the UK will enhance its energy security, setting out plans for future deployment of wind, new nuclear, solar and hydrogen, and for supporting the production of domestic oil and gas in the nearer term. The strategy builds on the Prime Minister's 'Ten point plan for a green industrial revolution', and the 'Net zero strategy'. Key aims and commitments include:

- New commitments to supercharge clean energy and accelerate deployment, which could see 95% of Great Britain's electricity set to be low carbon by 2030.
- Supporting over 40,000 more jobs in clean industries, totalling 480,000 jobs by 2030.
- Accelerated expansion of nuclear, wind, solar, hydrogen, oil and gas, including delivering the equivalent to one nuclear reactor a year instead of one a decade.
- Offshore wind aim of providing up to 50GW by 2030, of which 5GW is planned to be from floating offshore wind in deeper seas. This is aimed to be underpinned by new planning reforms to cut the approval times for new offshore wind farms from four years to one year and an overall streamlining which will aims to reduce the time it takes for new projects to reach construction stages while improving the environment.
- Oil and gas a licensing round for new North Sea oil and gas projects is planned to launch in Autumn, with a new taskforce providing bespoke support to new developments.
- Onshore wind The Government plans to consult on developing partnerships with a limited number of supportive communities who wish to host new onshore wind infrastructure in return for guaranteed lower energy bills.

**C.56** The **Net Zero Strategy: Build Back Greener** (2021)<sup>61</sup> sets out policies and proposals for decarbonising all sectors of the UK economy to meet net zero targets by 2050. It sets out strategies to keep the UK on track with carbon budgets, outlines the National Determined Contribution (NDC) and sets out the vision for a decarbonised economy in 2050. Its focus includes:

- Policies and proposals for reducing emissions across the economy in key sectors (power, fuel supply and hydrogen, industry, heat and buildings, transport, natural gas and waste).
- Policies and proposals for supporting transition across the economy through innovation, green investment, green jobs, embedding net-zero in government, local climate action, empowering people and businesses, and international leadership and collaboration.

**C.57** The **Carbon Budget Delivery Plan** (2023)<sup>62</sup> explains how the government intends to meet its legally-binding climate goals, setting out a package of quantified and unquantified proposals and policies, and associated timescales and delivery risks this also includes:

- wider matters in connection with carbon budgets;
- the contribution of these proposals and policies to sustainable development; and
- the impact the package has on sectors of the economy.

<sup>60</sup> Department for Business, Energy & Industrial Strategy and Prime Minister's Office, 10 Downing Street (2022) British energy security strategy (see: <a href="https://www.gov.uk/government/publications/british-energy-security-strategy">https://www.gov.uk/government/publications/british-energy-security-strategy</a>)
61 Department for Business, Energy and Industrial Strategy (2024) Net Zero Strategy

<sup>61</sup> Department for Business, Energy and Industrial Strategy (2021). Net Zero Strategy: Build Back Greener. (see https://www.gov.uk/government/publications/net-zero-strategy)
62 Department for Energy Security and Net Zero (2022). On the Park Security and Net Zero (2022).

<sup>&</sup>lt;sup>62</sup> Department for Energy Security and Net Zero (2023). Carbon Budget Delivery Plan. (see <a href="https://www.gov.uk/government/publications/carbon-budget-delivery-plan">https://www.gov.uk/government/publications/carbon-budget-delivery-plan</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

C.58 Powering up Britain (2023)<sup>63</sup> is a collection of policy documents relating to climate change, setting out the department's approach to energy security and net zero. In particular, Powering up Britain includes four key areas of action:

- decarbonising electricity generation;
- improving energy efficiency;
- electrifying transport; and
- and developing low-carbon heating

C.59 The Energy Security Plan (2023)<sup>64</sup> sets out the steps that the government is taking to improve the UK's energy system resilience, particularly in the current geopolitical context. Key commitments include:

- Looking at the role gas storage and other sources of flexibility can play in gas security;
- Delivery of energy efficiency upgrades through the Great British Insulation Scheme;
- Extension of the Boiler Upgrade Scheme to 2028; and
- Setting up Great British Nuclear to lead delivery of the new nuclear programme.
- Launching a competitive process to select the best Small Modular Reactor technologies.
- Launching the Floating Offshore Wind Manufacturing Investment Scheme, to provide up to £160 million investment in port infrastructure projects.
- Publishing action plans on reducing the development time for transmission network projects and on accelerating electricity network connections.
- Announcing the Track-1 negotiation project list of carbon capture usage and storage (CCUS) projects, launching a process to expand Track-1 clusters and establishing two further (Track-2) CCUS clusters.
- Announcing a shortlist of projects for the first electrolytic hydrogen production allocation round.
- Announcing successful applicants of the first competition window for Strands 1 and 2 of the Net Zero Hydrogen Fund (development and capital co-funding) and launching a second competition window.
- Consulting on revised energy National Policy Statements which underline the national need for new energy infrastructure with the intention of expediting planning processes.

C.60 The Net Zero Growth Plan (2023)<sup>65</sup> outlines the Government's plans to reach net zero and unlock the financial benefits that this can bring. Key commitments include:

- Publishing an addendum to the Resources and Waste Strategy which will focus on net zero and include a plan to achieve the near elimination of biodegradable municipal waste going to landfill.
- Responding to the consultation on a revised Waste Prevention Programme for England alongside the new programme 'Maximising Resources, Minimising Waste'.
- Providing up to £20 billion of funding for early deployment of CCUS to unlock private investment and jobs.
- Consulting on an ambitious Zero Emission Vehicle mandate, publishing the Low Carbon Fuels Strategy in 2023, and legislating to include recycled carbon and nuclear derived fuels in renewables transport fuel schemes.
- Consulting on transition planning disclosure requirements for the UK's largest companies and the UK Green Taxonomy, as well as on steps and interventions needed to support the growth of high integrity voluntary markets and to protect against greenwashing.

65 Ibid

<sup>63</sup> Department for Energy Security and Net Zero (2023). Powering up Britain. (see https://www.gov.uk/government/publications/powering-upbritain) 64 Ibid

Enfield Local Plan: Integrated Impact Assessment December 2023

- Introducing a regulatory framework for heat networks, beginning the implementation of heat network zoning by 2025, and confirming funding of £15 million for the 2023/24 Home Decarbonisation Skills Competition and the £5 million Heat Training Grant for heat pump and heat network skills. Growth and decarbonisation of the UK heat network market will continue through the Green Heat Network Fund and the Heat Network Efficiency Scheme, including £220 million for the Heat Network Transformation Programme over 2025/6 and 2026/7.
- Considering options for integrating greenhouse gas removals in the UK Emissions Trading Scheme.
- Publishing the Biomass Strategy in 2023, which will outline the role that bioenergy with carbon capture and storage (BECCS) can play in reducing carbon emissions.
- Taking forward the next steps in the Review of Electricity Market Arrangements.

**C.61** The **UK Hydrogen Strategy** (2021)<sup>66</sup> sets out the Government's approach to developing a thriving low carbon hydrogen sector in the UK, with the ambition for 5GW of capacity by 2030. The Strategy outlines the role of hydrogen in meeting net zero targets, the existing opportunity within the UK, a strategic framework, a roadmap for the economy, and the UK Government's commitments for a hydrogen economy.

**C.62** The **Industrial Decarbonisation Strategy** (2021)<sup>67</sup> aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy builds in the Prime Minister's 10 Point Plan for a Green Industrial Revolution and sets out the Government's vision for the manufacturing and construction sector and is part of the Government's path to net zero by 2050.

**C.63** The Strategy aims to reduce emissions by two-thirds in just 15 years and support up to 80,000 jobs over the next 30 years and includes measures to produce 20 terawatt hours of the UK industry's energy supply from low carbon alternatives by 2030. It also aims to introduce new rules on measuring the energy and carbon performance of the UK's largest commercial and industrial buildings, providing potential savings to businesses of around £2 billion per year in energy costs in 2030 and aiming to reduce annual carbon emissions by over 2 million tonnes – approximately 10% of their current emissions.

C.64 Other key commitments within the Strategy include:

- The use of carbon pricing to drive changes in industry to focus on emissions in business and investment decisions.
- To establish a policy framework to accelerate the switch from fossil fuels to low carbon alternatives such as hydrogen, electricity, or biomass.
- New product standards, enabling manufacturers to clearly distinguish their products from high carbon competitors.
- To ensure the land planning regime is fit for building low carbon infrastructure.
- Support the skills transition so that the UK workforce benefits from the creation of new green jobs.
- An expectation that at least 3 megatons of CO₂ is captured within industry per year by 2030.
- That by 2050, there will be zero avoidable waste of materials across heavy industries.

**C.65** The **Heat and Buildings Strategy** (2021)<sup>68</sup> sets out the Government's plan to significantly cut carbon emissions from the UK's 30 million homes and workplaces. This Strategy aims to provide a clear direction of travel for the 2020s, set out the strategic decisions that need to be taken this decade, and demonstrate how the UK plans to meet its carbon targets and remain on track for net zero by 2050.

C.66 Key aims of the Strategy include:

Reduce direct emissions from public sector buildings by 75% against a 2017 baseline by the end of carbon budget 6.

<sup>66</sup> Department for Business, Energy & Industrial Strategy (2022) UK Hydrogen Paper (see <a href="https://www.gov.uk/government/publications/uk-hydrogen-strategy">https://www.gov.uk/government/publications/uk-hydrogen-strategy</a>)
67 Department for Business, Energy & Industrial Strategy (2021) Industrial department for Business, Energy & Industrial Strategy (2021) Industrial department for Business, Energy & Industrial Strategy (2021) Industrial department for Business, Energy & Industrial Strategy (2021) Industrial department for Business, Energy & Industrial Strategy (2021) Industrial department for Business, Energy & Industrial Strategy (2021) Industrial department for Business (2021) Industrial Strategy (2021)

<sup>68</sup> Department for Business, Energy & Industrial Strategy (2021) Industrial decarbonisation strategy (see <a href="https://www.gov.uk/government/publications/industrial-decarbonisation-strategy">https://www.gov.uk/government/publications/industrial-decarbonisation-strategy</a>)
68 Department for Business, Energy & Industrial Strategy (2021). Heat and Buildings Strategy. (see

<sup>&</sup>lt;sup>68</sup> Department for Business, Energy & Industrial Strategy (2021). Heat and Buildings Strategy. (see <a href="https://www.gov.uk/government/publications/heat-and-buildings-strategy">https://www.gov.uk/government/publications/heat-and-buildings-strategy</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

- Significantly reduce energy consumption of commercial and industrial buildings by 2030.
- Phase out the installation of new natural gas boilers beyond 2035.
- Significantly grow the supply chain for heat pumps to 2028: from installing around 35,000 hydronic heat pumps a year to a minimum market capacity of 600,000 per year by 2028.
- Reduce the costs of installing a heat pump by at least 25-50% by 2025 and to ensure heat pumps are no more expensive to buy and run than gas boilers by 2030.
- Achieve 30-fold increase in heat pumps manufactured and sold within the UK by the end of the decade.
- Grow the market for heat pumps notably via a £450 million Boiler Upgrade Scheme to support households who want to switch with £5,000 grants.
- Improve heat pump appeal by continuing to invest in research and innovation, with the £60 million Net Zero Innovation Portfolio 'Heat Pump Ready' Programme supporting the development of innovation across the sector.
- Ensure all new buildings in England are ready for Net Zero from 2025. To enable this, new standards will be introduced through legislation to ensure new homes and buildings will be fitted with low-carbon heating and high levels of energy efficiency.
- Establish large-scale trials of hydrogen for heating, including a neighbourhood trial by 2023.
- Ensure as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030.
- Support social housing, low income and fuel poor households via boosting funding for the Social Housing Decarbonisation Fund and Home Upgrade Grant, which aim to improve the energy performance of low income households' homes, support low carbon heat installations and build the green retrofitting sector to benefit all homeowners.
- Scale up low-carbon heat network deployment and to enable local areas to deploy heat network zoning, Heat Network Transformation Programme of £338 million (over 2022/23 to 2024/25).

**C.67 The Energy Performance of Buildings Regulations 2021**<sup>69</sup> seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

**C.68** The **Energy white paper: Powering our net zero future** (2020)<sup>70</sup> builds on the Prime Minister's Ten point plan for a green industrial revolution. The white paper addresses the transformation of the UKs energy system, promoting high-skilled jobs and clean, resilient economic growth during its transition to net-zero emissions by 2050.

C.69 Key aims of the paper include:

- Supporting green jobs The Government aims to support up to 220,000 jobs in the next 10 years. Several will be supported via a "major programme" that will see the retrofitting of homes for improved energy efficiency and clean heat.
- Transforming the energy system To transform its electricity grid for net-zero, the white paper highlights how this will involve changing the way the country heats its homes, how people travel, doubling the electricity use, and harnessing renewable energy supplies.
- Keeping bills affordable The Government aims to do this by making the energy retail market "truly competitive". This will include offering people a simple method of switching to a cheaper energy tariff and testing automatically switching consumers to fairer deals to tackle "loyalty penalties".

<sup>&</sup>lt;sup>69</sup> HM Government (2021). The Energy Performance of Buildings Regulations. (see https://www.legislation.gov.uk/uksi/2012/3118/contents/made)

https://www.legislation.gov.uk/uksi/2012/3118/contents/made).

To Department for Business, Energy & Industrial Strategy (2020). Energy white paper: Powering our net zero future. (see https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future)

Enfield Local Plan: Integrated Impact Assessment December 2023

- Generating emission-free electricity by 2050 The Government aims to have "overwhelmingly decarbonised power" in the 2030s in order to generate emission-free electricity by 2050.
- Establishing UK Emissions Trading Scheme The Government aims to establish a UK Emissions Trading Scheme (UK ETS) from 1st January 2021 to replace the current EU ETS at the end of the Brexit Transition Period.
- Exploring new nuclear financing options The Government said it is continuing to explore a range of financing options for new nuclear with developers including the Regulated Asset Base (RAB) funding model.
- Further commitments to offshore wind The white paper lays out plans to scale up its offshore wind fleet to 40 gigawatts (GW) by 2030, including 1GW of floating wind, enough to power every home in the country.
- Carbon capture and storage investments Including £1bn worth of investments in state-of-the-art CCS in four industrial clusters by 2030. With four low-carbon clusters set up by 2030, and at least one fully net-zero cluster by 2040.
- Kick-starting the hydrogen economy The Government plans to work with industry to aim for 5GW of production by 2030, backed up by a new £240m net-zero Hydrogen Fund for low-carbon hydrogen production.
- Investing in electric vehicle charge points The Government plans to invest £1.3bn to accelerate the rollout of charge points for electric vehicles as well as up to £1bn to support the electrification of cars, including for the mass-production of the batteries needed for electric vehicles.
- Supporting the lowest paid with their bills The government aims to support those with lower incomes through a £6.7bn package of measures that could save families in old inefficient homes up to £400. This includes extending the Warm Home Discount Scheme to 2026 to cover an extra three quarters of a million households and giving eligible households £150 off their electricity bills each winter.
- Moving away from fossil fuel boilers The Government aims, by the mid-2030s, for all newly installed heating systems to be low-carbon or to be appliances that it is confident can be converted to a clean fuel supply.
- Supporting North Sea oil and gas transition The white paper notes the importance of supporting the North Sea oil and gas transition for the people and communities most affected by the move away from fossil fuels. The Government aims to achieve this by ensuring that the expertise of the oil and gas sector be drawn on in developing carbon capture and storage, and hydrogen production to provide new green jobs for the future.

C.70 Flood and Coastal Erosion Risk Management: Policy Statement (2020)<sup>71</sup> sets out the Government's long-term ambition to create a nation more resilient to future flood and coastal erosion risk, and in doing so, reduce the risk of harm to people, the environment and the economy. The Policy Statement sets out five policy areas which will drive this ambition. These are:

- Upgrading and expanding our national flood defences and infrastructure;
- Managing the flow of water more effectively;
- Harnessing the power of nature to reduce flood and coastal erosion risk and achieve multiple benefits;
- Better preparing our communities; and
- Enabling more resilient places through a catchment-based approach.

C.71 The Flood and Water Management Act 2010<sup>72</sup> and The Flood and Water Regulations 2019<sup>73</sup> set out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

<sup>71</sup> HM Government (2020) Flood and coastal erosion risk management: policy statement.(https://www.gov.uk/government/publications/floodand-coastal-erosion-risk-management-policy-statement)

72 HM Government (2040) First Indianatement

HM Government (2010). Flood and Water Management Act. (see https://www.legislation.gov.uk/ukpga/2010/29/contents)

<sup>73</sup> HM Government (2019). The Flood and Water Regulations. (see https://www.legislation.gov.uk/ukdsi/2019/9780111176283/contents)

Enfield Local Plan: Integrated Impact Assessment December 2023

**C.72** The **25 Year Environment Plan**<sup>74</sup> sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Actions relating to climate change are as follows:

- Using and managing land sustainably:
  - Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
- Protecting and improving our global environment:
  - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

**C.73** The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting (2018)<sup>75</sup> sets out visions for the following sectors:

- People and the Built Environment "to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate".
- Infrastructure "an infrastructure network that is resilient to today's natural hazards and prepared for the future changing climate".
- Natural Environment "the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides".
- Business and Industry "UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change".
- Local Government "Local government plays a central in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate".

**C.74 UK Climate Change Risk Assessment** (2017)<sup>76</sup> sets out six priority areas needing urgent further action over the next five years. These include:

- flooding and coastal change risks to communities, businesses and infrastructure;
- health, well-being and productivity from high temperatures;
- shortages in public water supply, and for agriculture, energy generation and industry with impacts on freshwater ecology;
- natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- domestic and international food production and trade; and
- new and emerging pests and diseases and invasive non-native species affecting people, plants and animals.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/727252/national-adaptation-programme-2018.pdf)

HM Government, 2018. A Green Future: Our 25 Year Plan to Improve the Environment. (see <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/693158/25-year-environment-plan.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/693158/25-year-environment-plan.pdf</a>)
 HM Government (2018). The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate. (see

<sup>&</sup>lt;sup>76</sup> HM Government (2017). UK Climate Change Risk Assessment 2017. (see <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/584281/uk-climate-change-risk-assess-2017.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/584281/uk-climate-change-risk-assess-2017.pdf</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

C.75 The Energy Efficiency Strategy (2012)<sup>77</sup> aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

C.76 The national flood and coastal erosion risk management strategy for England (2011)<sup>78</sup> sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

- Manage the risk to people and their property.
- Facilitate decision-making and action at the appropriate level individual, community or local authority, river catchment, coastal cell or national.
- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

C.77 The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009)<sup>79</sup> sets out a five-point plan to tackle climate change. The points are as follows: protecting the public from immediate risk; preparing for the future; limiting the severity of future climate change through a new international climate agreement; building a low carbon UK; and supporting individuals, communities and businesses to play their part.

C.78 The UK Renewable Energy Strategy (2009)<sup>80</sup> describes the ways in which we will tackle climate change by reducing our CO<sub>2</sub> emissions through the generation of a renewable electricity, heat and transport technologies.

C.79 The Climate Change Act 2008<sup>81</sup> sets targets for UK greenhouse gas emission reductions of at least 80% by 2050, against a 1990 baseline.

C.80 The Planning and Energy Act 200882 enables local planning authorities to set requirements for carbon reduction and renewable energy provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

## Sub-national

C.81 The London Plan (2021)<sup>83</sup> promotes the move towards a zero-carbon city by 2050 through achieving sustainable development and addressing both climate change and its consequences. Amongst the promotion of natural solutions such as green infrastructure and sustainable drainage systems, the Plan provides opportunities to increase energy efficiency, including through the use of smart technologies, and utilising low carbon energy sources. It further promotes creating a low carbon circular economy, in which the greatest possible value is extracted from resources before they become waste.

C.82 The London Environment Strategy (2018)84 seeks to address environmental challenges and promote sustainability in London. The strategy focuses on key areas including air quality, green spaces, waste reduction, energy efficiency, and transportation. It sets ambitious goals for improving air quality, increasing green cover, reducing waste, and transitioning to a low-carbon economy.

C.83 'Be seen' energy monitoring guidance (2021) explains how developers and owners of new major developments should monitor and report actual operational energy performance to comply with London Plan Policy SI 2: Minimising greenhouse gas

https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/228898/9780108510366.pdf)

<sup>77</sup> Department of Energy & Climate Change (2012). The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/65602/6927-energy-efficiency-strategy--the-

energy-efficiency.pdf)

78 HM Government (2011). Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England. (see

<sup>&</sup>lt;sup>79</sup> HM Government (2009). The UK Low Carbon Transition Plan. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/228752/9780108508394.pdf)

80 HM Government (2009). The UK Renewable Energy Strategy. (see <a href="https://www.gov.uk/government/publications/the-uk-renewable-energy-">https://www.gov.uk/government/publications/the-uk-renewable-energy-</a>

HM Government (2008). Climate Change Act 2008. (see https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga 20080027 en.pdf)

<sup>82</sup> HM Government (2008). Planning and Energy Act 2008. (see <a href="https://www.legislation.gov.uk/ukpga/2008/21/section/1">https://www.legislation.gov.uk/ukpga/2008/21/section/1</a>)

<sup>83</sup> Greater London Authority (2021). The London Plan. (see https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-londonplan-2021-table-contents)

Greater London Authority (2018) London Environment Strategy. (see https://www.london.gov.uk/sites/default/files/london\_environment\_strategy\_0.pdf)

Enfield Local Plan: Integrated Impact Assessment December 2023

emissions, i.e. the 'be seen' element of the energy hierarchy. The guidance works towards bridging the 'performance gap' between design theory and actual energy use.

**C.84 Circular Economy Statement Guidance** (2022)<sup>85</sup> puts circular economy principles at the heart of designing new buildings, requiring buildings that can more easily be dismantled and adapted over their lifetime. It treats building materials as resources rather than waste, and puts in place a clear hierarchy, prioritising the retention of existing structures above demolition, where this is the more sustainable and appropriate approach.

**C.85** The guidance applies to the largest developments in London that are referable to the Mayor, as required by London Plan Policy 2021 SI 7: Reducing waste and supporting the circular economy, however boroughs are encouraged to apply the policies for smaller developments.

**C.86 Energy Assessment Guidance** (2022)<sup>86</sup> provides information for planning applicants on how to comply with the London Plan climate mitigation policies.

**C.87 Carbon Offset Guidance** (2022)<sup>87</sup>, which is primarily for local authorities, explains how to set up a carbon offset fund and how these funds may be spent.

**C.88 Whole Life-Cycle Carbon Assessments Guidance** (2022) explains how to comply with the requirement in Policy SI 2: Minimising greenhouse gas emissions (F) for all referable planning applications to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture a development's carbon impact.

# Implications of the policy review

**C.89** In order to align with the international and national policies outlined above, the Local Plan should help to ensure that new development is energy efficient and promotes the use of sustainable construction methods and materials, as well as reduce their carbon emissions. The Local Plan should also ensure that risk from all sources of flooding as a result of climate change is managed effectively and ensure that development is resilient to future flooding, as well as improve the transport network across the Plan area including by encouraging a modal shift towards public transport, walking and cycling, and reduce the need to travel by car. The IIA is able to respond to this through the inclusion of IIA objectives relating to the mitigation of climate change and adaptation to climate change, sustainable construction, flooding and sustainable transport.

# Population, communities, health and wellbeing

## International

**C.90** The **2030 Agenda for Sustainable Development** (2015)<sup>88</sup> initiative, adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 1: No Poverty;
- SDG 2: Zero Hunger;
- SDG 3: Good Health and Well-being;
- SDG 4: Quality Education;
- SDG 5: Gender Equality;

https://www.london.gov.uk/sites/default/files/gla\_carbon\_offsetting\_guidance\_2022.pdf)

Greater London Authority (2022). Whole Life-Cycle Carbon Assessments guidance. (see <a href="https://www.london.gov.uk/sites/default/files/lpg">https://www.london.gov.uk/sites/default/files/lpg</a> - wlca guidance.odf)

wlca guidance.pdf)

88 United Nations Department of Economic and Social Affairs (2015) The 2030 Agenda for Sustainable Development. (see <a href="https://sdgs.un.org/2030agenda">https://sdgs.un.org/2030agenda</a>)

<sup>&</sup>lt;sup>85</sup> Greater London Authority (2022). Circular Economy Statement Guidance. (see <a href="https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance">https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance</a>)

<sup>86</sup> Greater London Authority (2022). Energy Assessment Guidance. (see https://www.london.gov.uk/media/12774/download?attachment)

<sup>&</sup>lt;sup>87</sup> Greater London Authority (2022). Carbon Offset Guidance. (see

Enfield Local Plan: Integrated Impact Assessment December 2023

- SDG 10: Reduced Inequalities; and
- SDG 11: Sustainable Cities and Communities.

**C.91 The United Nations Declaration on Sustainable Development (Johannesburg Declaration)** (2002)<sup>89</sup> sets the broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

C.92 United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') (1998)<sup>90</sup> establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

**C.93** The **Declaration on Forests and Land Use (COP26 Declaration) (2021)**<sup>91</sup> is an international commitment to halt and reverse forest loss and land degradation by 2030, while delivering sustainable development and promoting an inclusive rural transformation.

#### **National**

C.94 The NPPF (2023)<sup>92</sup> includes as part of its social objective the promotion of "strong, vibrant and healthy communities" by:

- "ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and
- by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing".

C.95 Ultimately planning policies and planning decision making should "aim to achieve healthy, inclusive and safe places".

**C.96** The document states that strategic policies should set out the pattern, scale and quality of development and make sufficient provision for "housing (including affordable housing) ... [as well as] community facilities (such as health, education and cultural infrastructure)." Policies should reflect "the size, type and tenure of housing needed". This policy approach is to include but should not be limited to housing requirements relating to affordable homes, families with children, older people, students, people with disabilities, service families, travellers, those who rent their homes and people wishing to commission the construction of their own homes. Major developments that involve the provision of new housing planning policies and decisions should expect at least 10% of the total number of homes to be delivered for affordable home ownership subject to conditions and exemptions.

**C.97** To help to diversify opportunities for builders, promote a better mix of site sizes and increase the number of schemes that can be built-out quickly to meet housing need, the NPPF states that at least 10% of the sites allocated for housing through a local authority's plan should be no larger than a hectare.

**C.98** Where there is an identified need, development of sites not already allocated for housing to provide entry-level homes suitable for first-time buyers is to be supported by local planning authorities unless such need is already to be met at other locations within the authority area. These sites should comprise of entry-level homes that offer one or more types of affordable housing.

**C.99** The document also promotes a theme of enhancing healthy and safe communities which is to be achieved by creating places which "promote social interaction (and) enable and support healthy lifestyles".

<sup>&</sup>lt;sup>89</sup> United Nations (2002) Declaration on Sustainable Development (Johannesburg Declaration). (see <a href="https://www.un.org/esa/sustdev/documents/WSSD\_POI\_PD/English/POI\_PD.htm">https://www.un.org/esa/sustdev/documents/WSSD\_POI\_PD/English/POI\_PD.htm</a>)

<sup>&</sup>lt;sup>90</sup> United Nations (1998) Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters. (see <a href="https://unece.org/DAM/env/pp/documents/cep43e.pdf">https://unece.org/DAM/env/pp/documents/cep43e.pdf</a>)

<sup>91</sup> United Nations (2021). Declaration on Forests and Land Use. (see https://ukcop26.org/glasgow-leaders-declaration-on-forests-and-land-use/)

<sup>92</sup> Department for Levelling Up, Housing and Communities (2023). National Planning Policy Framework.

 $<sup>(</sup>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/1182995/NPPF\_Sept\_23.pdf)$ 

Enfield Local Plan: Integrated Impact Assessment December 2023

**C.100** As part of this approach social, recreational and cultural facilities and services that the community needs should be provided guided by planning policies which:

- "plan positively provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services;
- support the delivery of local strategies to improve health, social and cultural wellbeing for all sections of the community;
- help prevent unnecessary loss of valued facilities and services".

**C.101** Plan making through the guidance of the NPPF recognises the important role of access to open spaces and other facilities which provide opportunities for sport and physical activity in terms of the health and wellbeing of communities. The importance of delivering a sufficient choice of school places to meet the needs of existing and new communities is also recognised in the document and local planning authorities should take a "proactive, positive and collaborative approach to meeting this requirement".

**C.102** The NPPF also sets out that the standard method provided in national planning guidance should be used to undertake a local housing need assessment identifying the minimum number of homes needed. The **Housing Delivery Test Measurement Rule Book** (2018)<sup>93</sup> provides this standard method allowing for calculation of objectively assessed housing need using government household forecasts adjusted for local house prices and local earnings. Unmet need from neighbouring areas will also need to be taken into account as part of the calculation.

C.103 The NPPF is supported by Planning Practice Guidance relating to:

- **Housing needs of different groups** (2021)<sup>94</sup> provides advice on planning for affordable, private rented, self-build, student and rural housing needs.
- **Healthy and safe communities** (2019)<sup>95</sup> provides guidance on achieving healthy, safe and inclusive communities, estate regeneration and school place provision.
- Housing supply and delivery (2019)<sup>96</sup> sets out guidance on five-year land supply and Housing Delivery Test.
- **Housing for older and disabled people** (2019)<sup>97</sup> provides guidance on preparing planning policies for accessible and adaptable housing and inclusive design.
- Noise (2019)<sup>98</sup> advises on how planning can manage potential noise impacts in new development.
- Light pollution (2019)<sup>99</sup> advises on how to consider artificial light within the planning system.
- Open space, sports and recreation facilities, public rights of way and local green space (2014)<sup>100</sup> provides key advice on open space, sports, recreation, public rights of way, National Trails and the Local Green Space designation.

**C.104** The **Levelling Up the United Kingdom White Paper** (2022)<sup>101</sup> sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to population, health and wellbeing state that by 2030:

 $\underline{\text{https://www.gov.uk/government/publications/levelling-up-the-united-kingdom)}}$ 

<sup>&</sup>lt;sup>93</sup> Ministry of Housing, Communities and Local Government (2018). Housing Delivery Test Measurement Rule Book. (see <a href="https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book">https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book</a>)

<sup>&</sup>lt;sup>94</sup> Ministry of Housing, Communities and Local Government (2021). Housing needs of different groups. (see <a href="https://www.gov.uk/guidance/housing-needs-of-different-groups#addressing-the-need-for-different-types-of-housing">https://www.gov.uk/guidance/housing-needs-of-different-groups#addressing-the-need-for-different-types-of-housing</a>)

<sup>&</sup>lt;sup>95</sup> Ministry of Housing, Communities and Local Government (2019). Healthy and Safe communities. (see <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a>)

96 Ministry of Housing, Communities and Local Government (2019). Housing supply and delivery. (see <a href="https://www.gov.uk/guidance/housing-">https://www.gov.uk/guidance/housing-</a>

<sup>&</sup>lt;sup>96</sup> Ministry of Housing, Communities and Local Government (2019). Housing supply and delivery. (see <a href="https://www.gov.uk/guidance/housingsupply-and-delivery">https://www.gov.uk/guidance/housingsupply-and-delivery</a>)

<sup>97</sup> Ministry of Housing, Communities and Local Covernment (2010). Hereign for the provided in the contract of the provided in the provided

<sup>&</sup>lt;sup>97</sup> Ministry of Housing, Communities and Local Government (2019). Housing for older and disabled people. (see https://www.gov.uk/guidance/housing-for-older-and-disabled-people)

<sup>&</sup>lt;sup>98</sup> Ministry of Housing, Communities and Local Government (2019). Noise. (see <a href="https://www.gov.uk/guidance/noise--2">https://www.gov.uk/guidance/noise--2</a>)

<sup>&</sup>lt;sup>99</sup> Ministry of Housing, Communities and Local Government (2019). Light pollution. (see <a href="https://www.gov.uk/guidance/light-pollution">https://www.gov.uk/guidance/light-pollution</a>)

<sup>100</sup> Ministry of Housing, Communities and Local Government (2014). Open space, sports and recreation facilities, public rights of way and local green space. (see https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space)
101 Department for Levelling Up, Housing and Communities (2022). White Paper Levelling Up the United Kingdom. (see

Enfield Local Plan: Integrated Impact Assessment December 2023

- The gap in Healthy Life Expectancy (HLE) between local areas where it is highest and lowest will have narrowed, and by 2035 HLE will rise by five years.
- Well-being will have improved in every area of the UK, with the gap between top performing and other areas closing.
- Homicide, serious violence, and neighbourhood crime will have fallen, focused on the worst-affected areas.
- Pride in place, such as people's satisfaction with their town centre and engagement in local culture and community, will have risen in every area of the UK, with the gap between the top performing and other areas closing.
- The number of primary school children achieving the expected standard in reading, writing and maths will have significantly increased. In England, this will mean 90% of children will achieve the expected standard, and the percentage of children meeting the expected standard in the worst performing areas will have increased by over a third.
- Renters will have a secure path to ownership with the number of first-time buyers increasing in all areas: and the Government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas.

C.105 The Levelling Up and Regeneration Act (2023)<sup>102</sup> sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Act also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as 'Environmental Outcomes Reports'.

C.106 National Design Guide (2021)<sup>103</sup> sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources, and lifespan.

C.107 Build Back Better: Our Plan for Health and Social Care (2021)<sup>104</sup> sets out the Government's new plan for health and social care. It provides an overview of how this plan will tackle the electives backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will improve the integration of health and social care. It explains the government's plan to introduce a new Health and Social Care Levy.

C.108 COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021)<sup>105</sup> sets out the Government's plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental wellbeing, to take action to address factors which play a crucial role in shaping mental health and wellbeing outcomes and, to support services to meet the need for specialist support.

C.109 A fairer private rented sector White Paper (2022)<sup>106</sup> aims to build upon the vision of the Levelling Up White Paper and reform the Private Rented Sector and improve housing quality. It outlines that everyone deserves a secure and decent home and outlines measures to improve the experience of renters in the Private Rented Sector.

C.110 The Charter for Social Housing Residents: Social Housing White Paper (2020)<sup>107</sup> sets out the Government's actions to ensure residents in social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.

Department of Health and Social Care (2021). Build Back Better: Our Plan for Health and Social Care. (see

https://www.gov.uk/government/publications/build-back-better-our-plan-for-health-and-social-care)

Department for Levelling Up, Housing and Communities (2022). A fairer private rented sector. (see

<sup>&</sup>lt;sup>102</sup> UK Parliament (2023). Levelling Up and Regeneration Act. (see https://bills.parliament.uk/bills/3155)

<sup>&</sup>lt;sup>103</sup> Ministry of Housing, Communities and Local Government (2021). National Design Guide. (see https://www.gov.uk/government/publications/national-design-guide)

Department for Health and Social Care and Cabinet Office (2021). COVID-19 mental health and wellbeing recovery action plan. (see https://www.gov.uk/government/publications/covid-19-mental-health-and-wellbeing-recovery-action-plan)

https://www.gov.uk/government/publications/a-fairer-private-rented-sector/a-fairer-private-rented-sector#executive-summary)

Ministry of Housing, Community and Local Government (2020). The charter for social housing residents: social housing white paper. (see https://www.gov.uk/government/publications/the-charter-for-social-housing-residents-social-housing-white-paper#full-publication-update-history)

Enfield Local Plan: Integrated Impact Assessment December 2023

C.111 Using the planning system to promote healthy weight environments (2020)<sup>108</sup>, Addendum (2021)<sup>109</sup> provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1st September 2020.

C.112 Public Health England, PHE Strategy 2020-25 (2019)<sup>110</sup> identifies PHE's priorities upon which to focus over this fiveyear period to protect people and help people to live longer in good health.

C.113 The 25 Year Environment Plan<sup>111</sup> (2018) sets out goals for improving the environment over the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. The document identifies six key areas upon which action will be focused. Those of relevance to the topics of population growth, health and wellbeing are 'using and managing land sustainably' and 'connecting people with the environment to improve health and wellbeing':

- Using and managing land sustainably:
  - Embed an 'environmental net gain' principle for development, including housing and infrastructure.
- Connecting people with the environment to improve health and wellbeing:
  - Help people improve their health and wellbeing by using green spaces including through mental health services.
  - Encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas.
  - 'Green' our towns and cities by creating green infrastructure and planting one million urban trees.

C.114 The Homes England Strategic Plan 2018 to 2023 (2018)<sup>112</sup> sets out a vision to ensure more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

C.115 The Environmental Noise Regulations 113 apply to environmental noise, mainly from transport. The Regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

C.116 The Housing White Paper 2017 (Fixing our broken housing market)<sup>114</sup> sets out ways to address the shortfall in affordable homes and boost housing supply. The White Paper focuses on the following:

Planning for the right homes in the right places - Higher densities in appropriate areas, protecting the Green Belt while making more land available for housing by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements.

<sup>108</sup> Public Health England (2020). Guidance and supplementary planning document template for local authority public health and planning teams. (https://www.gov.uk/government/publications/healthy-weight-environments-using-the-planning-system)

<sup>&</sup>lt;sup>109</sup> Public Health England (2021). Addendum: Hot food takeaways use in the new Use Class Order.

<sup>(</sup>https://www.gov.uk/government/publications/healthy-weight-environments-using-the-planning-system/addendum-hot-food-takeaways-use-inthe-new-use-class-order)

<sup>&</sup>lt;sup>110</sup> Public Health England (2019). PHE Strategy 2020-25. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/831562/PHE\_Strategy\_2020-25.pdf)

<sup>&</sup>lt;sup>1</sup> HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/693158/25-year-environment-plan.pdf) <sup>112</sup> Homes England (2018). Strategic Plan 2018 to 2023. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/752686/Homes\_England\_Strategic\_Plan\_AW REV 150dpi REV.pdf)

113 HM Government (2018). The Environmental Noise (England) Regulations

<sup>114</sup> Department for Communities and Local Government (2017). Fixing our broken housing market. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/590464/Fixing\_our\_broken\_housing\_market\_ -\_print\_ready\_version.pdf)

Enfield Local Plan: Integrated Impact Assessment December 2023

- Building homes faster Improved speed of planning cases, ensuring infrastructure is provided and supporting developers to build out more quickly.
- Diversifying the Market Backing small and medium-sized house builders, custom-build, institutional investors, new contractors, housing associations.
- Helping people now supporting home ownership and providing affordable housing for all types of people, including the most vulnerable.

C.117 Planning Policy for Traveller Sites (2015)<sup>115</sup> sets out the Government's planning policy for traveller sites. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

C.118 Select Committee on Public Service and Demographic Change report Ready for Ageing? (2013)<sup>116</sup> warns that society is underprepared for the ageing population. The report states "longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises". The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

C.119 Fair Society, Healthy Lives (2011)<sup>117</sup> investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities". Marmot Review 10 Years On (2020)<sup>118</sup> revisits Fair Society, Healthy Lives. It found that, since 2010, life expectancy in England has stalled, which suggests society has stopped improving. In addition, there are marked regional differences in life expectancy – the more deprived the area, the shorter the life expectancy. Mortality rates are increasing in those aged 45-49, child poverty has increased and there is a housing crisis and rise in homelessness.

C.120 Laying the foundations: A housing strategy for England (2011)<sup>119</sup> aims to provide support to deliver new homes and improve social mobility.

C.121 Healthy Lives, Healthy People: Our strategy for public health in England (2010)<sup>120</sup> sets out how our approach to public health challenges will:

- Protect the population from health threats led by central government, with a strong system to the frontline.
- Empower local leadership and encourage wide responsibility across society to improve everyone's health and wellbeing and tackle the wider factors that influence it.
- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework.
- Reflect the Government's core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier.

.<u>pdf</u>)

116 Select Committee on Public Service and Demographic Change (2013). Ready for Ageing? (see https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf)

Marmot, M (2011). Fair Society, Healthy Lives: The Marmot Review.

<sup>119</sup> HM Government (2011). Laying the Foundations: A Housing Strategy for England. (see

<sup>&</sup>lt;sup>115</sup> Department for Communities and Local Government (2015). Planning policy for traveller sites. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/457420/Final\_planning\_and\_travellers\_policy

<sup>118</sup> Institute of Health Equity (2020) Health Equity in England: The Marmot Review 10 Years On. (see https://www.instituteofhealthequity.org/resources-reports/marmot-review-10-years-on)

https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/7532/2033676.pdf)

120 HM Government (2010). Healthy Lives, Healthy People: Our strategy for public health in England. (see https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/216096/dh\_127424.pdf)

Enfield Local Plan: Integrated Impact Assessment December 2023

Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a 'ladder' of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.

**C.122** The **Technical Housing Standards – Nationally Described Space Standard** (2015)<sup>121</sup> set out the Government's new nationally described space standard. The standard deals with internal space within new dwellings and sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy, as well as floor areas and dimensions for key parts of the home.

#### **Sub-national**

**C.123 The London Plan** (2021)<sup>122</sup> recognises that London is made up of diverse communities, and seeks to accommodate them with inclusive growth. This includes "the creation of a London where all Londoners, including children and young people, older people, disabled people, and people with young children, as well as people with other protected characteristics, can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation".

**C.124 Accessible London SPG** (2014) provides advice on implementing inclusive design principles effectively, and on creating an accessible environment in London. This SPG has particular emphasis on the access needs of the capital's disabled and older people.

**C.125 Planning for Equality and Diversity in London SPG** (2007) sets out some of the overarching principles that should guide planning for equality in London. It also explores how key spatial planning issues can impact upon equality and diversity.

**C.126 Social Infrastructure SPG** (2015) emphasises the need for planning across services to ensure social infrastructure meets the broader built environment aims of the London Plan. Social infrastructure includes a wide range of services and facilities, including:

- health;
- education;
- community;
- cultural;
- play;
- recreation and sports facilities;
- faith;
- emergency facilities; and
- many other local services and facilities that contribute to quality of life.

#### Implications of the policy review

**C.127** In order to align with the international and national policies outlined above, the Local Plan should help to ensure that the provision of open space and green infrastructure is of sufficient quantity and quality to meet the needs of the Plan area, encourage healthy and active lifestyles, creates fair, safe and inclusive communities, and improves the sustainable transport network within the Plan area. The IIA is able to respond to this through the inclusion of IIA objectives relating to health and wellbeing, social inclusion, and sustainable transport.

<sup>121</sup> Department for Communities and Local Government (2015). Technical Housing Standards – Nationally Described Space Standard. (see <a href="https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard">https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard</a>

122 Greater London Authority (2021). The London Plan. (see <a href="https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents">https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

## **Economy and employment**

#### International

**C.128** The **2030 Agenda for Sustainable Development** (2015)<sup>123</sup>, adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic chapter are:

- SDG 8: Decent Work and Economic Growth;
- SDG 9: Industry, Innovation and Infrastructure; and
- SDG 12: Responsible consumption and production.

**C.129** There are no specific international economic policy agreements relevant to the preparation of the Local Plan and the SA, although there are a large number of trading agreements, regulations and standards that set down the basis of trade with the European Union and other nations.

#### **National**

**C.130** The **NPPF** (2023) contains an economic objective to "help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity".

**C.131** It also requires that planning seeks to "create the conditions in which businesses can invest, expand and adapt" with policies required to "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth". Policies addressing the economy should also seek "to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment".

**C.132** Of particular relevance is the requirement for planning policies to "recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations".

**C.133** Planning policies are also required specifically to address support for the rural economy. Sustainable growth and expansion of all types of business and enterprise in rural areas should be supported, both through conversion of existing buildings and well-designed new buildings, while the diversification of the rural economy and promotion of sustainable rural tourism and leisure developments is also supported.

**C.134** The NPPF also supports the role of town centres as functioning at the heart of local communities. This support is required to provide for a "positive approach to [town centres'] growth, management and adaptation". Included within this support is a requirement to "allocate a range of suitable sites in town centres to meet the scale and type of development needed, looking at least ten years ahead".

C.135 The NPPF is supported by Planning Practice Guidance relating to:

■ **Town centres and retail** (2020)<sup>124</sup> provides guidance on planning for town centre vitality and viability, permitted development, change of use and out of town centre development.

<sup>&</sup>lt;sup>123</sup> United Nations Department of Economic and Social Affairs (2015). The 2030 Agenda for Sustainable Development. (see <a href="https://sdgs.un.org/2030agenda">https://sdgs.un.org/2030agenda</a>)

<sup>&</sup>lt;sup>124</sup> Ministry of Housing, Communities and Local Government (2020). Town centres and retail. (see <a href="https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres">https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

**C.136** The **Levelling Up the United Kingdom White Paper** (2022)<sup>125</sup> sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to economy and employment state that by 2030:

- Pay, employment and productivity will have risen in every area of the UK, with each containing a globally competitive city, with the gap between the top performing and other areas closing.
- The number of people successfully completing high-quality skills training will have significantly increased in every area of the UK. In England, this will lead to 200,000 more people successfully completing high-quality skills training annually, driven by 80,000 more people completing courses in the lowest skilled areas.
- Domestic public investment in Research & Development outside the Greater South East will increase by at least 40% and at least one third over the Spending Review period, with that additional government funding seeking to leverage at least twice as much private sector investment over the long term to stimulate innovation and productivity growth.
- Every part of England that wants one will have a devolution deal with powers at or approaching the highest level of devolution and a simplified, long-term funding settlement.

**C.137** The **Levelling Up and Regeneration Act** (2023)<sup>126</sup> sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Act also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as 'Environmental Outcomes Reports'.

**C.138 Build Back Better: Our Plan for Growth** (2021)<sup>127</sup> sets out a plan to 'build back better' tackling long-term problems to deliver growth that delivers high-quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

**C.139 Agriculture Act 2020**<sup>128</sup> sets out how farmers and land managers in England will be rewarded in the future with public money for "public goods" – such as better air and water quality, thriving wildlife, soil health, or measures to reduce flooding and tackle the effects of climate change, under the Environmental Land Management Scheme. These incentives will provide a vehicle for achieving the goals of the gGovernment's 25 Year Environment Plan and commitment to reach zero emissions by 2050. The Act will help farmers to stay competitive, increase productivity, invest in new technology and seek a fairer return from the marketplace.

**C.140 Agricultural Transition Plan 2021 to 2024**<sup>129</sup> aims to drive competitiveness, increase productivity, reduce carbon emissions, and generate fairer returns across the agricultural industry. The Transition Plan introduces several new schemes to improve the environment, animal health and welfare, and farm resilience and productivity (e.g. grants will be available for sustainable farming practices, creating habitats for nature recovery and making landscape-scale changes such as establishing new woodland and other ecosystem services).

**C.141 UK Industrial Strategy: Building a Britain fit for the future** (2018)<sup>130</sup> lays down a vision and foundations for a transformed economy. Areas including artificial intelligence and big data; clean growth; the future of mobility; and meeting the needs of an ageing society are identified as the four 'Grand Challenges' of the future.

<sup>&</sup>lt;sup>125</sup> Department for Levelling Up, Housing and Communities (2022). White Paper Levelling Up the United Kingdom. (see <a href="https://www.gov.uk/government/publications/levelling-up-the-united-kingdom">https://www.gov.uk/government/publications/levelling-up-the-united-kingdom</a>)

<sup>126</sup> UK Parliament (2023). Levelling Up and Regeneration Act. (see <a href="https://www.gov.uk/government/collections/levelling-up-and-regeneration-bill">https://www.gov.uk/government/collections/levelling-up-and-regeneration-bill</a>)

bill)

127 HM Treasury (2021). Build Back Better: Our Plan for Growth. (see <a href="https://www.gov.uk/government/publications/build-back-better-our-plan-for-growth/build-back-better-our-plan-for-growth-html">https://www.gov.uk/government/publications/build-back-better-our-plan-for-growth-html</a>)

<sup>128</sup> UK Parliament (2020). Agriculture Act 2020. (see https://www.legislation.gov.uk/ukpga/2020/21/contents/enacted/data.htm)

<sup>129</sup> Department for Environment, Food and Rural Affairs (2020). Agricultural Transition Plan 2021 to 2024. (see

https://www.gov.uk/government/publications/agricultural-transition-plan-2021-to-2024) <sup>130</sup> HM Government (2018). Industrial Strategy: Building a Britain fit for the future. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/664563/industrial-strategy-white-paper-web-ready-version.pdf)

Enfield Local Plan: Integrated Impact Assessment December 2023

#### **Sub-national**

**C.142 The London Plan** (2021)<sup>131</sup> seeks to strengthen and grow London's economic potential by supporting local regeneration, investing in Opportunity Areas and enabling access to a wide range of jobs. The Plan seeks to "conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners" through a broad range of policies, including through the promotion of equitable economic opportunities, sufficient employment and industrial spaces, capitalising on London's rich heritage and cultural assets, and enhancing transport connectivity.

#### Implications of the policy review

**C.143** In order to align with the international and national policies outlined above, the Local Plan should help to ensure the sustainable growth of income and employment as well as the enhancement of productivity and investment within the Essex economy. The IIA is able to respond to this through the inclusion of IIA objectives relating to economic growth and employment.

## **Historic environment**

#### International

**C.144 Valletta Treaty**, formerly the European Convention on the Protection of Archaeological Heritage (1992)<sup>132</sup> agreed that the conservation and enhancement of an archaeological heritage is one of the goals of urban and regional planning policy. It is concerned in particular with the need for co-operation between archaeologists and planners to ensure optimum conservation of archaeological heritage.

**C.145** The European Convention for the Protection of the Architectural Heritage of Europe (1985)<sup>133</sup> defines 'architectural heritage' and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

**C.146 United Nations (UNESCO) World Heritage Convention** (1972)<sup>134</sup> promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

#### **National**

**C.147** Of relevance to the approach of the planning system to the historic environment the **NPPF** (2021) contains an environmental objective to contribute to the protection and enhancement of the built and historic environment. The document also sets out a strategy to seek "the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay and other threats". Such a strategy is required to take into consideration the desirability of sustaining and enhancing the significance of heritage assets and bringing them into viable use.

**C.148** It should also be considerate of the wider benefits of conserving the historic environment, the contribution new development can make in terms of character and distinctiveness and the opportunity for the historic environment to contribute to this character and distinctiveness. Local authorities should also maintain or have access to a historic environment record which is to be supported by up-to-date evidence.

C.149 The NPPF is supported by Planning Practice Guidance relating to:

<sup>&</sup>lt;sup>131</sup> Greater London Authority (2021). The London Plan. (see <a href="https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents">https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents</a>)

<sup>132</sup> Council of Europe (1992). Valletta Treaty. (https://rm.coe.int/168007bd25)

<sup>&</sup>lt;sup>133</sup> Council of Europe (1985). Convention for the Protection of the Architectural Heritage of Europe. (<a href="https://www.coe.int/en/web/culture-and-heritage/granada-convention">https://www.coe.int/en/web/culture-and-heritage/granada-convention</a>)

<sup>&</sup>lt;sup>134</sup> General Conference of UNESCO (1972). UNESCO World Heritage Convention. (https://whc.unesco.org/en/convention/)

Enfield Local Plan: Integrated Impact Assessment December 2023

■ **Historic environment** (2019)<sup>135</sup> advises on enhancing and conserving the historic environment through planning, decision-making, designation, listed building consent processes and consultation.

**C.150 The Environment Act 2021**<sup>136</sup> sets out the UK's new framework for environmental protection. It includes the creation of Conservation Covenant agreements between a landowner and a responsible body for the purposes of conservation. This can include to preserve land as a place of "archaeological, architectural artistic, cultural or historic interest".

**C.151** The **Heritage Statement** (2017)<sup>137</sup> describes out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

**C.152 Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8** (2016)<sup>138</sup> sets out Historic England's guidance and expectations for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

**C.153 Historic England Advice Note 4 Tall Buildings** (2022)<sup>139</sup> sets out Historic England's guidance and expectations for the integration of the historic environment considerations into the process of allocating sites for development. The guidance emphasises the importance of understanding the historical significance of sites, engaging stakeholders, and making well-informed choices that align with heritage conservation goals.

**C.154** Historic England Good Practice Advice 3 Managing Significance in Decision Making in the Historic Environment (2016)<sup>140</sup> provides guidance on making informed decisions regarding historical sites and assets. It emphasises the importance of considering the significance of these places when making development or preservation choices.

**C.155 Historic England Good Practice Advice 1 Local Plan Making** (2015)<sup>141</sup> sets out information to help local planning authorities make well informed and effective local plans. It offers practical advice to local authorities, planners, and developers on how to integrate the historic environment into planning processes, ensuring its protection and enhancement alongside new developments.

**C.156 Historic England Advice Note 3 The Historic Environment and Site Allocations** (2015)<sup>142</sup> focuses on integrating the historic environment considerations into the process of allocating sites for development. The note provides recommendations for local authorities, planners, and developers to ensure that site allocation decisions take into account the preservation and enhancement of the historic environment.

**C.157** The **Government's Statement on the Historic Environment for England** (2010)<sup>143</sup> sets out the Government's vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. It includes reference to promoting the role of the historic environment within the Government's response to climate change and the wider sustainable development agenda.

<sup>&</sup>lt;sup>135</sup> Ministry of Housing, Communities and Local Government (2019). Historic Environment. (see <a href="https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment">https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment</a>)

<sup>&</sup>lt;sup>136</sup> HM Government (2021). Environment Act 2021. (see <a href="https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted">https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted</a>)

<sup>&</sup>lt;sup>137</sup> Department for Digital, Culture Media and Sport (2017). The Heritage Statement 2017. (see <a href="https://www.gov.uk/government/publications/the-heritage-statement-2017">https://www.gov.uk/government/publications/the-heritage-statement-2017</a>)

<sup>&</sup>lt;sup>138</sup> Historic England (2016). Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8. (see <a href="https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment.pdf/)</a>

<sup>&</sup>lt;sup>139</sup> Historic England (2022). Tall Buildings: Historic England Advice Note 4. (see <a href="https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buil

v2/#:~:text=This%20revised%20Historic%20England%20Advice,buildings%20within%20the%20historic%20environment.&text=How%20to%20identify%20appropriate%20locations,relation%20the%20historic%20environment)

<sup>&</sup>lt;sup>140</sup> Historic England (2016). Managing Significance in Decision-Taking in the Historic Environment. (see <a href="https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2/">https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2/</a>)

<sup>&</sup>lt;sup>141</sup> Historic England (2015). The Historic Environment in Local Plans. (see <a href="https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/gpa1/">historic-environment-local-plans/gpa1/</a>)

<sup>&</sup>lt;sup>142</sup> Historic England (2015). The Historic Environment and Site Allocations in Local Plans. (see <a href="https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/heag074-he-and-site

https://www.gov.uk/government/publications/the-governments-statement-on-the-historic-environment-for-england)

Enfield Local Plan: Integrated Impact Assessment December 2023

**C.158 The Planning (Listed Buildings & Conservation Areas) Act 1990**<sup>144</sup> changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

**C.159 Ancient Monuments and Archaeological Areas Act 1979**<sup>145</sup> was a law passed by the UK government to protect the archaeological heritage of England, Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

**C.160 The Historic Buildings and Ancient Monuments Act 1953**<sup>146</sup> makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

#### **Sub-national**

**C.161 The London Plan** (2021)<sup>147</sup> recognises that London's diverse range of designated and non-designated heritage assets contribute to the city's economy, culture and quality of life. The Plan places emphasis on the effective management of the city's heritage and historic environment to achieve good growth. This is demonstrated in policies seeking to encourage new development to better identify, understand, conserve, and enhance the historic environment and heritage assets, and improve access to, and interpret, the heritage assets, landscapes and archaeology within an area.

**C.162** There are some important views across the capital, from parks and other public spaces that take in important buildings, to urban landscapes that help define London. The London Plan protects these and provides the basis for more detailed guidance on each view. This is called the London View Management Framework (LVMF) and the **London View Management Framework SPG** (2021)<sup>148</sup> produced guidance on this.

**C.163** The **London World Heritage Sites SPG** (2012) provides information on understanding World Heritage Sites and their settings in the context of London, information on the elements that contribute to a site's Outstanding Universal Value, to ensure these are conserved and enhanced by developers, policy makers and other stakeholders and provides guidance for assessing the effect of potential development on London's World Heritage Sites and their settings.

### Implications of the policy review

**C.164** In order to align with the international and national policies outlined above, the Local Plan should help to ensure the conservation and enhancement of the historic environment, including heritage and cultural assets, and protect local character and distinctiveness. The IIA is able to respond to this through the inclusion of IIA objectives relating to the historic environment and the character of landscapes and townscapes.

# Landscape

#### International

**C.165** The **European Landscape Convention** (2000)<sup>149</sup> promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

<sup>&</sup>lt;sup>144</sup> HM Government (2002). Planning (Listed Buildings & Conservation Areas) Act (1990). (see <a href="http://www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga\_19900009\_en.pdf">http://www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga\_19900009\_en.pdf</a>)

<sup>&</sup>lt;sup>145</sup> HM Government (1979). Ancient Monuments & Archaeological Areas Act. (see <a href="https://consult.environment-">https://consult.environment-</a>

agency.gov.uk/engagement/bostonbarriertwao/results/b.21---ancient-monuments-and-archaeological-areas-act-1979.pdf)

146 HM Government (1953). Historic Buildings and Ancient Monuments Act 1953. (see <a href="https://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents">https://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents</a>)

<sup>&</sup>lt;sup>147</sup> Greater London Authority (2021). The London Plan. (see <a href="https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents">https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents</a>)

<sup>&</sup>lt;sup>148</sup> Greater London Authority (2021). London View Management Framework. (see <a href="https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance-and-spgs/london-view-management">https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance-and-spgs/london-view-management</a>)

<sup>149</sup> Council of Furone (2000). The Furone London Council of Furone (2000). The Furone (2

<sup>&</sup>lt;sup>149</sup> Council of Europe (2000). The European Landscape Convention (Florence). (see <a href="https://www.coe.int/en/web/landscape/the-european-landscape-convention">https://www.coe.int/en/web/landscape/the-european-landscape-convention</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

#### **National**

**C.166** The **NPPF** (2023) includes as part of its approach to protecting the natural environment, recognition for the intrinsic character and beauty of the countryside, and the wider benefits to be secured from natural capital. Importantly, great weight is to be given to conserving the landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty (AONB).

**C.167** As part of the approach to achieving well-designed places the NPPF states that planning policies and decisions should ensure that developments "are sympathetic to local character and history, including the surrounding built environment and landscape setting".

C.168 The NPPF is supported by Planning Practice Guidance relating to:

- **Natural environment** (2019)<sup>150</sup> highlights key issues in implementing policy to protect and enhance the natural environment, agricultural land, soils and brownfield land of environmental value, green infrastructure, biodiversity, geodiversity, ecosystems and landscapes.
- **Green Belt** (2019)<sup>151</sup> provides advice on the role of the Green Belt in the planning system, removal of land from the Green Belt and compensatory improvements.

**C.169 The Environment Act 2021**<sup>152</sup> sets out the UK's new framework for environmental protection. It includes the creation of Conservation Covenant agreements between a landowner and a responsible body for the purposes of conservation of the natural environment of the land or its natural resources, or to conserve the place or setting of the land for its "archaeological, architectural, artistic, cultural or historic interest".

**C.170** The key area in the **25 Year Environment Plan**<sup>153</sup> of relevance in terms of the conservation and enhancement of landscape character is recovering nature and enhancing the beauty of landscapes. Actions that will be taken as part of this key area are as follows:

- Working with AONB authorities to deliver environmental enhancements.
- Identifying opportunities for environmental enhancement of all England's Natural Character Areas, and monitoring indicators of landscape character and quality.

**C.171** The **Countryside and Rights of Way Act 2010**<sup>154</sup> is an Act of Parliament to make new provision for public access to the countryside.

**C.172** The **National Parks and Access to the Countryside Act 1949**<sup>155</sup> is an Act of Parliament to make provision for National Parks and the establishment of a National Parks Commission, to confer on the Nature Conservancy and local authorities' powers for the establishment and maintenance of nature reserves, to make further provision for the recording, creation, maintenance and improvement of public paths and for securing access to open country.

#### **Sub-national**

**C.173 The London Plan** (2021)<sup>156</sup> seeks to encourage boroughs and new development to better identify, understand, conserve, and enhance and improve access to valued landscapes and archaeology within an area. The Plan states that "development should make provision for the protection of significant archaeological assets and landscapes" and "development Plans and

<sup>&</sup>lt;sup>150</sup> Ministry of Housing, Communities and Local Government (2019). Natural Environment. (see <a href="https://www.gov.uk/guidance/natural-environment">https://www.gov.uk/guidance/natural-environment</a>)

<sup>151</sup> Ministry of Housing, Communities and Local Government (2019). Green Belt. (see https://www.gov.uk/quidance/green-belt)

<sup>152</sup> HM Government (2021). Environment Act 2021. (see https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted)

<sup>&</sup>lt;sup>153</sup> HM Government, 2018. A Green Future: Our 25 Year Plan to Improve the Environment. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/693158/25-year-environment-plan.pdf)

154 HM Government (2010). Countryside and Rights of Way Act 2010. (see <a href="https://www.legislation.gov.uk/ukpga/2000/37/section/85">https://www.legislation.gov.uk/ukpga/2000/37/section/85</a>)

155 HM Government (1949). National Parks and Access to the Countryside Act 1949. (see <a href="https://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97">https://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97</a>)

<sup>14/97)

156</sup> Greater London Authority (2021). The London Plan. (see <a href="https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents">https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings".

## Implications of the policy review

**C.174** In order to align with the international and national policies outlined above, the Local Plan should help to ensure that designated and valued landscapes are protected and enhanced, and that development should be sympathetic to local character and history including the surrounding built environment and landscape setting. The IIA is able to respond to this through the inclusion of IIA objectives relating to the character of landscapes and townscapes and green infrastructure.

## **Transport and accessibility**

#### International

**C.175** The **2030 Agenda for Sustainable Development** (2015)<sup>157</sup> is an initiative adopted by all United Nations Member States that provides a shared blueprint for peace and prosperity for people and the planet, and includes 17 Sustainable Development Goals (SDGs) designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 9: Industry, Innovation and Infrastructure;
- SDG 11: Sustainable Cities and Communities; and
- SDG 13: Climate Action.

#### **National**

**C.176** The **NPPF** (2023) requires that "transport issues should be considered from the earliest stages of plan-making". The scale, location and density of development should reflect "opportunities from existing or proposed transport infrastructure". To help reduce congestion and emissions and improve air quality and public health the planning system should focus significant development "on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes". The draft revised framework also requires that planning policies support an appropriate mix of uses across an area to further help reduce the need to travel as well as the provision of high-quality walking and cycling network.

**C.177** While the framework promotes the use and development of sustainable transport networks it also requires that "where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development" should be identified and protected.

C.178 The NPPF is supported by Planning Practice Guidance relating to:

- Transport evidence bases in plan making and decision taking (2015)<sup>158</sup> provides guidance to help local authorities assess and reflect transport needs in Local Plan making.
- Travel Plans, Transport Assessments and Statements (2014)<sup>159</sup> provides advice on when Transport Assessments and Transport Statements are required, and what they should contain.
- A target on ambient PM2.5 concentrations.

**C.179** The **Levelling Up the United Kingdom White Paper** (2022)<sup>160</sup> sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030, which includes the following key mission relating to transport and travel:

<sup>&</sup>lt;sup>157</sup> United Nations Department of Economic and Social Affairs (2015). The 2030 Agenda for Sustainable Development. (see <a href="https://sdgs.un.org/2030agenda">https://sdgs.un.org/2030agenda</a>)

<sup>&</sup>lt;sup>158</sup> Ministry of Housing, Communities and Local Government (2015). Transport evidence bases in plan making and decision taking. (see <a href="https://www.gov.uk/guidance/transport-evidence-bases-in-plan-making-and-decision-taking">https://www.gov.uk/guidance/transport-evidence-bases-in-plan-making-and-decision-taking</a>)

https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements)

<sup>&</sup>lt;sup>160</sup> Department for Levelling Up, Housing and Communities (2022). White Paper Levelling Up the United Kingdom (see: <a href="https://www.gov.uk/government/publications/levelling-up-the-united-kingdom">https://www.gov.uk/government/publications/levelling-up-the-united-kingdom</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

By 2030, local public transport connectivity across the country will be significantly closer to the standards of London, with improved services, simpler fares and integrated ticketing.

C.180 The Environment Act 2021<sup>161</sup> sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers local air quality management frameworks and the recall of motor vehicles.

C.181 Decarbonising Transport: A Better, Greener Britain (2021)<sup>162</sup> sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. The document commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars and vans by 2035<sup>163</sup>. The document also sets out how the government will improve public transport and increase support for active travel, as well as creating a net zero rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

C.182 The Cycling and Walking Investment Strategy Report to Parliament (2022)<sup>164</sup> sets out the objectives and financial resources for cycling and walking infrastructure. It states the Government's long-term ambition is to make walking and cycling the natural choices for shorter journeys. It aims to double cycling by 2025, increase walking activity, increase the percentage of children that usually walk to school and reduce the number of cyclists killed or seriously injured on England's roads.

C.183 Decarbonising Transport: Setting the Challenge (2020)<sup>165</sup> sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies 166 to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

C.184 The Road to Zero (2018)<sup>167</sup> sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emissions by 2040.

C.185 Transport Investment Strategy (2017)<sup>168</sup> sets out four objectives that the strategy aims to achieve:

- Create a more reliable, less congested, and better connected transport network that works for the users who rely on it;
- Build a stronger, more balanced economy by enhancing productivity and responding to local growth priorities;

HM Government (2021). Environment Act 2021. (see <a href="https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted">https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted</a>)

<sup>&</sup>lt;sup>162</sup> Department for Transport (2021). Decarbonising Transport: A Better, Greener Britain. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/1009448/decarbonising-transport-a-better-

greener-britain.pdf)

163 Prime Minister Rishi Sunak confirmed in a speech on 20 September 2023 that the planned ban on the sale of petrol and diesel cars would be pushed back five years from 2030 to 2035

<sup>&</sup>lt;sup>164</sup> Secretary for Transport (2022). Cycling and Walking Investment Strategy Report to Parliament 2022. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/1087944/Cycling-and-walking-investmentstrategy-report-to-Parliament-2022-web.pdf)

<sup>&</sup>lt;sup>165</sup> Department for Transport (2020). Decarbonising Transport: Setting the Challenge. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/932122/decarbonising-transport-setting-thechallenge.pdf)

These have not been summarised, since the upcoming TDP will supersede them to some extent: the Road to Zero strategy, Maritime 2050 and the Clean Maritime Plan, the Aviation 2050 Green Paper and forthcoming net zero aviation consultation and Aviation Strategy, the Cycling and Walking Investment Strategy, Future of Mobility: Urban Strategy, the 2018 amendments to the Renewable Transport Fuel Obligation, Freight Carbon Review, the Rail Industry Decarbonisation Taskforce and the Carbon Offsetting for Transport Call for Evidence. <sup>167</sup> HM Government (2018). The Road to Zero. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/739460/road-to-zero.pdf)

Department for Transport (2017). Transport Investment Strategy. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/918490/Transport\_investment\_strategy.pdf)

Enfield Local Plan: Integrated Impact Assessment December 2023

- Enhance our global competitiveness by making Britain a more attractive place to trade and invest; and
- Support the creation of new housing.

C.186 The Highways England Sustainable Development Strategy and Action Plan<sup>169</sup> (2017) is designed to communicate the company's approach and priorities for sustainable development to its key stakeholders. Highways England aims to ensure its action in the future will further reduce the impact of its activities seeking a long-term and sustainable benefit to the environment and the communities it serves. The action plan describes how Highways England will progress the aspirations of their Sustainable Development and Environment Strategies. It describes actions that will enable the company to deliver sustainable development and to help protect and improve the environment.

C.187 Door to Door: A strategy for improving sustainable transport integration (2013)<sup>170</sup> focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport. There are as follows:

- Accurate, accessible and reliable information about different transport options:
- Convenient and affordable tickets;
- Regular and straightforward connections at all stages of the journey and between different modes of transport; and
- Safe and comfortable transport facilities.

C.188 The strategy also includes details on how the Government is using behavioural change methods to reduce or remove barriers to the use of sustainable transport and working closely with stakeholders to deliver a better-connected transport system.

#### Sub-national

C.189 The London Plan (2021)<sup>171</sup> recognises the value of sustainable modes of transport. The Plan states that the provision of a robust and resilient public transport network is essential in realising and maximising growth and ensuring that different parts of the city are connected in a sustainable and efficient way. Sustainable transport is promoted through a variety of policy, including prioritising Healthy Streets and active travel, the implementation of ULEZ, low emission travel and pedestrianised areas, and enhancing the city's public transport network through a series of initiatives, including improvements to bus networks, overground and underground rail upgrades, and tram upgrades.

C.190 Sustainable Transport, Walking and Cycling guidance (2022)<sup>172</sup> helps support planning authorities and applicants in meeting the requirements of London Plan Policy T3: Transport capacity, connectivity and safeguarding, as well as also supporting delivery against other policies including T1: Strategic approach to transport, and T2: Healthy Streets. It provides guidance to explain how Development Plans and development proposals should support walking, cycling and public transport.

C.191 The London Environment Strategy (2018)<sup>173</sup> seeks to address environmental challenges and promote sustainability in London. The strategy focuses on key areas including air quality, green spaces, waste reduction, energy efficiency, and transportation. It sets ambitious goals for improving air quality, increasing green cover, reducing waste, and transitioning to a low-carbon economy.

## Implications of the policy review

C.192 In order to align with the international and national policies outlined above, the Local Plan should help to ensure that more sustainable modes of transport are viable and encouraged in order to improve air quality, minimise climate change and reduce congestion. The Local Plan should also encourage walking and cycling as alternative modes of transport by providing safe and attractive walking and cycling infrastructure, as well as recognise the multiple benefits they bring in terms of physical and mental

<sup>169</sup> Highways England (2017). Highways England Sustainable Development Strategy and Action Plan. (see https://www.gov.uk/government/publications/highways-england-sustainable-development-strategy)

Department for Transport (2013). Door to Door: A strategy for improving sustainable transport integration. (see https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/142539/door-to-door-strategy.pdf)

Greater London Authority (2021). The London Plan. (see https://www.london.gov.uk/programmes-strategies/planning/london-plan/thelondon-plan-2021-table-contents)

<sup>&</sup>lt;sup>72</sup> Greater London Authority (2022) Sustainable Transport, Walking and Cycling guidance (see https://www.london.gov.uk/programmesstrategies/planning/implementing-london-plan/london-plan-guidance/sustainable-transport-walking-and-cycling-guidance)

Greater London Authority (2018) London Environment Strategy. (see

https://www.london.gov.uk/sites/default/files/london\_environment\_strategy\_0.pdf)

Enfield Local Plan: Integrated Impact Assessment December 2023

health, reducing carbon emissions and reducing air pollution. The IIA is able to respond to this through the inclusion of IIA objectives relating to the mitigation of climate change, improving air quality, public health and wellbeing, and the provision of sustainable transport.

# Appendix D

# **Baseline information**

Enfield Local Plan: Integrated Impact Assessment December 2023

**D.1** Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues.

D.2 Schedule 2 of the SEA Regulations requires information to be provided on:

- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
- 2. The environmental characteristics of areas likely to be significantly affected.
- 3. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive [92/43/EEC].

## Air quality

**D.3** Human health, quality of life and the environment can all be negatively affected by air and noise pollution. It is the top environmental risk to human health in the UK, and the fourth greatest threat to public health after cancer, heart disease and obesity. In London, the key driver of air pollution is transport.

**D.4** The GLA has identified 187 Air Quality Focus Areas in London. These are locations that exceed the EU annual mean limit value for nitrogen dioxide, and also have high levels of human exposure. They do not represent an exhaustive list of London's air quality hotspots, but locations where the GLA believes the problem to be most acute. They are also areas where the GLA considers there to be the most potential for air quality improvements and are, therefore, where the GLA and Transport for London (TfL) will focus actions to improve air quality. There are seven Air Quality Focus Areas in Enfield. These are:

- A406 North Circular between Bowes Road and Great Cambridge;
- A406 North Circular Edmonton A1010 and Fore Street A1010;
- Bullsmoor Lane;
- Enfield Great Cambridge Road A10 junction with Southbury Road A110;
- Enfield Town Church Street/Southbury Road/London Road;
- Palmers Green junction Green Lanes A105/Hedge Lane A111; and
- Southgate Circus A111/A1004.

**D.5** Pollution in Enfield comes from a variety of sources. This includes sources outside of the Borough, and, in the case of particulate matter, a significant proportion from outside of London and even the UK. Borough-wide carbon emissions increased by 2% over the 2017 Climate Action Plan baseline year and 6% over 2018. However, in accordance with national and global targets, the Council has met the previous carbon emission reduction target of 40% in 2020, as reductions of 45% of Borough emissions were made between 2009 and 2018.<sup>174</sup>

**D.6** The entirety of the London Borough of Enfield has been subject to an Air Quality Management Area since 2001 owing to high levels of nitrogen dioxide and PM<sub>10</sub> (Particulate Matter less than 10 micron in diameter) exceeding the standards set by the London Air Quality Management Plan, in the Borough's busy roadside locations.<sup>175</sup>

**D.7** There are four monitoring sites for air pollution across the Borough, as well as two Breathe London Sensors at Rumi Mosque and North Middlesex Hospital. The measured annual concentrations at the monitoring sites are below the health-based

<sup>&</sup>lt;sup>174</sup> Enfield Council (2022). Authority Monitoring Report 2021/2022. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf\_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)

<sup>175</sup> Enfield Council (2022). Enfield Air Quality Action Plan 2022, 2027. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf\_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)

<sup>&</sup>lt;sup>175</sup> Enfield Council (2022). Enfield Air Quality Action Plan 2022-2027. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0017/34271/Enfield-Air-Quality-Action-Plan-2022-Environment.pdf)

Enfield Local Plan: Integrated Impact Assessment December 2023

air quality limit value for nitrogen dioxide, which is set at 40ug/m3. These concentrations are lower than in previous years and the monitored levels will have been impacted by the lockdowns in 2021 and 2022. 176

- **D.8** According to WSP's Air Quality Appraisal, which accompanies the Publication Local Plan, numerous receptors were identified across the Borough and levels of air pollution measured. According to the Baseline scenario, the annual mean  $NO_2$  air quality objective of  $40\mu g/m^3$  is predicted to be exceeded at 1,414 receptors (20%) of the 6,589 receptors included within the model. Of these, 26 receptors are schools and 12 hospitals, while the remaining receptor points are residential. The maximum annual mean  $NO_2$  concentration is predicted to be  $66.2\mu g/m^3$  at a residential receptor on A406 Bowes Road. The receptors where exceedances of the annual mean  $NO_2$  air quality objective are predicted are primarily located along A roads, including the A406, A109, A1110, A1003, A105, A111, A10, A1010, A1055, A1005 and A110. Some exceedances are also predicted along the B137 and the B154, and two smaller roads, Silver Street and Victoria Road, just north of the A406.
- **D.9** The annual mean  $PM_{10}$  air quality objective of  $40\mu g/m^3$  is not predicted to be exceeded at any of the modelled receptor locations in the Baseline 2019 scenario. However, the air quality objective for daily mean  $PM_{10}$  concentrations is  $50\mu g/m^3$  to be exceeded no more than 35 times a year. In the Baseline 2019 scenario, it is predicted that there would be a maximum of 16 exceedances of the daily mean  $PM_{10}$  air quality objective.
- **D.10** There are 96 Public Highway and Public Car Park electric vehicle charging points installed within Enfield, as of February 2023<sup>177</sup>. In the Council's Climate Action Plan, there is a commitment to provide an additional 250 charging sockets for electric vehicles on public highways and public car parks by 2025. 178
- **D.11** There is growing concern from local stakeholders about the impact of air pollution on the Epping Forest Special Area of Conservation (SAC) from traffic movements along the A406. With key development sites such as Meridian water within LBE's boundary, the Borough must carefully consider the impacts any development brings with regards to increased traffic on road infrastructure and the knock-on effect this may have on the SAC.

## Likely future changes without the Local Plan

**D.12** The entire Borough is designated an Air Quality Management Area and contains seven Air Quality Focus Areas. Although there have been some decreases in nitrogen dioxide levels, these statistics were impacted by the COVID-19 lockdowns in 2021 and 2022. As the country recovers from the pandemic and people travel into work more, there is likely to be an increase in nitrogen dioxide and other pollutants associated with transport. However, this may in part be mitigated by expansion of the Ultra Low Emission Zone, the Government's commitment to ban all new petrol and diesel cars from 2030<sup>179</sup> and the subsequent increase in electric vehicles, partially in response to the electric Building Regulations 2010, in addition to an increased uptake in walking and cycling. Electric vehicles do, however, contribute to non-exhaust emissions through particulates from tyres. Without the Local Plan, air quality is likely to continue to decline as a result of population growth and car dependency but possibly more slowly than historic trends suggest, as a result of the factors listed above. Without the Local Plan, sites may be located in inaccessible locations which increase reliance on private vehicles, particularly if there is a lack of access to public transport, and walking and cycling routes.

## Implications for health

- **D.13** There is an ever-growing evidence base for the connections between air pollution and heart and lung health and the link to premature mortality, with connections also being made to other conditions such as diabetes, dementia, mental health and birth outcomes, and most recently potential links to COVID-19.
- **D.14** Some of the effects occur over a short period, from minutes to days, whereas others result from long term exposure. Air pollution is known to cause some health conditions, and can also exacerbate existing health conditions, such as triggering an asthma attack.

<sup>&</sup>lt;sup>176</sup> Enfield Council (2022). Authority Monitoring Report 2021/2022. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)

<sup>&</sup>lt;sup>177</sup> Enfield Council (2022). Authority Monitoring Report 2021/2022. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)

Enfield Council (2021). Electric vehicle charging. (see <a href="https://new.enfield.gov.uk/services/roads-and-transport/electric-vehicle-charging/">https://new.enfield.gov.uk/services/roads-and-transport/electric-vehicle-charging/</a>)
 Prime Minister Rishi Sunak confirmed in a speech on 20 September 2023 that the planned ban on the sale of petrol and diesel cars would be pushed back five years from 2030 to 2035

Enfield Local Plan: Integrated Impact Assessment December 2023

**D.15** Pollution particularly affects the most vulnerable in society such as children, the elderly, and those with existing heart and lung conditions. There is also often a strong correlation between poor air quality areas and less affluent areas.

# **Biodiversity**

**D.16** Enfield boasts a wealth of biodiversity, having important populations of nationally and internationally scarce plant and animal species. It also has several important habitats including important grassland habitats and more than three hundred hectares of woodland. The Enfield Biodiversity Action Plan<sup>180</sup> records the Borough as having an approximate green coverage of 38%. Despite this, the Mayor of London classifies 22% of the Borough's population as having a lack of access to nature.

**D.17** Although there are no Special Areas of Conservation (SAC), the Epping Forest SAC sits within 0.5km of Enfield's border to the east of the Borough. The Lee Valley Ramsar site sits within 0.5km north of the Borough, cradling the border between Essex County Council and Hertfordshire County Council. The Lee Valley is also designated as a Special Protection Area (SPA) and Ramsar.<sup>181</sup>

**D.18** New development within Enfield has the potential to adversely affect the integrity of nearby designated sites due to the increased recreational pressures and air pollution caused. Enfield's Blue and Green Strategy adopted in 2021 identifies the potential adverse effects from pollution and increased recreational activities on the conservation status and health of Epping Forest SAC, Walthamstow Reservoirs SSSI and Lee Valley SPA and Ramsar site.

**D.19** The Borough contains 41 Sites of Importance for Nature Conservation (SINCs), which are given protection through planning policy. This includes 7 metropolitan sites, 19 borough sites and 15 local sites. According to the latest Annual Monitoring Report, there were no identified losses or changes to the biodiversity status of the 41 SINCs in 2021/22.

**D.20** The King George V and William Girling Reservoirs are designated as a Site of Special Scientific Interest (SSSI) for their nationally important populations of wildfowl and wetland birds.

**D.21** There are also a number of SSSIs in close proximity to the Borough:

- Walthamstow Reservoir SSSI within 1km;
- Epping Forest SSSI within 0.5km;
- Cornmill Stream and Old River Lea SSSI within 1km;
- Waltham Abbey SSSI within 1km; and
- Northaw Great Wood SSSI within 2km.

**D.22** There are no National Nature Reserves within or in close proximity to LBE. However, there are pockets of Ancient Woodland sites in the north east of the Borough in the Enfield Chase area:

- Whitewebbs Wood;
- Little Beachhill Wood;
- Vault Hill Hood;
- Rough Lot & Moat Wood; and
- Oak Wood.

**D.23** There have been several network-led nature conservation efforts set out for the Borough. The Enfield Chase Woodland Restoration Project is being delivered in partnership with Thames21 and funded by the Mayor of London, Enfield Council and the Forestry Commission. The target of planting 100,000 trees between November 2020 and March 2022 has been achieved, resulting in the creation of 60 hectares of woodland.

 <sup>180</sup> Enfield Council (2011). Nature for People; A Biodiversity Action Plan for Enfield. (see
 https://www.enfield.gov.uk/ data/assets/pdf file/0019/5392/planning-application-information-biodiversity-action-plan.pdf)
 181 Enfield Council (2021) Enfield's Blue and Green Strategy (2021-2031). (see
 https://www.enfield.gov.uk/ data/assets/pdf file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf)

Enfield Local Plan: Integrated Impact Assessment December 2023

## Likely future changes without the Local Plan

**D.24** The London Borough of Enfield contains a number of designated and non-designated biodiversity assets, which are experiencing recreational use pressures and pollution, in addition to loss and fragmentation exacerbated by climate change. Recreational use pressures are a problem, despite the fact less than one quarter of the Borough's population lacks access to nature. Without the Local Plan, pressures on the natural environment are likely to continue, although the Environment Act 2021 will help address habitat loss and fragmentation through biodiversity net gain. In terms of pollution affecting biodiversity assets, particularly the Epping Forest SAC, this may to an extent be mitigated through expansion of the Ultra Low Emission Zone and a shift from petrol and diesel cars to electric vehicles. Without the Local Plan, sites may be located in sensitive locations and so exacerbate the aforementioned problems.

#### Implications for health

**D.25** A strong link exists between access to nature and biodiversity and associated health and societal benefits. Considering the COVID-19 pandemic, the importance of safe, accessible and well-connected green and blue spaces for improving quality of life has also never been more pertinent.

**D.26** According to the recently published World Health Organisation report 'Nature, Biodiversity and Health: An Overview of Interconnections' increased exposure to nature has been associated with a lower risk of specific health conditions including depression, anxiety, cortisol, blood pressure, pre-term birth, low birthweight, type 2 diabetes, and reduced risk of death from all causes. There is generally positive evidence relating to the impacts of activities in natural environments on children's mental health and their cognitive, emotional and behavioural functioning. These health benefits are thought to arise through a range of pathways, including providing opportunities and safe spaces for physical activity, for restoration and relaxation, and for socialising with friends and family. Exposure to green and blue space is also associated with higher levels of life satisfaction. Impacts appear to differ according to socio-economic status and other demographic factors such as age or gender. The '15 minute neighbourhood' concept is encouraged as part of Natural England's Green Infrastructure Framework. This seeks to ensure that everyone has access to good quality natural greenspace within 15 minutes walking distance from their homes, in line with the Accessible Natural Greenspace Standards and Green Flag Criteria.

**D.27** Similarly, open spaces and recreational facilities provide residents space in which they can undertake physical activity to the benefit of public health, including lowering the risk of specific health conditions such as depression, anxiety, cortisol, blood pressure, pre-term birth, low birthweight, and type 2 diabetes. There is generally positive evidence relating to the impacts of activities in natural environments on children's mental health and their cognitive, emotional and behavioural functioning. These health benefits are thought to arise through a range of pathways, including providing opportunities and safe spaces for physical activity, for restoration and relaxation, and for socialising with friends and family. Exposure to green and blue space is also associated with higher levels of life satisfaction. Impacts appear to differ according to socio-economic status and other demographic factors such as age or gender.

# Climate change adaptation

**D.28** Climate change presents a global risk, with a range of different social, economic and environmental impacts that are likely to be felt within Enfield across numerous receptors. A key challenge in protecting the environment will be to tackle the causes and consequences of climate change: warmer, drier summers and wetter winters with more severe weather events all year, higher sea levels and increased river flooding. A strong reaction is required from planning to ensure appropriate action can be taken to help people, species and habitats adapt.

**D.29** The UK Climate Risk Independent Assessment (CCEA3) identifies likely trends from climate change and sets out 61 specific risks and opportunities to the UK from climate change. 183 Some of these risks include:

The number of incidents of food poisoning, heat stress and heat related deaths may increase in summer.

World Health Organisation (2021). Nature, Biodiversity and Health: An Overview of Interconnections. (see <a href="https://apps.who.int/iris/bitstream/handle/10665/341376/9789289055581-eng.pdf">https://apps.who.int/iris/bitstream/handle/10665/341376/9789289055581-eng.pdf</a>)
 UK Climate Risk (2021) Third UK Climate Risk Independent Assessment. (see <a href="https://www.ukclimaterisk.org/wp-content/uploads/2021/06/Technical-Report-The-Third-Climate-Change-Risk-Assessment.pdf">https://www.ukclimaterisk.org/wp-content/uploads/2021/06/Technical-Report-The-Third-Climate-Change-Risk-Assessment.pdf</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

- Domestic energy use may increase during summer months as refrigeration and air conditioning demand increases.
- Wetter winters and more intense rainfall events throughout the year may result in a higher risk of flooding from rivers.
- More intense rainstorms may in some locations result in the amount of surface water runoff exceeding the capacity of drainage systems, consequently leading to more frequent and severe localised flash flooding.
- More frequent storms and floods may cause increased damage to property and infrastructure, resulting in significant economic costs.
- Periods of drought in summer could lead to soil shrinking and subsidence, causing damage to buildings and transport networks. Drought may also impact negatively on agriculture, industry and biodiversity.
- Warmer and drier summers are likely to affect the quantity and quality of water supply, which will need careful management.
- The changing climate will impact on the behaviour and distribution of species and may encourage the spread of invasive species.

**D.30** There has been a general trend towards warmer average temperatures in recent years with the most recent decade (2012–2021) being on average 0.2°C warmer than the 1991–2020 average and 1.0°C warmer than the 1961–1990 average. All the top ten warmest years for the UK in the series from 1884 have occurred this century.<sup>184</sup>

**D.31** Heavy rainfall and flooding events have been demonstrated to have increased potential to occur in the UK as the climate has generally become wetter. For example, for the most recent decade (2012–2021) UK summers have been on average 6% wetter than 1991–2020 and 15% wetter than 1961–1990. 185

**D.32** Flooding events are likely to become more frequent and severe as the climate changes, as demonstrated in a four month period between 2019 and 2020 when the UK suffered consistent flooding, which cumulated in significant damage caused by Storms Ciara and Dennis. In total, this is estimated to have cost the insurance industry between £435 and £535 million.

**D.33** The Intergovernmental Panel on Climate Change (IPCC) special report on global warming outlines that, under emissions in line with current pledges under the Paris Agreement, global warming is expected to surpass 1.5°C, even if these pledges are supplemented with very challenging increases in the scale and ambition of mitigation after 2030. This increased action would need to achieve net zero CO<sub>2</sub> emissions in less than 15 years. <sup>186</sup> It has since been suggested in the Environmental Improvement Plan published in January 2023 that "whilst we aim to limit global warming to 1.5°C, evidence shows that we must be prepared for warming up to 4°C", emphasising the importance of climate change adaptation measures and recognition in local policy. <sup>187</sup>

**D.34** The UK Climate Projections (UKCP18) predicts that by 2070, under a high emission scenario, average winter precipitation is projected to increase, whilst average summer rainfall is projected to decrease. Although summer rainfall is projected to decrease, there will be an increased frequency of short-lived high intensity showers.<sup>188</sup>

**D.35** The Borough will become more vulnerable to fluvial flooding, water supply deficiencies and sea level rises, as the local climate continues to change. The most significant sources of flooding in Enfield are main rivers and surface water. 189

**D.36** There are three main river valleys that flow across Enfield towards the River Lee on the eastern side of the Borough – Turkey Brook, Salmons Brook and Pymmes Brook. These rivers all rise in or near the higher ground in the western half of

<sup>184</sup> Met Office (2022). UKCP18 Climate Change. (see https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/data/index)

<sup>&</sup>lt;sup>185</sup> International Journal of Climatology (2022). State of the UK Climate 2021. (see https://rmets.onlinelibrary.wiley.com/doi/10.1002/JOC.7787)

<sup>186</sup> IPCC (2019) IPCC Special Report Global Warming of 1.5oC. (see https://www.ipcc.ch/sr15/)

<sup>&</sup>lt;sup>187</sup> Department for Environment, Food & Rural Affairs (2023). Environmental Improvement Plan 2023. (see <a href="https://www.gov.uk/government/publications/environmental-improvement-plan">https://www.gov.uk/government/publications/environmental-improvement-plan</a>)

<sup>188</sup> Department for Environment, Food and Rural Affairs, Department for Business, Energy and Industrial Strategy, Met Office and Environment Agency (n.d.) UK Climate Projections. (see <a href="https://www.metoffice.gov.uk/pub/data/weather/uk/ukcp18/science-reports/ukcp-infographic-headline-findings.pdf">https://www.metoffice.gov.uk/pub/data/weather/uk/ukcp18/science-reports/ukcp-infographic-headline-findings.pdf</a>)
189 Enfeld Coursel (2016) 1 and Flood Bisk Management Course (2016) 1 and Flood Bisk Management (2016) 1 and Flood

<sup>&</sup>lt;sup>189</sup> Enfield Council (2016). Local Flood Risk Management Strategy (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0021/5547/flooding-information-local-flood-risk-management-strategy-2016.pdf)

Enfield Local Plan: Integrated Impact Assessment December 2023

Enfield. The majority of the runoff that contributes to these rivers is generated within Enfield. The River Lee is the main source of potential flooding from outside the Borough.<sup>190</sup>

**D.37** The number of properties at risk of flooding in Enfield is high compared to most other local authorities. This is mainly due to the geography and layout of Enfield – most of the properties at risk of flooding are in the Lee valley area, which was historically an area of marshland. Consequently, a wide range of flood defence systems are required to manage flooding and ensure that Enfield's residents and businesses are not faced with unacceptable risks or disruption. These defences include all aspects of the drainage network from simple road gullies to large channelised rivers, floodwalls and flood storage areas. <sup>191</sup>

**D.38** In 2018, Enfield Council developed a Sustainable Drainage Design and Evaluation Guide<sup>192</sup> to make sure new developments comply with Borough policies. Sustainable Drainage Systems (SuDS) play an important role in increasing the resilience of the drainage network and improving water quality of receiving watercourses. There is a wide range of existing SuDS techniques in operation across Enfield. Some of these are relatively old features such as highway drainage ditches and ponds, more recently rain gardens and permeable paving have been installed as part of highway works and other projects. The guide promotes the idea of integrating SuDS into development to address issues with conventional drainage<sup>193</sup>. In addition to SuDS, Natural Flood Management (NHM) techniques such as holding water upstream can provide alternative methods of preparing for climate change and flood risk, as well as delivering co-benefits, and should be considered where appropriate.

## Likely future changes without the Local Plan

**D.39** The effects of human activities on the climate are irreversible on the timescale of humans alive today, although anticipating the adverse effects of climate change and taking appropriate action to prevent or minimise the damage they can cause may minimise the severity of climate change's impacts of Enfield's residents. Without the Local Plan, sites for development may be located in locations that are more prone to the effects of climate change, such as in areas with a higher chance of flooding.

### Implications for health

D.40 Climate change has potential for substantial implications on human health, including:

- Disruption to health, social care and emergency management services and schools provision, from flooding, heatwaves and storms.
- Flooding poses multiple risks to people's health, such as heart attacks, trauma, an increase in waterborne infectious diseases, and common mental and post-traumatic stress disorders. Damp housing and damage to water and sanitation infrastructure can further reinforce the adverse effects on health.
- Climate change may bring increases in both cold weather excess mortality and heat-related deaths and illness occurring in the summer. Excess heat represents a serious threat for the entire population, but the elderly and small children, and people with pre-existing cardiovascular, respiratory and renal diseases, diabetes and neurological disorders, are more susceptible. Urban areas tend to be at greater risk due to the "urban heat island" effect. The number of excess deaths in England resulting from heatwaves (excluding COVID-19) in 2022 was 2,803 for those aged 65 and over. Cumulative excess deaths resulting from heatwaves in summer 2022 was the highest recorded on record since the heatwave plan for England was introduced in 2004.<sup>194</sup>
- Cases of food poisoning in the UK that are linked to warm weather have been increasing rapidly.
- Wildfire likelihood and severity set to increase due to climate change.

<sup>&</sup>lt;sup>190</sup> Enfield Council (2016). Local Flood Risk Management Strategy (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0021/5547/flooding-information-local-flood-risk-management-strategy-2016 pdf)

information-local-flood-risk-management-strategy-2016.pdf)

191 Enfield Council (2016). Local Flood Risk Management Strategy (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0021/5547/flooding-information-local-flood-risk-management-strategy-2016.pdf)

<sup>&</sup>lt;sup>192</sup> Enfield Council (2018). Sustainable Drainage Design and Evaluation Guide (see <a href="http://online.flipbuilder.com/mccloy.consulting/ftyi/mobile/index.html">http://online.flipbuilder.com/mccloy.consulting/ftyi/mobile/index.html</a>)

http://online.flipbuilder.com/mccloy.consulting/fty/mobile/index.html)

194 LIK Health Sequrity Access (2000) LIKE 102

<sup>&</sup>lt;sup>194</sup> UK Health Security Agency (2022) UKHSA and ONS release estimates of excess deaths during summer of 2022. (see <a href="https://www.gov.uk/government/news/ukhsa-and-ons-release-estimates-of-excess-deaths-during-summer-of-2022">https://www.gov.uk/government/news/ukhsa-and-ons-release-estimates-of-excess-deaths-during-summer-of-2022</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

The likely increase in occurrence of severe winter gales is a cause for concern. Deaths during severe gales are commonplace, as are severe injuries. The likely loss of electrical power supplies during severe storms adds very significantly to these problems. Better forecasting of gales and better design and more frequent exercising of disaster plans may well help to mitigate the worst effects.

# **Climate change mitigation**

**D.41** Carbon dioxide (CO<sub>2</sub>) is the main greenhouse gas, accounting for about 80% of the UK greenhouse gas emissions. Emissions are produced when fossil fuels such as coal or gas are burnt or processed. In recent years, increasing emphasis has been placed on the role of regional bodies and local government in contributing to energy efficiency improvements, and hence reductions in carbon dioxide emissions. In line with the wider UK, London has seen a decrease in CO<sub>2</sub> emissions in recent years. One of the main drivers for reduced levels of emissions has been a decrease in the use of coal for electricity generation, accounting for a decrease in emissions for domestic electricity.

**D.42** The Government regularly publishes local authority and regional carbon dioxide emissions national statistics. <sup>195</sup> The statistics are largely consistent with the UK national Greenhouse Gas Inventory and with the Devolved Administration Greenhouse Gas Inventories. In Enfield, carbon dioxide emissions have fallen from 5.6 tonnes (t) per capita to 3.3t per capita (equivalent to a 52% reduction) as demonstrated in **Table D.1**.

Table D.1: CO<sub>2</sub> emissions estimates in Enfield 2005-2019<sup>196</sup>

Year	Total emissions (kt)	Per capita emissions (t)
2005	1,601.8	5.6
2006	1,739.3	6.1
2007	1,734.0	5.9
2008	1,567.8	5.3
2009	1,426.5	4.7
2010	1,508.1	4.9
2011	1,358.1	4.3
2012	1,463.2	4.6
2013	1,438.7	4.5
2014	1,294.4	4.0
2015	1,264.3	3.8
2016	1,207.6	3.6
2017	1,160.2	3.5

<sup>&</sup>lt;sup>195</sup> Office for National Statistics (2021). 2005 to 2019 UK local and regional CO<sub>2</sub> emissions – data tables. (see <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/996057/2005-19\_UK\_local\_and\_regional\_CO2\_emissions.xlsx">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/996057/2005-19\_UK\_local\_and\_regional\_CO2\_emissions.xlsx</a>)

<sup>&</sup>lt;sup>196</sup> Office for National Statistics (2021). 2005 to 2019 UK local and regional CO<sub>2</sub> emissions – data tables. (see <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/996057/2005-19\_UK\_local\_and\_regional\_CO2\_emissions.xlsx">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/996057/2005-19\_UK\_local\_and\_regional\_CO2\_emissions.xlsx</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

Year	Total emissions (kt)	Per capita emissions (t)
2018	1,151.6	3.4
2019	1,112.1	3.3

**D.43** The Department for Business, Energy & Industrial Strategy produced the following consumption figures for Enfield in 2020.<sup>197</sup>

- Coal a total of 0.1 kilo tonnes of oil equivalent (ktoe) predominantly through domestic use;
- Manufactured Fuels a total of 0.3koe predominantly through domestic use;
- Petroleum a total of 136ktoe predominantly through road transport;
- Gas a total of 189.8ktoe predominantly through domestic use;
- Electricity a total of 84.0ktoe predominantly through domestic use; and
- Bioenergy and wastes a total of 8.0ktoe predominantly through road transport.

**D.44** Between 2005 and 2020 the total reported energy consumption for the Borough fell from 338.7 to 291.3ktoe. The changes in consumption by energy type are shown in **Table D.2**.

Table D.2: Energy consumption in Enfield by type 2005-2020<sup>198</sup>

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2020)
Coal	0.2	0.1
Manufactured fuels	0.3	0.3
Petroleum	146.7	136
Gas	236.7	189.8
Electricity	98.4	84.0
Bioenergy and wastes	0.5	8.0
Total	482.8	418.2

**D.45** The use of private vehicles can also generate CO<sub>2</sub> emissions, although just under one third of Enfield residents do not own a vehicle, which is significantly below the London average (see 'Transport' section).

**D.46** Enfield Council declared a climate change emergency in summer 2019. Their Climate Action Plan 2020<sup>199</sup>, overseen by a dedicated Climate Change Taskforce subsequently explains how the Borough will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040. It sets out Enfield's current carbon emissions and the action they will need to take

<sup>&</sup>lt;sup>197</sup> Department for Business, Energy and Industrial Strategy (2022). Total final energy consumption at regional and local authority level: 2005 to 2020 (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/1106843/subnational\_total\_final\_energy\_consumption\_2020.xlsx)

<sup>198</sup> Department for Business, Energy and Industrial Strategy (2022). Total final energy consumption at regional and local authority level: 2005 to 2020 (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/1106843/subnational\_total\_final\_energy\_con\_sumption\_2020.xlsx)

sumption 2020.xlsx)

199 Enfield Council (2020). Enfield Climate Action Plan. (see <a href="https://www.enfield.gov.uk/services/environment/climate-action">https://www.enfield.gov.uk/services/environment/climate-action</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

to achieve their net zero targets. The Council has committed to reviewing this Action Plan on an annual basis, with the latest Climate Action Plan Progress Report being published in 2022. Currently, the 2022/2023 report is being prepared.<sup>200</sup>

**D.47** The Tyndall Centre has undertaken work to calculate the 'fair' contribution of local authorities towards the Paris Climate Change Agreement. Based on the analysis undertaken the following recommendations have been made for Enfield.<sup>201</sup>

- Stay within a maximum cumulative carbon dioxide emissions budget of 7.1 million tonnes (MtCO<sub>2</sub>) for the period of 2020 to 2100. At 2017 CO<sub>2</sub> emission levels, Enfield would use this entire budget within seven years from 2020.
- Initiate an immediate programme of CO₂ mitigation to deliver cuts in emissions averaging a minimum of -13.2% per year to deliver a Paris aligned carbon budget. These annual reductions in emissions require national and local action and could be part of a wider collaboration with other local authorities.
- Reach zero or near zero carbon no later than 2042. This report provides an indicative CO<sub>2</sub> reduction pathway that stays within the recommended maximum carbon budget of 7.1 MtCO<sub>2</sub>. At 2042, 5% of the budget remains. This represents very low levels of residual CO<sub>2</sub> emissions by this time, or the Authority may opt to forgo these residual emissions and cut emissions to zero at this point. Earlier years for reaching zero CO<sub>2</sub> emissions are also within the recommended budget, provided that interim budgets with lower cumulative CO<sub>2</sub> emissions are also adopted.

#### Likely future changes without the Local Plan

**D.48** Despite efforts to reduce greenhouse gas emissions, the effects of human activities on the climate are irreversible on the timescale of humans alive today, although every little bit of avoided future temperature increase results in less warming. Climate change will therefore continue to prevail. The London Plan contains policies that seek to reduce greenhouse gas emissions, and Enfield's Climate Action Plan 2020 will also contribute towards this goal. The most recent Climate Change Committee Report does, however, state that policy development continues to be too slow and confidence in the UK meeting its targets has decreased in the past year. Without the Local Plan, sustainable design and construction techniques may not be adopted in new build development, whilst development sites may be located in inaccessible locations that increase reliance on private vehicles, although expansion of the Ultra Low Emission Zone and the shift to electric vehicles may help reduce emissions associated with private vehicles. Carbon emissions associated with buildings may be reduced, in response to the amended Building Regulations 2010 and implementation of the Future Buildings Standard from 2025 that require CO<sub>2</sub> emissions from new build homes and other buildings, including offices and shops, to be 30% lower than current standards. This will be achieved through the installation of low carbon technology, such as solar panels and heat pumps, and using materials in a more energy efficient way to keep in heat.

#### Implications for health

D.49 Climate change has potential for substantial implications on human health, including:

- Disruption to health, social care and emergency management services and schools provision, from flooding, heatwaves and storms.
- Flooding poses multiple risks to people's health, such as heart attacks, trauma, an increase in waterborne infectious diseases, and common mental and post-traumatic stress disorders. Damp housing and damage to water and sanitation infrastructure can further reinforce the adverse effects on health.
- Climate change may bring increases in both cold weather excess mortality and heat-related deaths and illness occurring in the summer. Excess heat represents a serious threat for the entire population, but the elderly and small children, and people with pre-existing cardiovascular, respiratory and renal diseases, diabetes and neurological disorders, are more susceptible. Urban areas tend to be at greater risk due to the "urban heat island" effect. The number of excess deaths in England resulting from heatwaves (excluding COVID-19) in 2022 was 2,803 for those aged 65 and over. Cumulative

<sup>&</sup>lt;sup>200</sup> Enfield Council (2023). Climate Action. (see <a href="https://www.enfield.gov.uk/services/environment/climate-action">https://www.enfield.gov.uk/services/environment/climate-action</a>)

<sup>&</sup>lt;sup>201</sup> Tyndall Centre (2023). Setting Climate Commitments for Enfield. (see <a href="https://carbonbudget.manchester.ac.uk/reports/E09000010/">https://carbonbudget.manchester.ac.uk/reports/E09000010/</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

excess deaths resulting from heatwaves in summer 2022 was the highest recorded on record since the heatwave plan for England was introduced in 2004.<sup>202</sup>

- Cases of food poisoning in the UK that are linked to warm weather have been increasing rapidly.
- Wildfire likelihood and severity set to increase due to climate change.
- The likely increase in occurrence of severe winter gales is a cause for concern. Deaths during severe gales are commonplace, as are severe injuries. The likely loss of electrical power supplies during severe storms adds very significantly to these problems. Better forecasting of gales and better design and more frequent exercising of disaster plans may well help to mitigate the worst effects.

# **Population, Communities and Equalities**

D.50 Enfield is the seventh least densely populated local authority of London's 33 local authority areas (40.82 people per hectare), serving a population of 330,000 people across 25 wards. The population size has increased by 5.6%, from around 312,500 in 2011 to 330,000 in 2021. This is lower than the overall increase for England (6.6%) and London (7.7%).<sup>203</sup>

**D.51** Nearby areas like Barnet and Welwyn Hatfield have seen their populations increase by around 9.2% and 8.5%, respectively, while others such as Broxbourne saw an increase of 5.8% and Haringey saw smaller growth of 3.6%.

D.52 Table D.3 below present the most recent available estimates of population by ward in Enfield.<sup>204</sup>

Table D.3: Estimated populations by ward in Enfield

Ward	Population
Arnos Grove	7,157
Bowes	8,819
Brimsdown	13,974
Bullsmoor	9,559
Bush Hill Park	12,144
Carterhatch	9,379
Cockfosters	8,992
Edmonton Green	14,170
Enfield Lock	12,714
Grange Park	8,175
Hasebury	15,691
Highfield	8,596
Jubilee	13,820

<sup>&</sup>lt;sup>202</sup> UK Health Security Agency (2022). UKHSA and ONS release estimates of excess deaths during summer of 2022. (see https://www.gov.uk/government/news/ukhsa-and-ons-release-estimates-of-excess-deaths-during-summer-of-2022)

Office for National Statistics (2023) How the population changed in Enfield: Census 2021. (see

https://www.ons.gov.uk/visualisations/censuspopulationchange/E09000010/)

204 Office for National Statistics (2021). City Population Enfield (see <a href="https://citypopulation.de/en/uk/london/wards/E09000010">https://citypopulation.de/en/uk/london/wards/E09000010</a> enfield/)

Enfield Local Plan: Integrated Impact Assessment December 2023

Ward	Population
Lower Edmonton	12,557
New Southgate	9,429
Oakwood	7,559
Palmers Green	8,629
Ponders End	10,381
Ridgeway	10,714
Southbury	12,823
Southgate	11,801
Town	11,567
Upper Edmonton	12,576
Whitewebbs	13,081
Winchmore Hill	9,381

**D.53** In 2021, Enfield ranked 30th for total population out of 309 local authority areas in England, maintaining the same position it held a decade ago.<sup>205</sup>

**D.54** The Equality Act 2010 identifies nine 'protected characteristics' and seeks to protect people from discrimination based on these characteristics. It presents three main duties: to eliminate discrimination, harassment, victimisation and other conduct that is prohibited under the Act; to advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share it; and to foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The nine protected characteristics identified through the Act are:

- Age: children (0-4), younger people (aged 18-24), older people (aged 60 and over);
- Disability: Disabled people, people with physical and mental impairment;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex; and
- Sexual orientation.

**D.55** The population has continued to age. Across England, more than one in six people (18.4%) were aged 65 years and over on Census Day in 2021. This is a higher percentage than ever before. At the time of the 2011 Census, the largest age group in London was 25 to 29 years. As of 2021, this has increased to 30 to 34 years, the same as England.<sup>206</sup>

<sup>&</sup>lt;sup>205</sup> Office for National Statistics (2023). How the population changed in Enfield: Census 2021. (see <a href="https://www.ons.gov.uk/visualisations/censuspopulationchange/E09000010/">https://www.ons.gov.uk/visualisations/censuspopulationchange/E09000010/</a>)

<sup>206</sup> Office for National Statistics (2023). How the population changed in Enfield: Census 2021. (see <a href="https://www.ons.gov.uk/visualisations/censuspopulationchange/E09000010/">https://www.ons.gov.uk/visualisations/censuspopulationchange/E09000010/</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

**D.56** In Enfield, the median age in 36.4 years. This is lower than the median age in England (40 years) but slightly higher than the median age in London (35.6 years).<sup>207</sup>

D.57 Table D.4 below presents the most recent available estimates of age distribution in Enfield.<sup>208</sup>

Table D.4: Estimated age distribution in Enfield

Age	Population (2021)
0-9 years	44,013
10-19 years	45,445
20-29 years	40,293
30-39 years	47,106
40-49 years	47,302
50-59 years	43,757
60-69 years	29,848
70-79 years	19,312
80+ years	12,912

D.58 In 32 of the 309 local authority areas of England, the total number of people aged 65 years and over increased by 30.0% or more between 2011 and 2021. In line with this, in Enfield, there has been an increase of 16.1% in people aged 65 years and over (14% of the Enfield population), an increase of 4.3% in people aged 15 to 64 years (69% of the Enfield population), and an increase of 3.7% in children aged under 15 years (22% of the Enfield population). 209

D.59 The Borough's age structure has therefore been changing in line with national trends, with a decreasing proportion of young people and an increasingly ageing population. The working population is essential for economic growth, requiring adequate housing, access to jobs and businesses; yet trends suggest that Enfield's working population is forecast to decrease. Projections also suggest the Borough populations are likely to continue to age, placing greater and more complex demands upon support and care services (e.g., health, social care etc.) and may lead to changes in future housing and service provision needs.

D.60 Despite an ageing population, Enfield is younger compared to the rest of London and the UK. It is also becoming more diverse, largely thanks to inward migration from other parts of the UK and abroad. Over a third of the Borough's residents are under the age of 18.

D.61 Disability: The 2021 Census presented figures on people with disabilities in the UK. Of Enfield Borough's population, 84.6% stated that they are not disabled under the Equality Act, while 8.0% stated that they are disabled under the Equality Act and limited 'a little'. 7.3% are disabled under the Equality Act and 'limited a lot'. 210

D.62 Marriage and civil partnership: From the 2021 census data, 43.0% of the population were married or in a registered civil partnership and 40.7% of the population were never married and never in a registered civil partnership.

<sup>&</sup>lt;sup>207</sup> Office for National Statistics (2020). Local authority ageing statistics, based on annual mid-year population estimates (see https://www.ons.gov.uk/datasets/ageing-population-estimates/editions/time-series/versions/1)

Office for National Statistics (2021). City Population Enfield (see <a href="https://citypopulation.de/en/uk/london/wards/E09000010">https://citypopulation.de/en/uk/london/wards/E09000010</a> enfield/)

<sup>&</sup>lt;sup>209</sup> Office for National Statistics (2023). How the population changed in Enfield: Census 2021.

<sup>(</sup>https://www.ons.gov.uk/visualisations/censuspopulationchange/E09000010/) 210 Office for National Statistics (2021). Census Maps (see https://www.ons.gov.uk/census/maps/)

Enfield Local Plan: Integrated Impact Assessment December 2023

**D.63 Pregnancy and maternity**: The total fertility rate (TFR) for England was 1.55 children in 2021, decreasing from 1.94 in 2011 (-0.39%). In Enfield, the TFR was 1.66 in 2021, with a total number of 3,936 live births. Enfield Borough's TFR is higher than the London average (1.44).<sup>211</sup>

D.64 Ethnicity: In 2021, 52.1% of Enfield Borough's population reported as being 'White'. 'Black, Black British, Black Welsh, Caribbean or African' accounted for 18.3% of the population, 'Asian, Asian British or Asian Welsh' accounted for 11.5%, and mixed or multiple ethnic groups accounted for 5.9%. 12.1% of the population reported as being from 'any other ethnic group'. In 2021, 59.6% of people in Enfield were born in the UK.<sup>212</sup>

D.65 Religion and belief: In 2021, most of the Enfield Borough's population identified as Christian (46.4%). The second largest group within the Borough is 19.8% of residents who classify themselves as having no religion.

D.66 Sex: Based on figures from the 2021 census, there are 172,473 females (52.3%) and 157,511 males (47.7%).

D.67 Sexual orientation and gender identity: From the 2021 census data, 88.15% of people aged 16 years and over in Enfield identified as being straight or heterosexual. 2.18% of people aged 16 years and over identified with being lesbian, gay, bisexual, or other (LBG+). 967% of people aged 16 years and over preferred not to answer.

D.68 From the 2021 census data, 90.34.% of people aged 16 years and over in Enfield have a gender identity the same as their sex registered at birth. 1.08% have a gender identity different from their sex registered at birth. 8.58% did not answer.

## Likely future changes without the Local Plan

D.69 A review of the baseline information suggests that Enfield has an ageing population. It is expected that the ratio of those residents over the age of 65 will increase in the future across the UK. Enfield has a relatively high old-age-dependency ratio at 21.4, which is higher than the London average of 17.8, but lower than the England ratio of 29.4. This is the ratio of older dependents, people older than 64, to the working-age population. This number is expected to rise in line with national trends, with an ageing population placing additional pressure on health and social care infrastructure in the Borough. Much of the costs of old age have arisen because growth in total life expectancy has outpaced growth in healthy life expectancy (i.e. the number of years we can expect to live in good health). Policies that improve preventative healthcare and help people to remain active and healthy in later life, could help increase the proportion of life spent in good health and reduce costs. A healthier old-age population would also allow greater numbers to remain in the labour market for longer, thereby mitigating the impact of an ageing population on the dependency ratio.213 Without the Local Plan, issues are not likely to be realised, and issues will likely not be effectively addressed.

#### Implications for health

D.70 Enfield has a growing population, that are living longer, often with one or more long term health conditions or illnesses. This may place pressure on pre-existing and future healthcare facilities and access to services within the Borough.

# **Crime and community safety**

D.71 According to official crime summary data published by the Metropolitan Police<sup>214</sup>, the number of notifiable offences committed in Enfield between April 2022 and March 2023 was 34,357 - a near negligible reduction of 0.1% compared to the previous 12-month period. The official Met Police crime rate for this period was 103 offences per 1,000 residents which was slightly below the 109.7 offences per 1,000 recorded for the entirety of London.

<sup>&</sup>lt;sup>211</sup> Office for National Statistics (2023). Births in England and Wales: summary tables (see

https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/datasets/birthsummarytables)

Office for National Statistics (2021). Census Maps (see <a href="https://www.ons.gov.uk/census/maps/">https://www.ons.gov.uk/census/maps/</a>)

<sup>&</sup>lt;sup>213</sup> UK Parliament (2023) Challenges of an ageing population. (see <a href="https://www.parliament.uk/business/publications/research/key-issues-">https://www.parliament.uk/business/publications/research/key-issues-</a> parliament-2015/social-change/ageing-population/)

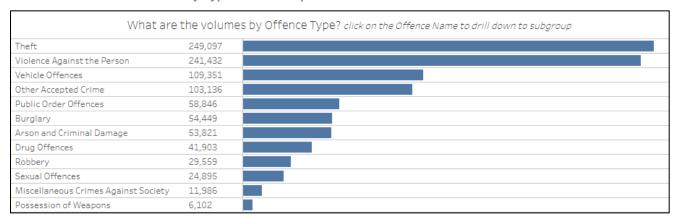
Metropolitan Police (2023). Overview of Crimes: Enfield. (see

https://public.tableau.com/app/profile/metropolitan.police.service/viz/MonthlyCrimeDataNewCats/Coversheet)

Enfield Local Plan: Integrated Impact Assessment December 2023

D.72 The three most common types of recorded crime in Enfield over this period were 'Violence Against the Person' (not including sexual offences), 'Theft', and 'Vehicle Offences'. The largest percentage increase in crime by type of offence was Theft, and largest decrease in percentage attributed to Burglary.

Table D.5: Volume of Offences by Type in Enfield April 2022-March 2023<sup>215</sup>



D.73 Data made available through the Enfield Borough Profile 2022<sup>216</sup> shows that 11,861 cases of Antisocial Behaviour were recorded in Enfield in 2021, 30% lower than 2020 levels.

D.74 Enfield has relatively high proportions of children and young people in comparison to the wider UK. When considering the rate of serious youth violence per 1,000 population aged 1-19, London Borough of Enfield recorded a rate of 6 victims over the last year, the same rate as boroughs with smaller populations such as Haringey, Islington, Hammersmith & Fulham, and Kensington & Chelsea.<sup>217</sup>

D.75 In the year ending February 2020, knife crime in Enfield had increased by 27.5%, compared to the previous year. Offences had increased to 789 by the end of February 2020 from 619 in the previous year. London experienced a much smaller increase of 5.7% in the same period. Enfield is ranked 8th in London for knife crime victims under 24 years old.218

D.76 The number of people killed or seriously injured on London's roads was 39% lower than the 2005-2009 baseline and the number of children killed or seriously injured was 65% lower than the baseline. The number of cyclists killed in 2019 is down by 70% on the 2005-2009 baseline, from 17 to 5. Whereas nationally there has been just a 6% decrease since 2008.

D.77 2019 saw a reduction in people killed and seriously injured for all transport modes compared to 2018. The numbers of motorcyclists killed and seriously injured declined by 6% and have continued to decline year on year, despite motorcyclist fatalities increasing in 2019. People walking, cycling and motorcycling made up 81% of all people killed or seriously injured. The number of children seriously injured in collisions also fell with the greatest percentage reduction amongst children as bus and coach passengers. However, the number of children seriously injured as pedal cyclists increased.<sup>219</sup>

### Likely future changes without the Local Plan

D.78 The number of notifiable offences committed in Enfield has seen a near negligible decrease and although there has been a decrease in burglaries, there has been an increase in theft. Crime rates are influenced by such many variables that it is very difficult to anticipate future trends. Spatial variation that currently exists in relative crime deprivation across the Enfield Borough is likely to remain for the foreseeable future, however, the Local Plan may be able to reduce or deter crime through preventative

<sup>&</sup>lt;sup>215</sup> Metropolitan Police (2023). Overview of Crimes: Enfield. (see

https://public.tableau.com/app/profile/metropolitan.police.service/viz/MonthlyCrimeDataNewCats/Coversheet)

<sup>&</sup>lt;sup>216</sup> Enfield Council (2022). Enfield Borough Profile 2022. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0028/28945/Borough-profile-2022-Your-council.pdf.pdf)
<sup>217</sup> Enfield Community Safety Unit (2020). Crime and Scrutiny Panel Report 17<sup>th</sup> March 2020. (see

https://governance.enfield.gov.uk/documents/s80680/Crime%20Scrutinity%20Performance%20Report%20-%20March%202020.pdf)

Enfield Community Safety Unit (2020). Crime and Scrutiny Panel Report 17th March 2020. (see

https://governance.enfield.gov.uk/documents/s80680/Crime%20Scrutinity%20Performance%20Report%20-%20March%202020.pdf)

219 Transport for London (2020.) Casualties in Greater London during 2019. (see <a href="https://content.tfl.gov.uk/casualties-in-greater-london-2019.pdf">https://content.tfl.gov.uk/casualties-in-greater-london-2019.pdf</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

measures included in policy, such as encouraging high quality design and intervention, i.e. street layout, public space provision, passive surveillance, lighting.

#### Implications for health

**D.79** Exposure to higher rates of crime may facilitate a range of short-term and long-term health effects, exacerbated by a range of factors that crime may elicit, from physical or emotional harm to financial or economic loss. A study conducted in 2013 assessing the effect of local area crime on mental health found a significant, and negative, impact of overall local crime rates on the mental distress of residents in urban areas, with the crime types of burglary, car theft and vandalism eliciting the most anguish. The study also found that violent crime causes mental distress when including the surrounding areas, suggesting that this crime type impacts through affecting individuals' daily routines, like travel to work etc. It is also noted in the study that crime can have different implications for health when considering gender, with the study concluding that when distinguishing between men and women, women are more responsive to changes in crime rates than men (adapting behaviour etc). When considering the variable of age instead, it was found that those above the age of 50 also produce very similar results, responding more strongly to changes in local crime rates than their younger counterparts.<sup>220</sup>

# **Economy and employment**

**D.80** Enfield has a dynamic business base and is market leading in certain sectors such as industrial, logistics and distribution. The Borough's industrial employment land is a critical part of the employment offer and is an important source of employment for local residents. The Borough is home to a wide range of industries, including automotive, electronics, food processing, pharmaceuticals, and advanced manufacturing, including Microsoft, Amazon, Ocado and Waitrose.

**D.81** Industry in Enfield (2017)<sup>221</sup> notes that the 26 clusters of industrial land studied for the report host 1,273 businesses, employing 22,117 people over 247 hectares of employment space (including both building and yard spaces). These clusters together represent the broad industrial base of Enfield where small and micro- enterprises are predominant with the exception of the clusters located in North East Enfield area, namely Brimsdown, Alma Road, Redburn Trading Estate, Morson Road, North Mollison Avenue & Innova Park and Great Cambridge Road. The North East Enfield area is the site of many of the Borough's mid- to large-scale businesses, a profile which distinguishes it from the Borough's typical micro-business profile.

**D.82** Although Enfield's industrial employment land is host to a wide-range of uses, there is a particular prominence of retail warehousing, wholesale warehousing and utilities, which occupy respectively 12%, 10% and 10% of the total employment space. These particular use categories reflect the diversity of industrial activities across the clusters studied. The retail warehousing category includes retail trade such as distribution serving large supermarkets. The wholesale warehousing category includes wholesale trade (e.g. a warehouse where products will be shipped to small businesses, including non-retail). The utilities category refers to sites such as waste remediation and recycling or power supply plant. Manufacturing accounts for 20% of the total employment within the area studied. The retail warehousing is another key cluster in the area, making up 16% of total businesses.<sup>222</sup>

**D.83** Despite the success of Enfield's industrial and manufacturing sector, the diversity of the Borough's employment offer is relatively narrow and focused on a few key industry sectors. It is noted in the Council's Economic Development Strategy<sup>223</sup> that Enfield must diversify industrial areas to create places that can support future business growth. The Borough needs to diversify the local employment offer and attract new industries, particularly from London's growing knowledge economy of creative, cultural, technology and science and the new industrial economies of making and green industries.

**D.84** Transport links have played a crucial role in Enfield's economic growth. The Borough benefits from excellent connectivity, with major road networks such as the M25 motorway passing through its borders. This accessibility enables businesses to

<sup>&</sup>lt;sup>220</sup> Fasani, F. and Dustmann, C. (2013). The Effect of Local Area Crime on Mental Health. (see <a href="https://www.iza.org/publications/dp/7711/the-effect-of-local-area-crime-on-mental-health">https://www.iza.org/publications/dp/7711/the-effect-of-local-area-crime-on-mental-health</a>)

<sup>&</sup>lt;sup>221</sup> AECOM (2017) Industry in Enfield. (see https://www.enfield.gov.uk/ data/assets/pdf\_file/0010/4222/industry-in-enfield-report-aecom-planning.pdf)

AECOM (2017) Industry in Enfield. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf\_file/0010/4222/industry-in-enfield-report-aecomplanning.pdf)

223 Enfield Council (2021) Enfield's Economic Development Strategy (2021)

<sup>&</sup>lt;sup>223</sup> Enfield Council (2021) Enfield's Economic Development Strategy. (see <a href="https://governance.enfield.gov.uk/documents/s85666/Enfield%20Economic%20Development%20Strategy%20250121.pdf">https://governance.enfield.gov.uk/documents/s85666/Enfield%20Economic%20Development%20Strategy%20250121.pdf</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

efficiently transport goods, access suppliers and customers, and connect with national and international markets. Enfield benefits from its proximity to the UK Innovation Corridor, Britain's fastest growing region. This provides substantial economic opportunity to make Enfield a prime destination for business, and growth region for London and the South East - a place where businesses have the work spaces and digital infrastructure they need to start, grow, succeed and stay.<sup>224</sup>

**D.85** Enfield boasts a robust retail sector, making it a shopping destination for residents and visitors. Enfield's high streets, such as Enfield Town and Palmers Green, host independent shops, boutiques, and restaurants, contributing to the Borough's character and local economy. The Council seeks to promote new investment in the Borough's town centres to improve their vitality and viability, and to maintain and support the Borough's established town centre hierarchy. The Council aims to diversify uses in town centres, to encourage more people to visit and use them. Enfield Council has published Town Centre Action Plans to support the future success of the Borough's five priority town centres. These include Action Plans for Enfield Town, Southgate Town Centre, Palmers Green Town Centre, Edmonton Green Town Centre, and Angel Edmonton Town Centre. <sup>225</sup> Commonly, these areas are heavily reliant on retail, and in line with national trends have been struggling with the challenges facing the sector and high street decline before the COVID-19 pandemic. Across Enfield's Town Centres, vacancy rates have been high, and the economic impacts of the pandemic have further exacerbated these challenges. Enfield seek to generate greater footfall in these areas through improving connectivity, encouraging development opportunities, capitalising on the Borough's market heritage and cultural assets, and utilising green and blue spaces. <sup>226</sup>

**D.86** Regeneration and investment initiatives are key drivers of Enfield's economic development. The Borough has implemented various programs to revitalise key areas, attract investment, and create favourable business environments. One of the largest of these initiatives is the Meridian Water project, which is a major, 20-year London regeneration programme led by Enfield Council, bringing 10,000 homes and 6,000 permanent, high-quality jobs to Enfield, next door to the Lee Valley Regional Park. Meridian One will see approximately 1,000 homes with associated commercial space built at Willoughby Lane. These first homes are being delivered around the new Meridian Water station. A development partner has also been appointed for Meridian Two at Leeside Road, which will deliver 250 affordable homes.<sup>227</sup>

**D.87** There are 159,700 people (70.2%) employed within the Borough. Data from NOMIS shows that the number of unemployed people in the Borough is 5.9%. This is higher than the regional average (4.4%) and the national average (3.6%). However, Enfield's unemployed population, whilst higher than the London average, can be accredited to the Borough's large young adult population, with 25.5% of the population registered as a student, 4.9% higher than the London average. 49.7% of Enfield's population held qualifications of NVQ4 and above in the period between January 2021 and December 2021. Only 4.4% of the Borough's population held no qualifications during the same period.

**D.88** In terms of occupation, professional occupations make up the majority of Enfield's employment (27.9%), followed by associate professional occupations (15.8%) and managers, directors and senior officials (10.9%). 66% of employees in Enfield ae full-time, and 33.3% are part-time.

**D.89** The GLA sets out employment projections for Enfield and the most current projections the GLA's 2022 employment projections. From a baseline of 120,000 jobs in 2021, the GLA's 2022 employment projections anticipate an increase to 126,000 jobs by 2026 and 136,000 jobs by 2036. This represents a 5% increase in jobs by 2026, and a 13.3% increase in jobs by 2036. 228

#### Likely future changes without the Local Plan

**D.90** Educational attainment and employment prospects are, to an extent, dependent on the provision of quality teaching and supportive community and family environments. Planning does, however, play a role in locating new development within close proximity of educational establishments and employment opportunities. The proportion of people recorded as being economically active in Enfield is likely to remain roughly where it is now, particularly as the Borough has a large young adult population registered as a student. Without the Local Plan, it is likely that these trends will continue.

<sup>&</sup>lt;sup>224</sup> The UK Innovation Corridor (2023) The UK Innovation Corridor. (see https://innovationcorridor.uk/)

<sup>&</sup>lt;sup>225</sup> Enfield Council (2022) Town Centre Action Plans. (see <a href="https://letstalk.enfield.gov.uk/towncentreactionplans">https://letstalk.enfield.gov.uk/towncentreactionplans</a>)

<sup>&</sup>lt;sup>226</sup> Ibic

<sup>&</sup>lt;sup>227</sup> Opportunity London (2023) Meridian Water. (see <a href="https://opportunity.london/boroughs/enfield#opp61">https://opportunity.london/boroughs/enfield#opp61</a>)

<sup>&</sup>lt;sup>228</sup> Enfield Council (2022). Authority Monitoring Report 2021/2022. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)

Enfield Local Plan: Integrated Impact Assessment December 2023

#### Implications for health

**D.91** Employment and job security influence mental health and levels of stress. Income can also influence physical health, in terms of the quality and location of housing that people can afford. A strong local economy will help create more job opportunities, contribute to greater job stability and raise the quality of life for local people, resulting in improved health outcomes.

## Health

**D.92** For the period 2020/21, 59.7% of adults in Enfield were classified as overweight or obese. This is under the national average of 63.8%<sup>229</sup>. Whilst below the national average, current trends suggest that Enfield is at risk of continuous declining physical health within its population. This is further compacted by the prevalence of obesity amongst children in the Borough. Of children in Year 6 and upwards (where records begin to be taken) living in Enfield, 27.3% are classified as overweight, obese, or severely obese, compared to the national average of only 23.4%. This is a significant increase of 3.9% and suggests that Enfield's population is trending towards more behavioural risk factors, and lower levels of health.

**D.93** In 2018/19, 21,558 adults (aged 17 and over) were recorded as having diabetes in Enfield. This constitutes a prevalence of 8.1%, which is the eighth highest in London. Furthermore, it is higher than both the London average of 6.6% and the England average of 6.9%.<sup>230</sup>

**D.94** Physical activity is a significant factor in determining people's health, with inactivity increasing the risk of chronic conditions including heart disease, diabetes and other obesity related illnesses. People in Enfield are less likely to be physically active (61.4% of Enfield adults compared to 65.9% of adults nationally) and rates of obesity are higher than London averages (60.9% of Enfield adults are overweight or obese compared to 56% across London).<sup>231</sup> Additionally, surveys conducted by the Office for Health Improvement & Disparities concluded that 18.5% of Enfield's population were active smokers, 5.5% above the national average. Similar survey data from 2014/15 provided local level data that showed 3.5% of 15-year olds in Enfield were smokers – lower than London and national averages but an indication that uptake of smoking remains a threat to young people.

**D.95** Life expectancy (at birth) for males between 2018 and 2020 was 80 years, and for females between the same years was recorded at 84.2. Perhaps surprisingly, both of these values were above the national average at the time, despite the aforementioned health and behavioural risk factors trending above the national average.<sup>232</sup> Men in Enfield can expect to live an average of 64.3 years in good health and women can expect to live 62.1 years in good health. The difference in life expectancy between the most and least deprived areas in Enfield is 7.4 years for women 7.2 years for men.<sup>233</sup>

**D.96** In 2017, Enfield recorded the prevalence of common mental disorders for residents aged 16 and over at 49,261 persons, approximately 19.2% of the Borough's population, and 2.3% above the national average<sup>234</sup>. Additionally, in 2017/18 the estimated number of children and young people with mental disorders (aged 5 to 17) was 7,206 – though this is little sufficient evidence to accurately compare this to national statistics. This includes emotional, conduct, and hyperkinetic disorders.

**D.97** There were 1,718 recorded cases of dementia among people aged 65 and over 5.3% of adults over 65 years of age have been diagnosed with dementia – indicating Enfield has the highest prevalence of recorded cases of dementia in London, and higher than the rate for England. It is higher than both the London average of 6.7% and the England average of 7.1%. <sup>235</sup>

Public Health England (2023). Local Authority Health Profiles: Enfield. (see <a href="https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132701/pat/15/ati/501/are/E09000010/iid/93347/age/187/sex/4/cat/-1/ctp/-1/yrr/1/cid/4/tbm/1)</a>
 Enfield Council (2020). Enfield Borough Profile 2020. (see <a href="https://new.enfield.gov.uk/services/your-council/Borough-and-wards-profiles/Borough-profile-2020-your-council.pdf">https://new.enfield.gov.uk/services/your-council/Borough-and-wards-profiles/Borough-profile-2020-your-council.pdf</a>
 Enfield Council (2023) Council Plan 2023-2026. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> <a href="https://www.enfield.gov.uk/">data/assets/pdf</a> file/0022/34087/Enfield-Council-Plan-

<sup>&</sup>lt;sup>231</sup> Enfield Council (2023) Council Plan 2023-2026. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf\_file/0022/34087/Enfield-Council-Plan-2023-2026-Your-Council.pdf</a>)

Enfield Council (2023) Council Plan 2023-2026 (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0022/34087/Enfield-Council-Plan-2023-2026-Your-Council.pdf)
 Office for Health Improvement & Disparities (2023). Mental Health and Wellbeing JSNA. (see <a href="https://fingertips.phe.org.uk/profile-">https://fingertips.phe.org.uk/profile-</a>

<sup>&</sup>lt;sup>234</sup> Office for Health Improvement & Disparities (2023). Mental Health and Wellbeing JSNA. (see <a href="https://fingertips.phe.org.uk/profile-group/mental-health/profile/mh-jsna/data#page/1/gid/1938132922/pat/6/ati/402/are/E09000010/iid/93495/age/164/sex/4/cat/-1/ctp/-1/yrr/1/cid/4/tbm/1)

<sup>235</sup> Enfield Council (2022). Authority Menitoring Penert 2004/2009. (see https://index.doi.org.uk/profile-group/mental-health/profile/mh-jsna/data#page/1/gid/1938132922/pat/6/ati/402/are/E09000010/iid/93495/age/164/sex/4/cat/-1/ctp/-1/yrr/1/cid/4/tbm/1)

<sup>&</sup>lt;sup>235</sup> Enfield Council (2022). Authority Monitoring Report 2021/2022. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)

Enfield Local Plan: Integrated Impact Assessment December 2023

## Likely future changes without the Local Plan

**D.98** Given that Enfield Borough has performed poorly for some health indicators against regional and national averages, it is likely it will continue to do so without substantial intervention. There are a range of potential changes in determinants that will affect health in the UK and Enfield Borough in the future including climate change. Summers are expected to become hotter, and overheating may increase the excess mortality rate for vulnerable groups. Without the Local Plan, these trends are likely to continue.

#### Implications for health

**D.99** Some areas of the Borough experience health challenges, with high levels of obesity and risk of associated health problems. The UK Chief Medical Officers advise that for good physical and mental health, adults should aim to be physically active every day. Over the course of a week adults should accumulate at least 150 minutes of moderate intensity activity; or 75 minutes of vigorous intensity activity day; or even shorter durations of very vigorous intensity activity; or a combination of moderate, vigorous and very vigorous intensity activity.<sup>236</sup>

**D.100** Similarly, open spaces and recreational facilities provide residents space in which they can undertake physical activity to the benefit of public health, including lowering the risk of specific health conditions such as depression, anxiety, cortisol, blood pressure, pre-term birth, low birthweight, and type 2 diabetes. There is generally positive evidence relating to the impacts of activities in natural environments on children's mental health and their cognitive, emotional and behavioural functioning. These health benefits are thought to arise through a range of pathways, including providing opportunities and safe spaces for physical activity, for restoration and relaxation, and for socialising with friends and family. Exposure to green and blue space is also associated with higher levels of life satisfaction. Impacts appear to differ according to socio-economic status and other demographic factors such as age or gender.

**D.101** Similarly, encouraging active travel, such as walking, wheeling and cycling can have a wider range of positive implications for health, including increased physical activity and opportunities for social interaction. In addition, an increase in active travel would be associated with a decrease in vehicular transport and an associated decrease in air pollutants that can be harmful to human health.

# Heritage and townscape

**D.102** Substantial growth over the next five years means that historic buildings and landscapes will be affected across the Borough. Growth is expected to be concentrated in existing town centres, increasing heights and densities. Established town centres across Enfield hold the greatest concentration of historic assets. How new design mediates between old and new, as at Enfield Town Library, will be central to the success of place-making, enhancing town centres and creating new places.<sup>237</sup>

**D.103** Enfield has several historic assets designated at local and national scale within its boundaries including five scheduled monuments, the most notable of which is the Earthworks at Old Park (1002047)<sup>238</sup>, 22 conservation areas, five registered parks and gardens of special historical interest, 479 statutory listed buildings, 262 local landmarks and landscapes identified on the Local heritage list and 25 areas of archaeological importance.

**D.104** All 22 conservation areas in the Borough have Conservation Area Character Appraisals. These documents highlight assets which make the areas distinctive and aim to protect the important historical and cultural features. Historic England defines the purpose of Conservation Area Appraisal, Designation and Management Plans as "the management of change in a way that conserves and enhances the character and appearance of historic areas through conservation area appraisal, designation and management".<sup>239</sup>

<sup>&</sup>lt;sup>236</sup> UK Chief Medical Officers (2019) UK Chief Medical Officers' Physical Activity Guidelines. (see <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/832868/uk-chief-medical-officers-physical-activity-guidelines.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/832868/uk-chief-medical-officers-physical-activity-guidelines.pdf</a>

<sup>237</sup> Enfield Council (2019) Enfield Horitoga Strotogy (2029 https://www.enfield.com/data/file/832868/uk-chief-medical-officers-physical-activity-guidelines.pdf</a>

<sup>&</sup>lt;sup>237</sup> Enfield Council (2019) Enfield Heritage Strategy. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0024/3957/heritage-strategy-2019-24-planning.pdf)

<sup>&</sup>lt;sup>238</sup> Historic England (2023). Map Search: Enfield. (see <a href="https://historicengland.org.uk/listing/the-list/map-search">https://historicengland.org.uk/listing/the-list/map-search</a>)

<sup>&</sup>lt;sup>239</sup> Historic England (2019). Conservation Area Appraisal, Designation and Management. (see <a href="https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/">https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

D.105 Historic England maintains a nationwide Heritage at Risk (HAR) register, updated on an annual basis. The 2022 HAR register<sup>240</sup> records 20 entries that are at risk within the Borough. Of these, six are Grade II\* listed buildings, and two are conservation areas (Church Street and Fore Street). Four are registered parks and gardens (Grovelands, Broomfield and Trent Park) and the remaining HARs are either Grade I or II listed buildings.

D.106 The National Lottery Heritage Fund (NLHF) has identified Enfield as an area of focus over the period 2019-24. This recognises the low number of previous grant awards per capita and areas of the Borough with high rates of deprivation. Further to an award from the NLHF, the Council has awarded £83,000 directly to 10 cultural heritage projects through the Stories of Enfield programme which began running in September 2021.<sup>241</sup>

## Likely future changes without the Local Plan

D.107 The historic environment can be considered a finite resource. It cannot be replaced and is susceptible to decline over time as historic features experience degradation and decay. However, cultural heritage can evolve and change, and features which are not currently considered a valued part of the historic environment may become so in the future, either due to their uniqueness, past use, or historic or cultural significance. There are many designated and non-designated historic assets and areas of historical and cultural interest in the Borough that could be adversely affected by inappropriate development. Without the Local PI sites may be located in areas with particular sensitivities to the historic environment.

#### Implications for health

D.108 Historic England explored the links between the historic environment and health in Wellbeing and the Historic Environment.<sup>242</sup> This identified mental and social wellbeing benefits of the historic environment, including opportunities to meet people and expand knowledge through volunteering or visiting historic sites and giving people a sense of place, community and belonging.

## Housing

D.109 Properties in Enfield have an overall average price of £580,688. The majority of sales in Enfield during 2022/23 were terraced properties, selling for an average price of £566,407. Flats sold for an average of £348,071, with semi-detached properties fetching £757,920. Overall, sold prices in Enfield in 2022/23 were 6% up on 2021 and 13% up on the 2020 peak of £513,532.<sup>243</sup> In comparison, North London, with an overall average price of £853,462 was cheaper than nearby North West London (£919,534), Central London (£1,656,257) and West London (£1,316,521). The most expensive area within North London was Islington (£843,053) and the cheapest was Enfield (£580,688).<sup>244</sup>

D.110 Over the last 25 years, housing affordability has worsened in every Local Authority, especially in London or surrounding areas. In 1997, 89% of local authorities had an affordability ratio of less than five times workers' earnings, whereas only 7% had this level of affordability in 2022.245 In 2022, Enfield had an affordability ratio of 12.6. This means that in Enfield, full-time employees could expect to spend 12.6 times their earnings on purchasing a home in the area. This is a higher ratio than the national average for England (8.3).

D.111 Enfield's Housing and Growth Strategy 2020-2030<sup>246</sup> acknowledges that there is a national housing crisis which is having significant local impact on the area. The strategy identifies a growing population with increasing numbers of householders on low incomes with no access to social or affordable homes. At the same time, private sector rents and the number of private

<sup>&</sup>lt;sup>240</sup> Historic England (2022). Heritage at Risk Register. (see <a href="https://historicengland.org.uk/advice/heritage-at-risk/search-">https://historicengland.org.uk/advice/heritage-at-risk/search-</a> register/results/?searchType=HAR&search=Enfield&page=1)

<sup>&</sup>lt;sup>41</sup> Enfield Council (2022). Authority Monitoring Report 2021/2022 (see https://www.enfield.gov.uk/ data/assets/pdf\_file/0015/34107/Authority-

monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)
<sup>242</sup> Historic England (2018) Wellbeing and the Historic Environment. (see <a href="https://historicengland.org.uk/images-books/publications/wellbeing-">https://historicengland.org.uk/images-books/publications/wellbeing-books/publications and-the-historic-environment/wellbeing-and-historic-environment/)

Rightmove (2023) House Prices in Enfield (see https://www.rightmove.co.uk/house-prices/enfield.html)

<sup>&</sup>lt;sup>245</sup> Office for National Statistics (2023) Housing affordability in England and Wales: 2022 (see

https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2022)

Enfield Council (2020) More and better homes for Enfield: Housing and Growth Strategy 2020-2030 (see https://www.enfield.gov.uk/ data/assets/pdf\_file/0023/4586/housing-and-growth-strategy-2020-2030-housing.pdf)

Enfield Local Plan: Integrated Impact Assessment December 2023

rented homes in the Borough is rapidly rising. This means that increasing numbers of people on low incomes are living with unsecure tenancies, and in many cases, experiencing housing standards which are not acceptable. In Enfield, 25% of low-income households living in the private rented sector have outgoings that are greater than their income, which is mainly driven by housing costs.

**D.112** As a result of considerable rent increases in outer London, boroughs like Enfield have felt the biggest impacts of the Local Housing Allowance freeze and have seen the largest reductions in affordability in recent years. For many private rented sector homes, even those which are lower quartile rents, the Local Housing Allowance is less than the rent being charged, causing affordability challenges to any renter who is reliant on Housing Benefit for all or part of their rent. Less than 15% of properties in Enfield are 'affordable' on Local Housing Allowance rates (LHA).<sup>247</sup>

**D.113** People hoping to own their own home face challenges too. Local people aspiring to buy a home close to their family are finding local market sale prices prohibitive. Homes for outright sale are often unaffordable and out of reach for many residents. This means people working in essential local services, such as teachers, social workers, occupational therapists, nurses, police officers or utility workers, and particularly those with families, are having to make difficult decisions. This often means choosing whether to stay locally, in overcrowded accommodation, or move out of the Borough, away from local support networks and local employment. <sup>248</sup>

**D.114** In the London Plan<sup>249</sup>, Enfield Borough has a 10-year housing target of 12,460 new homes (1,246 each year) and 3,530 new homes on smaller sites. The Borough must also achieve 195 units per year for older persons. The latest Authority Monitoring Report states that an overall total of 1,041 dwellings were completed (net) for all types of accommodation in 2021/22. This figure includes all types of housing such as care home bedrooms and student accommodation, as well as conventional housing. This means that the number of dwellings completed fell short of the GLA's annual housing target for Enfield of 1,246 homes per annum.<sup>250</sup>

**D.115** The number of net affordable homes completed was 247 (275 gross). Based on the 275 (gross) affordable homes measured against Core Strategy targets, 18% was social rented housing, 2% was affordable rent and 10% was intermediate housing when measured against gross completions of 1,084 conventional homes. Although, there was an increase from the last monitoring year in term of actual delivery by 16 homes - this fell short of the 40% borough-wide target for affordable housing provision. Most of the affordable homes completed, were as a result of major schemes - Alma Estate Regeneration, Gardiner Close and Electric Quarter. Conversely, a large number of housing completions came from smaller developments, below 10 units which do not require delivery of affordable homes. In addition, £894,200 was spent in 2021/22 towards the provision of offsite affordable housing delivery as part of the Borough's estate renewal programme, with a further £664,608 collected in affordable housing contributions during the monitoring year.<sup>251</sup>

**D.116** There is an estimated supply of 5,676 net new homes in the next five years. This is equivalent to 3.80 years housing land supply when measured against the London Plan requirement and considering backlog need and a 20% buffer. National planning policy requires local planning authorities to maintain a five-year housing land supply. This indicates that the Borough did not have the required five-year housing land supply. 252

**D.117** Enfield's Housing and Growth Strategy 2020-2030 also acknowledges that there are increasing numbers of people becoming homeless in Enfield, with too many people living in temporary accommodation. Since 2011/12, homelessness has increased by 246% in the Borough. In March 2019, Enfield had 3,410 households in temporary accommodation, a 74% rise since 2012. This makes Enfield the second highest provider of temporary accommodation in England. Temporary accommodation is not a good or stable housing option and represents a significant cost pressure to the Council. In 2018/19, Enfield spent over £66m on the Temporary Accommodation service, with a net cost to the local authority of £7m. In most cases, the route out of temporary accommodation is into the private rented sector.<sup>253</sup>

<sup>&</sup>lt;sup>247</sup> Ibid

<sup>&</sup>lt;sup>248</sup> Ibid

<sup>&</sup>lt;sup>249</sup> Mayor of London (2021). The London Plan. (see <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan/2021">https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan/2021</a>)

<sup>&</sup>lt;sup>250</sup> Enfield Council (2022). Authority Monitoring Report 2021/2022 (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)

<sup>251</sup> Ibio

<sup>&</sup>lt;sup>252</sup> Ibio

<sup>&</sup>lt;sup>253</sup> Enfield Council (2020) Preventing Homelessness and Rough Sleeping Strategy: 2020-2025. (see <a href="https://governance.enfield.gov.uk/documents/s78850/Preventing%20Homelessness%20and%20Rough%20Sleeping%20Strategy.pdf">https://governance.enfield.gov.uk/documents/s78850/Preventing%20Homelessness%20and%20Rough%20Sleeping%20Strategy.pdf</a>)

Enfield Local Plan: Integrated Impact Assessment December 2023

**D.118** The key drivers of rising homelessness in Enfield are complex and interconnected. Eviction from the Private Rented Sector (PRS) is now the main cause for someone becoming homeless in Enfield, and Enfield Borough has the second highest eviction rate in London. Increased levels of inward migration, deprivation, low incomes and the limited supply of affordable social rented homes means that vulnerable and migrant communities are increasingly reliant on finding accommodation in the private rented sector in Enfield and are exposed to these higher housing costs.<sup>254</sup>

**D.119** Enfield's Homelessness and Rough Sleeping Strategy 2020-2025<sup>255</sup> sets out a vision for ending homelessness in Enfield over the next five years. Alongside the Council's Housing and Growth Strategy, which sets out how the Council will deliver more homes and better homes for Enfield, the Homelessness and Rough Sleeping Strategy provides five ambitions to end homelessness. These ambitions include:

- Make homelessness prevention a priority for everyone;
- Treat people with empathy, dignity and respect;
- Support people to access the right accommodation;
- Support people to plan for their lifetime housing needs; and
- End rough sleeping in Enfield.

**D.120** Enfield has no pitches or plots for Traveller accommodation with the last residential site in Enfield being closed in 1999. According to the London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (October 2020)<sup>256</sup>, Enfield Borough has a five year pitch shortfall from 2020/21 to 2024/25 of 16 pitches. This figure is taken from nine existing households who currently live in bricks and mortar accommodation or are in-migrating to the Borough, combined with emerging households in the next five years. This figure for emerging households is based on the assumption that 50% of children upon reaching 18 years of age will form their own household. Those interviewed in the Gypsy and Traveller Accommodation Needs Assessment identified that sites of six to ten pitches are generally accepted as appropriate among the travelling community. A nomadic lifestyle is an integral part of Gypsy and Traveller tradition, however a shortage of sites results in Travellers being pushed into housing which is not culturally suitable for many.

**D.121** Enfield's Gypsy and Traveller Accommodation Needs Assessment (2020) concludes that there is a cultural shortfall of 23 pitches over the plan period to 2036, of which 21 pitches are for households who meet the Planning Policy for Traveller Sites definition. Evidence indicates that there is an immediate need for 9 pitches (from existing households wanting to move onto a pitch) and an additional need from emerging households for 7 pitches within five years. The Assessment also recommends that the Council considers future applications for small sites to meet the needs of additional families who may emerge over the plan period.

#### Likely future changes without the Local Plan

**D.122** Affordability of housing within Enfield Borough is an issue, with the median property price-to-earnings ratio for Enfield Borough Council higher than the average for England. The Borough's growing population will create additional demand for family homes, while relatively low levels of income will need to be considered through the provision of affordable accommodation. Enfield Borough has not delivered its annual housing target in the last three reporting years, leaving a gap in the supply of much needed housing (including affordable housing) within the Borough. This has had further impacts on the increasing rates of homelessness in the Borough and increases in households in temporary accommodation. The Council predict that the number of people registered as homeless is likely to continue to grow. This increase is believed to be largely because of reasons such as the economic climate, increased costs of both private and owner-occupied accommodation, and the government's welfare reforms. The continued rise of homelessness within the Borough is seen by the Council as being unsustainable and unlikely to fall without intervention.

**D.123** Without the Local Plan, the objectively assessed need for new housing and the appropriate mix of housing types in Enfield will not be delivered and the current trends will continue. The Local Plan offers the opportunity to facilitate and expedite

<sup>&</sup>lt;sup>254</sup> Ibid

<sup>255</sup> Ihic

<sup>&</sup>lt;sup>256</sup> Arc (2020). London Borough's Gypsy and Traveler Accommodation Needs Assessment. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0023/5684/enfield-gypsy-and-travellers-assessment-final-report-2020-planning.pdf)

Enfield Local Plan: Integrated Impact Assessment December 2023

the delivery of a variety of housing, including affordable housing and housing to meet the needs of an ageing population. The Local Plan also offers the opportunity to target residential development in areas where the barriers to housing are greatest.

#### Implications for health

**D.124** Housing is often cited as an important social determinant of health, recognising the range of ways in which a lack of housing, or poor-quality housing, can negatively affect health and wellbeing. The causal relationships between tangible physical housing defects and poor health outcomes are widely accepted. A 2020 study<sup>257</sup> concluded that housing service provision, tenants' experience of property quality and aspects of neighbourhood are all demonstrated to be significantly correlated with measures of health and wellbeing. The study found clear evidence of negative physical health effects of toxins within the home, damp and mould, cold indoor temperatures, overcrowding and safety factors and also of negative mental health effects arising from cold indoor temperatures, overcrowding/lack of personal space, and damp and mould.

**D.125** In 2021, the charity Shelter also released findings of their study<sup>258</sup> into the most common problems impacting renters' mental and physical health. The most substantial impacts include damp and mould, which affects 26% of all renters; being unable to heat their home (also affects 26%); constantly struggling to pay rent (21%) and fear of eviction (19%). The study further found that 39% said their housing problems or worries left them feeling stressed and anxious, 22% said their housing issues or worries made the physically sick and 21% said their housing issues had negatively affected their performance at work.

### Landscape and green infrastructure

**D.126** Enfield lies on the edge of the open countryside and forms part of a wider network of open spaces, routes and watercourses, extending from the Lee Valley Regional Park to Hertfordshire, with good links to Central London and the wider south east. The eastern part of the Borough lies in the valley of the River Lea (which includes parts of the Lee Valley Regional Park). The western half of the Borough lies on higher ground and includes a mix of undulating parkland (including the grounds of former grand estates and historic houses) and farmland.<sup>259</sup>

**D.127** Despite being one of the most populous boroughs in London, Enfield is remarkably green and borders on large expanses of water and open countryside. Enfield has developed from a traditional rural enclave into a teeming urbanised environment, including green and leafy suburbs, vibrant town centres and large public parks. The open character of the Borough provides an outstanding natural backdrop to several key visitor attractions and development sites.<sup>260</sup>

**D.128** Enfield's parks and open spaces range from large county parks and river valleys through to small-scale amenity areas and enclosed pocket parks in more built-up-areas. These spaces also support a wide variety of species and habitats.<sup>261</sup>

**D.129** A 2020 study by Essential Living found that Enfield ranked as the 4th greenest borough in London, with an overall "Green Space Score" of 44.56, just 4.28 off the greenest borough, Richmond upon Thames<sup>262</sup>. The overall Green Space Score is calculated using the following survey metrics: amount of green space in hectares; percentage of green space in the Borough; public perception of green space; air quality; public "happiness"; and public anxiety. Whilst this is a significant improvement on previous data showing Enfield as the 9<sup>th</sup> greenest borough, there remains some green space accessibility concerns, particularly with reference to the east of the Borough and the Lee Valley Regional Park. Connections to these areas are restricted by physical barriers including industrial land and the River Lea.<sup>263</sup> Other physical barriers to accessing the wider network include

<sup>&</sup>lt;sup>257</sup> Rolfe, S. Garnham, L. Godwin, J. Anderson, I. Seaman, P. and Donaldson, C. (2020). Housing as a social determinant of health and wellbeing: developing an empirically-informed realist theoretical framework. (see <a href="https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-020-09224-0">https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-020-09224-0</a>)

<sup>&</sup>lt;sup>258</sup> Shelter (2021) Health of one in five renters harmed by their home. (see

https://england.shelter.org.uk/media/press release/health of one in five renters harmed by their home)

<sup>&</sup>lt;sup>259</sup> Enfield Council (2021). Enfield's Blue and Green Strategy 2021-2031. (see

https://www.enfield.gov.uk/\_\_data/assets/pdf\_file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf)

<sup>&</sup>lt;sup>260</sup> Ibid

<sup>261</sup> Ibid

<sup>&</sup>lt;sup>262</sup> Essential Living (2020). The Greenest Cities in Europe. (see <a href="https://www.essentialliving.co.uk/blogs-insights/the-greenest-cities-in-europe/">https://www.essentialliving.co.uk/blogs-insights/the-greenest-cities-in-europe/</a>)
<sup>263</sup> Enfield Council (2010). The Enfield Plan Core Strategy 2010-2025. (see

https://www.enfield.gov.uk/ data/assets/pdf\_file/0015/4623/planning-policy-information-the-enfield-plan-core-strategy-november-2010.pdf)

Enfield Local Plan: Integrated Impact Assessment December 2023

roads, railway crossings, rivers and the lack of open space within deprived wards. Population growth is also placing more pressure on the Borough's existing green spaces and natural ecosystems.<sup>264</sup>

D.130 To address these concerns, the Enfield Blue and Green Strategy 2021-2031 sets out how the Borough's open spaces, habitats, landscapes and water assets will be protected, maintained, enhanced and expanded over the next ten years to make Enfield the greenest Borough in London by 2031, including through achieving a 25% increase in blue-green infrastructure in Enfield, and improving access to the Borough's green spaces.<sup>265</sup>

**D.131** Around 40% of the Borough's area is designated Green Belt and there are several sizeable parks within the built-up area. The largest park is Trent Country Park with 400 acres of meadow, woodland, and lakes, plus a water garden, animal corner, café and a full walks and events programme.<sup>266</sup> Other notable attractions include Enfield Chase (a former royal hunting ground and deer park), Capel Manor and the registered gardens of Trent Park, Forty Hall and Myddelton House.<sup>267</sup>

D.132 The quantity of open space (ha per 1,000 population) varies between wards across Enfield. Some wards fall below the recommended open space (quantity) standard. Whilst the quantity of open space / play space is an important factor, quality, value and ease of accessibility of open spaces may have a more significant impact in terms of the recreational offer and benefits afforded to health and wellbeing.<sup>268</sup>

D.133 According to the latest Annual Monitoring Report, there was no net loss of designated Green Belt or Metropolitan Open Land over the monitoring period 2021/22 with the Borough's Green Belt extent remaining at 3,058ha.<sup>269</sup>

D.134 According to the latest Annual Monitoring Report, there was no net loss of Protected Open Space over the monitoring period 2021/22 with the area of Protected Open Space remaining at 579ha.<sup>270</sup>

#### Likely future changes without the Local Plan

D.135 The Borough's landscapes and townscapes are vulnerable to adverse effects from urban expansion and increasing recreational pressures, particularly as around 40% of the Borough is Metropolitan Green Belt. Without the Local Plan, it is possible that sites may come forwards in areas with high landscape sensitivity. The Local Plan may also help to address concerns for the Borough's landscape and green infrastructure, including improving the quality of green infrastructure provision in new developments, removing barriers to wider green networks, and improving access to green space in more deprived areas across the Borough.

#### Implications for health

D.136 Now more than ever before, equitable access to high-quality green spaces is vital to promoting healthier lifestyles, especially in response to the COVID-19 pandemic. There is increasingly compelling evidence showing that access to blue and green spaces is essential to health and wellbeing. People with better access to greenspace enjoy a wide range of health benefits from lower levels of cardiovascular disease through to maintaining a healthier weight and reduced levels of depression. Disadvantaged groups appear to gain a larger health benefit and have reduced socio-economic related inequalities in health when living in greener communities, so greenspace and greener urban environment can also be used as an important tool in the drive to build a fairer and more equal place.271

 $\underline{\text{https://www.enfield.gov.uk/} \underline{\text{data/assets/pdf}} \underline{\text{file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf}})}$ 

https://www.enfield.gov.uk/\_\_data/assets/pdf\_file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf)

<sup>&</sup>lt;sup>264</sup> Enfield Council (2021). Enfield's Blue and Green Strategy 2021-2031. (see

Enfield Council (2021). Enfield's Blue and Green Strategy 2021-2031. (see

data/assets/pdf\_file/0015/34107/Authority-Enfield Council (2022). Authority Monitoring Report 2021/2022. (see https://www.enfield.gov.uk/\_ monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)

Enfield Council (2021). Enfield's Blue and Green Strategy 2021-2031. (see

https://www.enfield.gov.uk/\_data/assets/pdf\_file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf)

268 LUC (2020). Enfield Blue and Green Infrastructure Audit. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf\_file/0012/11910/Enfield-Blueand-Green-Infrastructure-Audit-2020-Planning.pdf)

LUC (2020). Enfield Blue and Green Infrastructure Audit. (see https://www.enfield.gov.uk/\_data/assets/pdf\_file/0012/11910/Enfield-Blueand-

Green-Infrastructure-Audit-2020-Planning.pdf)

270 LUC (2020). Enfield Blue and Green Infrastructure Audit. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0012/11910/Enfield-Blueand-Green-Infrastructure-Audit-2020-Planning.pdf)

271 Enfield Council (2024), F-77 His Table

Enfield Council (2021). Enfield's Blue and Green Strategy 2021-2031. (see

https://www.enfield.gov.uk/ data/assets/pdf\_file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf)

Enfield Local Plan: Integrated Impact Assessment December 2023

**D.137** In Enfield, around a fifth of adults are estimated to have depression or anxiety, while one tenth of children and young people are estimated to have a mental health disorder. Around two thirds of adults, two fifths of 10-to-11-year-olds and a quarter of 4-to 5-year-olds in the Borough are classed as overweight or obese. This comes at both a human and financial cost: the estimated annual cost of common mental disorders (depression or anxiety) in Enfield is £98 million. As with the rest of the UK population, much of the burden of ill-heath in Enfield could be prevented through the creation of greener, less polluted and physically active spaces.<sup>272</sup>

### **Transport**

**D.138** Enfield's road network comprises approximately 68km of principal roads, 37km of TfL road network, 51km of non-principal classified roads, and 466km of unclassified roads. Only three main roads cross through the Borough; the M25 to the north, the A10 (London to Cambridge) running up through the centre of the Borough, and the A406 (The North Circular) across the southern edge of the Borough.

D.139 The Borough has 22 train / tube stations and is serviced by four separate lines. These include:

- The London Underground Piccadilly Line servicing the west of the Borough with four associated stations;
- West Anglia Main line to London servicing Liverpool Street to Hertford East;
- London Overground servicing Liverpool Street to Chestnut; and
- Govia Thameslink Railway servicing Moorgate to Hertford North and Wootton on Stone.

**D.140** Between 2017 and 2019 Network Rail delivered the £170 million Lee Valley Rail programme, which increased capacity on the West Anglia mainline. A significant element of this is the delivery of a new four platform train station at Meridian Water to service the new 10,000 home development in the area. The London Borough of Enfield worked with the Mayor of London to submit a forward funding bid to the Government's Housing Infrastructure Fund (HIF). The objective of the bid was to deliver a four Trains Per Hour service and road infrastructure to unlock the early delivery of homes at Meridian Water.

**D.141** Both Routes 1 and 12 of the National Cycle Network (NCN) run through the London Borough of Enfield. Route 1 comprises a long distance cycle route connecting Dover to Shetland. It runs through the east of Enfield following the River Lea. Route 12 runs in sections from Enfield Lock to Spalding via Stevenage, St Neots, and Peterborough. The section within Enfield is currently incomplete and temporarily starts from Hadley Wood as opposed to Enfield Lock.

**D.142** The London Borough of Enfield Transport Plan 2019<sup>273</sup> notes that Enfield is one of five Outer London Boroughs identified as having the greatest number of potentially cyclable trips, with nearly 80% of car trips in Enfield of cyclable length. The below figure demonstrates the Borough's established cycle routes, in dark green.

<sup>&</sup>lt;sup>272</sup> Ihid

<sup>&</sup>lt;sup>273</sup> Enfield Council (2018). The London Borough of Enfield Transport Plan 2019. (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0019/4825/enfield-transport-plan-2019-2041-roads.pdf)

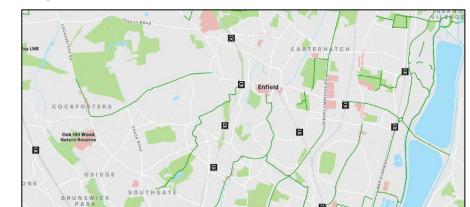


Figure D.1: Established cycle routes within LBE<sup>274</sup>

**D.143** Enfield is served by a network of 38-day bus routes, 7 school-day only services, and 8-night bus routes, which altogether service the 547 bus stops within the Borough. The North London Sub-Regional Transport Plan report states that travelling by bus accounts for 14% of all journeys made by LBE residents.

**D.144** With regard to personal vehicles, the below figure, taken from 2021 ONS Census data, demonstrates that approximately 31% of Enfield residents do not own a car or van. This is notable for being significantly below the London regional level (where circa 42% of people do not own a car or van). This may reflect the level of public transport accessed in the Borough. However, given the Borough's issues around inequality and deprivation, it is likely this is a result of affordability, particularly where TfL note Londoners are more likely to on a car if they live in outer London.

<sup>&</sup>lt;sup>274</sup> Cycle Enfield (2019). (see https://journeysandplaces.enfield.gov.uk/map/)

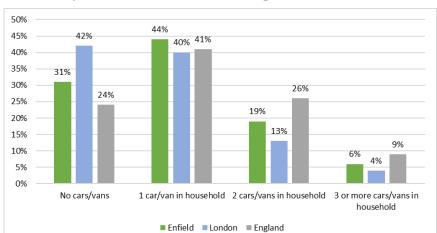
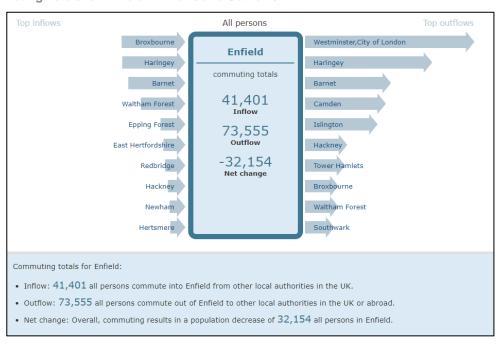


Figure D.2: Car and Van ownership across Enfield, London, and England

**D.145** It is important to note that this data should be viewed in the context of LBE's location within Greater London. Statistical comparison with England as a whole should be caveated by the understanding that the public transport model in London, as well as the extent, capacity and modal variety of the network is unique in England. In this context it is likely to be more instructive to compare public transport use in LBE to that of Greater London rather than to England as a whole.

**D.146** Enfield is subject to greater outflow for employment than inflow, with the largest number of commuters, 13,690 outflowing to Westminster, City of London, with only 190 inflowing from this borough. Conversely, more people inflow into Enfield from Broxbourne (5,002) than any other borough, with 2,203 travelling in the opposite direction. As a total, commuting to places of work results in an overall negative flow of people in Enfield of -32,154. This is illustrated below in **Figure D.3**..





Nomis (2011). Location of usual residence and place of work by sex. (see <a href="https://www.nomisweb.co.uk/census/2011/wu01uk/chart">https://www.nomisweb.co.uk/census/2011/wu01uk/chart</a>)

#### Likely future changes without the Local Plan

**D.147** Commuting trends are likely to continue as they are, although there may be a greater increase in people commuting out of the Borough as the UK continues to recover following the COVID-19 pandemic. As described above, in the last few years there has been a lot of investment in public transport, in particular the opening of Meridian Water railway station in 2019. Around one third of residents in Enfield own a vehicle, which is considerably lower than the London average. It is therefore likely that without the Local Plan, use of public transport will continue and maybe increase with further investment, particularly as there are policies in place in the Local Plan and London Plan to encourage more active and sustainable transport modes. Without the Local Plan, sites may be in inaccessible locations with no easy access to public transport, as the location of development within close proximity to existing services and facilities can influence use of public transport, and more active modes.

#### Implications for health

**D.148** A lack of sustainable and active travel options can have negative impacts on public health whilst also increasing reliance on relatively expensive private motorised transit and exacerbating existing inequalities. Encouraging active travel, such as walking, wheeling and cycling can have a wide range of positive implications for health, including increased physical activity and opportunities for social interaction. In addition, an increase in active travel could be associated with a decrease in reliance on often expensive vehicular transport, and an associated decrease in air pollutants that can be harmful to human health.

#### Water

**D.149** Water is a distinctive feature of the Borough's landscape, with more than 100 kilometres of watercourses – more than any other London borough. The River Lea is most significant watercourse running through the Borough. It is the easternmost tributary to the Thames, joining it at Tower Hamlets. The Borough includes an extensive network of canals (River Lea Navigation), rivers (River Lea), reservoirs (William Girling and King George V) and lakes. It should be recognised that part of the Borough is a Drinking Water Surface Water Protected Area and is located over a principal aquifer (also protected for drinking water purposes under the WFD).<sup>276</sup>

**D.150** Enfield's urban river network is, however, largely hidden from view (due to culverts or diversion into underground sewers) and inaccessible. The New River – a man-made watercourse built in the seventeenth century to bring fresh water from Hertfordshire to London – is a rare exception to this. The River Lea and its tributaries (Salmons Brook, Turkey Brook and Pymmes Brook) flow through the heart of Enfield's emerging growth areas (Meridian Water, Enfield Town, Edmonton Green and Ponders End) where there are significant opportunities to reconnect people and nature to the waterfront (e.g. new footpath and cycle routes).<sup>277</sup>

D.151 The Pymmes Brook, Salmon Brook and Turkey Brook are the main River Lea tributaries that make up LBE's water network. The WFD requires all EU watercourses to achieve a 'Good' overall (ecological and chemical) status by 2027. Table
D.3 below sets out the hydromorphilogical designation, current overall status and reasons for not achieving 'Good' status for the main watercourses that run through LBE. As per the Environment Agency data, the River Lea has been separated into three different catchments, which all sit within LBE's boundary.

Table D.6: LBE watercourses and regulatory status

Watercourse	Catchment area	Designation	Overall status (2016)	Reasons for not achieving 'Good' status
Lea Navigation (Fieldes Weir to Enfield Lock)	45.48km²	Heavily modified	Poor	Urbanisation Surface water abstraction Sewage discharge Misconnection

<sup>&</sup>lt;sup>276</sup> Enfield Council (2021). Enfield's Blue and Green Strategy 2021-2031 (see <a href="https://www.enfield.gov.uk/">https://www.enfield.gov.uk/</a> data/assets/pdf file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf) <sup>277</sup> Ibid

Watercourse	Catchment area	Designation	Overall status (2016)	Reasons for not achieving 'Good' status
				Inland boating and structures
				Invasive non-native species
				Use of restricted substance
Lea Navigation	15.811km²	Heavily modified	Bad	Urbanisation
(Enfield Lock to Tottenham				Transport drainage
Locks)				Sewage discharge
				Inland boating and structures
				Misconnections
				Flood protection structures
				Invasive non-native species
Small River Lee	40.034km²	Not designated artificial or	Moderate	Urbanisation
(and tributaries)		heavily modified		Sewage discharge
				Invasive non-native species
				Misconnection
				Land drainage
Pymmes Brook	40.778km²	Heavily modified	Moderate	Sewage discharge
				Urbanisation
				Transport drainage
				Misconnections
				Flood protection structures
Salmon Brook	36.956km²	Heavily modified	Moderate	Urbanisation
				Transport drainage
				Trade/Industry discharge
				Poor soil management
				Poor livestock management
				Flood protection structures
				Misconnections
Turkeybrook	48.209km <sup>2</sup>	No designated artificial or	Poor	Urbanisation
		heavily modifies		Transport drainage
				Private sewage treatment and domestic sewage discharge
				Poor nutrient management

**D.152** The adopted Thames Water WRMP notes that the Thames Water supply area is "designated as seriously water stressed" meaning that demand is very high in relation to available supply. The resilience of supply could potentially be affected by extreme weather events and climate change patterns as well as technical challenges such as leakage. Whilst it also notes that approximately 25% of the water put into supply is lost through leakages. The WRMP estimates that by 2045 there will be a

Enfield Local Plan: Integrated Impact Assessment December 2023

shortfall of 387 million litres of water per day for the Thames Water supply area, and that by 2100 this will rise to 688 million litres of water per day.

**D.153** Land contamination is a central issue in LBE, and land contamination and water quality are closely linked. LBE has a long established history with industrial uses and is significantly affected by Source Protection Zones (SPZs). This is particularly noticeable in the east and centre of the Borough. There are nine SPZ1s that run through the Borough, which are surrounded by and connected by three SPZ2s. There are no SPZ3s in the Borough boundaries

**D.154** Regarding wastewater, services for Enfield are provided by Thames Water. The Borough is served by the Deephams Sewage Treatment Works (STW), this serves Enfield as well as the neighbouring Boroughs of Epping, Waltham, Forest, and Haringey. This will need significant upgrade in order to continue to service a growing population.

**D.155** Nitrate Vulnerable Zones (NVZs) are areas designated as being at risk from agricultural nitrate pollution, in accordance with the 2015 Nitrate Pollution Prevention Regulations. Waters are defined as polluted if they contain nitrate concentrations greater than 50mg/l. The entirety of the Borough is covered by the Lee NVZS443.

**D.156** Part of the Borough is a Drinking Water Surface Water Protected Area, this is an area where 'raw' water is extracted from rivers or reservoirs. Raw water requires protection to ensure that it is not polluted which could lead to additional purification treatment. As with the majority of the south east of England, LBE is located over a principal aquifer (Chalk), this is also protected for drinking water purposes under the WFD.

#### Likely future changes without the Local Plan

**D.157** The Borough contains waterbodies of poorer water quality which do not meet 'Good' status. Pollution sources responsible for this include transport drainage and wastewater discharged. Without the Local Plan, it is possible that unplanned development could be in areas that could lead to further water quality issues and risks to the natural environment. However, existing safeguards such as the Water Framework Directive would help to reduce the potential for this to occur. Without the Local Plan, it is likely that the Thames Water supply area will continue to be seriously water stressed.

#### Implications for health

**D.158** Inadequate wastewater treatment and poor water quality in watercourses can result in the contamination of drinking water sources, which may increase the risk of some waterborne diseases.<sup>278</sup> Poor water quality as a result of pollutants in watercourses can also result in exposure to harmful chemicals. Industrial waste or agricultural runoff have the potential to introduce toxins into water sources. Exposure to these chemicals through drinking water or recreational activities in contaminated watercourses may lead to adverse health effects. Poor water quality can further harm the Borough's biodiversity, natural ecosystems and wildlife, which can have indirect health consequences for Enfield residents as ecosystems provide essential functions such as water purification and nutrient cycling.<sup>279</sup>

### Appendix E

# IIA findings for the spatial strategy options

**E.1** This appendix sets out the IIA findings for the spatial strategy options considered throughout the plan-making process.

#### Spatial strategy options considered at Regulation 18 stage

**E.2** The spatial strategy options considered at Regulation 18 stage are shown in **Table E.1**, with the findings illustrated in **Table E.2** and described below the table, by IIA objective. The Council's reasons for identifying the options subject to IIA at Regulation 18 stage is described in **Chapter 2**.

Table E.1: Reasonable alternative spatial options considered during preparation of the Regulation 18 Enfield Local Plan

Spatial strategy options considered, as described in IIA Report	Appraised as reasonable alternative in IIA Report?
Option 1A: Baseline growth	Yes
This is based on accommodating 17,000 new homes with some other land uses, including limited nature recovery and green and blue infrastructure improvements. Growth is distributed in the urban area only.	
Option 1B: Baseline growth	Yes
Similar to Option 1A, growth is distributed in the urban area and employment areas	
Option 2A: Medium growth [this is Medium Growth 2 in Table 2.2 of Draft Local Plan]	Yes
Medium growth in the urban area and employment areas	
Option 2B: Medium growth	Yes
This is based on accommodating approximately 25,000 new homes with a full range of land uses, including extensive nature recovery and green and blue infrastructure investment with growth distributed in the urban area, employment areas and some release of the Green Belt	
Option 2C: Medium growth	Yes
Similar to Option 2B, this option looks to accommodate 25,000 new homes, largely focused in the urban area some release of Green Belt. Growth is largely focused in the seven urban placemaking areas and the two rural placemaking areas. A zoning approach is taken to most of the rural areas to facilitate development of multi-layered mosaic of sustainable rural land uses and creation of National Park city designation area. No release of SIL	
Option 2D: Medium growth	Yes
Similar to Options 2B and C, this option looks to accommodate 25,000 new homes focused in the urban area only.	
Option 3A: High growth	Yes
This option is based on 55,000 homes, largely delivered in the urban area only.	

Spatial strategy options considered, as described in IIA Report	Appraised as reasonable alternative in IIA Report?
Option 3B: High growth	Yes
Similar to Option 3A, but the focus is in the urban area and employment areas	
Option 3C: High growth [this is High Growth in Table 2.2 of Draft Local Plan]	Yes
Similar to options 3B and C, this is widespread growth across the Borough including the urban area, employment areas and the Green Belt	
Option 3D: High growth	Yes
Similar to Option 3A, growth is focused in the urban area and Green Belt	
Option 4: seeking to accommodate most growth outside the Borough	No – not a reasonable alternative as it is outside the geographical scope of the Local Plan
<b>Option 5</b> : seeking to accommodate most of the development in the urban area to the east of the A10	Yes
<b>Option 6</b> : seeking to accommodate majority of development in the urban area to the west of the A10	Yes

Table E.2: Summary of IIA effects for the spatial strategy options at Regulation 18 stage

	_	: Baseline owth		Option 2: Me	dium growth			Option 3: I	ligh growth		Option 5	Option 6
IIA objective	1A: Focused in the urban area only	1B: Focused in the urban area and employ- ment areas	2A: Focused in the urban area and employ- ment areas	2B: Growth in the urban area, employ- ment areas and some release of Green Belt	2C: Focused in the urban area and Green Belt (this is the Preferred Option)	2D: Focused in the urban area only	3A: Focused in the urban area only	3B: Focused in the urban area and employ- ment areas	3C: Growth across the Borough including the urban area, employ- ment areas and the Green Belt	3D: Focused in the urban area and Green Belt	5: Focus growth in the urban area east of the A10	6: Focus growth in the urban area west of the A10
IIA1: Climate change mitigation	+?	+?/-	+?	+?/-	+?/-	+?	+?	+?	+?/-	+?/-	+?	+?
IIA2: Climate change adaptation	0	0	0	0	0	0	0	0	0	0	0	0
IIA3: Housing	+?/-	+?	++?	++	++?	++?/-	++/	++?	++	++?	+?/-	+?/-
IIA4: Health and wellbeing	++	++	++/-?	++/-?	++/-?	++/-?	++/?	++/?	++/?	++/?	++/?	++/?
IIA5: Services and facilities	++	++	++/-?	++/-?	++/-?	++/-?	++/-?	++/-?	++/-?	++/-?	++/-?	++/-?
IIA6: Social inclusion	+?/-?	+?/-?	+	+	+	+/-	+/-	+/-	+/-	+/-	++/-	+/-

	<u>-</u>	: Baseline owth		Option 2: Me	dium growth			Option 3: H	ligh growth		Option 5	Option 6
IIA objective	1A: Focused in the urban area only	1B: Focused in the urban area and employ- ment areas	2A: Focused in the urban area and employ- ment areas	2B: Growth in the urban area, employ- ment areas and some release of Green Belt	2C: Focused in the urban area and Green Belt (this is the Preferred Option)	2D: Focused in the urban area only	3A: Focused in the urban area only	3B: Focused in the urban area and employ- ment areas	3C: Growth across the Borough including the urban area, employment areas and the Green Belt	3D: Focused in the urban area and Green Belt	5: Focus growth in the urban area east of the A10	6: Focus growth in the urban area west of the A10
IIA7: Crime and community safety	-?	-?	-?	-?	-?	-?	?	?	?	?	-?	-?
IIA8: Road safety	0	0	0	0	0	0	0	0	0	0	0	0
IIA9: Economy	++	++/-?	++/-?	++/-?	++/-?	++	++	++/-?	++/?	++/-?	++/-?	++/-?
IIA10: Town and local centres	++	++	++	++	++	++	++	++	++	++	+	+
IIA11: Air pollution	++/	++/	++/	++/	++/	++/	++/	++/	++/	++/	++/	++/
IIA12: Sustainable transport	++?	++?	++?	++?/-	++?/-	++?	++?	++?	++?/-	++?/-	++?	++?

		: Baseline owth		Option 2: Me	edium growth			Option 3: H	ligh growth		Option 5	Option 6
IIA objective	1A: Focused in the urban area only	1B: Focused in the urban area and employ- ment areas	2A: Focused in the urban area and employ- ment areas	2B: Growth in the urban area, employ- ment areas and some release of Green Belt	2C: Focused in the urban area and Green Belt (this is the Preferred Option)	2D: Focused in the urban area only	3A: Focused in the urban area only	3B: Focused in the urban area and employ- ment areas	3C: Growth across the Borough including the urban area, employ- ment areas and the Green Belt	3D: Focused in the urban area and Green Belt	5: Focus growth in the urban area east of the A10	6: Focus growth in the urban area west of the A10
IIA13: Biodiversity	?	?	?	?	?	?	?	?	?	?	?	?
IIA14: Historic environment	-?	-?	-?	-?	-?	?					?	?
IIA15: Landscape and townscape	-?	-?	-?	-?	-?	?			?	?	?	?
IIA16: Efficient use of land	++	++	++	++/-	++/-	++	++	++	++/-	++/-	++	++
IIA17: Flooding	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?
IIA18: Water	-?	-?	-?	-?	-?	-?	?	?	?	?	-?	-?

Enfield Local Plan IIA December 2023

### IIA objective 1: Ensure the Local Plan serves to minimise LBE's per capita CO<sub>2</sub> emissions such that the Council will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040

E.3 All options within Options 1 to 3 focus development in urban areas around the transport nodes in the Borough, which consist of a mixture of railway stations and tube stations. It is unknown whether Options 5 and 6 would focus development around the transport nodes, however, given the number of nodes within the urban areas either side of the A10 it is assumed that development would be reasonably close to either a railway and/or tube station. These railway stations and tube stations are located in built up urban areas, where frequent bus services are also present, in addition to everyday services and facilities, including employment opportunities – all of which are within walking distance of one another. This element of all Options 1 to 3, 5 and 6 is therefore likely to reduce use of the private car and associated CO2 emissions, with minor positive effects expected in relation to IIA1: Climate change mitigation. However, these effects are recorded as uncertain because levels of walking and cycling within the Borough are not currently very high. For example, 95% of the Borough's population is not physically active enough to maximise benefits to their health (see baseline information). Additionally, the sheer scale of developed proposed by these options would result in significant population growth, as well as an increase in the presence of cars. Options and 2B, 2C, 3C and 3D also support development of Green Belt land in the north west of the Borough, where very few railway stations are located (there are no tube stations), bus services are less frequent and services and facilities are not within easy walking distance of one another. Therefore, it is very likely that new residents in these locations would have to drive to their workplace, as well as everyday services and amenities, which would increase greenhouse gas emissions associated with transport. Options 2B, 2C, 3C and 3D are therefore also expected to result in minor negative effects in relation to this objective. The incorporation of energy efficient design in new developments could also help reduce greenhouse gas emissions, but this would be influenced by other policies in the Local Plan and determined at planning application stage.

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

**E.4** Given the high-level nature of these spatial options, it is not possible to distinguish between them with respect to climate change adaptation. The spatial distribution of development is not likely to influence sustainable design and construction techniques in development or respond to extreme weather effects as a result of climate change. Flood risk is dealt with separately under IIA objective 17. All options are expected to have negligible effects in relation to this objective.

# IIA objective 3: Deliver housing to meet agreed targets and support an appropriate mix of housing types and tenures, including affordable and specialist housing, including housing for the elderly and disabled people

- **E.5** The high growth options (3A to 3D) seek to meet the housing requirement identified in the London Plan for the first ten years¹ and then apply the government's standard methodology for calculating housing need in the remaining period up to 2039. All four options would therefore deliver the number of new homes identified under the high growth scenario. As such, they are expected to have significant positive effects in relation to IIA3: Housing. Option 3A would result in a significant increase in the density of development around the transport nodes, involving the development of significantly taller buildings which would result in a very high proportion of flats, studios and 1-bedroom dwellings. Development would therefore not provide the range of housing types needed in the Borough, which could potentially discriminate against certain groups of people, such as larger families or those with specialist housing requirements. For this reason, Option 3A is also expected to have a significant negative effect in relation to this objective. Option 3C, on the other hand, supports development in employment areas and the Green Belt, in addition to transport nodes, which may help in the delivery of a greater mix of housing types. Options 3B and 3D also support development in either employment areas or the Green Belt (respectively), therefore they should help to deliver a greater mix of housing types, but the significant positive effect is uncertain.
- **E.6** The baseline growth options (1A and 1B) seek to meet the housing requirement identified in the London Plan for the first ten years in full and then deliver a significantly lower number of homes in the remaining Local Plan period. Therefore, although Options 1A and 1B would deliver the number of new homes identified under this baseline growth scenario, they may not meet future housing needs in full, although this is uncertain. Both options are therefore expected to have minor positive but uncertain effects in relation to this objective. Option 1A would result in an increase in the density of development around the transport

<sup>&</sup>lt;sup>1</sup> The London Plan covers the period up to 2041 but only provides housing targets for the first ten years of the London Plan period.

Enfield Local Plan IIA December 2023

nodes only but because it is not providing as much growth as Option 3A, it is expected to have a minor negative effect in relation to this objective in terms of meeting the Borough's need for a range of housing sizes and types.

- **E.7** The medium growth options (2A to 2D) seek to meet the housing requirement identified in the London Plan and carry this same annual requirement forward, beyond the first ten years of the London Plan period. All four medium growth options would deliver the number of new homes identified under the medium growth scenario and are therefore expected to have significant positive effects in relation to this objective. The effects are recorded as uncertain because the Council has had to predict what their housing targets might be beyond the first ten years of the London Plan period. As was the case with Options 1A and 3A, Option 2D focuses development at the transport nodes only and is therefore expected to result in an increase in the density of development in these areas, which could potentially limit the availability of housing types in the Borough. Therefore, Option 2D is also expected to have a minor negative effect in relation to this objective. Option 2B, on the other hand, supports development in employment areas and the Green Belt, in addition to transport nodes, which may help in the delivery of a greater mix of housing types. Options 2A and 2C also support development in either employment areas or the Green Belt (respectively), therefore they should help to deliver a greater mix of housing types, but the significant positive effect is uncertain.
- **E.8** Options 5 and 6 (deliver housing in the urban areas east or west of the A10) would result in a significant increase in the density of development in the urban areas but are unlikely to be able to meet the full housing need of the Borough, resulting in a minor positive uncertain effect. In addition, due to development being focused in the urban areas either side of the A10, it is likely to involve the development of significantly taller buildings which would result in a very high proportion of flats, studios and 1-bedroom dwellings. Development would therefore not provide the range of housing types needed in the Borough, which could potentially discriminate against certain groups of people, such as larger families or those with specialist housing requirements. For this reason, Options 5 and 6 are also expected to have a minor negative effect in relation to this objective.

### IIA objective 4: Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the Borough

E.9 As set out in the baseline information in the IIA Scoping Report produced by AECOM, there is an east-west divide in terms of inequality in Enfield, and this correlates with health indicators. For example, Enfield is the fifth worst Borough in England for obesity, with significantly higher levels of obesity in the east when compared to the west. All options focus development in urban areas around the transport nodes in the Borough, which consist of a mixture of railway stations and tube stations. These railway stations and tube stations are located in built up urban areas, where existing primary healthcare facilities are available. New residents would also be located within very close proximity to other services and facilities, which may encourage them to walk or cycle to reach these services, with beneficial effects on their physical health. All options are therefore expected to have significant positive effects in relation to IIA4: Health and wellbeing. However, as set out in the baseline information, there are very few GP surgeries on the estates within Enfield and where GP surgeries are present, they are often outdated with inadequate facilities. Development does, however, offer an opportunity for new development to provide new GP surgeries and improve the design of existing GP surgeries, in the areas that need them the most. The volume of development proposed by the high and medium growth options would undoubtedly place a lot of pressure on existing services, particularly GP surgeries, whilst also potentially resulting in the loss of Metropolitan Open Land to make room for housing. Furthermore, higher density development can contribute to social isolation and poorer health. Indeed, there is growing evidence of the link between high density development and the negative public health impacts this has. Therefore, Options 3A to 3D are also expected to have significant negative but uncertain effects in relation to this objective, whilst Options 2A to 2D are expected to have minor negative but uncertain effects. In addition, Options 2B and 3C support more distributed growth across the Borough than the other options, supporting development within the Green Belt (as does Option 2C), but there are no GP surgeries located in the Green Belt to the north west of the Borough. The services and facilities that are present within the Green Belt are not close to potential development locations and would therefore discourage active travel choices (e.g. walking and cycling). Options 5 and 6 could also have a significant negative effect as Option 5 concentrates development to the east of the A10, which could place more pressure on the existing GP surgeries within the estates in the east of the Borough, while Option 6 would not support any development east of the A10 therefore opportunities to improve existing GP provision would be lost.

### IIA objective 5: Support good access to services, facilities, and wider community infrastructure, for new and existing residents, mindful of the potential for community needs to change over time

**E.10** All options focus development in urban areas around the transport nodes in the Borough, which consist of a mixture of railway stations and tube stations. These railway stations and tube stations are located in built up urban areas, where a number

Enfield Local Plan IIA December 2023

of existing services and facilities are present. New residents would therefore not be required to travel far to reach the services, as they would be within walking distance of them. For example, there are a number of primary schools located within close proximity of the transport nodes, in addition to secondary schools. Options 2B, 2C and 3C also support development of Green Belt land in the north west of the Borough. However, the majority of the Green Belt allocation sites are not located within close proximity of a primary or secondary school. Despite this, all options are expected to have significant positive effects in relation to this objective. The volume of development proposed by the high and medium growth scenario options, and the options that concentrate the development in the urban areas east or west of the A10 would be likely to place a lot of pressure on existing services, such as primary and secondary school places, although this is uncertain. Therefore, Options 2A to 2D, 3A to 3D and Options 5 and 6 are also expected to have minor negative but uncertain effects in relation to this objective.

#### IIA objective 6: Encourage social inclusion, promotion of equality and a respect through diversity

**E.11** Enfield is characterised by an east-west divide in terms of inequality and deprivation, with the eastern part of the Borough containing ten Lower Super Output Areas that fall within the 10% most deprived nationally. All options support development around the transport nodes, which are spread across the Borough but not towards the north west, which comprises Green Belt land. Development is expected to help regenerate the areas surrounding the transport nodes but due to the fact the transport nodes are spread fairly evenly across the majority of the Borough, development would not be directed into the more deprived areas only. Therefore, although all options would, to an extent, help regenerate the more deprived areas of the Borough, they would also enhance the less deprived areas and not specifically address the gap in inequality between the east and west. Moreover, the level of development proposed by the high growth options, and the concentration of development within urban areas particularly under Options 3A, 3B, 5 and 6, would result in a significant increase in the density of development around the transport nodes in LBE. As a result, there would be a significant increase in the height of existing tall buildings and new high-rise buildings, which would limit the mix of housing types available and potentially discriminate against certain groups of people such as those with specialist housing requirements. Open space within urban areas may also be lost to new housing, contributing to inequalities in access to open space. This is particularly important following the Covid-19 pandemic, which has highlighted the importance of public open space, particularly if people do not have access to a private garden. Therefore, the high growth options (3A to 3D) are expected to have mixed minor positive and minor negative effects in relation to this objective. Option 5 which concentrates development to the east of the A10 could have a significant positive effect on social inclusion by focusing development in the more deprived eastern part of the Borough, but it could have the same potential negative effects in terms of high density, tall buildings, and pressure on open space. Option 6 which concentrates development to the west of the A10 would only have a minor positive effect as it would not address the gap in inequality between the east and west, and would have the same minor negative effects by requiring high density development in the western urban areas. Option 2D (medium growth in the urban area only) is also expected to have a mixed minor positive and minor negative effect because like Option 3A, it seeks to intensify land around transport nodes only and may therefore result in an over reliance on flats and a subsequent decrease in housing mix. The baseline growth options support the lowest number of new homes and would therefore contribute a lower amount of affordable housing than the medium and high growth options. Therefore, Options 1A and 1B are expected to have mixed minor positive and minor negative but uncertain effects in relation to this objective. The remaining options (2A to 2C) are expected to have minor positive effects in relation to IIA6: Social inclusion because they would provide more development than the baseline growth options, as well as a greater range of housing types due to more widespread growth.

#### IIA objective 7: Reduce crime and increase community safety

**E.12** The spatial distribution of development is not likely to influence levels of crime, anti-social behaviour, fear of crime and perceptions of safety, which will be more influenced by policies which seek to deliver inclusive design. As set out in the IIA Scoping Report, crime is generally concentrated in the east of the Borough at Southgate, Palmers Green, and the boundary the Borough shares with Haringey Council, in addition to around transport nodes. Crime levels have been rising in the area, partly due to the fact that the Borough has the largest youth population in Greater London, with some of the highest levels of crime recorded in the school-transport corridors. All options concentrate grown at the transport nodes, whilst Options 1B, 2A, 2B, 3B and 3C also support development at SIL and LSIS sites, located in the east of the Borough. Overall, all options are expected to have minor negative effects in relation to IIA7: Crime and community safety, although this is uncertain as there may be policies included in the Local Plan to support high quality developments, improvements to estates that suffer from poor quality housing and a high quality public realm that supports the integration of communities and natural surveillance including through the colocation of shops, services, community centres and green spaces. The higher growth options may have more of an adverse

Enfield Local Plan IIA December 2023

effect than the other options because the much higher level of growth proposed under Option 3 could result in higher levels of crime. Therefore, a significant negative but uncertain effect has been recorded for Options 3A to 3D.

#### IIA objective 8: Focus on delivering the 'Vision Zero' target for road safety

**E.13** The spatial distribution of development will not affect the achievement of this objective, which relates to healthy streets principles that encourage walking and cycling; these are more likely to be addressed through Local Plan policy. Therefore, all options are likely to have negligible effects in relation to IIA8: Road safety.

#### IIA objective 9: Support a strong, diverse, and resilient economy that provides opportunities for all

E.14 Concentrating development at the transport nodes in the Borough which are very central and well-connected, is expected to encourage the retention and expansion of town and local centre commercial and retail uses. The transport nodes in the Borough contain a range of services and facilities, and therefore offer job opportunities. Options 1A, 2D and 3A seek to focus development at the transport nodes only. Concentrating new residential development in these central and well-connected areas would help boost the economy by increasing the available workforce and attracting investment to the area, whilst also helping improve these local economies. These three options (1A, 2D and 3A) are therefore expected to have significant positive effects in relation to this objective. An even larger proportion of job opportunities are provided at the SIL and LSIS sites and with Options 1B, 2A, 2B, 3B, 3C and 5 (and 6 to a lesser extent as there are just a few LSIS sites in the south of the Borough west of the A10) concentrating future residential development in the employment areas, as well as at the transport nodes, there would be a loss in SIL and LSIS land. Options 1B, 2A, 2B, 3B, 3C, 5 and 6 are therefore expected to have mixed significant positive and minor negative effects in relation to IIA9: Economy. The minor negative effects are recorded as uncertain because although there may be a loss in employment land, residential development may be provided as part of mixed-use schemes at the SIL and LSIS sites. In addition, Options 2B and 3C spread development more evenly across the Borough, including on Green Belt land. However, the areas of Green Belt land where intensification is proposed, are not located within the main urban centres of the Borough, where more job opportunities are available. Conversely, supporting development in these areas may have positive effects on the rural economy and jobs. Option 3C is therefore expected to have a mixed significant positive and significant negative effect in relation to this objective, whilst Option 2B is still expected to have a mixed significant positive and minor negative effect, because although both options may support the rural economy, they could also result in the loss of SIL and LSIS land. This is particularly the case for Option 3C, which proposes the highest number of new homes out of all options. The negative effects are recorded as uncertain because residential development may be provided as part of mixed-use schemes at the SIL and LSIS sites. Options 2C and 3D also allow for some development on Green Belt land, therefore they are expected to have a minor negative but uncertain effect for directing some residential development to areas of Green Belt land where there are less existing job opportunities, but a positive effect in terms of supporting the rural economy. They would both still have a significant positive effect however, as they both also support a significant amount of development in the urban areas at the transport nodes, which are well connected to employment opportunities.

#### IIA objective 10: Support the vitality of the Borough's town and local centres

**E.15** Concentrating development at the transport nodes in the Borough which are very central and well-connected, is expected to encourage the retention and expansion of town and local centre commercial and retail uses. Options 1A, 2D and 3A are therefore expected to enhance the vitality and vibrancy of the town and local centres in the Borough, resulting in significant positive effects against IIA10: Town and local centres. Option 5 would only support the town and local centres to the east of the A10 and Option 6 would only support the town and local centres to the west of the A10, therefore both of these options would only have a minor positive effect. All the remaining options support development at the transport nodes in the Borough, but also support the development of SIL and LSIS sites (Options 1B, 2A, 2B, 3B and 3C) and/or intensification within the Green Belt (Options 2C, 2D, 3C and 3D). Although the SIL, LSIS and Green Belt sites are located on the edge and/or outside of the town and local centres and development under these options may not directly revitalise the town and local centres, these options still support development around the transport nodes, where the town and local centres are located. All remaining options are therefore also expected to have significant positive effects in relation to this objective.

#### IIA objective 11: Minimise air pollution

**E.16** All options focus development in urban areas around the transport nodes in the Borough, which consist of a mixture of railway stations and tube stations. These railway stations and tube stations are located in built up urban areas, where frequent

Enfield Local Plan IIA December 2023

bus services are also present, in addition to everyday services and facilities that are within walking distance of one another. All options are therefore likely to reduce reliance on the private car, which would help minimise air pollution. However, the actual use of more active and sustainable modes of travel will depend on people's behaviour. Further to this, the Borough experiences severe problems with air quality, especially between the east and west of the Borough, with the entire Borough being declared an Air Quality Management Area (AQMA). Therefore, although all options focus development within close proximity to sustainable travel modes, where services and facilities are within easy walking and cycling distance of one another, the amount of development proposed by all options is expected to have significant adverse effects on air quality through population increase and a higher presence of cars. Having said that, walking and cycling could be encouraged through the design of new development and incorporation of Healthy Streets principles. Options 2B, 2C, 3C and 3D also support development of Green Belt land in the north west of the Borough, where very few railway stations are located (there are no tube stations), bus services are less frequent and services and facilities are not within easy walking distance of one another. Therefore, new residents in these locations would be more reliant on the private car, contributing towards air pollution. Overall, all options are expected to have mixed significant positive and significant negative effects in relation to IIA11: Air pollution.

#### IIA objective 12: Minimise the need to travel and support a modal shift away from the private car

**E.17** All options focus development in urban areas around the transport nodes in the Borough, which consist of a mixture of railway stations and tube stations. These railway stations and tube stations are located in built up urban areas, where frequent bus services are present, in addition to everyday services and facilities that are within walking distance of one another. These options are therefore likely to reduce reliance on the private car and increase more sustainable modes of transport. However, the use of more sustainable modes of transport will depend on people's behaviour, especially following the Covid-19 pandemic where there has been a significant reduction in people using public transport. Indeed, the majority of residents in the Borough use a private car to get to work instead of public transport. All options are therefore expected to have significant positive but uncertain effects in relation to IIA12: Sustainable transport. However, Options 2B, 2C, 3C and 3D also support development of Green Belt land in the north west of the Borough, where very few railway stations are located (there are no tube stations), bus services are less frequent and services and facilities are not within easy walking distance of one another. Therefore, residents in these locations are expected to be more reliant on the private car, particularly because they are within close proximity of the M25 which borders the northern edge of LBE. These four options are therefore also likely to result in minor negative effects in relation to this objective.

# IIA objective 13: Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks

**E.18** The Borough does not contain a Special Protection Area (SPA), Special Area of Conservation (SAC) or a Ramsar site. However, it is located within close proximity to the Lee Valley SPA and Ramsar site which is located to the north and south of the Borough in Lee Valley Regional Park, which runs along the eastern edge of Enfield. The Epping Forest SAC is also located just outside the Borough, to the east. The Chingford Reservoir Site of Special Scientific Interest (SSSI) is located within the Borough, along its eastern edge. There is also one Local Nature Reserve (LNR) within the Borough, known as Covert Way, located just south of Hadley Wood. A large number of Sites of Importance in Nature Conservation (SINC) are spread across the Borough.

**E.19** All options would intensify development at transport nodes in the urban areas of the Borough, where no internationally designated biodiversity assets are present. Although there is one SSSI and one NNR present within the Borough, neither are located within close proximity to where development is proposed under all options. However, the zones of influence for some of the SACs, SPAs and Ramsar sites just outside the Borough extend into the Borough and indirect effects due to general population increase and pressure on any nature conservation sites, for example from recreation and increased air pollution, could still occur. The SINCs are spread relatively evenly across the Borough, with most containing a railway station. All options would therefore include land that falls within a SINC. Options 2B, 2C, 3C and 3D also promote development in the Green Belt in areas that comprise a mixture of both greenfield and brownfield sites. Greenfield and brownfield sites can have biodiversity interest which would be lost as a result of development. Overall, all options are expected to have significant negative effects in relation to IIA13: Biodiversity. The effects are recorded as uncertain because designated nature conservation sites could be avoided through site design, and there may be opportunities to promote habitat connectivity if new developments include green infrastructure.

Enfield Local Plan IIA December 2023

#### IIA objective 14: Sustain and enhance the significance of heritage assets

**E.20** The northern edge of the Borough does not contain a large proportion of heritage assets whereas the remainder of the Borough does, especially the more built-up areas such as Enfield Town. A number of Conservation Areas are located along the periphery of the built-up area within the edge of the Green Belt, the largest being Trent Park which is also a Registered Park and Garden. All options seek to intensify the areas surrounding the railway and tube stations within the Borough, which tend to be located within close proximity to a large number of Listed Buildings, whilst also falling within or close to Conservation Areas. The high growth options (Options 3A to 3D) would provide the highest number of new homes at around 36,000. This is significantly higher than the remaining options and considering the fact that Option 3A seeks to concentrate development within the urban area only, effects on the historic environment would be substantial. All high growth options are expected to have significant negative effects in relation to IIA14: Historic environment due to the scale of development proposed.

**E.21** Options 1A and 1B would support the lowest number of new homes in the Borough. Option 1A supports intensification around travel nodes in the urban area only, whereas Option 1B supports intensification of existing SIL and LSIS sites, in addition to travel nodes in the urban area. The SIL and LSIS sites identified for potential development contain very few heritage assets with some containing none at all, and therefore development within them is unlikely to result in adverse effects on the historic environment. Overall, Options 1A and 1B are expected to have minor negative but uncertain effects in relation to this objective. Option 2D is expected to have a significant negative effect in relation to this objective because it supports a medium number of new homes in the urban area only, where most historic assets are located. Options 2A, 2B and 2C on the other hand, are expected to have minor negative effects in relation to this objective because although they do not propose the lowest number of new homes when compared to the other growth scenarios, they do not solely focus development in the urban area and instead spread growth more widely across the Borough. Similar to Option 2D, Options 5 and 6 concentrate development within the urban areas to the east and west of the A10 respectively, but are unlikely to deliver the same level of growth as the high growth options, therefore they are expected to have significant negative effects also. The effects of all the options except 2D and 3A to 3D are recorded as uncertain because development could potentially reduce adverse impacts on the historic environment through mitigation and the design, scale, and layout of development.

#### IIA objective 15: Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes

**E.22** Options 3A to 3D would result in a significant increase in the density of development in the Borough around the transport nodes, as well as in SIL and LSIS sites under Options 3B and 3C. There would need to be a significant increase in the height of existing tall buildings, in addition to new high-rise buildings, both of which would fundamentally alter the character of the urban area and Borough as a whole. Option 3C would deliver the same number of new homes to Options 3A and 3B but would spread this development more evenly across the Borough, including areas that fall within the Green Belt. Option 3D would also direct some of the development to the Green Belt as well as the urban areas. However, the intensification of areas within the Green Belt under the high growth scenario could potentially alter the landscape in the north west of the Borough. All of the high growth options are therefore expected to have significant negative effects in relation to IIA15: Landscape and townscape. However, for Options 3C and 3D, the effect is recorded as uncertain because development within the Green Belt could be designed in a way that helps mitigate any adverse impacts on the character of the area.

**E.23** Options 1A and 1B would support the lowest number of new homes in the Borough. Option 1A supports intensification around travel nodes in the urban area and would therefore result in an increase in density within the urban area, whilst Option 1B would result in an increase in density within SIL and LSIS sites, as well as the urban area. However, this increase in density would not be comparable to that under the high growth scenario options. Overall, Options 1A and 1B are expected to have minor negative but uncertain effects in relation to this objective. The effects are recorded as uncertain as the actual effects would depend on the final design, scale, and layout of development. Options 2A to 2D support a higher number of new homes than Options 1A and 1B and could therefore potentially result in more adverse effects on townscape and/or landscape character, particularly Option 2D which focuses development it the urban area only. Overall, Option 2D is expected to have a significant negative but uncertain effect again this objective, whilst Options 2A, 2B and 2C are expected to have minor negative but uncertain effects. Similar to Option 2D, Options 5 and 6 concentrate development within the urban areas to the east and west of the A10 respectively, therefore they are expected to have significant negative but uncertain effects also.

#### IIA objective 16: To achieve efficient use of land and materials

**E.24** All options would result in intensification around transport nodes within the Borough, which fall on previously developed land that is classified as land predominantly in urban use. All options are therefore expected to have significant positive effects

Enfield Local Plan IIA December 2023

in relation to IIA16: Efficient use of land. However, Options 2B, 2C, 3C and 3D also promote development in the Green Belt in areas that comprise a mixture of both greenfield and brownfield sites, all of which are classified as Grade 3 agricultural land. Therefore, although these four options would promote the development of previously developed land, they would also promote the development of greenfield sites, which is not an efficient use of land. Therefore, Options 2B, 2C, 3C and 3D are also expected to have minor negative effects in relation to this objective.

#### IIA objective 17: To manage and reduce the risk of flooding

**E.25** The River Lee, in addition to King George's Reservoir and William Girling Reservoir located along the eastern edge of the Borough create a flood risk. The immediate area surrounding these waterbodies falls within Flood Zones 3a and 3b, as well as Flood Zone 2. All options promote development in urban areas around transport nodes within the Borough, a number of which are located in the east of the Borough. The above mentioned flood zones also stretch to the west of the Borough along New River (Old Course) and a number of brooks, most of which are also located within close proximity to transport nodes. The NPPF discourages the development of housing within areas at the highest risk of flooding. However, development may be able to incorporate surface water management measures, such as sustainable drainage systems to address the existing flood risk, as well as that generated by new development. It is also likely that under Options 1A, 1B, 2A, 2D, 3A, 3B, 5 and 6 housing would be delivered through an increase in height of existing buildings and would therefore not cause a reduction in permeable surfaces. Options 2B, 2C, 3C and 3D support development of Green Belt land in the north west of the Borough, some of which comprises greenfield land. As such, development would reduce the amount of permeable surface available and potentially contribute to surface water run-off, increasing flood risk. Overall, all options are expected to have minor negative but uncertain effects in relation to IIA17: Flooding.

#### IIA objective 18: Minimise water use and protect water quality

**E.26** The Borough is covered entirely by the London Water Resource Zone, with its potable water and waste water services supplied by Thames Water. Greater London is mostly supplied by surface water resources (80%), with the remainder delivered through groundwater abstractions. Availability of water resources is a key issue in the Borough, given that the Thames Water Supply is designated as "seriously water stressed" and that climate change may lead to limited water availability in the future, particularly in the summer. The Borough contains a fairly high proportion of land covered by Source Protection Zones 1 and 2², and it is therefore unlikely that development would be able to avoid these Source Protection Zones. Development in some locations could therefore contaminate water supplies without mitigation. However, all options support development in existing built-up areas and therefore any effect on Source Protection Zones is likely to be limited. Due to the fact all options contain land that falls within Source Protection Zones 1 and 2 but already contain built development, minor negative but uncertain effects are expected. However, the level of growth anticipated under the higher growth options 3A to 3D would place more pressure on water resources and water treatment capacity, therefore significant negative but uncertain effects are expected for Options 3A to 3D.

#### Spatial strategy options considered at Regulation 19 stage

**E.27** Since the spatial strategy options were appraised at Regulation 18 stage in 2021, the Council has identified three additional spatial strategy options. The Council's reasons for identifying the options subject to IIA at Regulation 19 stage are described in **Chapter 2**. Broadly, it is as a result of more urban sites becoming available and so the Council can now achieve more growth than previously anticipated.

**E.28** All three options would deliver the same growth in the urban areas (around 30,000 new homes) with options 8 and 9 providing for some additional growth in the rural areas, focussed on rural placemaking areas. The appraisals of the spatial options do not consider where these placemaking areas would be located within the rural area – this is considered elsewhere in the IIA through the appraisal of site options and allocated sites. As such, uncertainties and potential negative effects identified in the appraisal of spatial options may be reduced when the effects of specific development locations and associated site allocation and development management policies are assessed.

**E.29** The spatial strategy options considered at Regulation 19 stage are shown in **Table E.3**, with the findings illustrated in **Table E.4** and described below the table, by IIA objective.

 $<sup>^{\</sup>rm 2}$  There is no land in LBE covered by Source Protection Zone 3.

Table E.3: Reasonable alternative spatial options considered during preparation of the Regulation 19 Enfield Local Plan

Spatial strategy options considered	Appraised as reasonable alternative in IIA Report?
Option 7: Revised baseline growth - This is based on accommodating around 30,000 new homes and some other land uses within urban areas only (and is in effect, an update to Option 1A). It reflects the additional sites identified since the Regulation 18 stage, and the further work undertaken to assess and optimise delivery on sites proposed for allocation in the urban areas. Alongside this development there is scope for some nature recovery and green and blue infrastructure improvements.	Yes
Option 8: Medium to High Growth with 2 Rural Placemaking Areas - This option looks to accommodate 34,500new homes, largely focused in the urban area with some release of Green Belt. Growth is largely focused in the eight urban placemaking areas and the two rural placemaking areas. A zoning approach is taken to most of the rural areas to facilitate development of a multi-layered mosaic of sustainable rural land uses, ambitious nature recovery and rewilding. Intensification of existing industrial areas and new sites in urban and rural areas. No release of SIL.	Yes
Option 9: Medium to High Growth with 1 Rural Placemaking Area - This option looks to accommodate 31-32,000new homes, largely focused in the urban area with some release of Green Belt. Growth is largely focused in the eight urban placemaking areas and on one rural placemaking area (either Crews Hill or Chase Park). A zoning approach is taken to some of the rural areas to facilitate development of multi-layered mosaic of sustainable rural land uses, nature recovery and rewilding. Intensification of existing industrial areas and new sites in urban and rural areas. No release of SIL.	Yes

Table E.4: Summary of IIA effects for the spatial options

		Spatial Strategy Option	
IIA objective	7: Revised Baseline Growth	8: Medium to High Growth with 2 Rural Placemaking Areas	9: Medium to High Growth with 1 Rural Placemaking Area
IIA1: Climate change mitigation	+?	+?/-?	+?/-?
IIA2: Climate change adaptation	0	0	0
IIA3: Housing	+?	++?	++?
IIA4: Health and wellbeing	++/-?	++/-?	++/-?
IIA5: Services and facilities	++/-?	++/-?	++/-?
IIA6: Social inclusion	+/-	+	+
IIA7: Crime and community safety	-?	-?	-?
IIA8: Road safety	0	0	0
IIA9: Economy	++	++/-?	++/-?
IIA10: Town and local centres	++	++	++
IIA11: Air pollution	++/	++/	++/
IIA12: Sustainable transport	++?	++/-?	++/-?
IIA13: Biodiversity	?	?/+?	?/+?
IIA14: Historic environment	?	?	?
IIA15: Landscape and townscape	-?	-?	-?
IIA16: Efficient use of land and materials	++	++/-	++/-
IIA17: Flooding	-?	-?	-?
IIA18: Water	-?	-?	-?

Enfield Local Plan IIA December 2023

### IIA objective 1: Ensure the Local Plan serves to minimise LBE's per capita CO<sub>2</sub> emissions such that the Council will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040

**E.30** All three new options focus development in urban areas, around the transport nodes in the Borough, which consist of a mixture of railway stations and tube stations. These railway stations and tube stations are located in built up urban areas, where frequent bus services are also present, in addition to everyday services and facilities, including employment opportunities – all of which are within walking distance of one another. This element of all **Options 7, 8 and 9** is therefore likely to reduce use of the private car and associated CO<sub>2</sub> emissions, with minor positive effects expected in relation to **IIA1: Climate change mitigation**. However, these effects are recorded as uncertain because levels of walking and cycling within the Borough are not currently very high. For example, 95% of the Borough's population is not physically active enough to maximise benefits to their health (see baseline information). Although positive effects are expected in terms of CO<sub>2</sub> emissions per capita, it should be noted that the scale of development proposed under all three options would result in significant population growth in the Borough, therefore total CO<sub>2</sub> emissions may still increase.

**E.31 Options 8 and 9** also support development of Green Belt land in the north west of the Borough, where there are less public transport options and facilities are less likely to be within easy walking distance. Therefore, it is very likely that new residents in these locations would have to drive to their workplace, which would increase greenhouse gas emissions associated with transport. Development in these locations may also create a need for residents to drive to access everyday services and amenities. The resulting minor negative effect in relation to this objective is subject to some uncertainty as there is potential for the scale of growth in rural placemaking areas under **Options 8 and 9** to deliver new social infrastructure alongside housing development to minimise the need for travel and vehicle use to access schools, lower tier shops and so on. **Option 8** proposes two rural sites, and **Option 9** proposes one of two rural site options; the potential negative effects could therefore be greater for Option 8, but not enough to differentiate the score against **IIA objective 1**.

**E.32** As noted in the introduction to this section, appraisals for individual site allocations and accompanying development management policies elsewhere in the IIA may show that uncertainties and potential negative effects are likely to be reduced or avoided. The incorporation of energy efficient design in new developments could also help reduce greenhouse gas emissions but this would be influenced by other policies in the Local Plan and determined at planning application stage.

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

**E.33** Given the high-level nature of these spatial options, it is not possible to distinguish between them with respect to climate change adaptation. The spatial distribution of development is not likely to influence sustainable design and construction techniques in development or respond to extreme weather effects as a result of climate change. Flood risk is dealt with separately under **IIA objective 17**. All options are expected to have negligible effects in relation to this objective.

IIA objective 3: Deliver housing to meet agreed targets and support an appropriate mix of housing types and tenures, including affordable and specialist housing, including housing for the elderly and disabled people

**E.34 All options** meet the housing requirement identified in the London Plan for the first ten years of the plan period in full. Option 7 and then rolls that same amount of housing delivery per annum across the remainder of the plan period. **Options 8 and 9** provide for slightly higher growth (34,500 homes and 31-32,000 homes respectively), the additional growth being provided in the Green Belt.

**E.35 All options** would deliver a significant number of new homes (although less than the 'High Growth' options considered at Regulation 18 stage). **Options 8 and 9** would broadly meet the London Plan requirement for the London Borough of Enfield for the period to 2029, as well as making a contribution towards the wider shortfall within London.

**E.36** All options would result in an increase in the density of development around the transport nodes in the urban area, involving the development of taller buildings which would result in a high proportion of flats, studios and 1-bedroom dwellings. This higher density development is not likely to provide the full range of housing types needed in the Borough, which could potentially discriminate against certain groups of people, such as larger families or those with specialist housing requirements. **Options 8 and 9** also support some development in the Green Belt, focussed in rural placemaking areas, which is likely to help in the delivery of a greater mix of housing types.

Enfield Local Plan IIA December 2023

**E.37** Taking all of the above into consideration, the effects of **Option 7** are judged to be minor positive while those for **Options 8 and 9** are judged to be significant positive effects in relation to **IIA3: Housing.** The more positive effects identified for Options 8 and 9 are due to two factors. Firstly, the contribution these options make to helping address the shortfall between the London Plan requirement and objectively assessed housing need. Secondly, the potential for development in rural areas to deliver lower density family housing and to make a greater contribution to providing affordable homes, allowing the plan as a whole to provide a wider mix of types and tenures of housing that meet different needs. All positive effects are subject to some uncertainty due to uncertainty about exactly what mix of housing would be delivered under each option and how well this would align with need.

### IIA objective 4: Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the Borough

- **E.38** As set out in the previous assessment, the baseline information in the IIA Scoping Report produced by AECOM noted that, there is an east-west divide in terms of inequality in Enfield, and this correlates with health indicators. For example, Enfield is the fifth worst Borough in England for obesity, with significantly higher levels of obesity in the east when compared to the west.
- **E.39** All three revised options still focus development in urban areas around the transport nodes in the Borough. The railway stations and tube stations are located in built up urban areas, where existing primary healthcare facilities are available. New residents would also be located within very close proximity to other services and facilities, which may encourage them to walk or cycle to reach these services, with beneficial effects on their physical health. All three revised options are therefore expected to have **significant positive effects** in relation **to IIA4: Health and wellbeing**.
- **E.40** However, as set out in the baseline information and noted in previous assessments, there are very few GP surgeries on the estates within Enfield and where GP surgeries are present, they are often outdated with inadequate facilities. Development does, however, offer an opportunity for new development to provide new GP surgeries and improve the design of existing GP surgeries, in the areas that need them the most. The volume of development proposed by the high and medium growth options would undoubtedly place a lot of pressure on existing services, particularly GP surgeries, whilst also potentially resulting in the loss of Metropolitan Open Land to make room for housing.
- **E.41** Furthermore, higher density development can contribute to social isolation and poorer health. Indeed, there is growing evidence of the link between high density development and the negative public health impacts this has. Although **Options 8 and 9** include development within more rural areas, all three options would result in the same level of development within the urban area. Therefore, all three options are expected to have minor negative but uncertain effects in relation to IIA objective 4: Health and Wellbeing.
- **E.42 Options 8 and 9** support more distributed growth across the Borough than the other options, where there are currently less facilities and infrastructure. However, the majority of this development will be focussed in one or two rural placemaking areas. This offers greater potential than piecemeal development to deliver significant new social infrastructure particularly, as in this case, where development will be delivered in the form of comprehensively masterplanned, strategic scale developments. Despite this, infrastructure provision in strategic new developments in the Green Belt may not rival that available in existing service centres and transport nodes, particularly in the short term before the developments are fully built out. These potential positive effects are uncertain when considering the spatial strategy options in isolation as they will depend on the detail of the spatial strategy policy and associated strategic allocation policies

### IIA objective 5: Support good access to services, facilities, and wider community infrastructure, for new and existing residents, mindful of the potential for community needs to change over time

- **E.43** All three revised options focus some or all development in urban areas around the transport nodes in the Borough, which consist of a mixture of railway stations and tube stations. These railway stations and tube stations are located in built up urban areas, where a number of existing services and facilities are present. New residents would therefore not be required to travel far to reach the services, as they would be within walking distance of them. For example, there are a number of primary schools located within close proximity of the transport nodes, in addition to secondary schools. The scale of development proposed could provide opportunities to deliver significant improvements to infrastructure, benefiting new and existing residents and communities.
- **E.44 Options 8 and 9** also support development of Green Belt land in the north west of the Borough, and the majority of the Green Belt allocation sites are not located within close proximity of a primary or secondary school, or other community infrastructure, However, much of the development in rural areas would be focussed in identified rural placemaking areas, with

Enfield Local Plan IIA December 2023

greater potential for good provision of services, facilities and social infrastructure, as discussed in more detail above in relation to IIA objective 4: Health and wellbeing. All options are expected to have **significant positive effects** in relation to this objective, as the majority of development is in the urban areas which have the benefit of good facilities. The amount of development proposed could place a lot of pressure on existing services, such as primary and secondary school places, although this is uncertain. Therefore, all revised **Options 7, 8 and 9** are also expected to have **minor negative but uncertain** effects in relation to this objective.

#### IIA objective 6: Encourage social inclusion, promotion of equality and a respect through diversity

- **E.45** Enfield is characterised by an east-west divide in terms of inequality and deprivation, with the eastern part of the Borough containing ten Lower Super Output Areas that fall within the 10% most deprived nationally. All options support development around the transport nodes, which are spread across the Borough but not in the north west, which comprises Green Belt land.
- **E.46** Development is expected to help regenerate the areas surrounding the transport nodes but due to the fact the transport nodes are spread fairly evenly across the majority of the Borough, development would not be directed into the more deprived areas only. Therefore, although all options would, to an extent, help regenerate the more deprived areas of the Borough, they would also enhance the less deprived areas and not specifically address the gap in inequality between the east and west.
- **E.47** The concentration of development within urban areas in all the revised options, would result in an increase in the density of development around the transport nodes in LBE, albeit not as high as envisaged in the high growth spatial options appraised at Regulation 18 stage, before additional urban sites had been identified by the Council. As a result, there would be an increase in the height of existing tall buildings and new high-rise buildings. This, could lead to over-provision of flats vs. other types of dwelling in the housing mix and therefore limit the mix of housing types available and potentially discriminate against certain groups of people such as those with specialist housing requirements. Higher density urban development is also likely to be more expensive to provide than lower density development in rural areas and may therefore contribute a lower proportion of affordable housing. Open space within urban areas may also be lost to new housing, contributing to inequalities in access to open space. This is particularly important following the Covid-19 pandemic, which has highlighted the importance of public open space, particularly if people do not have access to a private garden.
- **E.48** Taking all of the above into account, **Option 7** is expected to have a **mixed minor positive and minor negative effect** n relation to **IIA6: Social inclusion** because of its purely urban focus while **Options 8 and 9** that also provide for development in the rural area are expected to have **minor positive effects**.

#### IIA objective 7: Reduce crime and increase community safety

- **E.49** The spatial distribution of development is not likely to have a major influence on levels of crime, anti-social behaviour, fear of crime and perceptions of safety, which will be more influenced by policies which seek to deliver inclusive design. As set out in the IIA Scoping Report, and the Regulation 18 IIA, crime is generally concentrated in the east of the Borough at Southgate, Palmers Green, and the boundary the Borough shares with Haringey Council, in addition to around transport nodes. Crime levels have been rising in the area, partly due to the fact that the Borough has the largest youth population in Greater London, with some of the highest levels of crime recorded in the school-transport corridors. All options concentrate grown at the transport nodes, which may exacerbate existing issues. In addition, all options would result in relatively high density development in urban areas, which may be linked to higher levels of crime.
- **E.50** Overall, all options are expected to have minor negative effects in relation to IIA7: Crime and community safety, although this is uncertain as there will be policies included in the Local Plan to support high quality developments, improvements to estates that suffer from poor quality housing and a high quality public realm that supports the integration of communities and natural surveillance including through the co-location of shops, services, community centres and green spaces.

#### IIA objective 8: Focus on delivering the 'Vision Zero' target for road safety

**E.51** The spatial distribution of development will not affect the achievement of this objective, which relates to healthy streets principles that encourage walking and cycling; these are more likely to be addressed through Local Plan policy. Therefore, all options are likely to have negligible effects in relation to **IIA8**: **Road safety.** 

Enfield Local Plan IIA December 2023

#### IIA objective 9: Support a strong, diverse, and resilient economy that provides opportunities for all

**E.52** Concentrating development at the transport nodes in the Borough which are very central and well-connected, is expected to encourage the retention and expansion of town and local centre commercial and retail uses. The transport nodes in the Borough contain a range of services and facilities, and therefore offer job opportunities. **Option 7** seeks to focus development at the transport nodes only. Concentrating new residential development in these central and well-connected areas would help boost the economy by increasing the available workforce and attracting investment to the area, whilst also helping improve these local economies. **Option 7** is therefore expected to have significant positive effects in relation to this objective.

**Options 8 and 9** spread development more evenly across the Borough, including on Green Belt land. However, the areas of Green Belt land where intensification is proposed, are not located within the main urban centres of the Borough, where more job opportunities are available. Conversely, supporting development in these areas may have positive effects on the rural economy and jobs. **Options 8 and 9** are therefore they expected to have a **minor negative but uncertain effect** for directing some residential development to areas of Green Belt land where there are less existing job opportunities, but a **positive effect** in terms of supporting the rural economy. They would both also have a **significant positive** effect more widely, as they support a significant amount of development in the urban areas at the transport nodes, which are well connected to employment opportunities.

#### IIA objective 10: Support the vitality of the Borough's town and local centres

**E.53** As for all previous options, the revised options concentrate development at the transport nodes in the Borough which are very central and well-connected, encouraging the retention and expansion of town and local centre commercial and retail uses. **Option 7** is therefore expected to enhance the vitality and vibrancy of the town and local centres in the Borough, resulting in **significant positive effects** against **IIA10: Town and local centres. Options 8 and 9** support development at the transport nodes in the Borough, but also support the development of rural sites. Although the Green Belt sites are located on the edge and/or outside of the town and local centres and development under these options may not directly revitalise the town and local centres, these options still support development around the transport nodes, where the town and local centres are located. All options are therefore expected to have **significant positive effects** in relation to this objective.

#### IIA objective 11: Minimise air pollution

**E.54** As with the original options, all three revised options focus development in urban areas around the transport nodes in the Borough, which consist of a mixture of railway stations and tube stations. These railway stations and tube stations are located in built up urban areas, where frequent bus services are also present, in addition to everyday services and facilities that are within walking distance of one another. **Options 7, 8 and 9** are therefore likely to reduce reliance on the private car, which would help minimise air pollution. However, the actual use of more active and sustainable modes of travel will depend on people's behaviour and the majority of residents in the Borough use a private car to get to work instead of public transport. Further to this, the Borough experiences severe problems with air quality, especially between the east and west of the Borough, with the entire Borough being declared an Air Quality Management Area (AQMA). Therefore, although all options focus development within close proximity to sustainable travel modes, where services and facilities are within easy walking and cycling distance of one another, the amount of development proposed by all options is expected to have significant adverse effects on air quality through population increase and an associated growth in the number of cars on the road. Walking and cycling could be encouraged through the design of new development and incorporation of Healthy Streets principles.

**E.55 Options 8 and 9** also support development of Green Belt land in the north west of the Borough, where very few railway stations are located (there are no tube stations), bus services are less frequent, and services and facilities are not within easy walking distance of one another. Therefore, new residents in these locations would be more reliant on the private car, contributing towards air pollution. It may be possible to mitigate this through provision of high quality public transport links to new strategic developments; the effects of any such provision are assessed in the IIA of the proposed plan policies.

**E.56** Overall, all options are expected to have **mixed significant positive and significant negative** effects in relation to **IIA11**: **Air pollution.** 

#### IIA objective 12: Minimise the need to travel and support a modal shift away from the private car

**E.57** All options focus development in urban areas around the transport nodes in the Borough, at least in part, these options are therefore likely to reduce reliance on the private car and increase more sustainable modes of transport. However, the use of

Enfield Local Plan IIA December 2023

more sustainable modes of transport will depend on people's behaviour, especially following the Covid-19 pandemic where there has been a significant reduction in people using public transport. Indeed, the majority of residents in the Borough use a private car to get to work instead of public transport. **All options are** therefore expected to have significant positive but uncertain effects in relation to **IIA12: Sustainable transport.** 

**E.58** However, **Options 8 and 9** also support development of Green Belt land in the north west of the Borough, where very few railway stations are located (there are no tube stations), bus services are less frequent, and services and facilities are not within easy walking distance of one another. Therefore, residents in these locations are expected to be more reliant on the private car, particularly because they are within close proximity of the M25 which borders the northern edge of LBE. As development would be concentrated within one or two rural areas, there is greater scope for ensuring sustainable transport options are available. Development at this scale will take time and so these two options are therefore also likely to result in minor negative effects in relation to this objective, especially in the short to medium term.

### IIA objective 13: Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks

**E.59** The Borough does not contain a Special Protection Area (SPA), Special Area of Conservation (SAC) or a Ramsar site. However, it is located within close proximity to the Lee Valley SPA and Ramsar site which is located to the north and south of the Borough in Lee Valley Regional Park, which runs along the eastern edge of Enfield. The Epping Forest SAC is also located just outside the Borough, to the east. The Chingford Reservoir Site of Special Scientific Interest (SSSI) is located within the Borough, along its eastern edge. There is also one Local Nature Reserve (LNR) within the Borough, known as Covert Way, located just south of Hadley Wood. A large number of Sites of Importance in Nature Conservation (SINC) are spread across the Borough.

**E.60** All options would intensify development at transport nodes in the urban areas of the Borough, where no internationally designated biodiversity assets are present. Although there is one SSSI and one NNR present within the Borough, neither are located within close proximity to where development is proposed under all options. However, the zones of influence for some of the SACs, SPAs and Ramsar sites just outside the Borough extend into the Borough and indirect effects due to general population increase and pressure on any nature conservation sites, for example from recreation and increased air pollution, could still occur. The SINCs are spread relatively evenly across the Borough, with most containing a railway station. All options would therefore include land that falls within a SINC. **Options 8 and 9** also promote development in the Green Belt in areas that comprise a mixture of both greenfield and brownfield sites (either of which can have biodiversity interest). The Green Belt areas contain a number of areas of priority habitat and locally designated wildlife sites. Overall, all options are expected to have **significant negative effects** in relation to IIA13: Biodiversity. The effects are recorded as **uncertain** because designated nature conservation sites could be avoided through site design, and there may be opportunities to promote habitat connectivity if new developments include green infrastructure.

**E.61 Options 8 and 9** propose ambitious biodiversity improvements so are considered to have **uncertain minor positive effects** on **IIA objective 13**; these improvements are uncertain as they depend on the timing and location of development. Biodiversity improvements proposed under **Option 7** are more limited and are considered to be **negligible** relative to the likely future baseline in the absence of the Local Plan (which would still require biodiversity net gain for all development).

#### IIA objective 14: Sustain and enhance the significance of heritage assets

**E.62** The northern edge of the Borough does not contain a large concentration of heritage assets whereas the remainder of the Borough does, especially the more built-up areas such as Enfield Town. A number of Conservation Areas are located along the periphery of the built-up area within the edge of the Green Belt, the largest being Trent Park which is also a Registered Park and Garden. As all options seek to intensify the areas surrounding the railway and tube stations within the Borough, proposed development is likely to be located within close proximity to a large number of Listed Buildings, whilst also falling within or close to Conservation Areas. The medium-high growth options (**Options 8 and 9**) would a higher number of homes than **Option 7**, and **both medium-high growth options** are expected to have **significant negative effects** in relation to **IIA14: Historic environment** due to the scale of development proposed. **Option 7**, however, would concentrate development in the urban areas only and effects on the historic environment would also be substantial. Therefore **Option 7** is also considered to have potential **significant negative effects** on **IIA objective 14**.

Enfield Local Plan IIA December 2023

**E.63** The effects of all the revised options are recorded as uncertain because development could potentially reduce adverse impacts on the historic environment through mitigation and the design, scale, and layout of development.

#### IIA objective 15: Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes

**E.64** All revised options (7, 8 and 9) would result in an increase in the density of development in the Borough around the transport nodes. There would need to be an increase in the height of existing tall buildings, in addition to new high-rise buildings, both of which would alter the character of the urban area although these potentially negative effects in increased development density would be less than envisaged at Regulation 18 stage due to the identification of more sites in the urban area across which development could be distributed. **Options 8 and 9** would deliver more homes than **Option 7** but would spread this development more evenly across the Borough, including areas that fall within the Green Belt.

**E.65** However, the intensification of areas within the Green Belt to deliver medium-high growth could potentially alter the landscape in the north west of the Borough. All three of the revised options are expected to have **minor negative effects** in relation to **IIA15**: **Landscape and townscape**. However, the effect is recorded as **uncertain** because development within the Green Belt could be designed in a way that helps mitigate any adverse impacts on the character of the area.

#### IIA objective 16: To achieve efficient use of land and materials

**E.66** All options would result in intensification around transport nodes within the Borough, which fall on previously developed land that is classified as land predominantly in urban use. All three revised options are therefore expected to have significant positive effects in relation to **IIA16**: **Efficient use of land**. However, Options **8 and 9** also promote development in the Green Belt in areas that comprise a mixture of both greenfield and brownfield sites, all of which are classified as Grade 3 agricultural land. Therefore, although these two options would promote the development of previously developed land, they would also promote the development of greenfield sites, which is not an efficient use of land. Therefore, Options **8 and 9** are also expected to have minor negative effects in relation to this objective.

#### IIA objective 17: To manage and reduce the risk of flooding

**E.67** The River Lee, in addition to King George's Reservoir and William Girling Reservoir located along the eastern edge of the Borough create a flood risk. The immediate area surrounding these waterbodies falls within Flood Zones 3a and 3b, as well as Flood Zone 2. All options promote development in urban areas around transport nodes within the Borough, a number of which are located in the east of the Borough. The above mentioned flood zones also stretch to the west of the Borough along New River (Old Course) and a number of brooks, most of which are also located within close proximity to transport nodes. The NPPF discourages the development of housing within areas at the highest risk of flooding. However, development may be able to incorporate surface water management measures, such as sustainable drainage systems to address the existing flood risk, as well as that generated by new development. It is also likely that under **Option 7, 8 and 9** housing would be partly delivered through an increase in the density of existing urban areas including through an increase in the height of buildings within the existing urban footprint, and would therefore not cause a reduction in permeable surfaces.

**E.68** Options **8 and 9** support development of Green Belt land in the north west of the Borough, some of which comprises greenfield land. As such, development would reduce the amount of permeable surface available and potentially contribute to surface water run-off, increasing flood risk. Overall, **all options** are expected to have **minor negative but uncertain effects** in relation to **IIA17: Flooding**.

#### IIA objective 18: Minimise water use and protect water quality

**E.69** The Borough is covered entirely by the London Water Resource Zone, with its potable water and waste water services supplied by Thames Water. Greater London is mostly supplied by surface water resources (80%), with the remainder delivered through groundwater abstractions. Availability of water resources is a key issue in the Borough, given that the Thames Water Supply is designated as "seriously water stressed" and that climate change may lead to limited water availability in the future, particularly in the summer. **All options** would place more pressure on water resources and water treatment capacity, this being greater for **options 8 and 9** that propose more development in total.

**E.70** The Borough contains a fairly high proportion of land covered by Source Protection Zones 1 and 2, and it is therefore unlikely that development would be able to avoid these Source Protection Zones. Development in some locations could

Enfield Local Plan IIA December 2023

therefore contaminate water supplies without mitigation. However, all options support development in existing built-up areas and therefore any effect on Source Protection Zones is likely to be limited.

E.71 Overall, minor negative but uncertain effects are expected for Options 7, 8 and 9.

### Appendix F

# IIA findings for the site options 2023

**F.1** This section presents the IIA findings for the reasonable alternative site options considered by the Council for allocation in the Enfield Local Plan at Regulation 19 stage.

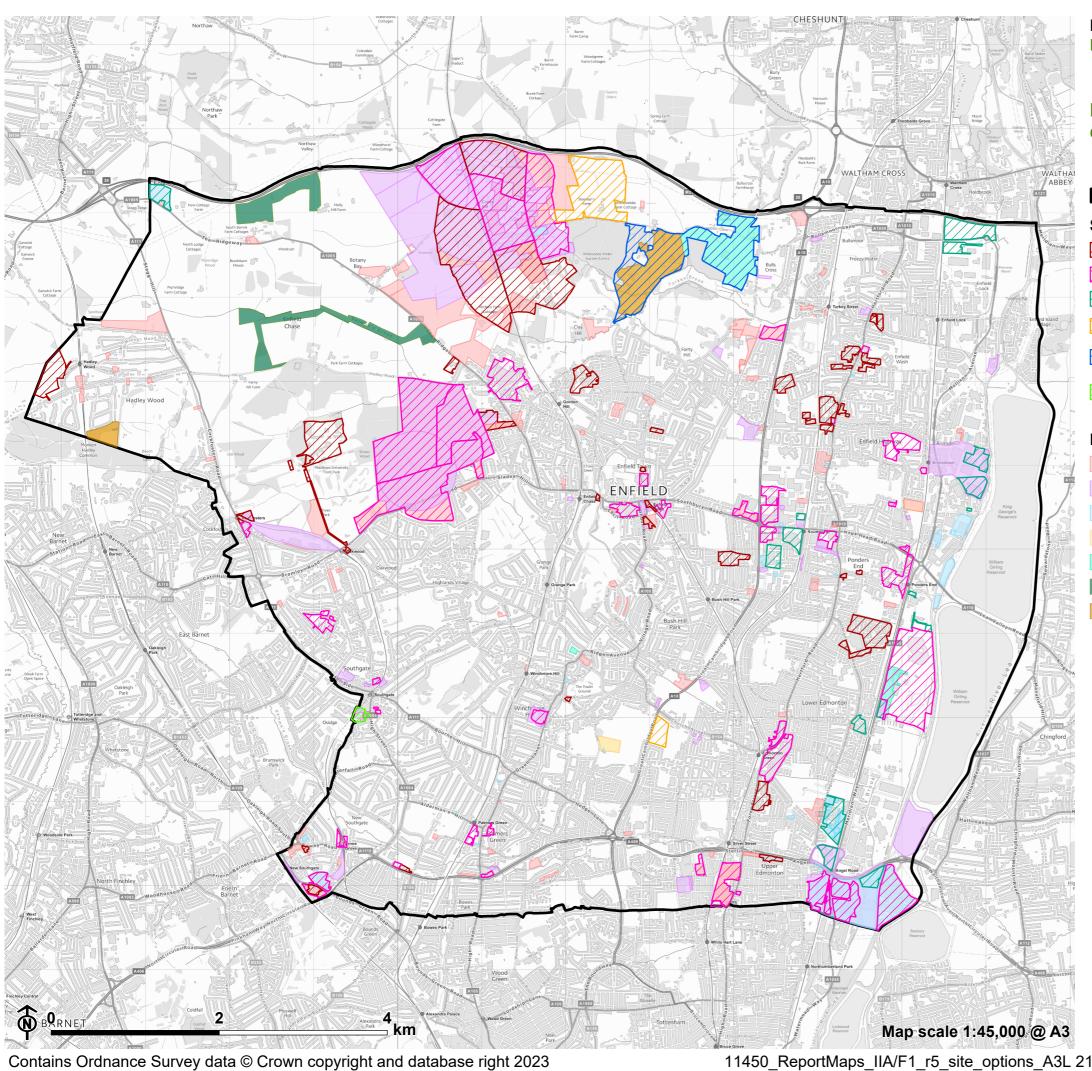
**F.2** The Council's approach to identifying the reasonable alternatives site options to be subject to IIA is described in **Chapter 2 Methodology** within the section 'Stage B: Developing and refining options and assessing effects'. Overall, there were:

- 146 site options considered for residential use
- 104 site options considered for mixed-use including residential uses<sup>1</sup>
- 59 site options considered for industrial or employment, involving some commercial, retail and town centre uses
- 14 site options considered for other uses (burial/crematorium, leisure/sports and recreation, nature recovery sites, education or green infrastructure)
- **F.3** A small number of sites were included twice because the proposed site boundary changed as the plan-making process progressed<sup>2</sup>; in these cases the site ID number for the revised (more recent) boundary version was suffixed with an "r" (e.g. CFS168\_r) to differentiate the IIA findings from the original version of the site.
- **F.4** The broad distribution of the appraised site options across the Borough is illustrated in **Figure F.1**, which also indicates which of these options was taken forward as an allocation in the Regulation 19 Plan.
- **F.5** The full appraisal methodology for the site options is described in **Chapter 2 Methodology** within the section 'Appraisal methodology' and the site appraisal criteria against which the site options were assessed are set out in **Table B.1** of **Appendix B**. When interpreting these IIA results for the site options, the following key features of this methodology should be borne in mind:
  - Assessments were of the principle of a specified type of development (residential, employment etc) within a defined boundary; no account was taken of any detailed development proposals for the sites.
- Assessments were 'policy-off' i.e. before consideration of any mitigation that may be provided by Local Plan policies.
- Assessments were precautionary and intended to highlight the potential for significant negative effects to the Council for further investigation so that the need for avoidance (e.g. amendments to site boundaries) or mitigation (e.g. requirements within allocation policies) could be considered.

**F.6 Table F.1** shows the effects of all reasonable alternative site options in relation to the IIA objectives, with the findings briefly described below the table.

<sup>&</sup>lt;sup>1</sup> Does not include SS10 Broad Location and SA11 Broad Location

<sup>&</sup>lt;sup>2</sup> In some cases, the differences between the site boundaries for the two versions were slight and may have been attributable to digitisation errors but both versions were included in the IIA results for completeness



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### Figure F.1: Reasonable alternative development site options

Enfield Borough Site allocation Residential Mixed-use Industrial/ employment Natural burial/ burial/ crematorium Nature recovery / Sports, leisure and recreation Education Reasonable alternative Residential Mixed-use Industrial Burial/ crematorium Leisure/ sports and recreation Green infrastructure Nature recovery

Table F.1: IIA find	dings 1	or sit	e opt	ions 2	2023																	1						1		1									
Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	II4: Health and wellbeing	II5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO <sub>2</sub> pollution	11b: PM10 pollution	11c: PM <sub>2.5</sub> pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
	,						1		1	,		ļ				ا	Resid	lentia	al site	e opt	ions																		
16/01452/FUL	N/A	N/A	+	-	++	0	+	+	0	N/A	N/A		0	N/A		0	-	0				+	-	0				N/A	?		0		+	0	+	0			0
18/03508/FUL		N/A		++	++	0	++	++	0		N/A	-	0	N/A		+	-	-	-	-	-	++	+	0	_	_		N/A	?		0		+	0	+	0	0	0	
19/04385/FUL	N/A	N/A	+	-	+		-	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-				0				N/A	?	-			+	0	+	0	0	0	0
20/01815/FUL	N/A	N/A	+	-	++	0	+	+	+	N/A	N/A	++		N/A	0	0	-	0	-	-		+	-	0	0	0		N/A	?	0	0	0	+	0	+	-	-		
20/02710/FUL	N/A	N/A	+	-	++	0	+	+	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-		-		0	-	-		N/A	?	-	0	-	+	0	+	0	0	0	0
20/03530/FUL	N/A	N/A	+	-	++		-	-	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-		+	-	0				N/A	?	-	-1		+	0	+	0	0	0	
BOC5	N/A	N/A	+	+	++	0	+	++	+	N/A	N/A	-	0	N/A	-	0	-	-	-	-		++	0	0	-	-	0	N/A	0?	-	0	-	+	0	+	0			
BOS2	N/A	N/A	+	+	++		+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-		+	-	0	-	-	0	N/A	0?	-			-	0	-	-			
BUE32	N/A	N/A	+	++	++	0	++	+	0	N/A	N/A	++	0	N/A	+	0		-	-	-	-	+	0	0	0	0		N/A	?	-	0	-	+	0	+	0			0
BUP22	N/A	N/A	+	++	++		+	++	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	-	++	+	0	-	-	-	N/A	-?	-			+	0	+	0			
BUP6	N/A	N/A	+	+	++		+	++	0	N/A	N/A	-	0	N/A	-	0		-	-	-	-	++	+	0	0	0		N/A	?	-			+	0	+	0			
CFS145	N/A	N/A	+	-	++		-	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-		-		0			N/A		?	N/A	N/A	?	-	0	-	0			
CFS150	N/A	N/A	+	-	++	0	+	+	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	+	++	++	0	-	-		N/A	?	0	0	0	+	0	+	0	0	0	0
CFS159	N/A	N/A	++	-	++	0	+		0	N/A	N/A	-	0	N/A	-	0	-	-	-	-				0	-	-		N/A	?	N/A	N/A	+?	+	0	+	0		1	0
CFS162	N/A	N/A	+	+	++		+	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-		-		0			N/A		?				-	-	-	0	-	-	0
CFS162_A	N/A	N/A	+	+	++		+	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	-	-		0		1	N/A		?		-	1	1	-	-	0	-	-	0
CFS162_B	N/A	N/A	+	-	++		-	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-		-		0			N/A		?				-	-	-	0	0	0	0
CFS162_C	N/A	N/A	+	-	++		-	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-		-		0	-	-		N/A	?		-		+	0	+	0	0	0	0
CFS165	N/A	N/A	++	++	++	0	++	++	0		N/A		0	N/A	+	0	-	-	-	-	0	+	+		-		-	N/A	-?	-	0	-	+	0	+	0	0	0	0
CFS169	N/A	N/A	++	-	++	0	+	+	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-				0				N/A	?	-	0	-		-		0	0	0	

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	114: Health and wellbeing	II5: Services and facilities		IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO2 pollution	11b: PM <sub>10</sub> pollution	11c: PM <sub>2.5</sub> pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity		14b: Proximity to historic assets, sites outside of existing settlements		15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
CFS174	N/A			-	++			4				N/A	-	0	N/A		0	-	-	-	-				0			N/A		?		N/A	?	+	0	+	0			0
CFS177	N/A			-	++			+			N/A		•		N/A		0	-	-	-	-		-		0	-	-		N/A	?				-	0	-	0	0	0	0
CFS177_r	N/A				++		•	+			N/A		-	0	N/A		0	-		-	-				0			N/A		?				+	0	+	0	0	0	0
CFS183	N/A			++	++		1				N/A		-	0	N/A		+		-	-	-	++	++	++	0	-	-		N/A	?	-			+	0	+	0	-	-	
CFS199-9	N/A			++	++	0	+					N/A	++		N/A		+			-	Ė	0	++	+	0	-	-	 NI/A	N/A	? ?		0	<u> </u>	+	0	+	0	0	0	0
CFS208 CFS210	N/A N/A				++						N/A N/A	N/A			N/A N/A		0			_	Ė			++	0	0	-	N/A	N/A	<i>?</i>	-	0			-		0			0
CFS210 CFS212	N/A			_	++	0	-				N/A			0	N/A		0	-		_		+	++		0	0	0	N/A	IN/A	?	0 N/A	0 N/A	0	+	0	+	0	_		0
CFS213	N/A				++			+	_		N/A			0	N/A		0								0			14/7	N/A	-2	0		:	+	0	+	0	0	0	0
CFS214	N/A				+			T				N/A	_		N/A		0	_		_					0			N/A		?		N/A	?	_	-		0	0	0	0
CFS223	N/A			++	++			+	+		N/A			0	N/A		0	_	-	_			+	0	0				N/A	?		N/A		_	0		0	0	0	
CFS224	N/A				++						N/A			0	N/A		0	_		_			++	0	0				N/A	?				+	0	+	0			
CFS225	N/A				++							N/A			N/A		0	_		-			+		0				N/A	-?	_			+	0	+	0	0	0	0
CFS242	N/A			+	++	0	4	+	+	+		N/A	-		N/A		0		-	-	-	0	+	+	-	-			N/A	?	0	0	0	+	0	+	0			0
CFS253	N/A	N/A	++	++	++	0		+ +	+	0	N/A	N/A	-	0	N/A	-	+	-	0	-	-	-	++	+	-	0	-		N/A	?	-	0		+	0	+	0			
CFS255	N/A	N/A	+	+	++	0	-	+	+	0	N/A	N/A	-	0	N/A	-	+		-	-	-	-	++	+	0	-	-		N/A	?	-	0	-	+	0	+	0	-	-	
CFS263	N/A	N/A	+	++	++	0	+	+ +	+	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	++	+	0	0	0	-	N/A	-?	-	0	-	+	0	+	0	0	0	0
CFS267	N/A	N/A	+	-	++	0	+	+		++	N/A	N/A	-	0	N/A	-	0	-	0	-	-		-		0	-	-		N/A	?	-	0	-	+	0	+	0	0	0	
CFS268	N/A	N/A	+	++	++	0	+	+ +	+	0	N/A	N/A	-	0	N/A	-	+		-	-	-	-	++	+	0	-	-		N/A	?	-	0	-	+	0	+	0			0
CFS269	N/A	N/A	+	++	++	0	+	+ +	+	0	N/A	N/A	-	0	N/A	-	+	-	0	-	-	-	++	+	0	0	0	0	N/A	0?	-	0	-	+	0	+	0	0	0	0
CFS270	N/A	N/A	+	++	++	0	+	+ +	+	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	-	++	+	0	0	0		N/A	?	-	0	-	+	0	+	0	-	-	
CFS271	N/A	N/A	+	+	++		4	+ 4		+	N/A	N/A	++	0	N/A	+	0		-	-	-		+	-	0	-	-		N/A	?	-			+	0	+		-		

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	 Health and w	II5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO <sub>2</sub> pollution	11b: PM10 pollution	11c: PM <sub>2.5</sub> pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
CFS273	N/A			+	++		+	+	0		N/A	-	0	N/A		+		٠	-	-	++	++	++	0	-	-		N/A	?	-	0	-	+	0	+	0	-	-	0
CFS275	N/A			++	++			++			N/A	-		N/A		+		0	-	-	0	++	+	0	-	-	0	N/A	0?	-			+	0	+	0	0	0	0
CFS276	N/A			++	++	0	++	++			N/A	-	0	N/A		+		·	-	-		++	0	0	-	-		N/A	?		0	-	+	0	+	0			0
CFS294	N/A			-	++	0	+	+			N/A	-	0	N/A		0	-	-	-	-				0				N/A	?		N/A		++	0	++	0			0
CFS295	N/A			-	++	0	+	-	0		N/A	-		N/A		0	-	-	-	-				0	-	-		N/A	?	N/A	N/A	+?	+	0	+	0	0	0	0
CFS304	N/A			++	++		+	++	+			++	0	N/A	+	+		Ŀ	-	-	-	++	+	0	-	-		N/A	?				++	0	++	0			0
CFS307	N/A			-	++		-	-			N/A	-	0	N/A	-	0	-	-	-	-				0				N/A	?		N/A		+	0	+	0			0
CFS311	N/A	N/A	+	-	+	0	0	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-				0				N/A	?	N/A	N/A	+?	+	0	+	0			0
CFS313	N/A	N/A	+	-	+	0	0	-	0	N/A	N/A	1	0	N/A	-	0	-	-	-	-				0			N/A		?	N/A	N/A	?	-	-		0	0	0	0
CFS318	N/A	N/A	+		++	0	+	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-				0	-	-	N/A		?	N/A	N/A	?	-	-		1		ļ	
CFS319	N/A	N/A	+	-	+	0	0	-	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-				0	-	-	N/A		?	N/A	N/A	?	-	-	-				
CFS320	N/A	N/A	++	-	++		-	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-				0			N/A		?	-				-	-	0		ļ	
CFS322	N/A	N/A	++	++	++		+	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	-	++	+	0			N/A		?	N/A	N/A	?		0	-	0		-	
CFS323	N/A	N/A	+	-	++		-	+	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-		-		0			N/A		?	N/A	N/A	?		-		0			
CHC1	N/A	N/A	++	-	++		-	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-				0	-	-		N/A	?	N/A	N/A	+?	++	0	++	0			
CHC10	N/A	N/A	++	-	++	0	+	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-				0				N/A	?	N/A	N/A	+?	+	0	+	0	-	-	0
CHC11	N/A	N/A	++	-	++	0	+	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-				-	-		N/A		?		0		+	0	+	0	-	-	
CHC12	N/A	N/A	++	-	++		-	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-				-			N/A		?	N/A	N/A	?	+	0	+	0	0	0	
CHC13	N/A	N/A	+	-	++	0	+	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-				0			N/A		?		0		-	-	-	0	0	0	
CHC14	N/A	N/A	+	-	++		-	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-		-		0	-	-	N/A		?				+	0	+	0		-	
CHC15	N/A	N/A	++	-	++		-	-	0	N/A	N/A	-	0	N/A	-	0		-	-	-				0			N/A		?	N/A	N/A	?		-		0			
CHC17	N/A	N/A	++	-	++	0	+	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-				0	-	-		N/A	?	N/A	N/A	+?	+	0	+	0			0

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	114. Health and mallhaine	Health ar	II5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO <sub>2</sub> pollution	11b: PM <sub>10</sub> pollution	11c: PM <sub>2.5</sub> pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
CHC18	N/A			-	++	0		+	-			N/A		0	N/A		0	-	-	-	-				0	-	-		N/A	?		N/A		+	0	+	0			0
CHC19	N/A			-	++	0		+	+			N/A			N/A		0	-	-	-	-				0	-	-		N/A	?		N/A		-	-	-	0	0	0	0
CHC2	N/A			-	++	0		+	-			N/A	-		N/A		0	-	-	-	-				0	-	-		N/A	?		N/A		+	0	+	0	0	0	
CHC21	N/A			-	++	0		+	+			N/A	-	0	N/A		0	-	-	-	-				0				N/A	?		N/A		++	0	++	0			0
CHC3	N/A			-	++			-	-			N/A	-	0	N/A		0		•	-	-				0			N/A		?	N/A	N/A	?		-		0			
CHC5	N/A			-	++			-	++			N/A		0	N/A		0		Ŀ	-	-		-		-			N/A		?	٠				-		0			
CHC7	N/A			-	++			-	+			N/A	-	0	N/A		0	-	-	-	-				0			N/A		?		N/A	?		-		0			
CHC8	N/A			-	++	0		+	++			N/A	-	0	N/A		0	-	-	-	-				0			N/A		?		N/A	?	-	-	•	0	0	0	0
CHC9	N/A	N/A	++	-	++	0		+	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-				0			N/A		?	N/A	N/A	+?		-		0			
CHP12	N/A	N/A	+	-	++	0		+	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-				0	-	-	N/A		?	N/A	N/A	?	-	-	-	0	0	0	0
CHP19	N/A	N/A	+	-	++	0		+	-	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-				0	-	-	N/A		?	N/A	N/A	?	-	-	-	0			0
CHS16	N/A	N/A	+	-	++			-	++	0	N/A	N/A	-	0	N/A	-	0		-	-	-		++	0	-			N/A		?	-			4	-	1	0	1	1	
COC1	N/A	N/A	+	++	++			+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-		-		0	-	-	-	N/A	-?	N/A	N/A	+?	-	0	-	0	0	0	0
COC2	N/A	N/A	+	++	++	0	4	++	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	-	++	+	0			-	N/A	-?	-	0	-	+	0	+	0	0	0	0
COC9a and COC9b	N/A	N/A	++	++	++			+	+	0	N/A	N/A	-	0	N/A	-	+		-		-	0	++	+	0				N/A	?				+	0	+	0	-	-	0
COP39	N/A	N/A	+	-	++			-	+	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-				0	-	-	N/A		?	-			+	0	+	0	0	0	0
COP49	N/A	N/A	+	++	++			+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	0	++	+	0	-	-	-	N/A	-?	-			+	0	+	0	0	0	0
COP70	N/A	N/A	+	-	++	0		+	+	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-				0	-	-		N/A	?	-	0	-	+	0	+	0	0	0	0
GRC1	N/A	N/A	++	++	++			+	++	0	N/A	N/A	-	0	N/A	-	+		-	-	-	+	++	++	-	-			N/A	?				+	0	+	0	-	-	
GRC10	N/A	N/A	+	-	++	0		+	-	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-		-		0	-	-		N/A	?	-	0	-	+	0	+	0	-	-	
GRC2	N/A	N/A	+	+	++	0		+	+	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-		-	0	-	-		N/A	?	-	0	-	+	0	+	0	0	0	
GRC9	N/A	N/A	+	-	++	0		+	-	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-		+	-	0	-	-		N/A	?	-	0	-	+	0	+	0			

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	II4: Health and wellbeing	II. Comiton of the control of	IID: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO <sub>2</sub> pollution	11b: PM10 pollution	11c: PM <sub>2.5</sub> pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
GRD4	N/A		+	++	++	0	+	+	+			N/A	-	0	N/A		+	-	-	-	-	++	++	++	0	-	-		N/A	?		0		+	0	+	0	-	-	
HIC10	N/A		+	++	++		4	+	++		N/A		-	0	N/A		+		-	-	-	-	++	+	0			N/A		?	-			+	0	+	-			
HIC11	N/A		++	++	++		4	-	++		N/A		-	0	N/A		0	-	-	-	-		+	-	0			N/A		?	-				-		0			
HIC6	N/A			+	++		•	-	-		N/A		-	0	N/A		+	-	-	-	-	0	++	+	0			N/A		?	N/A		?		-		0			
HIC9	N/A	N/A	++	++	++		4	+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-		+	-	0			N/A		?	-				-		0			0
HIP26	N/A	N/A	+	-	++		•	+	++	0	N/A	N/A	-	0	N/A	-	0		-	-	-	-			0	-	-	-	N/A	-?	-			+	0	+	0	0	0	0
HIP27	N/A	N/A	+	+	++	0	4	+ +	++	0	N/A	N/A	1	0	N/A	-	+	-	-	-	-	+	++	++	0	-	-	-	N/A	-?	-	0	-	+	0	+	0	0	0	
HIP5	N/A	N/A	+	+	++		•	-	++	0	N/A	N/A	-	0	N/A	-	0		-	-	-	-			0	-	-	-	N/A	-?	0			+	0	+	0	0	0	0
LOP20	N/A	N/A	+	-	++	0	-	Ť	++	+	N/A	N/A	++		N/A	0	0		-	-	-	-	+	0	0	0	0	-	N/A	-?	0	0	0	+	0	+	-	0		0
LOP9	N/A	N/A	+	+	++	0	+	-	+	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	+	++	++	0	0	0		N/A	?		0	-	+	0	+	-	-	1	0
LP637	N/A	N/A	+	-	++		,	-	++	0	N/A	N/A	1	0	N/A	-	0	-	0	-	-		-		0	-	-	N/A		?			-	-	0	-	0	1	1	
PAP17	N/A	N/A	+	++	++		4	-	++	0	N/A	N/A	++	0	N/A	+	0	-	-	-	-	0	++	+	0				N/A	?	0			+	0	+	0	-	-	
POC1	N/A	N/A	+	++	++	0	+	+ +	++	+	N/A	N/A	-	0	N/A	-	+		-	-	-	+	++	++	0	0	0		N/A	?	-	0	-	+	0	+	0		-	
POC2	N/A	N/A	++	-	++				+	+	N/A	N/A	++	0	N/A	+	0	-	-	-	-		+	-	-	-			N/A	?	-			-	0	-	0		-	
POC4	N/A	N/A	++	++	++	0	+	+ +	++	++	N/A	N/A	++		N/A	0	0	-	-	-	-		+	-	-	-			N/A	?		0		+	0	+	0	0	0	
PP-08601612	N/A	N/A	+	+	++	0	+	-	+	0	N/A	N/A	-	0	N/A	-	+		-	-	-	++	++	++	0	0	0	-	N/A	-?	-	0	-	+	0	+	0	0	0	0
PP-08746655	N/A	N/A	+	-	++	0	4	F	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-		-		0	-	-		N/A	?	-	0	-	+	0	+	0	0	0	0
PP-08780079	N/A	N/A	+	++	++	0	+	+ +	++	0	N/A	N/A	-	0	N/A	-	+		-	-	-	0	++	+	0	-	-		N/A	?	-	0	-	+	0	+	0	0	0	
R.02	N/A	N/A	++	-	++		ŀ		+	0	N/A	N/A	-	0	N/A	-	+	-	0	-	-		++	0	0			N/A		?					-		0			
SA.11.3	N/A	N/A	++	-	++				-	0	N/A	N/A	-	0	N/A	-	0		-	-	-				0			N/A		?	N/A	N/A	?		-		0			
SA1.2	N/A	N/A	++	++	++		ŀ		-+	0	N/A	N/A		0	N/A	-	+		-	-	-	++	++	++	-	-			N/A	?	-			+	0	+	0	-	-	
SA1.5	N/A	N/A	++	+	++	0	4	- 4	++	0	N/A	N/A	-	0	N/A	-	+		-	-	-	+	++	++		-			N/A	?		0		+	0	+	0	-	-	

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	II4: Health and wellbeing	II5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO <sub>2</sub> pollution	11b: PM10 pollution	11c: PM <sub>2.5</sub> pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
SA1.6	N/A	N/A	+	++	++		+	++	0	N/A	N/A	-	0	N/A	-	+		-	-	-	++	++	++	0				N/A	?				+	0	+	0	0	0	
SA1.7	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	+	++	++	0	-	-		N/A	?	-	0	-	+	0	+	0			
SA10.2	N/A	N/A	+	+	++		+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-		-		0			N/A		?					-		0			0
SA11.2		N/A		-	++		-	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-				0			N/A		?	-				-		0			
SA11.5	N/A	N/A	++	-	++		-	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-				0			N/A		?	-				-		0			
SA28	N/A	N/A	++	++	++		+	++	0	N/A	N/A	-	0	N/A	-	+		-	-	-		++	0	0			N/A		?	-			++	0	++	0			
SA4.2	N/A	N/A	++	++	++		+	+	+	N/A	N/A	-	0	N/A	-	0			-		+	++	++	-	-		-	N/A	-?				+	0	+	-	-		
SA7.2	N/A	N/A	++	+	++	0	+	+	+	N/A	N/A	++	0	N/A	+	0		-	-	-	+	-	0	0	-	-	0	N/A	0?	0	0	0	+	0	+	0			0
SA7.5	N/A	N/A	+	+	++	0	+	+	0	N/A	N/A	-	0	N/A	-	+		-	-	-	++	++	++	0	0	0	-	N/A	-?	0	0	0	+	0	+	0	0	0	0
SBP13	N/A	N/A	+	+	++	0	+	++	+	N/A	N/A	++		N/A	0	0	-	-	-	-	1	+	0	0	0	0	0	N/A	0?	0	0	0	+	0	+	0	-	-	0
SGC1	N/A	N/A	++	+	++		+	+	+	N/A	N/A	++	0	N/A	+	0					0	,	-	0		-	0	N/A	0?	-	0	1	+	0	+	0	-	-	0
SGC8	N/A	N/A	+	++	++		+	++	+	N/A	N/A	-	0	N/A	-	+	-	-	-	-	++	++	++	0	-	-	-	N/A	-?	-	ļ		+	0	+	0	-	-	0
SGS14	N/A	N/A	++	+	++	0	+	+	+	N/A	N/A	++	0	N/A	+	0		-	-	-	+	,	0	0	-	-	0	N/A	0?	0	0	0	+	0	+	0			0
TUC6a	N/A	N/A	+	-	++	0	+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	-	-	0	-	-		N/A	?	0	0	0	+	0	+	0			
TUC8	N/A	N/A	+	+	++	0	+	++	++	N/A	N/A	-	0	N/A	-	+	-	0	-	-		++	0	0	-	-	0	N/A	0?	-	0	-	+	0	+	0	0	0	
TUE12a	N/A	N/A	+	+	++	0	+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	+	0	0	-	-		N/A	?	0	0	0	+	0	+	0			
U.02	N/A	N/A	++	++	++		+	+	0	N/A	N/A	-	0	N/A	-	+		-	-	-	0	++	+	0				N/A	?	-			+	0	+	0	-	-	0
U.06	N/A	N/A	++	++	++		+	++	0	N/A	N/A	-	0	N/A	-	+		-	-	-		++	0	0	1		N/A		?		1	-	++	0	++	0			
U.08	N/A	N/A	++	++	++		+	++	+	N/A	N/A	-	0	N/A	-	+		-	-	-		++	+	-	0	-		N/A	?		-		++	0	++	0			
U.11	N/A	N/A	++	-	++	0	+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-				0	-	-	N/A		?	-	0	-	+	0	+	0	0	0	0
U.13	N/A	N/A	++	++	++		+	++	++	N/A	N/A	-	0	N/A	-	+		-	-	-	-	++	+	-	0	-		N/A	?	-	-	-	++	0	++	0			
U.14	N/A	N/A	+	+	++		+	++	+	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	++	+	0	-	-		N/A	?	-	•		++	0	++	0			0

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	II4: Health and wellbeing	II5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO <sub>2</sub> pollution	11b: PM10 pollution	11c: PM <sub>2.5</sub> pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland		14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
U.15	N/A	N/A	+	++	++		+	++	++	N/A	N/A	-	0	N/A	-	+	-	-	-	-	0	++	+	0				N/A	?	-	0	-	+	0	+	0	-	-	
U.17	N/A	N/A	+	++	++		+	++	+	N/A	N/A	-	0	N/A	-	+	-	-	-	-	-	++	+	0	-	-		N/A	?	-	0	-	++	0	++	0		-	
U.18	N/A	N/A	+	++	++		+	++	0	N/A	N/A	-	0	N/A	-	+		-	-	-	+	++	++	0	0	0		N/A	?	-		ŀ	+	0	+	0	0	0	
U.20	N/A	N/A	+	++	++		+	++	+	N/A	N/A	++	0	N/A	+	+	-	-	-	-		++	0	0				N/A	?	-		-	++	0	++	0		i i	0
U.22	N/A	N/A	+	++	++		+	++	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	+	++	++	0	-	-		N/A	?	-			+	0	+	0	0	0	0
U.23	N/A	N/A	+	+	++		+	++	+	N/A	N/A	-	0	N/A	-	0		-	-	-		+	-	0	-	-	0	N/A	0?	-	0	-	++	0	++	0		-	
U.24	N/A	N/A	+	++	++		+	+	++	N/A	N/A	-	0	N/A	-	+		-	-	-	++	++	++	0	-	-		N/A	?			-	++	0	++	0			
U.25	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	N/A	-	+	-	0	-	-		++	0	0	0	0		N/A	?	-	0	-	+	0	+	0	-	-	
U.26	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	-	++	+	0				N/A	?	-	0	-	+	0	+	0	0	0	
U.27	N/A	N/A	+	++	++		+	++	+	N/A	N/A	-	0	N/A	-	+		-	-	-	0	++	+	0	0	0		N/A	?	-			+	0	+	0	0	0	
UPM1	N/A	N/A	++	++	++		+	+	++	N/A	N/A	++		N/A	0	+		-	-	-	0	++	+	-	-			N/A	?				++	0	++	0			
UPM1_r	N/A	N/A	++	++	++		+	+	++	N/A	N/A	++		N/A	0	+		-	-	-	0	++	+	-	-			N/A	?				++	0	++	0			
UPP7	N/A	N/A	+	++	++	0	++	+	0	N/A	N/A	-	0	N/A	-	0		-	-	-	++	++	++	0	-	-		N/A	?	-	0	-	+	0	+	0	0	0	0
UPS21	N/A	N/A	++	++	++		+	+	+	N/A	N/A	-	0	N/A	-	+			-		+	++	++	-	-			N/A	?				+	0	+	-	-		
UPS21a	N/A	N/A	+	++	++		+	+	+	N/A	N/A	-	0	N/A	-	+			-		+	++	++	0	-	-		N/A	?			-	+	0	+	-	-		
WIC23	N/A	N/A	+	+	++	0	+	+	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	-	++	+	0				N/A	?		0		+	0	+	0	0	0	
														M	ixed-	use	(incl.	resid	dentia	al use	es) si	te op	tions																
BL1	N/A	N/A	++	-	++		-	+	0	N/A	N/A	-	0	++	-	0		-	-	-				-			N/A		?	-				-		0			
BL2	N/A			++			+			N/A			0	++	-	0	_	-	-	-		+	-	-			N/A		?	-				-		0			
BUS1	N/A				++		+	++	0		N/A		0	+	0	0		-	-	-	-	-	-	-	-			N/A	?	-			+	0	+	0	-	-	
CFS139	N/A			-	++		-	+	+		N/A			++	0	0	-	-	-	-				-				N/A	?	0			++	0	++	-			
CFS149		N/A			++			+	+		N/A			++	0	+						++						N/A	?	0			++	0	++	0			

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	II4: Health and wellbeing	II5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO <sub>2</sub> pollution	11b: PM10 pollution	11c: PM <sub>2.5</sub> pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	iodi	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
CFS158a		N/A		-	++	0	+	-	C		A N/A		0	++	-	0		-	-	-				-			N/A		?	N/A		?	++	0	++	0			
CFS158b		N/A		-	++	0	+	-	С		A N/A		0	++	•	0	-	-	Ŀ	·				·			N/A		?	N/A	N/A	?		-		0			
CFS160	N/A	N/A	++	-	++		-	+	C	) N/	A N/A	-	0	++	-	0		-	-	-				-			N/A		?	-				-		0			
CFS181	N/A	N/A	+	-	++		-	++	+	- N/	A N/A	++		+	+	0	-	-	-	-	-	++	+	-	-			N/A	?	-			+	0	+	0	0	0	
CFS183	N/A	N/A	+	++	++		+	++	C	) N/	A N/A	-	0	+	0	+		-	-	-	++	++	++	-	-			N/A	?	-			+	0	+	0	-	-	
CFS236		N/A		+	++	0	+	++	C		A N/A			+	+	0		-	-	-	0	+	+	-	0	-	-	N/A	-?	0	0	0	+	0	+	0	0	0	0
CFS242	N/A	N/A	++	+	++	0	+	++	+	- N/	A N/A	-	0	+	0	0		-	-	-	0	+	+	-	-			N/A	?	0	0	0	+	0	+	0			0
CFS249	N/A	N/A	+	-	++		-	++	+	- N/	A N/A	-	0	+	0	+		-	-	-		++	0	-	-			N/A	?	-	0	-	+	0	+	0	-	-	
CFS250	N/A	N/A	+	+	++		+	++	C	) N/	A N/A	-	0	+	0	+		-	-	-		++	0	-	0	-		N/A	?	-			+	0	+	0	0	0	0
CFS251	N/A	N/A	++	+	++		+	++	C	) N/	A N/A	-	0	+	0	+		-	-	-	-	++	+	-				N/A	?	-			++	0	++	0			
CFS252	N/A	N/A	++	-	++		-	-	+	- N/	A N/A	++	0	++	+	0		-	-	-				-			N/A		?	N/A	N/A	?		0	-	-			
CFS284		N/A		-	++		-	++	C	) N/	A N/A	-	0	+	0	0	-	0	-	-		-		-			N/A		?	N/A	N/A	?	-	-	-	0	0	0	
CFS291		N/A		+	++		+	++	C		A N/A		0	+	0	0	-	0	-	-		-		-			N/A		?					-		0			0
CFS315		N/A		-	++		-	++			A N/A		0	++	-	0	-	-	-	-				-			N/A		?	N/A	N/A	?		-		0			
CFS327		N/A		-	++		-	++	+		A N/A		0	+	+	0			-	-		+	-	-	-			N/A		0			+	0	+	0	-	-	0
CHC5		N/A		-	++			++			A N/A		0		0	0		-	-	-		-		•			N/A		?	-				-		0			
CHP22		N/A		-	++		-	+	C		A N/A		0		0	0	-	0	-	-				-	-		N/A		?					0	-	0			
COC10		N/A			++		+	++	C		A N/A		0	++	-	+		-	-	-	0	++	+	-				N/A		-			++	0	++	0			
COC9a		N/A		++	++		+	+	C		A N/A		0	+	0	+	-	-	-	-	0	++	+	-				N/A	?	-			+	0	+	0	-	-	0
EDP9	N/A	N/A	+	++	++	0	+-	+ ++	+	N/	A N/A	-	0	+	0	0	-	-		-	-	+	0	-	0	-	-	N/A	-?	-	0	-	+	0	+	0			0
ELC2	N/A	N/A	+	-	++		-	++	+	- N/	A N/A	-	0	+	0	0	-	0	-	-		++	0	-				N/A	?				+	0	+		0		
GRC13	N/A	N/A	+	++	++		+	++	C	) N/	A N/A	-	0	+	0	+		-	-	-	++	++	++	-	-			N/A	?	-	ļ		+	0	+	0	-	-	

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	HALL I Land Man American	Health ar	II5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO <sub>2</sub> pollution	11b: PM10 pollution	11c: PM <sub>2.5</sub> pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	iodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
GRD3	N/A			+	++	0			++	0		N/A	-	0	+	0	+	-	0	-	-	0	++	+	-				N/A	?	0	0	0	+	0	+	0			
GRD6	N/A			++	++	0		++	++			N/A	-	0	+	0	+		Ŀ	-	-	++	++	++	-	•			N/A	?		0		+	0	+	0			
GRS7	N/A			+	++	0		+	-			N/A	-	0	+	0	+	-	-	-	-	0	++	+	-				N/A	?		0		+	0	+	0			
GRS8	N/A			+	++	0		+	++			N/A	-	0	+	0	+	-	-	-	-	+	++	++	-	0	-		N/A	?		0		+	0	+	0	•	-	
HIC11_r	N/A			++	++			+	++			N/A	-	0	++	-	0	-	-	-	-		+	-	-			N/A		?	-				-		0			
JUS5	N/A			++	++	0		++	++	0		N/A	++		+	+	0		-	-	-	-	+	0	-	0	-		N/A	?	0	0	0	+	0	+	0	0	0	0
PAC39	N/A			++	++	0	+	++	++			N/A	-	0	+	0	+		Ŀ	-	-	-	++	+	-				N/A	?	-	0	-	++	0	++	0			
PGG1	N/A			++	++	0	+	++	++			N/A			+	+	+	-	-	-	-	0	++	+	-	-		-	N/A	-?	-	0	-	+	0	+	-			
POS29	N/A	N/A	+	+	++	0		+	++	0	N/A	N/A	++	0	+	+	0	-	-	-	-	-	+	0	-	0	-		N/A	?	-	0	1	+	0	+	0			0
POS43	N/A	N/A	+	++	++	0	-	++	++	0	N/A	N/A	++		+	+	+	-	-	-	-	0	++	+	-	0	-		N/A	?		0		+	0	+	0			0
POS44	N/A	N/A	+	++	++			+	++	+	N/A	N/A	++		+	+	+	-	-	-	-	+	++	++	-	0	-		N/A	?	-			+	0	+	0	-	-	
POS45	N/A			++	++	0	-	++	++	+		N/A			+	+	+	-	-	-	-	0	++	+	-	0	-		N/A	?	-	0	1	+	0	+	0	0	0	0
R.01	N/A				++			-	++			N/A		0	+	0	0		-	-	-		-		-			N/A		?	-				0	-	0			
SA.11.1	N/A	N/A	++	-	++			-	-			N/A		0	++	-	0		-	-	-				-			N/A		?	N/A	N/A	?		-		0			
SA.11.4	N/A	N/A	++	-	++			-	+	0	N/A	N/A	-	0	++	-	0	-	-	-	-				-			N/A		?	-				-		0	-		
SA1.1	N/A	N/A	++	++	++			+	++	0	N/A	N/A	-	0	+	0	+		-	-	-	++	++	++	-	-			N/A	?		0		++	0	++	0			
SA1.3	N/A	N/A	++	++	++	0	-	++	++	0	N/A	N/A	-	0	+	0	+	-	-	-	-	+	++	++	-	-			N/A	?	-	0	-	+	0	+	0	-	-	
SA1.4	N/A	N/A	++	++	++	0	-	++	++	0	N/A	N/A	-	0	+	0	+	-	-	-	-	+	++	++	-				N/A	?	-	0	-	+	0	+	0			
SA10.1	N/A	N/A	++	++	++			+	++	0	N/A	N/A	-	0	++	-	+		-	-	-		++	0	-			N/A		?	-				-		0			
SA10.3	N/A	N/A	++	++	++			+	++	0	N/A	N/A	-	0	++	-	0	-	0	-	-		+	-	-			N/A		?	-				-		0			
SA10.4	N/A	N/A	++	+	++			+	+	0	N/A	N/A	-	0	++	-	0	-	0	-	-		-		-			N/A		?	N/A	N/A	?		-		0			
SA11.6	N/A	N/A	++	-	++			-	+	0	N/A	N/A	-	0	++	-	0	-	-	-	-				-			N/A		?	-				-		-			

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	14: Health and wellheing	it. neath and welloeling	II5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO <sub>2</sub> pollution	11b: PM10 pollution	11c: PM <sub>2.5</sub> pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Moodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
SA19	N/A			+	++		Ŀ	+	+	++		N/A		0	++	+	+		-	-	-	-	++	+	-				N/A	?	-			++	0	++	-			
SA2.1	N/A			+	++				++	+		N/A			+	+	0					0	+	+	-	0	-		N/A	?	0	0	0	++	0	++	0			0
SA2.3	N/A			++	++	0		+ ·	++	0		N/A	++	0	+	+	0		•	-	-	0	+	+	-	0	-		N/A	?	0	0	0	+	0	+	0			0
SA2.4	N/A			+	++	0			++	+		N/A	1	0	+	0	0		-	-	-	0	+	+	-	-			N/A	?	0	0	0	+	0	+	0			0
SA2.5	N/A			++	++	0	+	+ ·	++	+		N/A			+	+	+		-	-	-	+	++	++	-	0	-		N/A	?	-	0	-	+	0	+	0			
SA2.6	N/A			+	++		•	+ -	++	+		N/A	++		+	+	0		-	-	-	0	*	-	-	0	-		N/A	?	0	0	0	++	0	++	0			0
SA3.1	N/A			++	++		-	+	+			N/A	-	0	+	0	+		•	-	-	++	++	++	-	-			N/A	?	0			++	0	++	0			
SA3.2	N/A			++	++				+			N/A	1	0	+	0	+		-	-	-	++	++	++	-	0	-		N/A	?	-			+	0	+	0			0
SA4.1	N/A			++	++			+	+			N/A			+	+	+		-	-	-	0	++	+	-	-			N/A	?				++	0	++	0			
SA4.3	N/A			++	++	0		+	+			N/A			+	+	0	-	-	-	-	0	++	+	-	0	-		N/A	?	0	0	0	+	0	+	0	0	0	0
SA4.4	N/A			++	++	0	+	+ .	++	0		N/A		0	+	+	0	-	-	-	-	+	++	++	-	-			N/A	?	-	0	-	+	0	+	0	0	0	0
SA4.5	N/A			++	++	0	+	+	+	+		N/A		0	+	0	+		-	_	-	++	++	++	-	0	-		N/A	?	-	0	-	+	0	+	0	0	0	
SA5.1	N/A			+	++			+	+			N/A		0	+	+	+				-	-	++	+	-	-			N/A	?	-			++	0	++	-	-		
SA5.2	N/A			-	++			-	+			N/A		0	+	0	0		-		-	-	+	0	-	-			N/A		0			+	0	+	0		-	
SA5.3	N/A				++			-	+			N/A		0	+	+	0		-	-	-	-	+	0	-	-			N/A		0			++	0	++	0			
SA5.4	N/A			-	++	0		+	+			N/A		0	+	+	0		-	-	-	-	+	0	-	-			N/A	?	0	0	0	++	0	++	0			
SA5.5	N/A	N/A	++	-	++			-	+			N/A		0	+	0	0		-	-	-	-	+	0	-	-			N/A	?	0			+	0	+	0	-	-	
SA5.6	N/A	N/A	++	-	++			-	+	++	N/A	N/A	++		++	0	0	-	-	-	-				-				N/A	?	0			++	0	++	-			
SA6.1	N/A	N/A	++	-	++	0	-	+	+	0	N/A	N/A	-	0	+	0	+	-	-	-	-	+	++	++	-	-	-		N/A	?		0		+	0	+	0	-	-	0
SA6.3	N/A	N/A	+	-	++	0	-	+	+	0	N/A	N/A	-	0	+	0	+	-	-	-	-	+	++	++	-	-			N/A	?		0		+	0	+	0	-	-	0
SA7.1	N/A	N/A	++	+	++		-	+	+	+	N/A	N/A	++	0	+	+	0			-		0	-	-	-	-		0	N/A	0?	-	0	-	+	0	+	0	-	-	0
SA7.3	N/A	N/A	++	+	++			+	++	+	N/A	N/A	++		+	+	0		-	-	-	++	+	++	-			-	N/A	-?	-			++	0	++	0			0

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	II4: Health and wellbeing	II5: Service		IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO <sub>2</sub> pollution	11b: PM <sub>10</sub> pollution	11c: PM <sub>2.5</sub> pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements		15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
SA7.4	N/A		++	++	++		+			N/A			0	+	0	+		Ŀ	-	-	++	++	++	-				N/A	?	·			+	0	+	0			0
SA8.1	N/A			++	++	0	+			N/A			0	+	0	+	-	-	-	-	0	++	+	-				N/A	?	_	0	-	+	0	+	0			
SA8.2	N/A			++	++	0	+			N/A			0	+	0	+	-		-	-	0	++	+	-	-			N/A	?	_	0	-	+	0	+	0	-	-	
SA8.3	N/A		++	++	++					N/A		++	-	+	+	+		_	-	-	0	++	+	-				N/A	?	-	0	-	+	0	+	0			
SA8.4 SBC3	N/A			++	++	0	+			N/A			0	+	0	+				-	0	++	+	-				N/A N/A	?	0	0	0	+	0	+	0			0
SBC3 SBC6	N/A N/A			+	++	0	+			N/A N/A		++		+	+	0		_		-	0	+	+	-	0	-		N/A N/A	?	0	0	0	+	0	+	0	0	0	0
SGC1	N/A N/A			+	++	0	+			N/A			0	+	+	0					0	++	+	-	0		0	N/A	0?	0	0	0	+	0		0	U	0	0
SGC6	N/A			++	++		+			N/A				+ +	+	+						++	++	_				N/A	?			_	+	0	+	0		_	
SGS13	N/A			+	++	0	+			N/A		TT	0	+	0	0					+	++	++	-				N/A	:	0	0	0	+ +	0	+	0			0
SGS13 SGS14	N/A			+	++	0	+			N/A		++	0	+	+	0					+	TT	0		-		0	N/A	0?	0	0	0	+	0	+	0			0
SOC8a	N/A				++	0	+			N/A		<u></u>	0	+	0	+					+	++	++	_	_			N/A	?	0	0	0	+	0	+	0			0
SOC8b	N/A			_	++	0	+			N/A			0	+	0	0					+		++	_	_			N/A			0		+	0	<u> </u>	0	0	0	0
SOE9	N/A			_	++					N/A			0	+	0	+			_	_	+		++	_	0	_		N/A					+	0	+	0			0
SOS11	N/A			_	++		_			N/A		-	0	+	0	+	_			_	+		++	_	-			N/A		0	0	0	+	0	+	0	-	_	0
SOS19	N/A			_	++		+			N/A			0	+	0	+		-		_	+		++	_	0			N/A			0		+	0	+	0	0	0	0
TUS5	N/A			++	++	0		+ +		N/A		_	0	+	0	+	_	_	_	_	_	++	+	_	-			N/A		_	0	_	+	0	+	0	_	_	
U.01	N/A				++		+			N/A			0	+	0	+	-	_	_		_	++	+	_	0	_		N/A					++	0	++	0			0
U.03	N/A				++		+			N/A		-	0	++		0				-	_	_	-	-	-			N/A			0	-	++	0	++	0			0
U.04	N/A						+			N/A			0	+	0	+			-	-	0	++	+	_				N/A			0		+	0	+	0	0	0	0
U.05	N/A						+			N/A			0	+	0	0	-	-	-	-		-		-	0	_	0		0?	_			++	0	++	0			0
U.07	N/A							+ +		N/A			0	+	0	+					_	++	+					N/A		0	0	0	+	0	+	0			

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	II4: Health and wellbeing	II5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO <sub>2</sub> pollution	11b: PM10 pollution	11c: PM <sub>2.5</sub> pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
U.09	N/A	N/A	++	+	++		+	+	+	N/A	N/A	++		+	+	0	-	0	-	-		+	-	-	-			N/A	?	-			+	0	+	0	0	0	
U.10	N/A	N/A	++	++	++		+	++	++	N/A	N/A	++	0	+	+	+	-	-	-	-	-	++	+	-	-			N/A	?				++	0	++	0			
U.12	N/A	N/A	+	-	++	0	+	+	+	N/A	N/A	++	0	+	+	+	-	-	-	-	-	++	+	-	0	-		N/A	?	0	0	0	+	0	+	-			
U.16	N/A	N/A	+	++	++		+	++	0	N/A	N/A	-	0	+	0	+		-	-	-	+	++	++	-	-			N/A	?				+	0	+	0			
U.19	N/A	N/A	+	++	++		+	++	+	N/A	N/A	-	0	+	0	+		-	-	-	-	++	+	-	-		-	N/A	-?	0			+	0	+	0	-	-	
U.21	N/A	N/A	+	++	++	0	++	++	++	N/A		-	0	+	0	+		-	-	-	-	++	+	-	0	-	-	N/A	-?	-	0	-	+	0	+	0			
UPC34	N/A	N/A	++	+	++	0	+	++	0	N/A	N/A	++		+	+	0	-	-	-	-	-	-	-	-	0	-	0	N/A	0?	0	0	0	+	0	+	0			0
UPC6a	N/A	N/A	++	+	++		+	+	++	N/A	N/A	++		++	0	0					-	++	+	-				N/A	?	-			++	0	++				
UPP32	N/A	N/A	++	+	++		+	+	++	N/A	N/A	++	0	+	+	+		-	-	-	-	++	+	-	-			N/A	?	-			++	0	++	-	-		
UPS15	N/A	N/A	+	+	++	0	+	+	0	N/A	N/A	++	0	+	+	0	-	-	-	-	-	-	-	-	0	-	0	N/A	0?	-	0	-	+	0	+	0	0	0	0
															In	dust	rial/e	emplo	oyme	nt si	te opt	ions																	
17/02543/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-		-		-	0	-		N/A	?	0	0	0	+	0	+	0	0	0	0
17/03059/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-		-		-				N/A	?	0			++	0	++	0	-	-	
17/04671/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	+	0	-	-			N/A	?	0	0	0	+	0	+	0	-	-	
18/03760/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0		-	-	-	-	+	0	-	0	-		N/A	?	0	0	0	+	0	+	0	-	-	0
19/00432/PRJ	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	0	++	+	-	0	-		N/A	?	-	0	-	+	0	+	0	0	0	0
19/00986/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	+	0	-	0	-	-	N/A	-?	-			+	0	+		-		
19/01505/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	0	++	+	-			-	N/A	-?	-	0	-	+	0	+	0	0	0	
19/01706/PRJ	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	0	++	+	-	0	-		N/A	?	-	0	-	+	0	+	0	0	0	0
19/01716/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	++	+	-	0	-		N/A	?	-	0	-	+	0	+	0	-	-	
19/02717/RE3	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	++	N/A	N/A	N/A	N/A	++	++	0		-	-	-		-		-				N/A	?	0			++	0	++				
19/02749/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	++	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-		-		-				N/A	?	0			++	0	++		-		

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	II4: Health and wellbeing	II5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO <sub>2</sub> pollution	11b: PM10 pollution	11c: PM <sub>2.5</sub> pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
19/03036/FUL		N/A				0		N/A			N/A			+	+	0		-	-	-		-		-	-			N/A	?	0	0	0	+	0	+				
20/00926/FUL		N/A						N/A					N/A		+	0		-	-	-		+	-	-	-			N/A	?	0	0	0	+	0	+	0			
20/01003/PRJ		N/A						N/A					N/A	+	+	+	-	0	-	-		++	0	-	0	-	0	N/A	0?	-	0	-	+	0	+	0	0	0	0
20/01343/PRJ		N/A						N/A					N/A	+	+	0		-	-	-	0	+	+	-	0	-	-	N/A	-?	0	0	0	+	0	+	0			0
20/01568/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+		-	-	-	0	++	+	-	-			N/A	?	-	0	-	+	0	+	0	0	0	
20/02083/CEA		N/A					N/A	N/A					N/A	+	+	+	-	-	-	-	0	++	+	-	-		0	N/A	0?	-	0	-	+	0	+	0			0
20/03914/PRJ	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	+	++	++	-	-			N/A	?	0	0	0	+	0	+	0	-	-	0
20/04196/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	0	++	+	-	-			N/A	?		0		+	0	+	0	0	0	
21/00811/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	0	-	-	-	++	+	-	0	-	-	N/A	-?	-	0	-	+	0	+	0	0	0	
21/01220/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	+	0	-	0	-		N/A	?	0	0	0	+	0	+	0	-	-	0
21/01949/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	++	++	++	-	0	-	-	N/A	-?	0	0	0	+	0	+	0	0	0	0
21/02685/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	1	+	ī	-	-		0	N/A	0?	N/A	N/A	-?	+	0	+	0	0	0	
21/02875/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	0	-	-	-	1			-			N/A	?	0	0	0	+	0	+	-	-	-	
21/02881/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	-	++	+	-	-		-	N/A	-?	-	0	-	+	0	+	0	-		
21/03375/RE4	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	+	++	++	1	0	-		N/A	?	0	0	0	+	0	+	0	0	0	0
21/03496/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	1	++	+	-	-			N/A	?		0	ļ	+	0	+	0	0	0	0
21/03849/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	-	1	-				N/A	?	0			++	0	++	0	-	-	
21/03947/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	0	++	+	-	-			N/A	?		0		+	0	+	0	0	0	
21/04087/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0	-	0	-	-		+	-	-	-		-	N/A	-?	0	0	0	+	0	+	0	0	0	0
21/04271/RE4	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0			-		+	++	++	-	-		-	N/A	-?				+	0	+	-	-		
CFS132	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-				-	-			N/A	?	N/A	N/A	+?	+	0	+	0			0
CFS135	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	-	-	-			N/A		?	0			+	0	+	-	0	-	

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	II4: Health and wellbeing	II5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO <sub>2</sub> pollution	11b: PM10 pollution	11c: PM <sub>2.5</sub> pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority	iodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
CFS144	N/A							A N/A					N/A		+	0	-	-	-	-		-		-			N/A		?	0			+	0	+	-	-		
CFS153_r	N/A							A N/A					N/A		+	0		-	-	-		+	-	-	-			N/A	?	-	0	-	++	0	++	- 1			
CFS153	N/A							A N/A					N/A		+	0		-	-	-		+	-	-	-			N/A	?	-	0	-	++	0	++				
CFS155	N/A							A N/A					N/A		+	0		Ŀ	-	-				-	-		N/A		?	N/A	N/A	?	++	0	++	0			
CFS257	N/A							A N/A					N/A		++	0	-	-	-	-				-				N/A	?	0			++	0	++	-			
CFS258	N/A							A N/A		N/A	N/A	N/A	N/A	++	++	+					1	++	+	-				N/A	?	-		-	++	0	++	-			
LP1146	N/A							A N/A		N/A	N/A	N/A	N/A	++	++	0		-	-	-				-			N/A		?	N/A	N/A	+?		0	-	-			
LP662	N/A	N/A	N/A	N/A	N/A	0	N/A	A N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	-	++	+	-				N/A	?		0		+	0	+	0	0	0	
NA001	N/A	N/A	N/A	N/A	N/A	0	N/A	A N/A	+	N/A	N/A	N/A	N/A	+	+	0		-	-	-		-		-				N/A	?	0		-	++	0	++	0	-	-	
P12-02202PLA	N/A						N/A	A N/A	+	N/A	N/A	N/A	N/A	+	+	0		-	-	-	++	+	++	-			-	N/A	-?	-			++	0	++	0			0
R.03	N/A	N/A	N/A	N/A	N/A	0	N/A	A N/A	0	N/A	N/A	N/A	N/A	++	++	0		-	-	-		-		-			N/A		?	0		-	++	0	++	-			
R.04	N/A	N/A	N/A	N/A	N/A	0	N/A	A N/A	0	N/A	N/A	N/A	N/A	+	+	0		4	-	-	1			-	-		N/A		?	N/A	N/A	?	1	1		0	1	1	
R.05	N/A	N/A	N/A	N/A	N/A	0	N/A	A N/A	0	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	1	-		-	-		N/A		?	0			++	0	++	0		i	
SA2.2	N/A	N/A	N/A	N/A	N/A	0	N/A	A N/A	0	N/A	N/A	N/A	N/A	+	+	+		-	-	-	0	++	+	-	0	-		N/A	?	0	0	0	++	0	++	0		i	0
SA2.7	N/A	N/A	N/A	N/A	N/A	0	N/A	A N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	0	++	+	-	0	-		N/A	?	0	0	0	+	0	+	0	-	-	0
SA2.8	N/A	N/A	N/A	N/A	N/A	0	N/A	A N/A	0	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	+	0	-	0	-		N/A	?	-	0		++	0	++	0			0
SA5.7	N/A	N/A	N/A	N/A	N/A	0	N/A	A N/A	+	N/A	N/A	N/A	N/A	+	+	0		-	-	-				-				N/A	?	0			++	0	++	0	-	-	
SA5.8	N/A	N/A	N/A	N/A	N/A	0	N/A	A N/A	+	N/A	N/A	N/A	N/A	+	+	0		-	-	-	-	+	0	-				N/A	?	0			++	0	++		-		
U.28	N/A	N/A	N/A	N/A	N/A	0	N/A	A N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-		+	-	-				N/A	?	0			++	0	++	0			
U.29	N/A	N/A	N/A	N/A	N/A	0	N/A	A N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	0	-	-		-		-				N/A	?	0			++	0	++	0			
U.30	N/A	N/A	N/A	N/A	N/A	0	N/A	A N/A	+	N/A	N/A	N/A	N/A	+	+	0		-	-	-		+	-	-	-			N/A	?	-	0	-	++	0	++				
U.31	N/A	N/A	N/A	N/A	N/A	0	N/A	A N/A	+	N/A	N/A	N/A	N/A	+	+	0		-	-	-	-	+	0	-	-			N/A	?	0	0	0	+	0	+	0	-	-	

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	II4: Health and wellbeing	II5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO <sub>2</sub> pollution	11b: PM <sub>10</sub> pollution	11c: PM <sub>2.5</sub> pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	3: Biodi	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
U.32	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0		-	-	-		+	-	-	-			N/A	?	0	0	0	+	0	+	-	-		
U.33	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	++	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	-		-				N/A	?	0			+	0	+	0	1	-	
U.34	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	++	N/A	N/A	N/A	N/A	+	+	0		1	-	-	1	+	ı	-	-	-	-	N/A	?	0			+	0	+	0	1	-	0
U.35	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	0	-	-		-		-	-			N/A	?	0	0	0	+	0	+	0	0	0	
CFS161	N/A	N/A	N/A	N/A	24	NI/Δ	44	NI/Δ	0	N/A	NI/Δ	NI/A	0	N/A	0	0	Ot	her s	ite o <sub>l</sub>	ption	s 	N/A		N/A	++	++	N/A	N/A	N/A	NI/A	+	+		_		N/A	+	+	N/A
CFS167		N/A								N/A				N/A			N/A		N/A	N/A		N/A		-				N/A		N/A				0		0	-		
CFS168		N/A								N/A				N/A					N/A			N/A		-			-	N/A		N/A				0	-	0	-	-	
CFS188		N/A					++			N/A				N/A		0	-	0	-	-		N/A		N/A	++	++	N/A	N/A				+		0	-	N/A	+	+	N/A
CFS218		N/A								N/A				N/A		0		-		-		N/A					N/A		?					-		0			
CFS279	N/A	N/A	N/A	N/A	++	N/A	++	N/A	0	N/A	N/A	N/A	0	N/A	0	0	-	-	-	-		N/A		N/A	++	++	N/A	N/A	N/A	N/A	+	+		-		N/A	+	+	N/A
CFS280	N/A	N/A	N/A	N/A	++	N/A	++	N/A	0	N/A	N/A	N/A	0	N/A	0	0		-	-	-		N/A		N/A	++	++	N/A	N/A	N/A	N/A	+	+		-		N/A	+	+	N/A
CFS326	N/A	N/A	N/A	N/A	++	N/A	++	N/A	0	N/A	N/A	N/A	0	N/A	0	+	-	-	-	-	-	N/A	-	-	-		-	N/A	-?	-			-	0	-	0	0	0	
LP675	N/A	N/A	N/A	N/A	++	N/A	++	N/A	++	N/A	N/A	N/A	0	N/A	0	0		-	-	-		N/A		-			N/A		?	0				0	-	0			0
R.06	N/A	N/A	N/A	N/A	++	N/A	++	N/A	++	N/A	N/A	N/A		N/A		0		-	-	-		N/A		-			N/A		?	0				0	-	0			
R.07	N/A	N/A	N/A	N/A	++	N/A	++	N/A	0	N/A	N/A	N/A	0	N/A	0	0		-	-	-		N/A		-	++	++	N/A		?	+	+	+		-		0	+	+	
R.08	N/A	N/A	N/A	N/A	N/A			N/A	N/A	N/A	N/A	N/A	0	N/A	0	N/A	N/A	N/A	N/A	N/A		N/A		-			N/A		?	N/A	N/A	?		-		0			
SA6.2	N/A	N/A	+	-	++	0	+	++	0	N/A	N/A	-	0	+	0	+	-	-	-	-	+	++	++	-	-			N/A	?	+	+	+	+	0	+	0			0
U.36	N/A	N/A	N/A	N/A	N/A			N/A	N/A	N/A	N/A	N/A	0	N/A	0	N/A	N/A	N/A	N/A	N/A	-	+	0	-				N/A	?	-				0	-	0	0	0	

Enfield Local Plan: Integrated Impact Assessment December 2023

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

**F.7** The extent to which the location of development sites would facilitate the use of sustainable modes of transport in place of cars is considered separately under IIA objective 12 below. The location of development will not otherwise significantly affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage. Those policies in the Local Plan have been appraised separately to the site options. This IIA objective has therefore been scoped out of the site options assessment.

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

**F.8** The extent to which flood risk can be managed and reduced is considered separately under IIA objective 17 below. The location of development will not otherwise significantly affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage. Those policies in the Local Plan have been appraised separately to the site options. This IIA objective has therefore been scoped out of the site options assessment.

IIA objective 3: Deliver housing to meet agreed targets and support an appropriate mix of housing types and tenures, including affordable and specialist housing, including housing for the elderly and disabled people

#### Residential site options

**F.9** All residential site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites will provide opportunities for the development of a larger number of homes and so have significant positive effects. Around one third of residential sites will deliver over 100 homes, and as such received a significant positive effect against IIA objective 3. The remaining sites will deliver under 100 homes, and as such received a minor positive effect.

#### Mixed-use site options

**F.10** As above, all mixed-use site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites will provide opportunities for the development of a larger number of homes and so have significant positive effects. Around two thirds of mixed-use sites will deliver over 100 homes, and as such received a significant positive effect against IIA objective 3. The remaining sites will deliver under 100 homes, and as such receive a minor positive effect.

#### Industrial/employment site options

**F.11** The location of industrial/employment sites is not considered likely to affect this objective; therefore this objective has been scoped out for industrial/employment sites.

# IIA objective 4: Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the Borough

**F.12** Residential sites that are close to existing healthcare facilities (i.e. GP surgeries) will help to ensure that residents have good access to healthcare services. Other factors not captured by the assessment of site options include there being capacity at those healthcare facilities to accommodate new residents and whether new residential development supports the provision of additional healthcare capacity. Public health will also be influenced by the proximity of sites to open spaces, walking and cycling paths, easy access to which can encourage participation in active outdoor recreation. GP surgeries are evenly spread across the Borough providing good all-round access to formal healthcare facilities, however there is slightly more limited access in the north west. This is also apparent for some recreational opportunities and green space, with greater access to Metropolitan Open Land and the Lea Valley Regional Park in the centre and east of the Borough; Public Rights of Way and Local Green Space are more evenly distributed.

Enfield Local Plan: Integrated Impact Assessment December 2023

#### Residential site options

**F.13** Roughly one tenth of residential sites received a significant positive effect in relation to IIA objective 4. This is because the residential sites are less than or equal to 400m from an existing healthcare facility, less than 800m from an area of open space and less than 400m from a walking or cycle path, without risking loss of any existing open space. Almost half of the sites received a minor positive effect in relation to IIA objective 4. This is because the sites are less than 800m from an area of open space and less than 400m from a walking or cycle path but are within 401-800m of an existing healthcare facility and/or contain existing open space, including Green Loops and Links. Some of the sites recorded as containing existing open space (negative effect vs. criterion 4c) may only intersect the open space by a very small proportion. This helps highlight the potential need to avoid development in that part of the site or to incorporate mitigation measures in the allocation policy to protect and potentially enhance existing open space. Just under half of the sites received a minor negative effect because they are both further than 400m from an existing healthcare facility and contain existing open space. Just under one quarter of the residential sites received a minor negative effect because they are both further than 400m from an existing healthcare facility and contain existing open space including Metropolitan Open Land and Green Chains.

#### Mixed-use site options

**F.14** Roughly one fifth of mixed-use sites received a significant positive effect in relation to IIA objective 4. This is because the mixed-use sites are less than or equal to 400m from an existing healthcare facility, less than 800m from an area of open space and less than 400m from a walking or cycle path without risking loss of any existing open space. The majority of sites received a minor positive effect in relation to IIA objective 4. This is because the sites are less than 800m from an area of open space and less than 400m from a walking or cycle path but are within 401-800m from an existing healthcare facility and/or contain existing open space, including Green Loops and Links. Just under one quarter of the mixed-use sites received a minor negative effect because they are both further than 400m from an existing healthcare facility and contain existing open space including Metropolitan Open Land and Green Chains.

#### Industrial/employment site options

**F.15** The location of industrial/employment sites is not considered likely to affect this objective therefore this objective has been scoped out for industrial/employment sites.

# IIA objective 5: Support good access to services, facilities and wider community infrastructure, for new and existing residents, mindful of the potential for community needs to change over time

**F.16** The effect of residential site options on the educational element of this objective was assessed on the basis of the access that they provide to existing educational facilities. Other factors not captured by the assessment of site options include there being capacity at those schools to accommodate new pupils and whether new residential development supports the provision of additional school places. Enfield has high coverage of educational facilities, with a number of primary and secondary schools throughout the Borough. Like healthcare facilities, access to school facilities is more limited towards the north west of the Borough, however.

#### Residential site options

**F.17** Approximately half of the residential sites are within both 800m of at least one primary school and one secondary school, and as such as received a significant positive effect, whilst roughly one third are within 800m of either one primary school or one secondary school and received a minor positive effect. Just under a quarter of residential sites are further than 800m from at least one primary or secondary school, and as such received a minor negative effect.

#### Mixed-use site options

**F.18** Approximately two thirds of the mixed-use sites are within 800m of at least one primary school and one secondary school, and as such as received a significant positive effect, whilst approximately one third are within 800m of either one primary school or one secondary school and received a minor positive effect. The remaining sites are further than 800m from at least one primary or secondary school, and as such received a minor negative effect.

Enfield Local Plan: Integrated Impact Assessment December 2023

#### Industrial/employment site options

**F.19** The location of industrial/employment sites is not considered likely to affect this objective; therefore this objective has been scoped out for industrial/employment sites.

#### IIA objective 6: Encourage social inclusion, promotion of equality and a respect through diversity

**F.20** The London Borough of Enfield contains a number of Lower-Layer Super Output Areas (LSOAs) that fall within the most deprived areas in England. Site options that fall within the most deprived areas of the Borough offer the potential to help regenerate those areas through residential, industrial and mixed-use development and the delivery of supporting infrastructure. There is a strong east-west divide regarding deprivation in Enfield, with the incidence of deprived areas reducing from east to west.

#### Residential site options

**F.21** Whilst the majority of sites do not fall within the most deprived areas of the Borough, scoring a negligible effect, under one tenth of the residential sites fall into the 10% most deprived areas in England, scoring a significant positive effect and a similar number fall into the 10-20% most deprived areas, scoring a minor positive effect.

#### Mixed-use site options

**F.22** As above, whilst the majority of mixed-use sites do not fall within the most deprived areas of the Borough, scoring a negligible effect, approximately one tenth of the sites fall into the 10% most deprived areas in England, scoring a significant positive effect and roughly one third fall into the 10-20% most deprived areas, scoring a minor positive effect.

#### Industrial/employment site options

**F.23** Whilst around one tenth of the industrial/employment sites fall into the 10% most deprived areas in England, scoring a significant positive effect, almost half of the industrial/employment sites fall into the 10-20% most deprived areas, scoring a minor positive effect. The remaining sites do not fall within the most deprived areas of the Borough, scoring a negligible effect.

#### IIA objective 7: Reduce crime and increase community safety

**F.24** The effects of new development on levels of crime and fear of crime will depend on factors such as the incorporation of green space within development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of development sites; rather they will be determined through the policies in the Local Plan and detailed proposals for each site. This objective was therefore scoped out of the site options assessment.

#### IIA objective 8: Focus on delivering the 'Vision Zero' target for road safety

**F.25** The location of development will not significantly affect the achievement of this objective as effects will depend largely on the detailed proposals for sites, such as the incorporation of walking and cycling routes, which would be influenced by policies in the Local Plan and details submitted at the planning application stage. The policies in the Local Plan were appraised separately to the site options. This objective was therefore scoped out of the site assessment assumptions.

#### IIA objective 9: Support a strong, diverse and resilient economy that provides opportunities for all

**F.26** The location of residential sites will influence the achievement of this objective by affecting how easily residents would be able to access job opportunities in existing employment areas. Opportunities for employment are located towards the south and east of the Borough, with nine Strategic Industrial Locations along the east border of Enfield and eight Locally Significant Industrial Sites along the south border and towards the east of the Borough.

#### Residential site options

**F.27** Approximately one tenth of the residential sites are located within 100m of a Strategic Industrial Location or Locally Significant Industrial Site, and as such received a minor positive effect in relation to IIA objective 9. The remaining sites are

Enfield Local Plan: Integrated Impact Assessment December 2023

located further than 100m from a Strategic Industrial Location or Locally Significant Industrial Site, and as such received a minor negative effect in relation to IIA objective 9.

#### Mixed-use site options

**F.28** The location of mixed-use sites will affect how easily residents are able to access job opportunities in existing employment areas, in addition to ensuring new job opportunities are provided to match population growth that is being planned for within the Local Plan. Approximately one quarter of the mixed-use sites are located within 100m of a Strategic Industrial Location or Locally Significant Industrial Site, and as such received a minor positive effect in relation to IIA objective 9. The remaining sites are located further than 100m from a Strategic Industrial Location or Locally Significant Industrial Site, and as such received a minor negative effect in relation to IIA objective 9.

#### Industrial/employment site options

**F.29** The provision of new industrial/employment sites in any location is likely to have a positive effect on this objective by ensuring that new job opportunities are provided to match the population growth that is being planned for within the Local Plan. Effects will be particularly positive where sites are large in size as they will result in more job creation. Roughly one tenth of the industrial/employment sites are larger than 10ha, and as such received a significant positive effect in relation to IIA objective 9. The remaining industrial/employment sites are smaller than 10ha, and as such, these sites received a minor positive effect in relation to IIA objective 9.

#### IIA objective 10: Support the vitality of the Borough's town and local centres

**F.30** The London Borough of Enfield has identified a town centre hierarchy in the Regulation 19 Proposed Submission Local Plan. This classifies settlements in the Borough as Major Centres, District Centres and Local Centres. Enfield's Major Centre, Enfield Town, is located in the centre of the Borough, and is surrounded by smaller Local Centres that stretch out to the north, east, south and west. Enfield contains four District Centres, which are located along its southern border. New development located within or close to one of these centres has the potential contribute to the vitality of those centres. As each site is assessed individually, this contribution is considered to be minor rather than significant.

#### Residential site options

**F.31** Approximately one third of the residential sites are located less than 100m from a Major, District or Local Centre, and as such received a minor positive effect in relation to IIA objective 10. The remaining sites received a negligible effect.

#### Mixed-use site options

**F.32** Roughly half of the residential-led mixed use sites are located less than 100m from a Major, District or Local Centre, and as such received a minor positive effect in relation to IIA objective 10. The remaining sites received a negligible effect.

#### Industrial/employment site options

**F.33** Roughly one third of the industrial/employment sites are located less than 100m from a Major, District or Local Centre, and as such received a minor positive effect in relation to IIA objective 10. The remaining sites received a negligible effect.

#### IIA objective 11: Minimise air pollution

**F.34** The assessment of effects of site options in relation to air quality focuses on the variation across the Borough in baseline concentrations of key air pollutants and how residential development at different locations would result in different levels of exposure to these pollutants. Exposure to pollutants, notably NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> tends to be higher in the more built up areas of the Borough, notably Enfield Town and the District Centres, and along key transport routes such as the A10 and the A1010. Consideration is not given to whether a site is within or outside of an Air Quality Management Area (AQMA) under this objective, as the whole Borough has been declared an AQMA.

Enfield Local Plan: Integrated Impact Assessment December 2023

#### Residential site options

**F.35** Almost all of the residential sites are in an area where the current baseline annual mean concentration of a pollutant (per London Atmospheric Emissions Inventory 'LAEI' 2019 data) exceeds 2021 WHO guidelines, meaning there is high exposure to at least one pollutant. As such, these sites received a minor negative effect in relation to IIA objective 11. The remaining few sites are in an area where current annual mean pollution exceeds both the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK's national air quality objectives. As such, these sites received a significant negative effect.

#### Mixed-use site options

**F.36** Almost all mixed-use sites are in an area where the current baseline annual mean concentration of a pollutant (per LAEI 2019 data) exceeds 2021 WHO guidelines, meaning there is high exposure to at least one pollutant. As such, these sites received a minor negative effect in relation to IIA objective 11. The remaining few sites are in an area where current annual mean pollution exceeds both the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK's national air quality objectives. As such, these sites received a significant negative effect.

#### Industrial/employment site options

**F.37** Almost all industrial/employment sites are in an area where the current baseline annual mean concentration of a pollutant (per LAEI 2019 data) exceeds 2021 WHO guidelines, meaning there is high exposure to at least one pollutant. As such, these sites received a minor negative effect in relation to IIA objective 11. The remaining few sites are in an area where current annual mean pollution exceeds both the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK's national air quality objectives. As such, these sites received a significant negative effect.

#### IIA objective 12: Minimise the need to travel and support a modal shift away from the private car

**F.38** As identified in relation to IIA objective 10, Enfield's facilities and services are concentrated within the Borough's Major, District and Local Centres and sites located close to these will help to reduce the need to travel. In addition, the proximity of development sites to sustainable transport links will affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour. Public Transport Accessibility Levels (PTAL) provide a detailed and accurate measure of the accessibility of a point to the public transport network, taking into account walk access time and service availability. Access to public transport is highest in areas such as Enfield Town, New Southgate and Lower Edmonton, all of which benefit from a PTAL of 6a. Areas such as Hadley Wood, Botany Bay and Crews Hill in the north west are some of the least connected areas and the lowest PTALs in the Borough. It is possible that new services and facilities and transport links such as bus routes or cycle paths will be provided as part of new developments, particularly at larger sites, but this was not assumed in assessing site options.

#### Residential site options

**F.39** Roughly one tenth of residential sites received a significant positive effect in relation to IIA objective 12. This was because the sites are less than 200m from Major, District or Local Centres, and are located in areas with high PTALs (4, 5 or 6a). Residential sites that received a minor positive effect (of which around one quarter received a minor positive effect) are also less than 200m from Major, District or Local Centres, but are located in areas with a lower PTAL (3 or 2). Roughly one tenth of residential sites received a minor negative effect in relation to IIA objective 12. This is because the residential sites are between 201-800m of Major, District or Local Centres and / or have a lower PTAL (0, 1a, 1b or 2). Just under half of sites have the poorest connectivity to Major, District or Local Centres (further than 800m) and have the lowest PTAL (0, 1a or 1b), and as such received a significant negative effect.

#### Mixed-use site options

**F.40** Roughly one quarter of mixed-use sites received a significant positive effect in relation to IIA objective 12. This is because the sites are less than 200m from Major, District or Local Centres, and are located in areas with high PTALs (4, 5 or 6a). Mixed-use sites that received a minor positive effect (of which around one third receive a minor positive effect) are also less than 200m from Major, District or Local Centres, but are located in areas with a lower PTAL (3 or 2). Roughly one tenth of mixed-use sites received a minor negative effect in relation to IIA objective 12. This is because the mixed-use sites are between 201-800m of

Enfield Local Plan: Integrated Impact Assessment December 2023

Major, District or Local Centres and/or have a lower PTAL (0, 1a, 1b or 2). Approximately one quarter of sites have the poorest connectivity to Major, District or Local Centres (further than 800m) and have the lowest PTAL (0, 1a or 1b), and as such received a significant negative effect.

#### Industrial/employment site options

**F.41** Roughly one tenth of industrial/employment use sites received a significant positive effect in relation to IIA objective 12. This is because the sites are less than 200m from Major, District or Local Centres, and are located in areas with high PTALs (4, 5 or 6a). Industrial/employment sites that received a minor positive effect (around one quarter) are also less than 200m from Major, District or Local Centres, but are located in areas with a lower PTAL (3 or 2). Roughly one tenth of industrial/employment sites received a minor negative effect in relation to IIA objective 12. This is because the industrial/employment sites are between 201-800m of Major, District or Local Centres and/or have a lower PTAL (0, 1a, 1b or 2). Approximately one third of sites have the poorest connectivity to Major, District or Local Centres (further than 800m) and have the lowest PTAL (0, 1a or 1b), and as such received a significant negative effect.

# IIA objective 13: Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks

**F.42** Sites that are close to internationally, nationally or locally designated conservation sites have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, or increased recreation pressure. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, it is generally not proportionate to attempt to identify the particular biodiversity assets present at different locations and their sensitivity to different types of development (although Impact Risk Zones defined by Natural England provide a useful proxy for this in relation to SSSIs and internationally designated sites). Instead, this would be determined once more specific proposals are developed and submitted as part of a planning application. Enfield boasts a wealth of biodiversity, having important populations of nationally and internationally scarce plant and animal species. It also has several important habitats including important grassland habitats and more than three hundred hectares of woodland. SSSI Impact Risk Zones extending into the Borough include those associated with Lea Valley to the north and east, Epping Forest to the east, and Wormley-Hoddesdonpark Woods to the north. There are SINCs throughout the Borough while areas of Priority Habitat Inventory and Ancient Woodland are more prevalent to the west and north.

#### Residential site options

**F.43** Roughly just under half of residential sites received a significant negative effect in relation to IIA objective 13. This is because the sites intersect with a locally designated site, Priority Habitat or Ancient Woodland. Where sites that do not intersect with a locally designated site receive a significant negative effect, they are less than 250m from a locally designated site, Priority Habitat or Ancient Woodland and they intersect with 'all planning applications', 'residential' or 'rural residential' SSSI Impact Risk Zones (IRZ), though these residential sites are in the minority. Roughly one half of residential sites received a minor negative effect in relation to IIA objective 13. This is because the residential sites are less than 250m from a locally designated site, Priority Habitat or Ancient Woodland. Where sites that are not within 250m of a locally designated site receive a minor negative effect, they intersect with 'all planning applications', 'residential' or 'rural residential' IRZ, though these residential sites are in the minority. The remaining sites received a negligible effect as their proximity does not pose a threat to any biodiversity sites/features.

#### Mixed-use site options

**F.44** Roughly four fifths of mixed-use sites received a significant negative effect in relation to IIA objective 13. This is because the sites intersect with a locally designated site, Priority Habitat or Ancient Woodland. Where sites that do not intersect with a locally designated site received a significant effect, they are less than 250m from a locally designated site, Priority Habitat or Ancient Woodland and intersect with 'all planning applications', 'residential', 'rural residential', 'air pollution' or 'water supply' IRZ, though these mixed-use sites are in the minority. Roughly one quarter of mixed-use sites received a minor negative effect in relation to IIA objective 13. This is because the mixed-use sites are less than 250m from a locally designated site, Priority Habitat or Ancient Woodland. Where sites that are not within 250m of a locally designated site receive a minor negative effect,

Enfield Local Plan: Integrated Impact Assessment December 2023

they intersect with 'all planning applications', 'residential', 'rural residential', 'air pollution' or 'water supply' IRZ, though these mixed-use sites are in the minority. The remaining sites received a negligible effect as their proximity does not pose a threat to any biodiversity sites/features.

#### Industrial/employment site options

**F.45** Just over two thirds of industrial/employment sites received a significant negative effect in relation to IIA objective 13. This is because the sites intersect with a locally designated site, Priority Habitat or Ancient Woodland. Where sites that do not intersect with a locally designated site receive a significant negative effect, they are less than 250m from a locally designated site, Priority Habitat or Ancient Woodland and intersect with 'all planning applications', 'rural non-residential', 'air pollution' or 'water supply' IRZ, though these industrial/employment sites are in the minority. Roughly one quarter of industrial/employment sites received a minor negative effect in relation to IIA objective 13. This is because the development site options are less than 250m from a locally designated site, Priority Habitat or Ancient Woodland. Where sites that are not within 250m of a locally designated site receive a minor negative effect, they intersect with 'all planning applications', 'rural non-residential', 'air pollution' or 'water supply' IRZ, though these industrial/employment sites are in the minority. The remaining sites received a negligible effect as their proximity does not pose a threat to any biodiversity sites/features.

#### IIA objective 14: Sustain and enhance the significance of heritage assets

**F.46** The NPPF states that the "significance [of a heritage asset] can be harmed or lost through alteration or destruction of the heritage asset or development within its setting". However, development could also enhance the significance of the asset, provided that the development preserves those elements of the setting that make a positive contribution to or better reveal the significance of the asset. In all cases, effects from a Local Plan site allocation will be subject to a degree of uncertainty as the actual effects on heritage assets will depend on the particular scale, design and layout of new development and opportunities which may exist to enhance the setting of heritage features, for example where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect.

**F.47** Site options were assessed on the basis of proximity to historic assets. The findings were intended to provide a basis for screening for the potential for adverse effects on heritage assets but in the absence of a separately commissioned historic environment sensitivity study or similar of all reasonable alternative site options they are subject to a high degree of uncertainty. Distances used were based on professional judgement. Longer screening distances were used for site options outside of existing settlements to reflect typically longer sightlines in rural rather than urban areas.

**F.48** Enfield contains a number of heritage assets that are spread across the Borough. This includes Local Heritage Assets and Listed Buildings as well as Conservation Areas, Scheduled Monuments and Registered Parks and Gardens. The largest Archaeological Priority Areas correlate with the Borough's Green Belt land, which is found to the north west and east.

#### Residential site options

**F.49** Around eight tenths of residential sites received a significant negative in relation to IIA objective 14 as they have the closest proximity to heritage assets (within 100m for sites within existing settlements or 500m for sites outside of existing settlements). Approximately one tenth of sites received a minor negative effect as they are at a further distance (101-250m from a heritage asset for sites within existing settlements or 501-1,000m for sites outside of existing settlements). The remaining sites received a negligible effect as their proximity does not pose a threat to any heritage assets.

#### Mixed-use site options

**F.50** Around one half of mixed-use sites received a significant negative in relation to IIA objective 14 as they have the closest proximity to heritage assets (within 100m for sites within existing settlements or 500m for sites outside of existing settlements). Less than one tenth of sites received a minor negative effect as they are at a further distance (101-250m from a heritage assets for sites within existing settlements or 501-1,000m for sites outside of existing settlements). The remaining sites received a negligible effect as their proximity does not pose a threat to any heritage assets.

#### Industrial/employment site options

**F.51** Around one half of industrial/employment sites received a significant negative in relation to IIA objective 14 as they have the closest proximity to heritage assets (within 100m for sites within existing settlements or 500m for sites outside of existing

Enfield Local Plan: Integrated Impact Assessment December 2023

settlements). Just over one tenth of sites received a minor negative effect as they are at a further distance (101-250m from a heritage assets for sites within existing settlements or 501-1,000m for sites outside of existing settlements). The remaining sites received a negligible effect as their proximity does not pose a threat to any heritage assets.

#### IIA objective 15: Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes

**F.52** Enfield's 'Character of Growth' study informed the IIA of most site options at Regulation 19 stage. The study provides recommendations on the acceptable level of development and change in landscape and townscape terms for different areas of the Borough. Much of the urban area of the Borough is identified as being able to accommodate medium change. Many of the areas able to accommodate the highest scale of change are concentrated along the eastern edge of the Borough while limited change is recommended in areas around Enfield Town and in other areas dispersed around the Borough. A minority of site options were located in parts of the Borough located outside of the Character of Growth Study's scope (broadly those in the Green Belt or open spaces). IIA of these site options in landscape/townscape terms fell back on the more simplistic appraisal method used at Regulation 18 stage, based on the size of sites and whether they are located in urban or more rural areas. Whichever approach was used, appraisals of site options also considered whether the site contains open space that could potentially be lost to development.

**F.53** Actual effects on landscape and townscape will also depend on the design, scale and layout of development within the site, which may help mitigate and/or enhance effects on the existing townscape.

#### Residential site options

- **F.54** Around one quarter of residential sites fall into an area where 'medium change' can be accommodated and therefore received minor negative effects in relation to IIA objective 15. Just under half of sites fall into an area where 'medium change' can be accommodated but also contain an existing open space or fall into an area where 'limited change' can be accommodated and therefore received a significant negative effect.
- **F.55** The remaining sites do not fall into an area identified in Enfield's 'Character of Growth' study and as such were appraised separately. Around half of these residential sites were either larger than three hectares and on the edge of a settlement (and/or in a relatively undeveloped area) or located in the Green Belt and as such received a significant negative effect, however this is uncertain as the actual effect on this objective will also depend on the design, scale and layout of development within the site. The other half of these residential sites are located within a settlement, and as such received a minor positive effect, however this is also uncertain.

#### Mixed-use site options

- **F.56** Just under two tenths of mixed-use sites fall into an area where 'medium change' can be accommodated, and as such received a minor negative effect in relation to IIA objective 15. Just under two thirds of sites fall into an area where 'medium change' can be accommodated but also contain an existing open space or fall into an area where 'limited change' can be accommodated and therefore received a significant negative effect.
- **F.57** The remaining sites do not fall into an area identified in Enfield's 'Character of Growth' study and as such were appraised separately. Almost all these mixed-use sites were either larger than three hectares and on the edge of a settlement (and/or in a relatively undeveloped area) or located in the Green Belt, and as such received a significant negative effect, however this is uncertain as the actual effect on this objective will also depend on the design, scale and layout of development within the site. A small proportion of these mixed-use sites are located within a settlement, and as such received a minor positive effect, however this is also uncertain.

#### Industrial/employment site options

- **F.58** Around two tenths of industrial/employment sites fall into an area where 'medium change' can be accommodated, and as such received a minor negative effect in relation to IIA objective 15. Around half of sites fall into an area where 'medium change' can be accommodated but also contain an existing open space or fall into an area where 'limited change' can be accommodated and therefore received a significant negative effect.
- **F.59** The remaining sites do not fall into an area identified in Enfield's 'Character of Growth' study and as such were appraised separately. Around one third of these industrial/employment use sites were larger than three hectares and on the edge of a

Enfield Local Plan: Integrated Impact Assessment December 2023

settlement (and/or in a relatively undeveloped area) and as such received a significant negative effect, however this is uncertain as the actual effect on this objective will also depend on the design, scale and layout of development within the site. A small proportion were within a settlement but did not contain built development, and as such received a minor negative effect, however this is also uncertain. The remaining half of sites are located within a settlement, and as such received a minor positive effect, however this is also uncertain.

#### IIA objective 16: To achieve efficient use of land and materials

- **F.60** Appraisal of site options in relation to this IIA objective considered whether the site is greenfield or brownfield and also what quality of agricultural land it contains.
- **F.61** Development on brownfield land represents a more efficient use of land in comparison to the development of greenfield sites. Larger scale sites may also have more of an impact and therefore sites above three hectares have been used as an indication of larger scale development. The effects of development on waste generation will depend largely on residents' behaviour. However, where development takes place on previously developed land there may be opportunities to reuse onsite buildings and materials, thereby reducing waste generation. Although open spaces may contain a small number of buildings to maintain recreational use, they are largely undeveloped and considered greenfield land.
- **F.62** The majority of land in the Borough is classified by the Agricultural Land Classification (ALC) as urban, with further non-agricultural land to the east of the Borough and two smaller patches to the north west near Hadley Wood. The highest quality agricultural land is to the very north of the Borough, which contains a small patch of Grade 2 agricultural land, bordering on a large patch of Grade 3 agricultural land that correlates with the Borough's Green Belt land.
- **F.63** Furthermore, all new development will result in the increased consumption of minerals for construction but this will not be influenced by the location of the development. The location of development sites can influence the efficient use of minerals as development in Minerals Safeguarding Areas may sterilise mineral resources and restrict the availability of resources in the Borough. However, there are no Minerals Safeguarding Areas within LBE so this issue was scoped out of the IIA of site options.

#### Residential site options

**F.64** Roughly one tenth of residential sites received a significant positive effect in relation to IIA objective 16. This is because the sites are larger than 3ha and are located on brownfield land. Smaller sites located on brownfield land and less than 3ha in size were expected to have a minor positive effect, which accounted for around two thirds of the sites. The largest sites on greenfield land (larger than 3ha) and those on Grade 1 or 2 agricultural land received a significant negative effect, which accounted for around one tenth of the sites. The remainder of residential sites received a minor negative effect in relation to IIA objective 16; the majority of these sites are less than 3ha and on greenfield land and/or are located on Grade 3 agricultural land.

#### Mixed-use site options

**F.65** Roughly one quarter of mixed-use sites received a significant positive effect in relation to IIA objective 16. This is because the sites are larger than 3ha and are on brownfield land. Smaller sites on brownfield land less than 3ha were expected to have a minor positive effect, which accounts for around three quarters of the sites. The largest sites on greenfield land (larger than 3ha) and those on Grade 1 or 2 agricultural land received a significant negative effect, which accounted for around one quarter of the sites. Roughly one tenth of mixed-use sites received a minor negative effect in relation to IIA objective 16; most of these are less than 3ha on greenfield land and/or are located on greenfield land classed as Grade 3 agricultural land.

#### Industrial/employment site options

**F.66** Roughly one third of industrial/employment sites received a significant positive effect in relation to IIA objective 16. This is because the sites are larger than 3ha and are on brownfield land. Smaller sites proposed on brownfield land less than 3ha were expected to have a minor positive effect, which accounted for around two thirds of the sites. A small number of sites on greenfield land (larger than 3ha) and those on Grade 1 or 2 agricultural land received a significant negative effect, which account for an acute minority of the sites. A small number of industrial/employment sites received a minor negative effect in relation to IIA objective 16; the majority of these sites are less than 3ha on greenfield land and/or are located on greenfield land classed as Grade 3 agricultural land.

Enfield Local Plan: Integrated Impact Assessment December 2023

#### IIA objective 17: To manage and reduce the risk of flooding

**F.67** Site options were assessed by reference to the distribution of flood risk areas in the Borough. Enfield is prone to fluvial flooding from the Borough's many waterbodies and watercourses, notably Lea Valley in the east of the Borough. As such, there are multiple areas along these water corridors that fall within Flood zones 2 or 3. Surface water flood risk is also a threat to Enfield, with multiple areas spread across the Borough with either a 1 in 100 year risk or 1 in 30 year risk of surface water flooding.

**F.68** The effects of new development on this IIA objective will also depend to some extent on its design, for example whether it incorporates sustainable drainage systems (SuDS), which is unknown and cannot be addressed at this stage. Where site options are located in areas of high flood risk, it could increase the risk of flooding in those areas (particularly if the sites are not previously developed) and would increase the number of people and assets at risk from flooding. These factors are outside the scope of the site options appraisal.

#### Residential site options

**F.69** Just under one quarter of the residential sites contain land with a 1 in 100 year risk of surface water flooding or are located partially within Flood Zone 2 and as such, received a minor negative effect. Almost half of the residential sites contain land with a 1 in 30 year risk of surface water flooding and as such received a significant negative effect. Where sites that do not contain land with a 1 in 30 year risk of surface water flooding received a significant negative effect, they are partially located within Flood Zone 3, or both contain land with a 1 in 100 year risk of surface water flooding and are partially located within Flood Zone 2, though these sites are in the minority. The remaining sites were not identified to be at risk of flooding, and as such received a negligible effect.

#### Mixed-use site options

**F.70** Just under one quarter of the mixed-use sites contain land with a 1 in 100 year risk of surface water flooding or are located partially within Flood Zone 2 and as such, received a minor negative effect. Over two thirds of the mixed-use sites contain land with a 1 in 30 year risk of surface water flooding and as such received a significant negative effect. Where sites that do not contain land with a 1 in 30 year risk of surface water flooding received a significant negative effect, they are partially located within Flood Zone 3, or both contain land with a 1 in 100 year risk of surface water flooding and are partially located within Flood Zone 2, though these sites are in the minority. The remaining sites were not identified to be at risk of flooding, and as such received a negligible effect.

#### Industrial/employment site options

**F.71** Roughly one quarter of the industrial/employment sites contain land with a 1 in 100 year risk of surface water flooding or are located partially within Flood Zone 2 and as such, received a minor negative effect. Around one half of the industrial/employment sites contain land with a 1 in 30 year risk of surface water flooding and as such received a significant negative effect. Where sites that do not contain land with a 1 in 30 year risk of surface water flooding received a significant negative effect, they are partially located within Flood Zone 3, or both contain land with a 1 in 100 year risk of surface water flooding and are partially located within Flood Zone 2, though these sites are in the minority. The remaining sites were not identified to be at risk of flooding, and as such received a negligible effect.

#### IIA objective 18: Minimise water use and protect water quality

**F.72** Levels of water consumption within new development will be determined by its design and onsite practices, rather than the location of the site. However, the location of development could affect water quality during construction depending on its proximity to watercourses, water bodies and Source Protection Zones. There are multiple Source Protection Zones throughout Enfield, notably surrounding Lea Valley to the east, and through the centre of the Borough, corresponding with the waterbodies present. The extent to which water quality is affected would depend on construction techniques and the use of SuDS within the design.

#### Residential site options

**F.73** Roughly half of the residential sites contain a watercourse, water body or fall within a Source Protection Zone, and as such received a significant negative effect. The remaining sites are not expected to negatively affect water quality, and as such received a negligible effect.

#### Mixed-use site options

**F.74** Roughly two thirds of the mixed-use sites contain a watercourse, water body or fall within a Source Protection Zone, and as such received a significant negative effect. The remaining sites are not expected to negatively affect water quality, and as such received a negligible effect.

#### Industrial/employment site options

**F.75** Roughly two thirds of the industrial/employment sites contain a watercourse, water body or fall within a Source Protection Zone, and as such received a significant negative effect. The remaining sites are not expected to negatively affect water quality, and as such received a negligible effect.

#### Summary of site options appraisals

**F.76** The IIA of site options primarily seeks to identify the risk of significant negative effects from site options in relation to individual sustainability objectives. These potential effects can then be considered in more detail by plan makers and, if appropriate, action taken to avoid or mitigate them. For completeness, however, this section identifies those site options that performed best and worst in sustainability terms across the whole range of IIA objectives, noting that all such findings are 'policy-off', i.e. before consideration of mitigation.

#### Residential site options

**F.77** Across all IIA objectives taken together, the most sustainable residential site options were: CFS269, CFS165, CFS263, SBP13, SA7.5, PP-08601612, LOP20, SGS14, TUC8, SGC8, SA7.2, CFS210, CFS150, CFS275, COC2, CFS199-9, UPP7 and HIP27.

**F.78** Across all IIA objectives taken together, the least sustainable residential site options were: CHC3, CFS323, CHC15, SA.11.3, CHC7, CFS319, CHC5, CFS320, CFS318, CFS212, CFS145, SA11.2, SA11.5, CHC9, LP637, CFS214 and R.02.

#### Mixed-use site options

**F.79** Across all IIA objectives taken together, the most sustainable mixed-use site options were: SA4.3, CFS236, SBC6, JUS5, POS45, SBC3, SA4.4, SA2.3, SA2.5 and SA7.3.

**F.80** Across all IIA objectives taken together, the least sustainable mixed-use site options were: SA.11.1, BL1, CFS158b, CFS160, SA.11.4, SA11.6, CHP22, CFS315, SA10.4, CHC5 and CFS252.

#### Industrial/employment site options

**F.81** Across all IIA objectives taken together, the most sustainable industrial/employment site options were: 21/01949/FUL, 21/03375/RE4, 20/01003/PRJ, 19/00432/PRJ, 19/01706/PRJ, 20/01343/PRJ, 20/03914/PRJ and SA2.7.

**F.82** Across all IIA objectives take together, the least sustainable industrial/employment site options were: R.04, CFS144, CFS155, R.05, U.29, NA001, LP1146, 21/02875/FUL, 19/03036/FUL and R.03.

#### Site options proposed for 'other' uses

F.83 14 site options were considered for 'other' uses as follows:

- Burial site, cemetery, or crematorium: CFS167; CFS168; R.08, U.36
- Nature recovery site: CFS161; CFS188
- Green infrastructure site: CFS279; CFS280

Enfield Local Plan: Integrated Impact Assessment December 2023

- Leisure and/or sports and recreation site: CFS218; CFS326; LP675; R.06
- Education site: SA6.2
- Nature recovery and/or sports/leisure site: R.07

**F.84** In appraising sites for these uses it was assumed that any built development associated with nature recovery or green infrastructure use would be negligible but that the remaining uses could all include built development.

The location of sites proposed for 'other' uses is not considered likely to affect objectives **IIA1: Climate change mitigation** or **IIA2: Climate change adaptation**, therefore these three objectives have been scoped out for the assessment of 'other' use sites. **IIA3: Housing** has also been scoped out for the majority of 'other' use sites, however as the site for education (site SA6.2) may also allocate some housing, this received a minor positive effect.

**F.85** Leisure and/or sports and recreation sites, nature recovery sites (R.07 is proposed for both leisure and nature recovery) and green infrastructure sites received a significant positive effect in relation to **IIA4: Health and Wellbeing** as they provide access to opportunities for sport and formal or informal recreation. Similarly, the site allocated for education (SA6.2) received a minor positive effect as this will provide publicly accessible buildings with enhanced landscaping and public realm which may provide similar opportunities. The burial, crematorium and cemetery sites received a significant negative effect in relation to IIA4 because they contain existing open space, including Metropolitan Open Land and Green Loops/Links or contain a walking or cycle path.

**F.86** The location of 'other' use sites is not considered likely to affect **IIA5**: **Services and facilities**; therefore this objective has been scoped out of the assessment for all 'other' use sites apart from site SA6.2, which is allocated for education. This site received a significant positive effect in relation to IIA5, as this site will provide greater access to education in the Borough.

**F.87** Leisure and/or sports and recreation sites, nature recovery sites (R.07 is proposed for both leisure and nature recovery), green infrastructure and education sites that fall within deprived areas of the Borough have the potential to have a positive effect in relation to **IIA6: Social inclusion** as they may help to regenerate those areas through providing supporting social infrastructure. As such, site LP675 received a significant positive effect. The remaining sites received a negligible effect. The remaining burial, crematorium and cemetery sites are not considered likely to affect objective and have therefore been scoped out of the assessment of 'other' use sites.

**F.88** The location of sites proposed for 'other' uses is not considered likely to affect objectives **IIA7**: **Crime and community safety** and **IIA8**: **Road safety**. Therefore, these two objectives have been scoped out for the assessment of 'other' use sites.

**F.89** All 'other' use sites except for site CFS167 received a negligible effect in relation to **IIA9: Economy**. Site CFS167 received a significant negative effect as the site is located partly within a Strategic Industrial Location or a Locally Significant Industrial Site.

**F.90** Leisure and/or sports and recreation sites, nature recovery sites (R.07 is proposed for both leisure and nature recovery), green infrastructure and education sites that are located within 100m of a Major, District or Local Centre have the potential to receive a positive effect in relation to **IIA10**: **Town and local centres** as they may contribute to the vitality of those centres. As such, site CFS326 and SA6.2 received a minor positive effect. The remaining sites received a negligible effect. The remaining burial, crematorium and cemetery sites are not considered likely to affect objective IIA10 and have therefore been scoped out for the assessment of 'other' use sites.

**F.91** All leisure and/or sports and recreation sites, nature recovery sites (R.07 is proposed for both leisure and nature recovery), green infrastructure and education sites are in areas with exposure to poor air quality and as such received a minor negative effect in relation to **IIA11:** Air **pollution**. The remaining burial, crematorium and cemetery sites are not considered likely to affect objective IIA11 and have therefore been scoped out for the assessment of 'other' use sites.

**F.92** In relation to **IIA12: Sustainable transport,** 'other' use sites were assessed on the basis of their connectivity to public transport. Due to their poor connectivity, all but two sites received a significant negative effect. However, site CFS326 received a minor negative effect, site U.36 received a minor positive effect and site SA6.2 received a significant positive effect.

**F.93** All leisure and/or sports and recreation sites, education sites, burial sites, crematorium sites and cemetery sites are in close proximity to an internationally, nationally or locally designated conservation site and as such received a significant negative effect in relation to **IIA13: Biodiversity**. Conversely, the sites considered for nature recovery (R.07 is proposed for

Enfield Local Plan: Integrated Impact Assessment December 2023

both leisure and nature recovery) or green infrastructure use provide an opportunity to improve biodiversity and therefore received a significant positive effect in relation to IIA13.

**F.94** All leisure and/or sports and recreation sites (R.07 is proposed for both leisure and nature recovery), education sites, burial sites, crematorium sites and cemetery sites either are near a historic asset and as such received either a significant negative of minor negative effect in relation to **IIA14**: **Historic environment**, depending on proximity and whether they are within or outside existing settlements. The sites considered for nature recovery sites (excluding site R.07) or green use are not considered likely to affect objective IIA14 and have therefore been scoped out for the assessment of 'other' use sites.

**F.95** All leisure and/or sports and recreation sites, burial sites, crematorium sites and cemetery sites were assessed in relation to **IIA15**: **Landscape and townscape** in the same way as residential and employment uses, as previously described. As such, the sites covered by the Character of Growth study area received a significant negative effect (predominantly because the site contains open space). The remaining sites for these uses that fall outside the 'Character of Growth' study area were appraised separately. All but one of these sites (site CFS167) received a significant negative effect as they are in more rural, undeveloped areas. Site CFS167 received a minor positive effect as it is located within a settlement and contains built development. All sites considered for nature recovery (R.07 is proposed for both leisure and nature recovery) or green infrastructure use received a minor positive effect as they were assumed to provide an opportunity to improve the landscape or townscape, although actual effects will be context-specific. Similarly, the site allocated for education (SA6.2) received a minor positive effect as it will include open space and landscaping.

**F.96** All 'other' use sites other than site SA6.2 are located on greenfield land, and as such receive either a significant negative effect or a minor negative effect, depending on the size of the site and/or the quality of the agricultural land the site is within, in relation to **IIA16: Efficient use of land and materials**. Conversely, site SA6.2 is less than 3ha and located on brownfield land, and as such received a minor positive effect.

**F.97** All sites considered for leisure and/or sports and recreation, education, burial, crematorium or cemetery sites were assessed in relation to **IIA17: Flooding** in the same way as residential and employment uses, as previously described. Most of these sites were in areas subject to surface water flood risk and received either a significant negative effect or minor negative effect depending on the severity of that risk. Those sites not affected (site CFS326 and site U.36) received a negligible effect. Site considered for nature recovery (R.07 is proposed for both leisure and nature recovery) or green infrastructure provide an opportunity to mitigate surface water flood risk and as such, received a minor positive effect.

**F.98** All sites considered for leisure and/or sports and recreation (R.07 is proposed for both leisure and nature recovery), education, burial, crematorium or cemetery sites were assessed in relation to **IIA18: Water** in the same way as residential and employment uses, as previously described. All leisure and/or sports and recreation sites, education, burial sites, crematorium sites and cemetery sites have the potential to affect water quality. Most of these sites (besides site LP675) contain a watercourse, water body or fall within a Source Protection Zone and as such received a significant negative effect. Site LP675 received a negligible effect. The sites considered for nature recovery (excluding site R.07) or green infrastructure are not considered likely to affect objective IIA18 and were therefore scoped out.

### **Appendix G**

# **IIA** findings for the site options 2021

- **G.1** This section presents the IIA findings for the reasonable alternative site options considered by the Council for allocation in the Enfield Local Plan at Regulation 18 stage, as well as an appraisal of the sites that have been selected for allocation. Overall, there are 22 allocated housing sites, 23 allocated mixed-use sites, 10 allocated industrial sites, 2 allocated leisure/sports and recreation sites, 4 burial/crematorium sites and a nature recovery site. There are also 19 housing site options and 4 mixed-use site options that were appraised but have not been allocated. **Table G.1** contains a summary of the effects of all reasonable alternative site options in relation to the IIA objectives, with the findings summarised below the table.
- **G.2** Following this, are the separate appraisal matrices for each reasonable alternative site option. These matrices contain two columns that show the likely sustainability effect of the site option (and justification) *without* taking any mitigation into account. For those site options that were then selected for allocation in the 2021 Enfield Local Plan, the IIA appraisal matrix includes another two columns that show the likely effects of the site (and justification) *with* any mitigation provided in the Local Plan policies or site proformas taken into account. For site allocations where the proposed use changed from the initial reasonable alternative site option appraisal, an extra set of two columns are provided to show the appraisal of the site allocation with its revised use and *without* mitigation. Reasonable alternative site options that were not allocated by the Council, are shown in the section of this appendix entitled 'Site options appraised but not allocated'.

Table G.1: IIA findings for site options 2021

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
				Н	lousin	g sites														
CHC1/LP031: Warmerdams Nursery, Cattlegate Road	3.04	345	0	0	++	++/	-?	0	0	0	-	0	-?	++/	?	-?	+?	++		0
CHC10/LP179: Site at Oak Farm and Homestead Nursery, Cattlegate Road	2.62	340	0	0	++	+/-	-?	0	0	0	-	0	-?	 /+	?	-?	-?	+		0
CHC11/LP472 – Parcel 1: Land to the rear of Jesus Christ Church, Parcel 1	1.70	160	0	0	++	++/	++?	0	0	0	-	0	-?	 /+	?	?	-?	+		?
CHC12/LP472 – Parcel 2: Land to the south of Forty Hill Church of England School, Forty Hill, Parcel 2	2.15	399	0	0	++	++/	++?	0	0	0	-	0	-?	++/ 	?	?	-?	+	÷	?
CHC14/LP637: Land north of Goat Lane	0.46	60	0	0	+	++/	++?	0	0	0	-	0	-?	-	?	-?	-?	+		 ?
CHC17/LP645: Towneley Nurseries, Theobalds Park	1.70	113	0	0	++	++/	-?	0	0	0	-	0	-?	++/	?	-?	+?	+		 ?
CHC18/LP649: Brown's Garden Village, Theobalds Park Road	0.94	62	0	0	+	+/-	-?	0	0	0	-	0	-?	++/	-?	-?	+?	+		0
CHC2/LP056: Wolden Garden Centre, Cattlegate Road	1.19	135	0	0	++	+/-	-?	0	0	0	-	0	-?	++/	?	-?	+?	+		0

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
CHC3/LP107: Burton Farm Ride	2.47	97	0	0	+	+/-	-?	0	0	0	-	0	-?	++/	-?	?	-?	?	1	?
CHC5/LP1138: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road	4.07	270	0	0	++	++/ ?	++?	0	0	0	-	0	?	++/	?	?	?	?		 ?
COC8/LP465: Land between Camlet Way and Crescent Way, Hadley	11.05	160	0	0	++	++/	+?	0	0	0	-	+	-?	++/	?	?	?	?	-	 ?
COC9a and COC9b/LP608_1: Cockfosters Station Car Park, Cockfosters Road, Barnet	1.15	316	0	0	++	++	+?	0	0	0	-	+	-?	++	?	?	-?	+	0	0
COP10 (20/03200/PRJ): Blackhorse Tower, Holbrook House and Churchwood House, 116 Cockfosters Road	1.25	200	0	0	++	++	+?	0	0	0	-	+	-?	++	?	?	+?	+		0
GRC1/LP1105, LP652, CFS040, CFS060: St Anne's Catholic High School for Girls	1.76	236	0	0	++	++	++?	0	0	0	-	+	?	++	?	?	+?	+		?
GRC3/LP1117: 100 Church Street	0.28	56	0	0	+	++	++?	0	0	0	-	+	?	++	?	?	+?	+	-	 ?
HIC10/LP642: Land opposite Jolly Farmers	1.70	89	0	0	+	++	++?	0	0	0	-	0	-?	++	?	0?	+?	+		 ?
HIC11/LP707: Chase Park	140.5 6	1082	0	0	++	++	++?	0	0	0	-	0	-?	++	?	?	?	?		?
HIC6/LP1153: Bramley Road	5.63	268	0	0	++	+	-?	0	0	0	-	+	-?	++	?	?	?	?	-	0

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
HIC9/LP623: Land south of Enfield Road	13.28	494	0	0	++	++	++?	0	0	0	-	0	-?	++/	?	-?	+?	?		0
LOC1/LP1108: Chiswick Road Estate (Osward and Newdales)	2.37	272	0	0	++	++/ ?	+?	+	0	0	-	+	?	++	0	?	+?	+		0
POC6/LP1196: Land at former Wessex Hall Building	0.38	110	0	0	++	 ?/+	+?	+	0	0	++	0	-?	++	?	0?		+		?
SBC2/LP1107: Main Avenue Site	4.49	82	0	0	+	++/ ?	++?	+	0	0	-	+	?	++	-?	-?	+?	++		0
SGC1/LP1145: Site between North Circular Road and Station Road	1.13	230	0	0	++	++	+?	+	0	0	++	0	?	++/	?	-?	+?	+	-	0
SGC4/LP608_2: Arnos Grove Station Car Park	1.08	162	0	0	++	++/?	++?	0	0	0	-	+	?	++	?	?	1	+		0
SGP13 (18/00388/OUT): 188-200 Bowes Road	0.48	86	0	0	+	++	++?	0	0	0	-	+	?	++	?	-?	+?	+		?
SGS14/17100370: Station Road, New Southgate	1.37	203	0	0	++	++	+?	+	0	0	++	0	?	++/	?	-?	+?	+		0
CFS162_A: Land to the Rear of Arnold House (West)	0.90	36	0	0	+	+	-?	0	0	0	-	0	-?	++/ 	?	0?	-?	?	-	0
CFS162_B: Land to the Rear of Arnold House (East)	0.75	36	0	0	+	++/	-?	0	0	0	-	0	-?	++/	?	0?	-?	-	0	0

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
CFS162_C: Arnold House	0.60	36	0	0	+	++/	-?	0	0	0	-	0	-?	++/	?	0?	-?	+	-	0
UPM1: Joyce Avenue and Snells Park Estate	9.94	1217	0	0	++	++/ ?	+?	0	0	0	++	+	?	++	?	?		++		?
UPP9 (18/00760/FUL): Public House, 50-56 Fore Street	0.19	68	0	0	+	++	+?	+	0	0	-	+	?	++	-?	?	+?	+	-	?
UPS21/17100372: Upton Road and Raynham Road	1.92	198	0	0	++	++/ ?	+?	+	0	0	-	+	?	++	-?	?	+?	+	-1	?
CFS150 and CFS189: Minchenden Car Park and Alan Pullinger Centre	0.11	48	0	0	+	++/	+?	0	0	0	-	+	?	++	?	-?	+?	+	0	0
CFS159: Wyevale Garden Centre, Cattlegate Road	2.00	260	0	0	++	++/	-?	0	0	0	-	0	-?	++/	?	-?	+?	+	0	0
CFS165: South east corner of North Middlesex University Hospital Trust of Sterling Way	1.35	400	0	0	++	++	+?	0	0	0	++	0	?	++	?	-?	+?	+		0
CFS169: Kings Oak Equestrian Centre (Part)	4.23	127	0	0	++	++/	+?	0	0	0	-	0	-?	++/	?	-?	-?	++		0
CFS178: Oak House, 43 Baker Street	0.26	55	0	0	+	++	++?	0	0	0	-	+	?	++	?	?	+?	+	-	?
CFS183: Enfield Town Station and Former Enfield Arms, Genotin Road	0.07	6	0	0	+	++	++?	0	0	0	-	+	-?	++	?	?	+?	+		?

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
CFS207: Albany Leisure Centre and Car Park, 55 Albany Road	0.63	30	0	0	+	++	+?	+	0	0	-	+	-?	++	0	-?	+?	+	-	?
CFS210: Southgate Library, High Street, Southgate	0.15	9	0	0	+	++/	+?	0	0	0	-	+	-?	++	-?	-?	+?	+		0
CFS223: Fords Grove Car Park	0.24	24	0	0	+	++	++?	0	0	0	-	+	-?	++	?	-?	+?	+	0	?
CFS226: Lodge Drive Car Park (inl. Depot)	0.66	18	0	0	+	++	+?	0	0	0	-	+	?	++	?	-?	+?	+	-	?
CFS253: Southbury Leisure Park	2.95	450	0	0	++	++/	++?	+	0	0	-	0	?	++	-?	0?	+?	+		0
SA27: Land at Crews Hill	83.00	3000	0	0	++	++/?	+?	0	0	0	-	0	-?	++/ 	?	?	 ?/+ ?	++/ ?		?
SA28: Land at Chase Park	60.00	3000	0	0	++	++	++?	0	0	0	-	+	-?	++	?	?	?	?		?
SA29: Arnold House	2.25	106	0	0	+	++/	-?	0	0	0	-	0	-?	++/	?	0?	-?	?		0
				ln	dustri	al sites	5													

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
ELC3/LP606: Land West of Ramney Marsh	12.01	70,20 0 sq.m	0	0	0	0	0	0	0	0	++	0	?	++/	?	?	+?	++	1	?
POC5/LP694/CFS135: Car Park Site, Wharf Road	0.79	5,115 sq.m	0	0	0	0	0	+	0	0	+	0	0	++/	?	?	-?	+	1	?
CFS132: Land at 135 Theobalds Park Road	1.64	3,251 sq.m	0	0	0	0	0	0	0	0	+	0	-?	++/	?	-?	+?	+	1	0
CFS136: 6 Morson Road	0.83	2,600 sq.m	0	0	0	0	0	+	0	0	+	0	0	++/	?	-?	-?	+	-	 ?
CFS148: Land to the North West of Innova Park	3.46	16,44 5 sq.m	0	0	0	0	0	0	0	0	+	0	?	++/	?	0?	+?	++		?
CFS151: Crown Road Lorry Park	0.71	4,530 sq.m	0	0	0	0	0	+	0	0	+	0	-?	++	0	-?	+?	+		0
CFS153: Montagu Ind Estate	5.68	6,613 sq.m	0	0	0	0	0	+	0	0	+	0	?	++	?	?	+?	++	1	?
CFS155: Land East of Junction 24	5.16	30,00 0 sq.m	0	0	0	0	0	0	0	0	+	0	-?	 /+	?	0?	?	?		?

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
NA001: Ravenside Retail Park	3.99	21,64 5 sq.m	0	0	0	0	0	+	0	0	+	0	?	++/	?	-?	+?	++		?
				Mi	xed-u	se site	S													
GRC12/LP603, CFS197: Palace Gardens Shopping Centre	3.73	350	0	0	++	++	++?	0	0	0	+?/	+	?	++	?	?	+?	++	0	?
EDC2/LP1137: Edmonton Green Shopping Centre	10.00	1173	0	0	++	++/ ?	+?	++	0	0	+?/	+	?	++	-?	?	+?	++		?
EHP34 (18/04935/FUL): 241 Green Street	0.45	92	0	0	+	++/	+?	+	0	0	++ ?	+	-?	++	-?	0?	+?	+		?
PA39/LP654: Sainsburys Green Lanes	2.20	299	0	0	++	++/ ?	++?	0	0	0	+?/	+	-?	++	?	?	+?	+		?
PAC8/LP656: Travis Perkins Palmers Green, Bridge Drive, Bloomfield Lane	0.62	76	0	0	+	++/ ?	+?	0	0	0	+?/	+	?	++	?	?	+?	+		?
SBC35/LP653: Sainsburys Baird Road	3.21	1041	0	0	++	++	++?	+	0	0	++ ?	0	?	++/	0	0?	+?	++	0	0
SBC36/LP1104: Morrisons, Southbury Road	2.75	892	0	0	++	++	++?	0	0	0	++ ?	0	?	++	0	-?	+?	+		0
SBC4/LP1131: Southbury Road Superstore Area	1.74	291	0	0	++	++	++?	0	0	0	+?/	+	?	++	?	?	+?	+		?

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
SBC7/LP659: Colosseum Retail Park	4.35	1587	0	0	++	++	++?	+	0	0	++ ?	0	?	++	0	-?	+?	++		0
SGC2/LP1159: Land at Ritz Parade	0.65	79	0	0	+	++	++?	0	0	0	+/-	+	?	++	-?	-?	+?	+		?
SOP35 (19/01941/FUL): Southgate Office Village, 286 Chase Road	0.55	125	0	0	++	++/ -	+?	0	0	0	+?/	+	?	++	-?	?	+?	+		0
UPP24 (19/02718/RE3): Meridian Water Orbital Business Park (and adjoining land including Land South of Argon Road and Land Known as IKEA Clear and Gas Holder Leeside Road), 5 Argon Road	11.90	2300	0	0	++	?	-?	+	0	0	++	0	?	++/	?	0?	?	++		?
UPP32 (16/01197/RE3): Meridian Water, Willoughby Lane and Meridian Way	8.13	725	0	0	++	++	+?	+	0	0	++ ?	+	?	++	?	0?	+?	++		?
UPC2/LP1130: Tesco Extra, 1 Glover Drive	4.24	661	0	0	++	++/	-?	+	0	0	++ ?	0	?	++	-?	0?	+?	++		 ?
UPC1/LP1111: IKEA Meridian Water	8.43	854	0	0	++	++/	-?	+	0	0	++ ?	0	?	++	?	0?	+?	++	-	 ?
CFS152: Claverings, Centre Way	2.41	587	0	0	++	++	++?	+	0	0	++ ?	0	-?	+	-?	0?	-?	++		 ?
SOS11/CFS157: M&S Food	0.45	150	0	0	++	++/	+?	0	0	0	+?/	+	?	++	?	?	+?	+		0

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
CFS166: Tesco, Ponders End, 288 High Street	2.77	350	0	0	++	++	+?	+	0	0	++ ?	+	?	++	0	-?	+?	+	-	 ?
CFS191: Enfield Civic Centre	1.41	150	0	0	++	++	++?	0	0	0	+?/	+	?	++	?	?	-?	+		 ?
CFS209: Asda Southgate, 130 Chase Side, Southgate	1.65	165	0	0	++	?	+?	0	0	0	+?/	+	?	++	-?	?	+?	+	-	0
CFS217: Land known as Brimsdown Sports Ground	8.08	50	0	0	+	 ?/+	+?	+	0	0	+?/	+	-?	++	-?	-?	+?		-	0
SA19: IKEA store; Tesco Extra, 1 Glover Drive; Meridian Water, Willoughby Lane and Meridian Way	37.00	5000	0	0	++	++/ ?	+?	+	0	0	++ ?	+	?	++	?	0?	+?	++		 ?
					Other	sites														
LOC2/LP675: Picketts Lock/Lee Valley Leisure Centre	6.50	N/A	0	0	0	++	0	+	0	0	0	0	-?	+	?	0?	?		-	0
CFS161: Whitewebbs Golf Course, Beggar's Hollow	41.34	N/A	0	0	0	0	0	0	0	0	0	0	-?	0	++	0	+	0	-	0
CFS167: Alma Road Open Space	2.68	N/A	0	0	0	?	0	0	0	0	0	0	-?	++/	?	0	0	0	-	 ?
CFS168: Firs Farm Recreation Ground (Part)	3.67	N/A	0	0	0	?	0	0	0	0	0	0	?	+	?	0?				 ?
CFS171: Sloemans Farm	47.32	N/A	0	0	0	0	0	0	0	0	0	0	-?	++/	?	0	0	0	-	 ?

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
CFS230: Church Street Recreation Ground	5.54	N/A	0	0	0	?	0	0	0	0	0	0	?	+	?	0?			-	 ?
CFS218: Tottenham Hotspur's training centre	42.25	N/A	0	0	0	++	0	0	0	0	0	0	?	+/-	?	-?	-?	?	1	0

Enfield Local Plan: Integrated Impact Assessment December 2023

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

#### Housing sites

**G.3** All housing sites are expected to have negligible effects in relation to this objective. This is because the location of housing sites will not affect the achievement of this objective – effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

#### Industrial sites

**G.4** All industrial sites are expected to have negligible effects in relation to this objective. This is because the location of industrial sites will not affect the achievement of this objective – effects will depend largely on the detailed proposal for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

#### Mixed use sites

**G.5** All mixed use sites are expected to have negligible effects in relation to this objective. This is because the location of mixed use sites will not affect the achievement of this objective – effects will depend largely on the detailed proposal for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

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

#### **Housing sites**

**G.6** All housing sites are expected to have negligible effects in relation to this objective. This is because the location of housing sites will not affect the achievement of this objective – effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

#### **Industrial sites**

**G.7** All industrial sites are expected to have negligible effects in relation to this objective. This is because the location of industrial sites will not affect the achievement of this objective – effects will depend largely on the detailed proposal for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

#### Mixed use sites

**G.8** All mixed use sites are expected to have negligible effects in relation to this objective. This is because the location of mixed use sites will not affect the achievement of this objective – effects will depend largely on the detailed proposal for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

IIA objective 3: Deliver housing to meet agreed targets and support an appropriate mix of housing types and tenures, including affordable and specialist housing, including housing for the elderly and disabled people

#### Housing sites

**G.9** Around two thirds of the housing site options are expected to have significant positive effects against this objective because they have the capacity to deliver more than 100 housing units. Therefore, they will contribute significantly to the total housing need. The remaining housing site options are expected to have minor positive effects in relation to this objective because they have capacity to deliver fewer than 100 housing units.

#### Industrial sites

**G.10** The location of industrial sites is not considered likely to affect this objective; therefore the effects of all industrial site options are negligible.

Enfield Local Plan: Integrated Impact Assessment December 2023

#### Mixed use sites

**G.11** Most of the mixed use sites are expected to have significant positive effects against this objective because they have capacity to deliver more than 100 housing units as part of the mixed use development. Therefore, they will contribute significantly to the total housing need. The remaining four sites are anticipated to have minor positive effects in relation to this objective because they have capacity to deliver fewer than 100 housing units.

IIA objective 4: Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the Borough

#### **Housing sites**

- **G.12** Around 40% of the housing sites are expected to have significant positive effects in relation to this objective because they are all located within 800m of an area of open space, with some of them also located within 400m of a GP surgery. Some of the sites are also within 400m of a walking or cycle path. Development of these sites is therefore expected to help improve people's physical health and mental well-being because they will have access to open space and/or easy access to primary healthcare facilities (i.e. GP surgeries). Access to open space is particularly important in LBE as there is an identified imbalance in open space between the east and west and the COVID-19 pandemic has highlighted the importance of access to open space.
- **G.13** Just under one third of the housing sites are expected to have a mixed significant positive and minor negative effect in relation to this objective because although they are within 800m of an area of open space, they are not within 800m of a GP surgery. Seven of the sites are expected to have a mixed significant positive and significant negative effect in relation to this objective because although they are within 800m of an area of open space and some are also within 400m of a GP surgery, they contain a walking or cycle path which could be lost as a result of development, although this is uncertain. Two of these sites also contain an area of open space, which could be lost as a result of development: (1) Arnos Park Metropolitan Open Land which is within site SGC4/LP608\_2: Arnos Grove Station Car Park; and (2) a number of areas of Amenity Green Space within site UPM1: Joyce Avenue and Snells Park Estate.
- **G.14** One of the site options, POC6/LP1196: Land at former Wessex Hall Building, is expected to have a mixed significant negative and minor positive effect against this objective because although it is within 400-800m of a GP surgery, it partially overlaps Durants Park Metropolitan Open Land and so this area could be lost to new development, although this is uncertain. Two sites are expected to have minor positive effects in relation to this objective because they are within 400-800m of a GP surgery and 800m of an area of open space but are not within 400m of a walking or cycling path. Four sites are expected to have a mixed minor positive and minor negative effect because they are either within 800m of open space or within 400m of a walking or cycle path but are not within 800m of a GP surgery.

#### **Industrial sites**

**G.15** The location of industrial sites is not considered likely to affect this objective; therefore the effects for all industrial site options are negligible.

### Mixed use sites

- **G.16** Just under half of the mixed use sites are expected to have significant positive effects in relation to this objective because they are all located within 800m of an area of open space, with some of them also located within 400m of a GP surgery, and a walking or cycle path. Development of these sites is therefore expected to help improve people's physical health and mental wellbeing because they will have access to open space and/or easy access to primary healthcare facilities. One quarter of the sites are expected to have mixed significant positive and minor negative effects in relation to this objective because they are within 800m of an area of open space but are not within 800m of a GP surgery. Just one site, CFS217: Land known as Brimsdown Sports Ground, has a potential but uncertain mixed significant negative and minor positive effect against this objective because it contains a walking path that could be lost as a result of new development. However, the site is located within 400-800m of a GP surgery.
- **G.17** Four of the mixed use sites have potential but uncertain mixed significant positive and significant negative effects in relation to this objective: (1) EDC2/LP1137: Edmonton Green Shopping Centre; (2) PA39/LP654: Sainsburys Green Lanes; (3) PAC8/LP656: Travis Perkins Palmers Green, Bridge Drive, Bloomfield Lane; and (4) SA19: IKEA store; Tesco Extra, 1 Glover Drive; Meridian Water, Willoughby Lane and Meridian Way. One of these sites (EDC2/LP1137: Edmonton Green Shopping

Enfield Local Plan: Integrated Impact Assessment December 2023

Centre) contains a walking path that could be lost as a result of development, whilst the other three contain cycling paths that could be lost as a result of development. However, all three mixed use site options fall within 400m of a GP surgery. These effects are recorded as uncertain because it is unknown whether these walking and cycling paths will definitely be lost as a result of development or not. Just two mixed use sites have potential but uncertain significant negative effects against this objective because they contain a walking or cycle path: (1) UPP24 (19/02718/RE3): Meridian Water Orbital Business Park, 5 Argon Road; and (2) CFS209: Asda Southgate.

IIA objective 5: Support good access to services, facilities and wider community infrastructure, for new and existing residents, mindful of the potential for community needs to change over time

#### **Housing sites**

**G.18** Around two fifths of the housing site options could have significant positive effects in relation to this objective (although these are uncertain) because they are within 800m of an existing primary school and an existing secondary school. Development of these sites is therefore expected to improve people's access to education facilities which will support raising attainment and the development of a skilled workforce within the Borough. A similar number of the housing site options could have minor positive effects in relation to this objective (although these effects are again uncertain) because they are within 800m of either one existing primary school or one existing secondary school, but not both. All effects are recorded as uncertain because it is unknown whether the schools in question will have capacity to accommodate new pupils or not. The remaining housing site options may have minor negative effects in relation to this objective as they do not fall within 800m of a primary school or a secondary school. These effects are also recorded as uncertain because new residential development could potentially stimulate the provision of new schools/school places.

#### **Industrial Sites**

**G.19** The location of industrial sites is not considered likely to affect this objective; therefore the effects for all industrial site options are negligible.

#### Mixed use sites

**G.20** Around two fifths of the mixed use site options could have significant positive effects in relation to this objective because they are within 800m of an existing primary school and an existing secondary school. Development of these sites is therefore expected to improve people's access to education facilities which will support raising attainment and the development of a skilled workforce within the Borough. Just under half of the mixed use site options could have minor positive effects in relation to this objective because they are within 800m of either one existing primary school or one existing secondary school, but not both. As with the housing site options, all effects are recorded as uncertain because it is unknown whether the schools in question will have capacity to accommodate new pupils or not. The remaining mixed use site options could have minor negative effects in relation to this objective as they do not fall within 800m of a primary school or a secondary school. These effects are recorded as uncertain because new residential development as part of mixed use sites could potentially stimulate the provision of new schools/school places.

#### IIA objective 6: Encourage social inclusion, promotion of equality and a respect through diversity

# **Housing sites**

**G.21** Only nine housing site options are expected to have minor positive effects in relation to this objective because they partially or entirely fall within one of the 20% most deprived areas in England. Although LBE contains ten Lower-Layer Super Output Areas (LSOAs) that fall within the 10% most deprived areas in England, none of the housing site options fall within them. Site options that fall within the most deprived areas of the Borough could help regenerate those areas through development and the delivery of supporting infrastructure. The remaining site options are expected to have negligible effects in relation to this objective as they do not fall within the 10% or 20% most deprived areas in England.

#### Industrial sites

**G.22** Over half of the industrial sites are expected to have minor positive effects in relation to this objective because they are partially or entirely located within one of the 20% most deprived areas in England. Development of these sites would help to

Enfield Local Plan: Integrated Impact Assessment December 2023

regenerate the surrounding areas through the delivery of supporting infrastructure. Although LBE contains ten Lower-Layer Super Output Areas (LSOAs) that fall within the 10% most deprived areas in England, none of the industrial site options fall within them. The remaining industrial site options are expected to have negligible effects in relation to this objective as they do not fall within the 10% or 20% most deprived areas in England.

#### Mixed use sites

**G.23** Just one mixed use site, EDC2/LP1137: Edmonton Green Shopping Centre, is expected to have a significant positive effect in relation to this objective because it is entirely located within one of the 10% most deprived areas in the Borough. Site options that fall within the most deprived areas of the Borough will help regenerate those areas through development and the delivery of supporting infrastructure. Just over half of the mixed use site options are expected to have minor positive effects in relation to this objective because they are partially or entirely located within one of the 20% most deprived areas within the Borough. The remaining sites are expected to have negligible effects in relation to this objective as they do not fall within the 10% or 20% most deprived areas in the England.

#### IIA objective 7: Reduce crime and increase community safety

#### Housing sites

**G.24** All of the housing site options are expected to have negligible effects in relation to this objective. This is because the location of housing sites will not affect the achievement of this objective – effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

#### Industrial sites

**G.25** All of the industrial site options are expected to have negligible effects in relation to this objective. This is because the location of industrial sites will not affect the achievement of this objective – effects will depend largely on the detailed proposal for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

## Mixed use sites

**G.26** All of the mixed use site options are expected to have negligible effects in relation to this objective. This is because the location of mixed use sites will not affect the achievement of this objective – effects will depend largely on the detailed proposal for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

## IIA objective 8: Focus on delivering the 'Vision Zero' target for road safety

## **Housing sites**

**G.27** All of the housing site options are expected to have negligible effects in relation to this objective. This is because the location of housing sites will not affect the achievement of this objective – effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

#### Industrial sites

**G.28** All of the industrial site options are expected to have negligible effects in relation to this objective. This is because the location of industrial sites will not affect the achievement of this objective – effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

Enfield Local Plan: Integrated Impact Assessment December 2023

#### Mixed use sites

**G.29** All of the mixed use site options are expected to have negligible effects in relation to this objective. This is because the location of mixed use sites will not affect the achievement of this objective – effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

#### IIA objective 9: Support a strong, diverse and resilient economy that provides opportunities for all

#### **Housing sites**

**G.30** Five of the housing site options are anticipated to have significant positive effects in relation to this objective as they are adjacent or close to (i.e. within 100m of) at least one Locally Significant Industrial Site. Therefore, these five sites provide easy access to job opportunities. The remaining site options are expected to have minor negative effects in relation to this objective because they are not adjacent or close to Strategic Industrial Locations or Locally Significant Industrial Sites. Development of these sites would therefore not provide good access to employment opportunities for local people, which could slow LBE's economic recovery from the COVID-19 pandemic.

#### Industrial sites

**G.31** One of the industrial sites, ELC3/LP606: Land West of Ramney Marsh, is expected to have a significant positive effect in relation to this objective because it falls into the 'large sites' category (sites that are 10ha or larger). Development of this site would result in the creation of a significant number of new job opportunities, which would support the population growth that is being planned for within the Local Plan. The remaining industrial sites are expected to have minor positive effects in relation to the objective because they fall into the 'small sites' category (sites that are under 10ha) and so would provide a smaller number of new jobs.

#### Mixed use sites

G.32 Half of the mixed use site options could have significant positive effects in relation to this objective because they are next to Strategic Industrial Locations and/or Locally Significant Industrial Sites and would therefore provide easy access to employment opportunities. Two of these sites, UPC1/LP1111: IKEA Meridian Water and SA19: Meridian Water area, are also over 10ha in size and would therefore contribute significantly towards new employment opportunities. All of these effects are recorded as uncertain because it is unknown what proportion of each mixed use site would comprise employment development. The remaining sites, with the exception of SGC2/LP1159: Land at Ritz Parade, are expected to have mixed minor positive and minor negative effects in relation to this objective because they will contribute towards employment development (although are under 10ha in size) but are not located adjacent or close to Strategic Industrial Locations or Locally Significant Industrial Sites. Site SGC2/LP1159: Land at Ritz Parade is expected to have a mixed minor positive and minor negative effect with no uncertainty because it re-provides existing retail uses on site.

# IIA objective 10: Support the vitality of the Borough's town and local centres

#### **Housing sites**

**G.33** Just under half of the housing site options are anticipated to have minor positive effects in relation to this objective as they are within or adjacent to a Major, District or Local Centre. New development located within or next to these centres will contribute to their vitality through an increase in footfall, whilst also encouraging the retention and expansion of town and local centre commercial and retail uses. The remaining site options are expected to have negligible effects in relation to the objective because they are not within or adjacent to a Major, District or Local Centre.

#### **Industrial sites**

**G.34** All of the industrial site options are expected to have negligible effects in relation to this objective because they are not within or adjacent to a Major, District or Local Centre.

Enfield Local Plan: Integrated Impact Assessment December 2023

#### Mixed use sites

**G.35** Around two thirds of the mixed use site options are expected to have minor positive effects in relation to this objective as they are within or adjacent to a Major, District or Local Centre. New development located within these centres will contribute to their vitality through an increase in footfall, whilst also encouraging the retention and expansion of town and local centre commercial and retail uses. The remaining mixed use site options are expected to have negligible effects in relation to this objective because they are not within or adjacent to a Major, District or Local Centre.

#### IIA objective 11: Minimise air pollution

#### **Housing sites**

**G.36** Around two fifths of the housing site options are expected to have significant negative effects in relation to this objective because they scored 2 in the air quality appraisal. The remaining housing site options are expected to have minor negative effects in relation to this objective because they scored 1 in the air quality appraisal. The air quality appraisal gave consideration to the estimated housing capacity of each of the housing site options and proximity to Air Quality Focus Areas (AQFAs)<sup>1</sup>, in order to determine the potential future impact on the air quality of each site. The effects are recorded as uncertain because the air quality appraisal does not take into account measures that will improve future air quality, such as the expansion of the Ultra-low Emissions Zone to the North Circular Road in 2021 or the petrol and diesel car ban in 2030.

#### Industrial sites

**G.37** Two fifths of industrial site options are expected to have significant negative effects in relation to this objective because they scored 2 in the air quality appraisal, whilst another two fifths of industrial site options are expected to have minor negative effects in relation to this objective because they scored 1 in the air quality appraisal. The air quality appraisal gave consideration to the area of each industrial site option and proximity to Air Quality Focus Areas (AQFAs), in order to determine the potential future impact on the air quality of each site. The effects are recorded as uncertain because the air quality appraisal does not take into account measures that will improve future air quality, such as the expansion of the Ultra-low Emissions Zone to the North Circular Road in 2021 or the petrol and diesel car ban in 2030. The remaining industrial sites are expected to have negligible effects in relation to this objective because they scored 0 in the air quality appraisal.

## Mixed use sites

**G.38** Around 85% of mixed use site options are expected to have a significant negative effect in relation to this objective because they scored 2 in the air quality appraisal. The remaining mixed use sites are expected to have a minor negative effect in relation to this objective because they scored 1 in the air quality appraisal. The air quality appraisal gave consideration to the estimated housing capacity of each of the mixed use site options and proximity to Air Quality Focus Areas (AQFAs), in order to determine the potential future impact on the air quality of each site. The effects are recorded as uncertain because the air quality appraisal does not take into account measures that will improve future air quality, such as the expansion of the Ultra-low Emissions Zone to the North Circular Road in 2021 or the petrol and diesel car ban in 2030.

### IIA objective 12: Minimise the need to travel and support a modal shift away from the private car

## Housing sites

**G.39** Just over half of the housing site options are expected to have significant positive effects in relation to this objective because they are within 1km of a railway/tube station and 350m of at least one bus stop, and some of them fall within 200m of a Major, District or Local Centre. Development of these sites that are near to sustainable transport links will therefore help support a modal shift away from the private car. Just under one third of the housing site options are expected to have mixed significant positive and significant negative effects in relation to this objective, because although they are within 1km of a railway/tube station and 350m of a bus stop, they are more than 800m from a Major, District or Local Centre.

**G.40** Four of the housing site options are anticipated to have mixed significant positive and minor negative effects in relation to this objective because, although they are all within 1km of a railway/tube station and 350m of at least one bus stop, they are

<sup>&</sup>lt;sup>1</sup> An AQFA is a location that has been identified as having high levels of pollution and human exposure.

Enfield Local Plan: Integrated Impact Assessment December 2023

within 401-800m of a Major, District or Local Centre. A further two housing site options are anticipated to have mixed significant negative and minor positive effects against this objective because they are more than 800m from a Major, District or Local Centre but are within 1km of a railway station. Finally, one site, CHC14/LP637: Land north of Goat Lane, is expected to have a minor negative effect in relation to this objective because it is within 401-800m of a Local Centre, more than 1km from a railway/tube station and 350m from a bus stop with no existing cycle route passing the site.

#### **Industrial sites**

**G.41** Just two industrial site options, CFS151: Crown Road Lorry Park and CFS153: Montagu Ind Estate are expected to have significant positive effects in relation to this objective as they are within 1km of a railway/tube station and 350m of a bus stop. Site CFS151 is also within 200m of a Local Centre. Development of these sites near sustainable transport links will therefore help support a modal shift away from the private car. Over half of the industrial site options are expected to have mixed significant positive and minor negative effects in relation to this objective because they are located within 1km of a railway station and 350m of at least one bus stop but are only within 401-800m of a Major, District or Local Centre. Just one site, CFS155: Land East of Junction 24, will have a mixed significant negative and minor positive effect as the site is more than 800m from a Major, District and Local Centre, but is within 350m of at least one bus stop. One site, CFS132: Land at 135 Theobalds Park Road, is expected to have a mixed significant positive and significant negative effect in relation to this objective because it is within 1km of a railway station and 350m of at least one bus stop, but is more than 800m from a Major, District and Local Centre.

#### Mixed Use

**G.42** Over 80% of the mixed use site options are expected to have significant positive effects in relation to IIA12: Sustainable transport because they are within 1km of a railway/tube station and 350m of at least one bus stop. Development of these sites near to sustainable transport links will therefore help support a modal shift away from the private car. Just one site option, CFS152: Claverings, Centre Way, is expected to have a minor positive effect in relation to this objective because it is within 350m of a bus stop and 201-400m of a Local Centre. Similarly, just one site, SBC35/LP653: Sainsbury's Baird Road is expected to have a mixed significant positive and minor negative effect as it is within 1km of a railway station and 350m of a bus stop but is only within 401-800m of a Local Centre. Finally, one site, UPP24 (19/02718/RE3): Meridian Water Orbital Business Park, 5 Argon Road, is anticipated to have a mixed significant positive and significant negative effect in relation to this objective because it is within 1km of a railway station and 350m of at least one bus stop, but is more than 800m from a Major, District and Local Centre.

# IIA objective 13: Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks

# Housing sites

**G.43** Over three quarters of the housing site options could have significant negative effects against this objective because they fall within 250m of one or more Sites of Special Scientific Interest or Sites of Importance for Nature Conservation and/or within 100m of a Priority Habitat or Ancient Woodland. Six of the residential site options contain a Priority Habitat: (1); COC9a and COC9b/LP608\_1: Cockfosters Station Car Park (2); HIC10/LP642: Land opposite Jolly Farmers; (3) HIC11/LP707: Vicarage Farm, Land between Hadley Road and Enfield Road; (4) CFS162\_B: Land to the Rear of Arnold House (East); (5) CFS162\_C: Arnold House; and (6) SA29: Arnold House. Development of these sites will therefore place increased stress on the designated and non-designated biodiversity assets within the Borough which are already experiencing pressure from recreational use, as well as poor air quality. Eight of the housing site options could have minor negative effects against this objective, as they fall within 250-750m of a Sites of Special Scientific Interest or Sites of Importance for Nature Conservation and/or within 750m of a Local Nature Reserve, as well as 100-250m from a Priority Habitat or Ancient Woodland. All effects are recorded as uncertain because appropriate mitigation may avoid adverse effects and may even result in beneficial effects. The remaining site options, namely LOC1/LP1108: Chiswick Road Estate (Osward and Newdales) and CFS207: Albany Leisure Centre and Car Park, 55 Albany Road, are expected to have negligible effects in relation to this objective because they do not fall within 750m of any of these biodiversity assets.

Enfield Local Plan: Integrated Impact Assessment December 2023

#### Industrial sites

**G.44** Almost all of the industrial site options could have significant negative effects in relation to this objective because they fall within 250m of one or more Sites of Special Scientific Interest or Sites of Importance for Nature Conservation and/or within 100m of a Priority Habitat or Ancient Woodland. One of the industrial sites, ELC3/LP606: Ramney Marsh Mollison Avenue, contains a Priority Habitat. Development of these sites will therefore place increased stress on the designated and non-designated biodiversity assets within the Borough which are already experiencing pressure from recreational use, as well as poor air quality. The effects are uncertain because appropriate mitigation may avoid adverse effects and may even result in beneficial effects. The remaining site, CFS151: Crown Road Lorry Park is expected to have a negligible effect in relation to this objective because it does not fall within close proximity of a biodiversity asset.

#### Mixed use sites

**G.45** Around two fifths of mixed use site options could have significant negative effects in relation to this objective because they fall within 250m of one or more Sites of Special Scientific Interest or Sites of Importance for Nature Conservation and/or within 100m of a Priority Habitat or Ancient Woodland. Three of the mixed use sites contain a Priority Habitat: (1) PA39/LP654: Sainsburys Green Lanes; (2) UPP32 (16/01197/RE3): Meridian Water; and (3) SA19: Meridian Water area. A further eight mixed use site options could have minor negative effects in relation to this objective because they fall within 250-750m of a Sites of Special Scientific Interest or Sites of Importance for Nature Conservation and/or within 750m of a Local Nature Reserve, as well as 100-250m from a Priority Habitat or Ancient Woodland. Development of these sites will therefore place increased stress on the designated and non-designated biodiversity assets within the Borough which are already experiencing pressure from recreational use, as well as poor air quality. The remaining sites are expected to have negligible effects in relation to this objective because they do not fall within 750m of any of these biodiversity assets.

#### IIA objective 14: Sustain and enhance the significance of heritage assets

### **Housing sites**

**G.46** Just over two fifths of the housing site options could have significant negative but uncertain effects against this objective because they have the potential to cause harm to heritage assets where it is unlikely that these can be adequately mitigated. Development of these sites will therefore place increased pressure on the LBE's rich variety of designated heritage assets which are already under stress from inappropriate development and activity affecting their setting and context. Another two fifths of housing site options could have minor negative but uncertain effects against this objective because they have the potential to cause harm to heritage assets, but this harm could potentially be mitigated. The remaining housing site options could have negligible but uncertain effects in relation to this objective as they are more than 500m from the nearest designated heritage asset but there is still some potential for impacts on non-designated heritage features and effects may extend beyond 500m in some cases.

#### Industrial sites

**G.47** Three industrial site options, ELC3/LP606: Ramney Marsh Mollison Avenue, POC5/LP694/CFS135: Car Park Site and CFS153: Montagu Industrial Estate could have significant negative but uncertain effects against this objective because they have the potential to cause harm to heritage assets where it is unlikely that these can be adequately mitigated. Less than half of the industrial site options could have minor negative but uncertain effects in relation to this objective as they have the potential to cause harm to heritage assets, but this harm can potentially be mitigated. Development of these sites would therefore place increased pressure on the LBE's rich variety of designated heritage assets which are already under stress from inappropriate development and activity affecting their setting and context. The remaining three site options could have negligible but uncertain effects in relation to this objective as they are more than 500m from the nearest designated heritage asset but there is still some potential for impacts on non-designated heritage features and effects may extend beyond 500m in some cases.

#### Mixed use sites

**G.48** Two fifths of mixed use site options could have significant negative but uncertain effects in relation to this objective because they have the potential to cause harm to heritage assets where it is unlikely that these can be adequately mitigated. Development of these sites will therefore place increased pressure on the LBE's rich variety of designated heritage assets which are already under stress from inappropriate development and activity affecting their setting and context. Approximately one

Enfield Local Plan: Integrated Impact Assessment December 2023

quarter of site options could have minor negative but uncertain effects in relation to this objective because they have the potential to cause harm to heritage assets, but this harm could potentially be mitigated. The remaining eight sites could have negligible effects in relation to this objective as they are more than 500m from the nearest designated heritage asset but there is still some potential for impacts on non-designated heritage features and effects may extend beyond 500m in some cases.

## IIA objective 15: Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes

#### Housing sites

**G.49** Just under two thirds of the housing site options could have minor positive but uncertain effects in relation to this objective because they are located within a settlement and contain built development. Development of these sites is therefore expected to help improve the quality of the landscape and/or townscape within LBE, including designated landscapes and extensive semi-rural landscape character areas, all of which need to be protected. Just over one fifth of the housing site options could have minor negative but uncertain effects in relation to this objective because they are either located within a settlement but do not contain built development, are not large in scale (i.e. <3ha), located on the edge of a settlement or within a relatively undeveloped area. Five of the housing site options could have significant negative but uncertain effects in relation to this objective because they are large in scale (i.e. >=3ha), located on the edge of a settlement or within a relatively undeveloped area. Three site options could have significant negative effects against this objective because they contain open space, including Metropolitan Open Land and/or Green Chains: (1) Durants Park Metropolitan Open Land in site POC6/LP1196: Land at former Wessex Hall Building; (2) Arnos Park Metropolitan Open Land in site SGC4/LP608\_2: Arnos Grove Station Car Park; and (3) a number of areas of Amenity Green Space within site UPM1: Joyce Avenue and Snells Park Estate. Only one of the site options, SA27: Land at Crews Hill, is expected to have a mixed significant negative and minor positive effect in relation to this objective. This is because it is large in scale and although it is partially located within the settlement of Crews Hill and contains built development, it is also partially located in an undeveloped area.

#### Industrial sites

**G.50** Around two thirds of industrial site options could have minor positive effects in relation to this objective because they are located within a settlement and contain built development. Two industrial site options, POC5/LP694/CFS135: Car Park Site, Wharf Road and CFS136: 6 Morson Road, could have minor negative effects against this objective because although they are not large in scale (i.e. <3ha), they are located on the edge of Ponders End. The remaining site option, CFS155: Land East of Junction 24, is expected to have a significant negative effect against this objective because it is large in scale (>=3ha) and located in an undeveloped area. In all cases, effects in relation to this objective are uncertain as the potential for negative or positive effects on landscape will depend on the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features.

## Mixed use sites

**G.51** Just under 90% of the mixed use site options could have minor positive effects in relation to this objective because they are located within a settlement and contain built development. Development of these sites is therefore expected to help improve the quality of the landscape and/or townscape within LBE, including designated landscapes and extensive semi-rural landscape character areas, all of which need to be protected. Just one site option could have a significant negative effect in relation to this objective: UPP24 (19/02718/RE3): Meridian Water Orbital Business Park, 5 Argon Road. This is because the site is large in scale (i.e. >=3ha) and located on the edge of Upper Edmonton. The two remaining sites, CFS152: Claverings, Centre Way and CFS191: Enfield Civic Centre, are expected to have minor negative effects in relation to this objective because they are not large in scale but located on the edge of settlements. In all cases, effects in relation to this objective are uncertain as the potential for negative or positive effects on landscape will depend on the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features.

### IIA objective 16: To achieve efficient use of land and materials

## **Housing sites**

**G.52** Four of the housing site options are expected to have significant positive effects in relation to this objective because they are relatively large in size (i.e. >=3ha) and on brownfield land. Just under three quarters of the housing site options are

Enfield Local Plan: Integrated Impact Assessment December 2023

anticipated to have minor positive effects in relation to the objective because they are relatively small in size (i.e. <3ha) and on brownfield land. Therefore, development of these sites would be an efficient use of previously developed land. However, nine housing site options are anticipated to have significant negative effects in relation to this objective as they are relatively large in size (i.e. >=3h) and on greenfield land, which is not an efficient use of land. The effects are recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land (Grade 3a is considered to be high quality, while Grade 3b is not). Just one housing site option, CFS162\_B: Land to the Rear of Arnold House (East), is expected to have a minor negative effect as it is relatively small in size (i.e. <3ha) but is on greenfield land. One housing site option, SA27: Land at Crews Hill, is expected to have a mixed significant positive and significant negative effect in relation to this objective, as it is relatively large in size and is located on Grade 3 agricultural quality greenfield land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.

#### **Industrial sites**

**G.53** Half of the industrial site options are expected to have significant positive effects in relation to this objective because they are relatively large in size (i.e. >=3ha) and on brownfield land. Four of the industrial site options are expected to have minor positive effects in relation to this objective because they are relatively small in size (i.e. <3ha) and on brownfield land; therefore development of these sites would be an efficient use of previously developed land. Just one industrial site option, CFS155: Land East of Junction 24, is expected to have a significant negative effect against this objective because it is on greenfield land classed as Grade 3. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land (Grade 3a is considered to be high quality, while Grade 3b is not).

#### Mixed use sites

**G.54** Less than half of the mixed use site options are expected to have significant positive effects in relation to this objective because they are relatively large in size (i.e. >=3ha) and on brownfield land. Half of the sites are expected to have minor positive effects against this objective because they are relatively small in size (i.e. <3ha) and on brownfield land. However, one site, CFS217: Land known as Brimsdown Sports Ground, is expected to have a significant negative effect in relation to this objective as it is relatively large in size (i.e. >=3h) and on greenfield land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land (Grade 3a is considered to be high quality, while Grade 3b is not).

# IIA objective 17: To manage and reduce the risk of flooding

#### **Housing sites**

**G.55** Just over two thirds of housing site options are expected to have significant negative effects in relation to this objective because they have a predicted peak flood depth of greater than 300mm. About one fifth of the housing site options are expected to have minor negative effects in relation to this objective because they partially fall within Flood Zone 3, mainly fall within Flood Zone 2 or have a predicted peak flood depth of greater than 150m, with some site options also located on greenfield land. The remaining five housing site options are expected to have negligible effects against this objective because they are on brownfield land, do not fall within Flood Zones 2 or 3 and are not at risk of surface water flooding.

### **Industrial sites**

**G.56** Almost all of the industrial site options are expected to have significant negative effects against this objective because they either fall mainly within Flood Zone 3 or have a predicted peak flood depth of greater than 300mm. Only one of the industrial site options, CFS136: 6 Morson Road, is expected to have a minor negative effect in relation to this objective because it partially falls within Flood Zone 3.

### Mixed use sites

**G.57** About three quarters of the mixed use site options are expected to have significant negative effects in relation to this objective because they either partially fall within Flood Zone 3 or have a predicted peak flood depth of greater than 300mm. The remaining two mixed use site options, namely GRC12/LP603, CFS197: Palace Gardens Shopping Centre and SBC35/LP653: Sainsburys Baird Road, are expected to have negligible effects against this objective because they are on brownfield land, do not fall within Flood Zones 2 or 3, and are not at risk of surface water flooding.

Enfield Local Plan: Integrated Impact Assessment December 2023

### IIA objective 18: Minimise water use and protect water quality

#### **Housing sites**

**G.58** Half of the housing site options could have significant negative but uncertain effects in relation to this objective because they contain a watercourse, water body or fall within Source Protection Zones 1 or 2<sup>2</sup>. Development of these sites may therefore exacerbate water quality issues that currently impact the Borough, such as not meeting the Water Framework Directive (WFD) required ecological status of 'Good'. The remaining half of the housing site options are expected to have negligible effects in relation to this objective as they do not contain a watercourse, water body or fall within a Source Protection Zone.

#### **Industrial sites**

**G.59** Four fifths of the industrial site options could have significant negative but uncertain effects in relation to this objective because they contain a watercourse, water body or fall within Source Protection Zones 1 or 2. Development of these sites may therefore exacerbate water quality issues that currently impact the Borough, such as not meeting the WFD required ecological status of 'Good'. The remaining two industrial sites, CFS132: Land at 135 Theobalds Park Road and CFS151: Crown Road Lorry Park are expected to have negligible effects in relation to this objective as they do not contain a watercourse, water body or fall within a Source Protection Zone.

#### Mixed use sites

**G.60** Just under three quarters of the mixed use site options could have significant negative but effects in relation to this objective because they contain a watercourse, water body or fall within Source Protection Zones 1 or 2. Development of these sites may therefore exacerbate water quality issues that currently impact the Borough, such as not meeting the WFD required ecological status of 'Good'. The remaining mixed use site options are expected to have negligible effects in relation to this objective as they do not contain a watercourse, water body or fall within a Source Protection Zone.

#### Other sites

G.61 There are seven 'Other' sites and their uses are as follows:

- LOC2/LP675: Picketts Lock/Lee Valley Leisure Centre: leisure uses site.
- CFS161: Whitewebbs Golf Course, Beggar's Hollow: nature recovery site.
- CFS167: Alma Road Open Space: cemetery.
- CFS168: Firs Farm Recreation Ground (Part): crematorium.
- CFS171: Sloemans Farm: natural burial site.
- CFS230: Church Street Recreation Ground: crematorium.
- CFS218: Land at and within the vicinity of Tottenham Hotspur Football Club Training Ground: sport and recreation site

**G.62** Two of these sites, LOC2/LP675: Picketts Lock/Lee Valley Leisure Centre and CFS218: Tottenham Hotspur's training centre, are expected to have significant positive effects in relation to **IIA4: Health and wellbeing** because the development of a leisure uses and sport and recreation site, respectively, would have beneficial effects on people's health and wellbeing. Three of the sites are expected to have significant negative effects in relation to this objective as they contain an area of open space that could be lost to the proposed site use: (1) Durants Park Metropolitan Open Land at site CFS167: Alma Road Open Space; (2) Firs Farm & Clowes Sportsgrounds Metropolitan Open Land at site CFS168: Firs Farm Recreation Ground (Part); and (3) Church Street Recreation Ground Metropolitan Open Land at site CFS230: Church Street Recreation Ground.

**G.63** Three of these sites, (1) CFS168: Firs Farm Recreation Ground (Part); (2) CFS230: Church Street Recreation Ground; and (3) CFS218: Tottenham Hotspur's training centre, are expected to have a significant negative effect in relation to **IIA11: Air pollution** because they scored 2 in the air quality appraisal. The remaining four sites are expected to have minor negative

<sup>&</sup>lt;sup>2</sup> Source Protection Zone 3 is present within LBE.

Enfield Local Plan: Integrated Impact Assessment December 2023

effects against this objective because they scored 1 in the air quality appraisal. The air quality appraisal gave consideration to the area of each site and proximity to Air Quality Focus Areas (AQFAs), in order to determine the potential future impact on the air quality of each site. The effects are recorded as uncertain because the air quality appraisal does not take into account measures that will improve future air quality, such as the expansion of the Ultra-low Emissions Zone to the North Circular Road in 2021 or the petrol and diesel car ban in 2030.

**G.64** Site CFS171: Sloemans Farm is expected to have a mixed significant positive and significant negative effect in relation to **IIA12: Sustainable transport** because although it is within 1km of a railway station and 350m of at least one bus stop, it is more than 800m from a Major, District and Local Centre. Site CFS167: Alma Road Open Space is expected to have a mixed significant positive and minor negative effect against this objective because it is located within 1km of a railway station and 350m of at least one bus stop but is only within 401-800m of a Local Centre. Site CFS218: Tottenham Hotspur's training centre is expected to have a mixed minor positive and minor negative effect in relation to this objective because it is within 1km of a railway station but not within 350m of a bus stop and only within 401-800m of a Local Centre. Three of the sites are expected to have minor positive effects in relation to IIA12 because they are all within 350m of at least one bus stop and 201-400m of a Local Centre. One site, CFS161: Whitewebbs Golf Course, Beggar's Hollow, is expected to have a negligible effect against this objective because the development of a nature recovery site will not affect the achievement of this objective.

**G.65** All but one of the sites could have significant negative effects in relation to **IIA13: Biodiversity** because they are within 250m of one or more Sites of Special Scientific Interest or Sites of Importance for Nature Conservation and/or less than 100m from a Priority Habitat or Ancient Woodland. Three of the sites contain a Priority Habitat: (1) CFS171: Sloemans Farm; (2) CFS230: Church Street Recreation Ground; and (3) CFS218:Tottenham Hotspur's training centre. The effects are recorded as uncertain because appropriate mitigation may avoid any adverse effects and may even result in beneficial effects. Site CFS161: Whitewebbs Golf Course is expected to have a significant positive effect in relation to this objective because it is proposed as a nature recovery site and would therefore have beneficial effects on biodiversity.

**G.66** Site CFS218: Tottenham Hotspur's training centre could have a minor negative but uncertain effect in relation to **IIA14: Historic environment** because over half of the site falls within Forty Hill Conservation Area, which contains a number of listed buildings, as well as Myddelton House Registered Park and Garden which falls partially within the site. Due to the fact this site is allocated as a sport and recreation site, future development could potentially take place with an adverse effect on the historic environment. Three of the sites could have negligible but uncertain effects in relation to this objective because although they are more than 500m from a designated heritage asset, they may have some potential for impacts on non-designated heritage features and effects may extend beyond the 500m distance threshold. The remaining sites are expected to have negligible effects against this objective as their development would not affect the achievement of this objective.

G.67 Two of the sites are expected to have significant negative effects against IIA15: Landscape and townscape, whilst one of the sites could have a significant negative effect but this is uncertain. The two sites that are expected to have significant negative effects against this objective contain an area of open space, that could be lost as a result of development: (1) Firs Farm & Clowes Sportsgrounds Metropolitan Open Land at site CFS168: Firs Farm Recreation Ground (Part); and (2) Church Street Recreation Ground Metropolitan Open Land at site CFS230: Church Street Recreation Ground. Although site CFS167: Alma Road Open Space also contains an open space, the development of a cemetery is not considered to have an adverse effect on the landscape. Site LOC2/LP675: Picketts Lock/Lee Valley Leisure Centre is expected to have a significant negative but uncertain effect against this objective because it is large in scale and located on the edge of Lower Edmonton. Therefore, the potential future development of this site could result in an adverse effect on the landscape. Site CFS161: Whitwewebbs Golf Course is expected to have a minor positive effect in relation to this objective because the development of a nature recovery site is expected to have beneficial effects on the landscape. Site CFS218: Tottenham Hotspur's training centre is expected to have a minor negative but uncertain effect in relation to this objective because it is large in scale and located in a relatively undeveloped area. Due to the fact the site is allocated as a sport and recreation site which could contain built development in the future, its development could affect the landscape.

**G.68** Three of the sites are expected to have significant negative effects in relation to **IIA16**: **Efficient use of land and materials** because they are relatively large and on greenfield land, classed as Urban land. Therefore, if development were to take place on these sites, it would not be an efficient use of previously developed land. One of the sites could have a significant negative effect in relation to this objective because it is relatively large and on greenfield land which is classed as Grade 3 agricultural land. This effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.

Enfield Local Plan: Integrated Impact Assessment December 2023

**G.69** Two of the sites, CFS168: Firs Farm Recreation Ground (Part) and CFS218: Tottenham Hotspur's training centre, are expected to have significant negative effects in relation to **IIA17: Flooding** because they both have a predicted peak flood depth of greater than 300mm. The remaining five site options are expected to have minor negative effects in relation to IIA17 because they partially within Flood Zone 3, have a predicted peak flood depth of greater than 150m and are on greenfield land Four of the sites could have significant negative effects in relation to **IIA18: Water** because they contain a watercourse, water body or fall within Source Protection Zones 1 or 2.

**G.70** All eight sites are expected to have negligible effects against the remaining IIA objectives.

# **Allocated Site Appraisal Matrices**

# **Enfield Town (SP PL1)**

SA1: St Anne's Catholic High School for Girls (housing site) – formerly referred to as GRC1/LP1105, LP652, CFS040 and CFS060

IIA objective	SA1 (without mitigation)	Justification text	SA1 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, Bush Hill Park and the New River Green Chain, in addition to falling within 400m of a		Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, Bush Hill Park and the New River Green Chain, in addition to falling within 400m of a walking and cycle path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	orimary school and a ++?	
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.		Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Enfield Town Major Centre.	+	Site is adjacent to Enfield Town Major Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.

IIA objective	SA1 (without mitigation)	Justification text	SA1 (with mitigation)	Justification text
IIA12: Sustainable transport	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also next to Enfield Town Major Centre and within 200m of Lincoln Court, London Road Local Centre.	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also next to Enfield Town Major Centre and within 200m of Lincoln Court, London Road Local Centre.
IIA13: Biodiversity	?	Site is located within 250m from Enfield Loop of the New River SINC and the New River SINC.	?	Site is located within 250m from Enfield Loop of the New River SINC and the New River SINC.
IIA14: Historic environment	?	Site is adjacent to Enfield Town Conservation Area and is within 500m of two Grade II* listed buildings (Church of St Andrew Enfield Parish Church and North east Building of Enfield Grammar School) and a number of Grade II listed buildings. Due to the fact the site is adjacent to Enfield Town Conservation Area, its development could affect the setting of the heritage asset.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Town and contains built development.	+?	Site is located within the settlement of Enfield Town and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zones 2 and its northern eastern boundary falls within Source Protection Zone 1.	?	Site falls within Source Protection Zones 2 and its northern eastern boundary falls within Source Protection Zone 1.

# SA2: Palace Gardens Shopping Centre (mixed-use site) – formerly referred to as GRC12/LP603 and CFS197

IIA objective	SA2 (without mitigation)	Justification text	SA2 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	a GP surgery. The site is also within 800m of a number of areas of open space, including Town Park, Bush Hill Park, and the New River Green Chain Corridor, in addition to falling within 400m of a		Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Town Park, Bush Hill Park, and the New River Green Chain Corridor, in addition to falling within 400m of a walking path and a cycle path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived 0 areas within England.		Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of town centre and commercial floorspace.  However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of town centre and commercial floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Enfield Town Major Centre.	+	Site is within Enfield Town Major Centre.

IIA objective	SA2 (without mitigation)	Justification text	SA2 (with mitigation)	Justification text
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.
IIA13: Biodiversity	?	Site is located within 250m from Enfield Loop SINC.	?	Site is located within 250m from Enfield Loop SINC.
IIA14: Historic environment	?	Site is within Enfield Town Conservation Area and within 500m of three Grade II* listed buildings (Clarendon Cottage, north east building of Enfield Grammar School, and Church of St Andrew Enfield Parish Church) and of a number of Grade II listed buildings. Although the site contains built development, its redevelopment could affect the setting of the Conservation Area and listed buildings.	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Town and contains built development.	+?	Site is located within the settlement of Enfield Town and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.
IIA18: Water	?	Site falls within Source Protection Zone 2.	?	Site falls within Source Protection Zone 2.

# SA3: 100 Church Street (housing site) – formerly referred to as GRC3/LP1117

IIA objective	SA3 (without mitigation)	Justification text	SA3 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA3 (without mitigation)	Justification text	SA3 (with mitigation)	Justification text
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++	a GP surgery. The site is also within 800m of a number of areas of open space, including Chase Green, Town Park, Bush Hill Park, and Cheyne Walk Open Space, in addition to falling within 400m of a		Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Chase Green, Town Park, Bush Hill Park, and Cheyne Walk Open Space, in addition to falling within 400m of a walking and cycling path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Enfield Town Major Centre.	+	Site is adjacent to Enfield Town Major Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Enfield Chase railway station and 350m of at least one bus stop. The site is also within 200m of Enfield Town Major Centre.	offield Chase railway station d 350m of at least one bus op. The site is also within 0m of Enfield Town Major	
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and within 250m from Enfield Loop of the New River SINC and Crews	?	Site is located within 100m of a Priority Habitat and within 250m from Enfield Loop of the New River SINC and Crews

IIA objective	SA3 (without mitigation)	Justification text	SA3 (with mitigation)	Justification text
		Hill to Bowes Park Railsides SINC.		Hill to Bowes Park Railsides SINC.
IIA14: Historic environment	?	Site is within Enfield Town Conservation Area and within 500m of three Grade II* listed buildings (Clarendon Cottage, North East Building of Enfield Grammar School, and Church of St Andrew Enfield Parish Church) and a number of Grade II listed buildings. Although the site contains built development, its redevelopment could affect the setting of the Conservation Area and listed buildings.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Town and contains built development.	+?	Site is located within the settlement of Enfield Town and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zone 2.	?	Site falls within Source Protection Zone 2.

# SA4: Enfield Town Station and Former Enfield Arms, Genotin Road (mixed-use site) – formerly referred to as CFS183<sup>3</sup>

IIA objective	CFS183 (without mitigation)	Justification text	SA4 (without mitigation)	Justification text	SA4 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, New River Gardens, Town Park and Chase Green, in addition to falling within 400m of a walking and cycle path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, New River Gardens, Town Park and Chase Green, in addition to falling within 400m of a walking and cycle path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, New River Gardens, Town Park and Chase Green, in addition to falling within 400m of a walking and cycle path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.

<sup>&</sup>lt;sup>3</sup> Enfield Town Station and Former Enfield Arms, Genotin Road was previously appraised as a housing site (CFS253). It has now been appraised as a mixed use site (SA4).

IIA objective	CFS183 (without mitigation)	Justification text	SA4 (without mitigation)	Justification text	SA4 (with mitigation)	Justification text
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Enfield Town Major Centre.	+	Site is within Enfield Town Major Centre.	+	Site is within Enfield Town Major Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.
IIA13: Biodiversity	?	Site is located within 250m of the Enfield Loop of the New River SINC and New River SINC.	?	Site is located within 250m of the Enfield Loop of the New River SINC and New River SINC.	?	Site is located within 250m of the Enfield Loop of the New River SINC and New River SINC.
IIA14: Historic environment	?	Site is adjacent to Enfield Town Conservation Area and within 500m of Bush Hill Park Conservation Area, two Grade	?	Site is adjacent to Enfield Town Conservation Area and within 500m of Bush Hill Park Conservation Area, two Grade II* listed buildings (Church of St	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a

IIA objective	CFS183 (without mitigation)	Justification text	SA4 (without mitigation)	Justification text	SA4 (with mitigation)	Justification text
		II* listed buildings (Church of St Andrew Enfield Parish Church, and North East Building of Enfield Grammar School) and a number of Grade II listed buildings. Due to the fact that the site is adjacent to the Enfield Town Conservation Area (the western boundary of the site) which contains a number of listed buildings, its redevelopment could affect the setting of these heritage assets.		Andrew Enfield Parish Church, and North East Building of Enfield Grammar School) and a number of Grade II listed buildings. Due to the fact that the site is adjacent to the Enfield Town Conservation Area (the western boundary of the site) which contains a number of listed buildings, its redevelopment could affect the setting of these heritage assets.		Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Town and contains built development.	+?	Site is located within the settlement of Enfield Town and contains built development.	+?	Site is located within the settlement of Enfield Town and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zones 1 and 2.	?	Site falls within Source Protection Zones 1 and 2.	?	Site falls within Source Protection Zones 1 and 2.

# SA5: Enfield Civic Centre (mixed-use site) – formerly referred to as CFS191

IIA objective	SA5 (without mitigation)	Justification text	SA5 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, Town Park and the New River Green Chain , in addition to falling within 400m of a walking and cycle path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, Town Park and the New River Green Chain , in addition to falling within 400m of a walking and cycle path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of office floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of office floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Enfield Town Major Centre.	+	Site is within Enfield Town Major Centre.

IIA objective	SA5 (without mitigation)	Justification text	SA5 (with mitigation)	Justification text
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.
IIA13: Biodiversity	?	Site is located within 250m of the Enfield Loop of the New River SINC and New River SINC.	?	Site is located within 250m of the Enfield Loop of the New River SINC and New River SINC.
IIA14: Historic environment	?	Site is adjacent to Enfield Town Conservation Area, and within 500m from three Grade II* listed buildings (Church of St Andrew Enfield Parish Church, North east building of Enfield Grammar School, and Clarendon Cottage) and a number of Grade II listed buildings. Due to its location adjacent to Enfield Town Conservation Area and a number of Grade II listed buildings, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	-?	Site not large in scale but is located on the edge of Enfield Town.	-?	Site not large in scale but is located on the edge of Enfield Town.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zone 2.	?	Site falls within Source Protection Zone 2.

SA6: Southbury Road Superstore Area (mixed-use site) – formerly referred to as SBC4/LP1131

IIA objective	SA6 (without mitigation)	Justification text	SA6 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Town Park, Bush Hill Park and the New River Green Chain, in addition to falling within 400m of a walking and cycle path. The site is also located within 400m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Town Park, Bush Hill Park and the New River Green Chain, in addition to falling within 400m of a walking and cycle path. The site is also located within 400m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of town centre and commercial floorspace.  However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of town centre and commercial floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Enfield Town Major Centre and is adjacent	+	Site is within Enfield Town Major Centre and is adjacent

IIA objective	SA6 (without mitigation)	Justification text	SA6 (with mitigation)	Justification text
		to Southbury Road Local Centre.		to Southbury Road Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.
IIA13: Biodiversity	?	Site is located within 250m of the Enfield Loop of the River SINC and New River SINC.	?	Site is located within 250m of the Enfield Loop of the River SINC and New River SINC.
IIA14: Historic environment	?	Site is adjacent to Enfield Town Conservation Area and within 500m from two Grade II* listed buildings (North east building from Enfield Grammar School, and Church of St Andrew Enfield Parish Church) and a number of Grade II listed buildings. Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Town and contains built development.	+?	Site is located within the settlement of Enfield Town and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	1	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zone 1.	?	Site falls within Source Protection Zone 1.

SA7: Oak House, 43 Baker Street (housing site) – formerly referred to as CFS178

IIA objective	SA7 (without mitigation)	Justification text	SA7 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, New River Gardens, Town Park and Chase Green, in addition to falling within 400m of a walking path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, New River Gardens, Town Park and Chase Green, in addition to falling within 400m of a walking path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is partially within (southern edge of the site) Enfield Town Major Centre.	+	Site is partially within (southern edge of the site) Enfield Town Major Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also next to Enfield Town Major Centre.	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also next to Enfield Town Major Centre.

IIA objective	SA7 (without mitigation)	Justification text	SA7 (with mitigation)	Justification text
IIA13: Biodiversity	?	Site is located within 250m of the Enfield Loop of the New River SINC.	?	Site is located within 250m of the Enfield Loop of the New River SINC.
IIA14: Historic environment	?	Site is adjacent to Enfield Town Conservation Area which contains three Grade II* listed buildings (Church of St Andrew Enfield Parish Church, North East Building of Enfield Grammar School, and Clarendon Cottage) and a number of Grade II listed buildings. Due to the fact that the site is adjacent to Enfield Town Conservation Area (the western boundary of the site) and some listed buildings, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Town and contains built development.	+?	Site is located within the settlement of Enfield Town and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zone 2.	?	Site falls within Source Protection Zone 2.

# **Southbury (SP PL2)**

# SA8: Sainsburys Baird Road (mixed-use site) – formerly referred to as SBC35/LP653

IIA objective	SA8 (without mitigation)	Justification text	SA8 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA8 (without mitigation)	Justification text	SA8 (with mitigation)	Justification text
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Enfield Playing Fields, Bush Hill Park and the New River Green Chain, in addition to falling within 400m of a cycle path. The site is also located within 400-800m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Enfield Playing Fields, Bush Hill Park and the New River Green Chain, in addition to falling within 400m of a cycle path. The site is also located within 400-800m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is next to a Strategic Industrial Location. The site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development.	++?	Site is next to a Strategic Industrial Location. The site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Southbury Road & Kingsdown, which is a Local Centre.	++/-	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Southbury Road & Kingsdown, which is a Local Centre.

IIA objective	SA8 (without mitigation)	Justification text	SA8 (with mitigation)	Justification text
IIA13: Biodiversity	0	Site is not located within close proximity of any biodiversity assets.	0	Site is not located within close proximity of any biodiversity assets.
IIA14: Historic environment	0?	Although the site is located within 500m of a Grade II listed building (Enfield Technical College), it is unlikely to affect the setting of this heritage asset because there is a lot of built development between the two. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	-?	The Council's assessment of impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southbury and contains built development.	+?	Site is located within the settlement of Southbury and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

# SA9: Colosseum Retail Park (mixed-use site) – formerly referred to as SBC7/LP659

IIA objective	SA9 (without mitigation)	Justification text	SA9 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Enfield Playing Fields and Bush Hill	++	Site is within 800m of a number of areas of open space, including Enfield Playing Fields and Bush Hill

IIA objective	SA9 (without mitigation)	Justification text	SA9 (with mitigation)	Justification text
		Park, in addition to falling within 400m of a cycle path. The site is also located within 400-800m of a GP surgery.		Park, in addition to falling within 400m of a cycle path. The site is also located within 400-800m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is next to a Strategic Industrial Location. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of commercial floorspace. However, it is unknown what proportion of the site will comprise employment development.	++?	Site is next to a Strategic Industrial Location. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of commercial floorspace. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within 201- 400m of Southbury Road & Kingsway, which is a Local Centre.	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within 201- 400m of Southbury Road & Kingsway, which is a Local Centre.
IIA13: Biodiversity	0	Site is not located within close proximity of any biodiversity assets.	0	Site is not located within close proximity of any biodiversity assets.
IIA14: Historic environment	-?	Site is within 500m of two Grade II listed buildings (Enfield Technical College,and and Ripaults Factory). Although the site contains built	-?	The Council's assessment of impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment

IIA objective	SA9 (without mitigation)	Justification text	SA9 (with mitigation)	Justification text
		development, its redevelopment could affect the setting of these heritage assets.		should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southbury and contains built development.	+?	Site is located within the settlement of Southbury and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	-	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

# SA10: Morrisons, Southbury Road (mixed-use site) – formerly referred to as SBC36/LP1104

IIA objective	SA10 (without mitigation)	Justification text	SA10 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Enfield Playing Fields and Bush Hill Park, in addition to falling within 400m of a walking path. The site is also located within 400m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Enfield Playing Fields and Bush Hill Park, in addition to falling within 400m of a walking path. The site is also located within 400m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.

IIA objective	SA10 (without mitigation)	Justification text	SA10 (with mitigation)	Justification text
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is close to Strategic Industrial Locations. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of commercial floorspace. However, it is unknown what proportion of the site will comprise employment development.	++?	Site is close to Strategic Industrial Locations. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of commercial floorspace. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within 201- 400m of Percival Road Enfield, which is a Local Centre.	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within 201- 400m of Percival Road Enfield, which is a Local Centre.
IIA13: Biodiversity	0	Site is not located within close proximity of any biodiversity assets.	0	Site is not located within close proximity of any biodiversity assets.
IIA14: Historic environment	-?	Site is within 500m from two Grade II listed buildings (Enfield Technical College, and Ripaults Factory). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southbury and contains built development.	+?	Site is located within the settlement of Southbury and contains built development.

IIA objective	SA10 (without mitigation)	Justification text	SA10 (with mitigation)	Justification text
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

# SA11: Southbury Leisure Park (mixed-use site) – formerly referred to as CFS253<sup>4</sup>

IIA objective	CFS253 (without mitigation)	Justification text	SA11 (without mitigation)	Justification text	SA11 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Enfield Playing Fields and Bush Hill Park, in addition to falling within 400m of a cycle route. the site is not located within 800m of a GP surgery.	++/-	Site is within 800m of a number of areas of open space, including Enfield Playing Fields and Bush Hill Park, in addition to falling within 400m of a cycle route. the site is not located within 800m of a GP surgery.	++/-	Site is within 800m of a number of areas of open space, including Enfield Playing Fields and Bush Hill Park, in addition to falling within 400m of a cycle route. the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

<sup>&</sup>lt;sup>4</sup> Southbury Leisure Park was previously appraised as a housing site (CFS253). It has now been appraised as a mixed use site (SA11).

IIA objective	CFS253 (without mitigation)	Justification text	SA11 (without mitigation)	Justification text	SA11 (with mitigation)	Justification text
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy		Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of commercial floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of commercial floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within 201-400m of Percival Road Enfield, which is a Local Centre.	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within 201-400m of Percival Road Enfield, which is a Local Centre.	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within 201-400m of Percival Road Enfield, which is a Local Centre.
IIA13: Biodiversity	-?	Site is located within 250-750m of New River SINC and 100-250m of a Priority Habitat.	-?	Site is located within 250-750m of New River SINC and 100-250m of a Priority Habitat.	-?	Site is located within 250-750m of New River SINC and 100-250m of a Priority Habitat.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage	0?	Site is more than 500m from the nearest designated heritage asset.	-?	The Council's assessment of impacts on Archaeological Priority Areas

## Appendix G IIA findings for the site options 2021

IIA objective	CFS253 (without mitigation)	Justification text	SA11 (without mitigation)	Justification text	SA11 (with mitigation)	Justification text
		asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.		However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.		records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Town and contains built development.	+?	Site is located within the settlement of Enfield Town and contains built development.	+?	Site is located within the settlement of Enfield Town and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

### SA12: Tesco, Ponders End, 288 High Street (mixed-use site) – formerly referred to as CFS166

IIA objective	SA12 (without mitigation)	Justification text	SA12 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Durants Park and Ponders End Recreation Ground, in addition to falling within 400m of a walking and cycle path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Durants Park and Ponders End Recreation Ground, in addition to falling within 400m of a walking and cycle path.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is next to a Locally Significant Industrial Site. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of town centre and commercial floorspace. However, it is unknown what proportion of the site will comprise employment development.	++?	Site is next to a Locally Significant Industrial Site. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of town centre and commercial floorspace. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	+	Site is partially within (northern eastern part of the site) Ponders End Local Centre.	+	Site is partially within (northern eastern part of the site) Ponders End Local Centre.

IIA objective	SA12 (without mitigation)	Justification text	SA12 (with mitigation)	Justification text
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within Ponders End, which is a Local Centre.	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within Ponders End, which is a Local Centre.
IIA13: Biodiversity	0	Site is not located within close proximity of any biodiversity assets.	0	Site is not located within close proximity of any biodiversity assets.
IIA14: Historic environment	-?	Site is within 500m from two Grade II listed buildings (Enfield Technical College, and Ripaults Factory). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	0?	The Council's assessment of impacts on Archaeological Priority Areas records this site as 'Green' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southbury and contains built development.	+?	Site is located within the settlement of Southbury and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site partially falls within Source Protection Zone 2.	?	Site partially falls within Source Protection Zone 2.

### SA46: Crown Road Lorry Park (industrial site) – formerly referred to as CFS151

IIA objective	SA46 (without mitigation)	Justification text	SA46 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA46 (without mitigation)	Justification text	SA46 (with mitigation)	Justification text
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+	The site is under 10ha in size.	+	The site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also next to Southbury Road & Kingsway, which is a Local Centre.	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also next to Southbury Road & Kingsway, which is a Local Centre.
IIA13: Biodiversity	0	Site is not located within close proximity of any biodiversity assets.	0	Site is not located within close proximity of any biodiversity assets.
IIA14: Historic environment	-?	Site is within 500m from two Grade II listed buildings (Ripaults Factory and Enfield Technical Collage). Although the site contains built development, its redevelopment could affect	-?	The Council's assessment of impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.

IIA objective	SA46 (without mitigation)	Justification text	SA46 (with mitigation)	Justification text
		the setting of these heritage assets		
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southbury and contains built development.	+?	Site is located within the settlement of Southbury and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

## **Edmonton Green (SP PL3)**

### SA13: Edmonton Green Shopping Centre (mixed-use site) – formerly referred to as EDC2/LP1137

IIA objective	SA13 (without mitigation)	Justification text	SA13 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/?	Site is located within 400m of a GP surgery. However, the site contains a walking path which could be lost as a result of new development.	++/?	Site is located within 400m of a GP surgery. However, the site contains a walking path which could be lost as a result of new development.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	++	Site falls within the 10% most deprived areas within England.	++	Site falls within the 10% most deprived areas within England.

IIA objective	SA13 (without mitigation)	Justification text	SA13 (with mitigation)	Justification text
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will contribute towards employment opportunities through the provision of town centre and commercial floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will contribute towards employment opportunities through the provision of town centre and commercial floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Edmonton Green District Centre.	+	Site is within Edmonton Green District Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Edmonton Green railway station and 350m of at least one bus stop. The site is also within Edmonton Green, which is a District Centre.	++	Site is located within 1km of Edmonton Green railway station and 350m of at least one bus stop. The site is also within Edmonton Green, which is a District Centre.
IIA13: Biodiversity	-?	Site is located within 250- 750m of Pymme's Park SINC.	-?	Site is located within 250- 750m of Pymme's Park SINC.
IIA14: Historic environment	?	Site is adjacent to four Conservation Areas (Montagu Cemeteries, Fore Street North, The Crescent, and Church Street Edmonton) and within 500m of two Grade II* listed buildings (Lamb's cottage and Church of All Saints Edmonton Parish Church) and a number of Grade II listed buildings. Although the site contains built development, its redevelopment could affect	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.

IIA objective	SA13 (without mitigation)	Justification text	SA13 (with mitigation)	Justification text
		the setting of all four conservation areas, in addition to the Grade II listed buildings.		
IIA15: Landscape and townscape	+?	Site is located within the settlement of Edmonton Green and contains built development.	+?	Site is located within the settlement of Edmonton Green and contains built development.
IIA16: Efficient use of land and materials	++	The site is relatively large in size and on brownfield land.	++	The site is relatively large in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.
IIA18: Water	?	Site partially falls within Source Protection Zone 2.	?	Site partially falls within Source Protection Zone 2.

### SA14: Chiswick Road Estate (Osward and Newdales) (housing site) – formerly referred to as LOC1/LP1108

IIA objective	SA14 (without mitigation)	Justification text	SA14 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/?	Site is located within 400m of a GP surgery. The site is also located within 800m of a number of open spaces, including Edmonton Green Pocket Park. However, the site contains a walking path which could be lost as a result of new development.	++/?	Site is located within 400m of a GP surgery. The site is also located within 800m of a number of open spaces, including Edmonton Green Pocket Park. However, the site contains a walking path which could be lost as a result of new development.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.

IIA objective	SA14 (without mitigation)	Justification text	SA14 (with mitigation)	Justification text
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.		Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Edmonton Green District Centre.	+	Site is adjacent to Edmonton Green District Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Edmonton Green railway station and 350m of at least one bus stop. The site is also next to Edmonton Green, which is a District Centre.	++	Site is located within 1km of Edmonton Green railway station and 350m of at least one bus stop. The site is also next to Edmonton Green, which is a District Centre.
IIA13: Biodiversity	0	Site is not located within close proximity of any biodiversity assets.	0	Site is not located within close proximity of any biodiversity assets.
IIA14: Historic environment	?	Site is adjacent to The Crescent Conservation Area and is also within 500m of three Conservation Areas (Church Street Edmonton, Fore Street North, and Montagu Cemeteries). The site is also within 500m of two Grade II* listed buildings (Lamb's Cottage and Church of All Saints Edmonton Parish Church) and a number of Grade II listed buildings. Due to the fact that the site is adjacent to the Crescent Conservation Area (the east boundary), its redevelopment could affect	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.

IIA objective	SA14 (without mitigation)	Justification text	SA14 (with mitigation)	Justification text
		the setting of the heritage asset.		
IIA15: Landscape and townscape	+?	Site is located within the settlement of Edmonton and contains built development.	+?	Site is located within the settlement of Edmonton and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	1	Site partially falls within Flood Zone 3 and has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land.	-	Site partially falls within Flood Zone 3 and has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

## **Angel Edmonton (SP PL4)**

### SA15: Joyce Avenue and Snells Park Estate (housing site) – formerly referred to as UPM1

IIA objective	SA15 (without mitigation)	Justification text	SA15 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/?	Site is located within 400m of a GP surgery. However, the site contains many areas of Amenity Green Space and a walking path, all of which could be lost as a result of new development.	++/?	Site is located within 400m of a GP surgery. However, the site contains many areas of Amenity Green Space and a walking path, all of which could be lost as a result of new development.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.

IIA objective	SA15 (without mitigation)	Justification text	SA15 (with mitigation)	Justification text
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++	Site is located close to a Locally Significant Industrial Site.	++	Site is located close to a Locally Significant Industrial Site.
IIA10: Town and local centres	+	Site is partially within (northern eastern part of the site) Angel Edmonton District Centre.	+	Site is partially within (northern eastern part of the site) Angel Edmonton District Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Silver Street railway station and 350m of at least one bus stop. The site is also within and next to Angel Edmonton, which is a District Centre.	++	Site is located within 1km of Silver Street railway station and 350m of at least one bus stop. The site is also within and next to Angel Edmonton, which is a District Centre.
IIA13: Biodiversity	?	Site is located within 250m of Pymme's Park SINC.	?	Site is located within 250m of Pymme's Park SINC.
IIA14: Historic environment	?	Site is adjacent to two Conservation Areas (Fore Street South, and Fore Street Angel) and is within 500m from four Grade II* listed buildings (808 and 810 High Road N17, Percy House, Forecourt walls and railings to Number 796 (Percy House), and Dial House) and a number of Grade II listed buildings. Due to the fact that the site is adjacent to two Conservation Areas and large in scale, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.

IIA objective	SA15 (without mitigation)	Justification text	SA15 (with mitigation)	Justification text
IIA15: Landscape and townscape		Development of this site would result in the loss of a number of areas of Amenity Green Space.		Development of this site would result in the loss of a number of areas of Amenity Green Space.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site partially falls within Source Protection Zone 2 (the northern eastern part of the site).	?	Site partially falls within Source Protection Zone 2 (the northern eastern part of the site).

### SA16: Public House, 50-56 Fore Street (housing site) – formerly referred to as UPP9 (10/00760/FUL)

IIA objective	SA16 (without mitigation)	Justification text	SA16 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Pymnes Park, Craig Park, Joyce Avenue Amenity Space and St James Open Space, in addition to falling within 400m of a walking path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Pymnes Park, Craig Park, Joyce Avenue Amenity Space and St James Open Space, in addition to falling within 400m of a walking path.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.

IIA objective	SA16 (without mitigation)	Justification text	SA16 (with mitigation)	Justification text
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy		Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.		Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Angel Edmonton District Centre.	+	Site is within Angel Edmonton District Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Silver Street railway station and 350m of at least one bus stop. The site is also within Angel Edmonton, which is a District Centre.	++	Site is located within 1km of Silver Street railway station and 350m of at least one bus stop. The site is also within Angel Edmonton, which is a District Centre.
IIA13: Biodiversity	-?	Site located is within 250- 750m of Pymme's Park SINC.	-?	Site located is within 250- 750m of Pymme's Park SINC.
IIA14: Historic environment	?	Site is adjacent to Fore Street South Conservation Area and within 500m of another Conservation Area (Fore Street Angel), one Grade II* listed building (808 and 801 High Road N17) and a number of Grade II listed buildings. Due to the fact the site is adjacent to Fore Street South Conservation Area (the northern boundary of the site), its redevelopment could affect the setting of this heritage asset.	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Upper	+?	Site is located within the settlement of Upper

IIA objective	SA16 (without mitigation)	Justification text	SA16 (with mitigation)	Justification text
		Edmonton and contains built development.		Edmonton and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	<u></u>	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	-	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zone 2.	?	Site falls within Source Protection Zone 2.

### SA17: Upton Road and Raynham Road (housing site) – formerly referred to as UPS21/17100372

IIA objective	SA17 (without mitigation)	Justification text	SA17 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/?	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Craig Local Park. However, the site contains a walking path which could be lost as a result of new development.	++/?	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Craig Local Park. However, the site contains a walking path which could be lost as a result of new development.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA17 (without mitigation)	Justification text	SA17 (with mitigation)	Justification text
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.		Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is partially within (western part of the site) Angel Edmonton District Centre.	+	Site is partially within (western part of the site) Angel Edmonton District Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Silver Street railway station and 350m of at least one bus stop. The site is also within and next to Angel Edmonton, which is a District Centre.	++	Site is located within 1km of Silver Street railway station and 350m of at least one bus stop. The site is also within and next to Angel Edmonton, which is a District Centre.
IIA13: Biodiversity	-?	Site is located within 250- 750m of Pymme's Park SINC.	-?	Site is located within 250- 750m of Pymme's Park SINC.
IIA14: Historic environment	?	Site partially falls within the Fore Street Angel Conservation Area, which contains a number of listed buildings. The site is also within 500m of the Fore Street South Conservation Area. Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Upper Edmonton and contains built development.	+?	Site is located within the settlement of Upper Edmonton and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3.	1	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3.300mm.

IIA objective	SA17 (without mitigation)	Justification text	SA17 (with mitigation)	Justification text
		However, the site is on brownfield land.		However, the site is on brownfield land.
IIA18: Water	?	Site falls within Source Protection Zone 2.	?	Site falls within Source Protection Zone 2.

## SA18: South east corner of North Middlesex University Hospital Trust of Sterling Way (housing site) – formerly referred to as CFS165

IIA objective	SA18 (without mitigation)	Justification text	SA18 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Pymnes Park, St Davids Park and St James Open Space, in addition to falling within 400m of a walking path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Pymnes Park, St Davids Park and St James Open Space, in addition to falling within 400m of a walking path.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA18 (without mitigation)	Justification text	SA18 (with mitigation)	Justification text
IIA9: Economy	++	Site is located close to Locally Significant Industrial Sites.	++	Site is located close to Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Silver Street railway station and 350m of at least one bus stop. The site is also within 201-400m of Silver Street Edmonton, which is a Local Centre, and Angel Edmonton, which is a District Centre.	++	Site is located within 1km of Silver Street railway station and 350m of at least one bus stop. The site is also within 201-400m of Silver Street Edmonton, which is a Local Centre, and Angel Edmonton, which is a District Centre.
IIA13: Biodiversity	?	Site is located within 250m of Pymme's Park SINC.	?	Site is located within 250m of Pymme's Park SINC.
IIA14: Historic environment	-?	Site is within 500m of two Conservation Areas (Fore Street South and Fore Street Angel) and two Grade II listed buildings (Former Garden Walls in Pymme's Park, and Angel Place). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Upper Edmonton and contains built development.	+?	Site is located within the settlement of Upper Edmonton and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

## **Meridian Water (SP PL5)**

SA19: IKEA store; Tesco Extra, 1 Glover Drive; Meridian Water, Willoughby Lane and Meridian Way (mixed-use site) – formerly referred to as UPP32, UPC2, UPC1 and UPP24

IIA objective	SA19 (without mitigation)	Justification text	SA19 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/?	Site is within 800m of a number of areas of open space, including Kenninghall Amenity Green Space and Craig Local Park, in addition to falling within 400m of a walking and cycle path. The site is also located within 400-800m of a GP surgery. However, the site contains a cycle path which could be lost as a result of new development.	++/?	Site is within 800m of a number of areas of open space, including Kenninghall Amenity Green Space and Craig Local Park, in addition to falling within 400m of a walking and cycle path. The site is also located within 400-800m of a GP surgery. However, the site contains a cycle path which could be lost as a result of new development.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England	+	Site falls within the 20% most deprived areas within England
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is next to Strategic Industrial Locations and close to a Locally Significant Industrial Site, in addition to being over 10ha in size. The site will make a limited contribution towards employment opportunities	++?	Site is next to Strategic Industrial Locations and close to a Locally Significant Industrial Site, in addition to being over 10ha in size. The site will make a limited contribution towards employment opportunities

IIA objective	SA19 (without mitigation)	Justification text	SA19 (with mitigation)	Justification text
		through the provision of non- residential uses including social and community infrastructure. However, it is unknown what proportion of the site will comprise employment development.		through the provision of non- residential uses including social and community infrastructure However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	+	Site is adjacent to Dysons Road Edmonton Local Centre.	+	Site is adjacent to Dysons Road Edmonton Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. The site is also next to Dysons Road Edmonton, which is a Local Centre.	++	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. The site is also next to Dysons Road Edmonton, which is a Local Centre.
IIA13: Biodiversity	?	Site contains a Priority Habitat and is within 250m of the Lea Valley SINC.	?	Site contains a Priority Habitat and is within 250m of the Lea Valley SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non- designated heritage features and effects may extend beyond 500m.	-?	The Council's assessment of impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Upper Edmonton and contains built development.	+?	Site is located within the settlement of Upper Edmonton and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300m and partially falls within Flood Zone 3. However, the site is on brownfield land.		Site has a predicted peak flood depth of greater than 300m and partially falls within Flood Zone 3. However, the site is on brownfield land.
IIA18: Water	?	Site falls within Source Protection Zone 2 and partially within Source Protection Zone 1 (northern part of the site). The site also contains watercourses.	?	Site falls within Source Protection Zone 2 and partially within Source Protection Zone 1 (northern part of the site). The site also contains watercourses.

SA47: Ravenside Retail Park (industrial site) – formerly referred to as NA001

IIA objective	SA47 (without mitigation)	Justification text	SA47 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+	The site is under 10ha in size.	+	The site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Dysons Road Edmonton, which is a Local Centre.	++/-	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. However, the site is only within 401- 800m of Dysons Road Edmonton, which is a Local Centre.

IIA objective	SA47 (without mitigation)	Justification text	SA47 (with mitigation)	Justification text
IIA13: Biodiversity	?	Site is located within 250m of the Lea Valley SINC.	?	Site is located within 250m of the Lea Valley SINC.
IIA14: Historic environment	-?	Site is within 500m from a Grade II listed building (Water Turbine House, Chingford Pumping Station). Although the site contains built development, its redevelopment could affect the setting of the heritage asset.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Upper Edmonton and contains built development.	+?	Site is located within the settlement of Upper Edmonton and contains built development.
IIA16: Efficient use of land and materials	++	The site is relatively large in size and on brownfield land.	++	The site is relatively large in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3300mm. However, the site is on brownfield land.
IIA18: Water	?	Site falls within Source Protection Zones 1 and 2 and there is a waterbody, as well as some brooks, within the boundary of the site.	?	Site falls within Source Protection Zones 1 and 2 and there is a waterbody, as well as some brooks, within the boundary of the site.

### **Southgate (SP PL6)**

### SA20: Asda Southgate, 130 Chase Side, Southgate (mixed-use site) – formerly referred to as CFS209

IIA objective	SA20 (without mitigation)	Justification text	SA20 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.

IIA objective	SA20 (without mitigation)	Justification text	SA20 (with mitigation)	Justification text
IIA4: Health and wellbeing	?	Site contains a walking path which could be lost as a result of new development. In addition, the site is not located within 800m of a GP surgery.	?	Site contains a walking path which could be lost as a result of new development. In addition, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of town centre floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of town centre floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is partially (southern part of the site) within Southgate District Centre.	+	Site is partially (southern part of the site) within Southgate District Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also within Southgate, which is a District Centre.	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also within Southgate, which is a District Centre.
IIA13: Biodiversity	-?	Site is located within 250- 750m of the Grovelands	-?	Site is located within 250- 750m of the Grovelands Park

IIA objective	SA20 (without mitigation)	Justification text	SA20 (with mitigation)	Justification text
		Park & Priory Hospital SINC and Oakwood Park SINC.		& Priory Hospital SINC and Oakwood Park SINC.
IIA14: Historic environment	?	Site is adjacent to a Grade II listed building (Church of St Andrew) and within 500m of Southgate Circus Conservation Area, two Grade II* listed buildings (Southgate Underground Station, and Station Pylons to north and south of Southgate Station) and a number of Grade II listed buildings. Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southgate and contains built development.	+?	Site is located within the settlement of Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

### SA21: Southgate Office Village, 286 Chase Road (mixed-use site) – formerly referred to as SPO35 (19/01941/FUL)

IIA objective	SA21 (without mitigation)	Justification text	SA21 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA21 (without mitigation)	Justification text	SA21 (with mitigation)	Justification text
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Grovelands Park and Ivy Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.	++/-	Site is within 800m of a number of areas of open space, including Grovelands Park and Ivy Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the re-provision of office floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the re-provision office floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Southgate District Centre.	+	Site is adjacent to Southgate District Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also next to	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also next to

IIA objective	SA21 (without mitigation)	Justification text	SA21 (with mitigation)	Justification text
		Southgate, which is a District Centre.		Southgate, which is a District Centre.
IIA13: Biodiversity	-?	Site is located within 250- 750m of Park & Priory Hospital SINC and Oakwood Park SINC.	-?	Site is located within 250- 750m of Park & Priory Hospital SINC and Oakwood Park SINC.
IIA14: Historic environment	?	Site is adjacent to Southgate Circus Conservation Area (along the southern boundary of the site) and within 500m of Grovelands Registered Park and Garden, which contains a number of Grade I and Grade II listed buildings. The site is also within 500m of Meadway Conservation Area, three Grade II* listed buildings (Southgate House, Southgate Underground Station, and Station Pylons to north and south of Southgate Station) and a number of Grade II listed buildings. Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southgate and contains built development.	+?	Site is located within the settlement of Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

SA22: M&S Food (mixed-use site) – formerly referred to as SOS11/CFS157

IIA objective	SA22 (without mitigation)	Justification text	SA22 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Grovelands Park and Ivy Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.	++/-	Site is within 800m of a number of areas of open space, including Grovelands Park and Ivy Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of nonresidential floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of nonresidential floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.

IIA objective	SA22 (without mitigation)	Justification text	SA22 (with mitigation)	Justification text
IIA10: Town and local centres	+	Site is partially (southern eastern part of the site) within Southgate District Centre.	+	Site is partially (southern eastern part of the site) within Southgate District Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also within Southgate, which is a District Centre.	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also within Southgate, which is a District Centre.
IIA13: Biodiversity	?	Site is located within 250m of the Grovelands Park & Priory Hospital SINC and 250-750m of the Oakwood Park SINC.	?	Site is located within 250m of the Grovelands Park & Priory Hospital SINC and 250-750m of the Oakwood Park SINC.
IIA14: Historic environment	?	Site is adjacent to Southgate Circus Conservation Area and within 500m of Grovelands Registered Park and Garden, Meadway Conservation Area, three Grade II* listed buildings (Southgate House, Southgate Underground Station, and Station Pylons to north and south of Southgate Station) and a number of Grade II listed buildings. Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southgate and contains built development.	+?	Site is located within the settlement of Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or	0	Site does not fall within a Source Protection Zone or

IIA objective	SA22 (without mitigation)	Justification text	SA22 (with mitigation)	Justification text
		contain a watercourse or water body.		contain a watercourse or water body.

### SA23: Minchenden Car Park and Alan Pullinger Centre (housing site) – formerly referred to as CFS150 and CFS189

IIA objective	SA23 (without mitigation)	Justification text	SA23 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Grovelands Park and Ivy Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.	++/-	Site is within 800m of a number of areas of open space, including Grovelands Park and Ivy Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.

IIA objective	SA23 (without mitigation)	Justification text	SA23 (with mitigation)	Justification text
IIA10: Town and local centres	Site is adjacent to Southgate District Centre.		+	Site is adjacent to Southgate District Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also next to Southgate, which is a District Centre.	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also next to Southgate, which is a District Centre.
IIA13: Biodiversity	?	Site is located within 250m of the Grovelands and Priory Hospital SINC.	?	Site is located within 250m of the Grovelands and Priory Hospital SINC.
IIA14: Historic environment	-?	Site is within 500m of three Conservation Areas (Southgate Circus, Meadway, and Southgate Green), Grovelands Registered Park and Garden, three Grade II* listed buildings (Southgate House, Southgate Underground Station, and Station pylons to the north and south of Southgate Station), and a number of Grade II listed buildings. Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southgate and contains built development.	+?	Site is located within the settlement of Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	0	Site is located on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.	0	Site is located on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

## **New Southgate (SP PL7)**

### SA24: Arnos Grove Station Car Park (housing site) – formerly referred to as SGC4/LP608\_2

IIA objective	SA24 (without mitigation)	Justification text	SA24 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/?	Site is located within 400m of a GP surgery. However, the site partially overlaps Arnos Park Metropolitan Open Land and contains a walking path, both of which could be lost as a result of new development.	++/?	Site is located within 400m of a GP surgery. However, the site partially overlaps Arnos Park Metropolitan Open Land and contains a walking path, both of which could be lost as a result of new development.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within the Borough.	0	Site does not fall within the 10% or 20% most deprived areas within the Borough.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.		Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is partially within (southern part of the site) Arnos Grove Local Centre.	+	Site is partially within (southern part of the site) Arnos Grove Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.

IIA objective	SA24 (without mitigation)	Justification text	SA24 (with mitigation)	Justification text
IIA12: Sustainable transport	++	Site is located within 1km of Arnos Grove railway station and 350m of at least one bus stop. The site is also next to Arnos Grove, which is a Local Centre.	++	Site is located within 1km of Arnos Grove railway station and 350m of at least one bus stop. The site is also next to Arnos Grove, which is a Local Centre.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and 250m of Arnos Park SINC.	?	Site is located within 100m of a Priority Habitat and 250m of Arnos Park SINC.
IIA14: Historic environment	?	Site is adjacent to a Grade II* listed building (Arnos Grove Underground Station) and within 500m from Abbotshall Avenue Conservation Area, as well as two Grade II listed buildings (Bowes Road Clinic and Bowes Road Library and Arnos Pool). Due to the fact the site is adjacent to a Grade II* listed building (Arnos Grove Underground Station), its development could affect the setting of this heritage asset.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape		Development of this site would result in the partial loss of Arnos Park Metropolitan Open Land.	1	Development of this site would result in the partial loss of Arnos Park Metropolitan Open Land.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	ı	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

#### SA25: Site between North Circular Road and Station Road (mixed-use site) – formerly referred to as SGC1/LP1145<sup>5</sup>

IIA objective	SGC1/LP1 145 (without mitigation)	Justification text	SA25 (without mitigation)	Justification text	SA25 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Arnos Park, Millenium Green New Southgate and High Road Open Space, in addition to falling within 400m of a walking path. The site is also located within 400-800m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Arnos Park, Millenium Green New Southgate and High Road Open Space, in addition to falling within 400m of a walking path. The site is also located within 400-800m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Arnos Park, Millenium Green New Southgate and High Road Open Space, in addition to falling within 400m of a walking path. The site is also located within 400-800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.

<sup>&</sup>lt;sup>5</sup> Site between North Circular Road and Station Road was previously appraised as a housing site (SGC1/LP1145). It has now been appraised as a mixed use site (SA25).

IIA objective	SGC1/LP1 145 (without mitigation)	Justification text	SA25 (without mitigation)	Justification text	SA25 (with mitigation)	Justification text
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++	Site is located close to a Locally Significant Industrial Site.	++?	Site is close to a Locally Significant Industrial Site. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of non-residential floorspace. However, it is unknown what proportion of the site will comprise employment development.	++?	Site is close to a Locally Significant Industrial Site. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of non-residential floorspace. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Arnos Grove tube station and 350m of at least one bus stop. However, the site is only within 401-800m of Arnos Grove, Bowes Road West and New Southgate Barnet Road, which are Local Centres.	++/-	Site is located within 1km of Arnos Grove tube station and 350m of at least one bus stop. However, the site is only within 401-800m of Arnos Grove, Bowes Road West and New Southgate Barnet Road, which are Local Centres.	++/-	Site is located within 1km of Arnos Grove tube station and 350m of at least one bus stop. However, the site is only within 401-800m of Arnos Grove, Bowes Road West and New Southgate Barnet Road, which are Local Centres.

## Appendix G IIA findings for the site options 2021

IIA objective	SGC1/LP1 145 (without mitigation)	Justification text	SA25 (without mitigation)	Justification text	SA25 (with mitigation)	Justification text
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat.	?	Site is located within 100m of a Priority Habitat.	?	Site is located within 100m of a Priority Habitat.
IIA14: Historic environment	-?	Site is within 500m of two Grade II listed buildings (Friern Hospital and Garden House of Friern Hospital). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	Site is within 500m of two Grade II listed buildings (Friern Hospital and Garden House of Friern Hospital). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of New Southgate and contains built development.	+?	Site is located within the settlement of New Southgate and contains built development.	+?	Site is located within the settlement of New Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. 300mm. However, the site is on brownfield land.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

### SA26: Station Road, New Southgate (mixed-use site) – formerly referred to as SGS14/17100370<sup>6</sup>

IIA objective	SGS14/1 7100370	Justification text	SA26 (without mitigation)	Justification text	SA26 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Arnos Park, Millennium Green New Southgate and High Road Open Space, in addition to falling within 400m of a walking path. The site is also located within 400-800m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Arnos Park, Millennium Green New Southgate and High Road Open Space, in addition to falling within 400m of a walking path. The site is also located within 400-800m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Arnos Park, Millennium Green New Southgate and High Road Open Space, in addition to falling within 400m of a walking path. The site is also located within 400-800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

<sup>&</sup>lt;sup>6</sup> Station Road, New Southgate was previously appraised as a housing site (SGS14/17100370). It has now been appraised as a mixed use site (SA26).

IIA objective	SGS14/1 7100370	Justification text	SA26 (without mitigation)	Justification text	SA26 (with mitigation)	Justification text
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++	Site is located close to a Locally Significant Industrial Site.	++	Site is close to a Locally Significant Industrial Site. The site is under 10ha in size and will re-provide the existing store on site.	++	Site is close to a Locally Significant Industrial Site. The site is under 10ha in size and will re-provide the existing store on site.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Arnos Grove tube station and 350m of at least one bus stop. However, the site is only within 401-800m of Arnos Grove, Bowes Road West and New Southgate Road, which are Local Centres.	++/-	Site is located within 1km of Arnos Grove tube station and 350m of at least one bus stop. However, the site is only within 401-800m of Arnos Grove, Bowes Road West and New Southgate Road, which are Local Centres.	++/-	Site is located within 1km of Arnos Grove tube station and 350m of at least one bus stop. However, the site is only within 401-800m of Arnos Grove, Bowes Road West and New Southgate Road, which are Local Centres.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and within 250- 750m of Arnos Park SINC.	?	Site is located within 100m of a Priority Habitat and within 250-750m of Arnos Park SINC.	?	Site is located within 100m of a Priority Habitat and within 250-750m of Arnos Park SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything

## Appendix G IIA findings for the site options 2021

IIA objective	SGS14/1 7100370	Justification text	SA26 (without mitigation)	Justification text	SA26 (with mitigation)	Justification text
		heritage features and effects may extend beyond 500m.				
IIA15: Landscape and townscape	+?	Site is located within the settlement of New Southgate and contains built development.	+?	Site is located within the settlement of New Southgate and contains built development.	+?	Site is located within the settlement of New Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

## **Crews Hill (SP PL9)**

## SA27: Land at Crews Hill (housing site) – formerly referred to as CHC2, CHC10, CHC17, CHC1, CFS159, CFS169, CFS132 and CHC18

IIA objective	SA27 (without mitigation)	Justification text	SA27 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/	Site is within 800m of a number of areas of open space, including Whitewebbs Metropolitan Park, Blay Hill Fields Natural and Semi-Natural Urban Greenspace and Hilly Fields District Park. However, the site is not located within 800m of a GP surgery and contains a walking path, which could be lost as a result of development.	++/	Site is within 800m of a number of areas of open space, including Whitewebbs Metropolitan Park, Blay Hill Fields Natural and Semi-Natural Urban Greenspace and Hilly Fields District Park. However, the site is not located within 800m of a GP surgery and contains a walking path, which could be lost as a result of development.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.

IIA objective	SA27 (without mitigation)	Justification text	SA27 (with mitigation)	Justification text
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.	++/	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	?	Site contains Priority Habitats, an area of Ancient Woodland, Crews Hill Golf Course SINC and Crews Hill Bowes Park Railsides SINC. The site is also located within 250m of Hily Fields Country Park SINC and Whitewebbs Wood SINC.	?	Site contains Priority Habitats, an area of Ancient Woodland, Crews Hill Golf Course SINC and Crews Hill Bowes Park Railsides SINC. The site is also located within 250m of Hily Fields Country Park SINC and Whitewebbs Wood SINC.
IIA14: Historic environment	?	Site contains a Grade II* listed building (The Paddocks) and two Grade II listed buildings (2 Barns North West of Farmhouse at The Paddocks and Owls Hall). The site is also located within 500m of Clay Hill Conservation Area and further Grade II listed buildings. Due to the fact the site contains listed buildings, its development could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	?/+?	Site is large in scale and although it is partially located within the settlement of Crews Hill and contains built development, it is also partially located in an undeveloped area.	?/+?	Site is large in scale and although it is partially located within the settlement of Crews Hill and contains built development, it is also partially located in an undeveloped area.
IIA16: Efficient use of land and materials	++/?	Site is relatively large in size and partially located on brownfield land and greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not	++/?	Site is relatively large in size and partially located on brownfield land and greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish

IIA objective	SA27 (without mitigation)	Justification text	SA27 (with mitigation)	Justification text
		distinguish between Grades 3a and 3b agricultural land.		between Grades 3a and 3b agricultural land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	-	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site contains Turkey Brook within its boundary.	?	Site contains Turkey Brook within its boundary.

### SA48: Land at 135 Theobalds Park Road (industrial site) – formerly referred to as CFS132

IIA objective	SA48 (without mitigation)	Justification text	SA48 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA48 (without mitigation)	Justification text	SA48 (with mitigation)	Justification text
IIA9: Economy	+	The site is under 10ha in size.	+	The site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/	Site is within 1km of Turkey Street railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.	++/	Site is within 1km of Turkey Street railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	?	Site is located within 250m of the Whitewebbs SINC.	?	Site is located within 250m of the Whitewebbs SINC.
IIA14: Historic environment	-?	Site is within 500m from two Grade II listed buildings (Bridge at West End of Lane, Whitewebbs Wood, and Glasgow Stud Farmhouse). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.		The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Crews Hill and contains built development.	+?	Site is located within the settlement of Crews Hill and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small and on brownfield land.	+	Site is relatively small and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

## **Chase Park (SP PL10)**

### SA28: Land at Chase Park (housing site) – formerly referred to as HIC10, HIC11, HIC6 and HIC9

IIA objective	SA28 (without mitigation)	Justification text	SA28 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Trent Metropolitan Park, Lakeside Natural and Semi-Natural Urban Greenspace and Hilly Fields District Park, in addition to falling within 400m of a walking and cycle path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Trent Metropolitan Park, Lakeside Natural and Semi-Natural Urban Greenspace and Hilly Fields District Park, in addition to falling within 400m of a walking and cycle path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is close to Oakwood Local Centre.	+	Site is close to Oakwood Local Centre.

IIA objective	SA28 (without mitigation)	Justification text	SA28 (with mitigation)	Justification text
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Gordon Hill railway station and Oakwood tube station and 350m of at least one bus stop. The site is also next to Oakwood, which is a Local Centre.	++	Site is located within 1km of Gordon Hill railway station and Oakwood tube station and 350m of at least one bus stop. The site is also next to Oakwood, which is a Local Centre.
IIA13: Biodiversity	?	Site is located within 250m of Trent Park SINC, Trent Park Golf Course SINC, Lakeside SINC and Boxer's Lane & Lonsdale Drive Woods SINC, in addition to falling within 100m of Priority Habitats.	?	Site is located within 250m of Trent Park SINC, Trent Park Golf Course SINC, Lakeside SINC and Boxer's Lane & Lonsdale Drive Woods SINC, in addition to falling within 100m of Priority Habitats.
IIA14: Historic environment	?	Site partially falls within Trent Park Conservation Area, which contains a number of Grade II listed buildings, Trent Park Registered Park and Garden and a Scheduled Monument (Moated site, Camlet Moat, Moat Wood). There is no built development between the site and the Conservation Area, listed buildings and Scheduled Monument. Its development could therefore adversely affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	?	Site is large in scale and located on the edge of World's End.	?	Site is large in scale and located on the edge of World's End.
IIA16: Efficient use of land and materials	?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.	?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3.		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3.

IIA objective	SA28 (without mitigation)	Justification text	SA28 (with mitigation)	Justification text
		However, the site is on brownfield land.		However, the site is on brownfield land.
IIA18: Water	?	Site contains a number of brooks within its boundary, including Merryhills Brook, Salmon's Brook and Leeging Beach Gutter.	?	Site contains a number of brooks within its boundary, including Merryhills Brook, Salmon's Brook and Leeging Beach Gutter.

### SA29: Arnold House (housing site) – formerly referred to as CFS162\_B and CFS162\_C

IIA objective	SA29 (without mitigation)	Justification text	SA29 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is located within 800m of a number of areas of open space, including West Enfield Parklands Metropolitan Open Land and Lee View Amenity Space, in addition to falling within 400m of a walking path. However, the site is more than 800m from a GP surgery.	++/-	Site is located within 800m of a number of areas of open space, including West Enfield Parklands Metropolitan Open Land and Lee View Amenity Space, in addition to falling within 400m of a walking path. However, the site is more than 800m from a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA29 (without mitigation)	Justification text	SA29 (with mitigation)	Justification text
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored poorly in the air quality assessment.	-?	Site scored poorly in the air quality assessment.
IIA12: Sustainable transport	++/	Site is located within 1km of Gordon Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.	++/	Site is located within 1km of Gordon Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	?	Site contains a Priority Habitat and is within 250- 750m of Crews Hill to Bowes Park Railsides SINC.	?	Site contains a Priority Habitat and is within 250-750m of Crews Hill to Bowes Park Railsides SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non- designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of World's End.	-?	Site is not large in scale but is located on the edge of World's End.
IIA16: Efficient use of land and materials	?	Site is relatively small in size and partially located on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.	?	Site is relatively small in size and partially located on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.

IIA objective	SA29 (without mitigation)	Justification text	SA29 (with mitigation)	Justification text
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

## Other proposed site allocations outside of the place making areas (urban areas)

### SA30: Claverings, Centre Way (mixed-use site) – formerly referred to as CFS152

IIA objective	SA30 (without mitigation)	Justification text	SA30 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Montagu Recreation Ground, in addition to falling within 400m of a walking path. The site is also located within 400-800m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Montagu Recreation Ground, in addition to falling within 400m of a walking path. The site is also located within 400-800m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England	+	Site falls within the 20% most deprived areas within England
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Although the site falls within a Locally Significant	++?	Although the site falls within a Locally Significant Industrial

IIA objective	SA30 (without mitigation)	Justification text	SA30 (with mitigation)	Justification text
		Industrial Site, it is unlikely to result in any loss of this existing employment area because it makes provision for employment. It is under 10ha in size but as mentioned already, will contribute towards employment development. It is unknown what proportion of the site will comprise employment development.		Site, it is unlikely to result in any loss of this existing employment area because it makes provision for employment development. It is under 10ha in size but as mentioned already, will contribute towards employment development. It is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 2 in the air quality appraisal.	-?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	+	Site is located within 350m of at least one bus stop. The site is also within 201-400m of Nightingale Road, Edmonton, which is a Local Centre.	+	Site is located within 350m of at least one bus stop. The site is also within 201-400m of Nightingale Road, Edmonton, which is a Local Centre.
IIA13: Biodiversity	-?	Site is located within 250- 750m of the Chingford Reservoirs SSSI and Lea Valley SINC.	-?	Site is located within 250- 750m of the Chingford Reservoirs SSSI and Lea Valley SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non- designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of Lower Edmonton.	-?	Site is not large in scale but is located on the edge of Lower Edmonton.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	ı	Site has a predicted peak flood depth of greater than 300mm and falls mainly within Flood Zone 2. However, the site is on brownfield land.	ł	Site has a predicted peak flood depth of greater than 300mm and falls mainly within Flood Zone 2. However, the site is on brownfield land.

IIA objective	SA30 (without mitigation)	Justification text	SA30 (with mitigation)	Justification text
IIA18: Water	?	Southern edge of the site falls within Source Protection Zone 2.	?	Southern edge of the site falls within Source Protection Zone 2.

# SA31: Cockfosters Station Car Park (Parcels a and b), Cockfosters Road, Barnet (housing site) – formerly referred to as COC9a and COC9b/LP608\_1

IIA objective	SA31 (without mitigation)	Justification text	SA31 (with mitigation)	Justification text	
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.	
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Trent Park, Cockfosters Sports Ground and Belmont Close, in addition to falling within 400m of a walking path.		Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Trent Park, Cockfosters Sports Ground and Belmont Close, in addition to falling within 400m of a walking path.	
IIA5: Services and facilities	+?	Site is within 800m of a secondary school.	+?	Site is within 800m of a secondary school.	
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.	
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.		The location of development will not affect the achievement of this objective.	
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	

IIA objective	SA31 (without mitigation)	Justification text	SA31 (with mitigation)	Justification text
		Locally Significant Industrial Sites.		
IIA10: Town and local centres	+	Site is within Cockfosters Local Centre.	+	Site is within Cockfosters Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Cockfosters tube station and 350m of at least one bus stop. The site is also within Cockfosters, which is a Local Centre.	++	Site is located within 1km of Cockfosters tube station and 350m of at least one bus stop. The site is also within Cockfosters, which is a Local Centre.
IIA13: Biodiversity	?	Site contains a Priority Habitat and is within 250m of Trent Park SINC.	?	Site contains a Priority Habitat and is within 250m of Trent Park SINC.
IIA14: Historic environment	?	Site is within Trent Park Conservation Area and is within 500m of a number of Grade II listed buildings. Due to the fact the site is within the Conservation Area and adjacent to one of the Grade II listed buildings (Cockfosters London Regional Transport Station including platforms and platform canopies), its development could affect the setting of these heritage assets.		The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Green' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	-?	Site is not large in scale and located on the edge of Cockfosters.	-?	Site is not large in scale and located on the edge of Cockfosters.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

SA32: Sainsburys Green Lanes (mixed-use site) – formerly referred to as PA39/LP654

IIA objective	SA32 (without mitigation)	Justification text	SA32 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/?	Site is located within 400m of a GP surgery. However, a cycle path crosses through the site, which could be lost as a result of development.	of a GP surgery. However, a cycle path crosses through the site, which could be lost	
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	mary school and a ++?	
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.		The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	Site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.		+?/-	Site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Winchmore Hill Broadway Local Centre.		Site is adjacent to Winchmore Hill Broadway Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.

IIA objective	SA32 (without mitigation)	Justification text	SA32 (with mitigation)	Justification text
IIA12: Sustainable transport	++	Site is located within 1km of Winchmore Hill railway station and 350m of at least one bus stop. The site is also next to Winchmore Hill Broadway, which is a Local Centre.	++	Site is located within 1km of Winchmore Hill railway station and 350m of at least one bus stop. The site is also next to Winchmore Hill Broadway, which is a Local Centre.
IIA13: Biodiversity	?	Site contains a Priority Habitat and falls within 250m of New River SINC.	?	Site contains a Priority Habitat and falls within 250m of New River SINC.
IIA14: Historic environment	?	Site is within 500m of Winchmore Hill Green Conservation Area, which contains a number of Grade II listed buildings. The site is also located directly adjacent to another Grade II listed building (Police Station). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	0?	The Council's assessment of heritage considerations records this site as 'Green' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Winchmore Hill and contains built development.	+?	Site is located within the settlement of Winchmore Hill and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small and on brownfield land.	+	Site is relatively small and on brownfield land.
IIA17: Flooding	ł	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	ł	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zone 1.	?	Site falls within Source Protection Zone 1.

# SA33: Blackhorse Tower, Holbrook House and Churchwood House, 116 Cockfosters Road (housing site) – formerly referred to as COP10 (20/03200/PRJ)

IIA objective	SA33 (without mitigation)	Justification text	SA33 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA33 (without mitigation)	Justification text	SA33 (with mitigation)	Justification text
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Trent Park, Bramley Road Sports Ground and Cockfosters Sports Ground, but is not within 400m of a walking or cycling path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Trent Park, Bramley Road Sports Ground and Cockfosters Sports Ground, but is not within 400m of a walking or cycling path.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Cockfosters Local Centre.	+	Site is within Cockfosters Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.		Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Cockfosters tube station and 350m of at least one bus stop. The site is also within Cockfosters, which is a Local Centre.	++	Site is located within 1km of Cockfosters tube station and 350m of at least one bus stop. The site is also within Cockfosters, which is a Local Centre.

IIA objective	SA33 (without mitigation)	Justification text	SA33 (with mitigation)	Justification text
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and within 250m from Trent Park SINC.	?	Site is located within 100m of a Priority Habitat and within 250m from Trent Park SINC.
IIA14: Historic environment	?	Site is within 500m of Trent Park Conservation Area and five Grade II listed buildings (Cockfosters London Regional Transport Station including platforms and platform canopies, West entrance gateway to Trent Park at Front Lodge, Bollards at entrance gateway to Trent Park, Front Lodge at Trent Park, and Cockfosters War Memorial). Due to the fact the site is adjacent to one of the Grade II listed buildings (Cockfosters London Regional Transport Station including platforms and platform canopies), its development could affect the setting of this heritage asset.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Green' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Cockfosters and contains built development.	+?	Site is located within the settlement of Cockfosters and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

#### SA34: 241 Green Street (mixed-use site) – formerly referred to as EHP34 (18/04935/FUL)<sup>7</sup>

IIA objective	EHP34 (18/04935/ FUL) (without mitigation)	Justification text	SA34 (without mitigation)	Justification text	SA34 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Durants Park and Alma Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.	++/-	Site is within 800m of a number of areas of open space, including Durants Park and Alma Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.	++/-	Site is within 800m of a number of areas of open space, including Durants Park and Alma Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within 20% most deprived areas within England.	+	Site falls within 20% most deprived areas within England.	+	Site falls within 20% most deprived areas within England.

<sup>&</sup>lt;sup>7</sup> Green Street was previously appraised as delivering 92 housing units (EHP34 (18/04935/FUL)). It has now been appraised as delivering 148 housing units (SA34).

IIA objective	EHP34 (18/04935/ FUL) (without mitigation)	Justification text	SA34 (without mitigation)	Justification text	SA34 (with mitigation)	Justification text
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is close to Strategic Industrial Locations. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of replacement employment floorspace. However, it is unknown what proportion of the site will comprise the replacement floorspace.	++?	Site is close to Strategic Industrial Locations. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of replacement employment floorspace. However, it is unknown what proportion of the site will comprise the replacement floorspace.	++?	Site is close to Strategic Industrial Locations. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of replacement employment floorspace. However, it is unknown what proportion of the site will comprise the replacement floorspace.
IIA10: Town and local centres	+	Site is adjacent to Brimsdown (Brimsdown Avenue) Local Centre.	+	Site is adjacent to Brimsdown (Brimsdown Avenue) Local Centre.	+	Site is adjacent to Brimsdown (Brimsdown Avenue) Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. The site is also next to	++	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. The site is also next to Brimsdown Avenue, which is a Local Centre.	++	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. The site is also next to Brimsdown Avenue, which is a Local Centre.

## Appendix G IIA findings for the site options 2021

IIA objective	EHP34 (18/04935/ FUL) (without mitigation)	Justification text	SA34 (without mitigation)	Justification text	SA34 (with mitigation)	Justification text
		Brimsdown Avenue, which is a Local Centre.				
IIA13: Biodiversity	-?	Site is located within 250-750m of the Lea Valley SINC.	-?	Site is located within 250-750m of the Lea Valley SINC.	-?	Site is located within 250-750m of the Lea Valley SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Brimsdown and contains built development.	+?	Site is located within the settlement of Brimsdown and contains built development.	+?	Site is located within the settlement of Brimsdown and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.	-	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.
IIA18: Water	?	Site falls within Source Protection Zone 2.	?	Site falls within Source Protection Zone 2.	?	Site falls within Source Protection Zone 2.

### SA35: Land at former Wessex Hall Building (housing site) – formerly referred to as POC6/LP1196

IIA objective	SA35 (without mitigation)	Justification text	SA35 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	?/+	Site partially overlaps Durants Park Metropolitan Open Land, which could be lost as a result of new development. However, the site is located within 400- 800m of a GP surgery.	?/+	Site partially overlaps Durants Park Metropolitan Open Land, which could be lost as a result of new development. However, the site is located within 400-800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++	Site is located adjacent to a Locally Significant Industrial Site.	++	Site is located adjacent to a Locally Significant Industrial Site.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. The site is also within 201-400m of Durants	++	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. The site is also within

IIA objective	SA35 (without mitigation)	Justification text	SA35 (with mitigation)	Justification text
		Road, which is a Local Centre.		201-400m of Durants Road, which is a Local Centre.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat.	?	Site is located within 100m of a Priority Habitat.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non- designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape		Development of this site would result in the partial loss of Durants Park Metropolitan Open Land.		Development of this site would result in the partial loss of Durants Park Metropolitan Open Land.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zone 2.	?	Site falls within Source Protection Zone 2.

### SA36: 188-200 Bowes Road (housing site) – formerly referred to as SGP13 (18/00388/OUT)

IIA objective	SA36 (without mitigation)	Justification text	SA36 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 units.	+	Site has capacity for fewer than 100 units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. Site is also within 800m of a number of areas of open space,	++	Site is located within 400m of a GP surgery. Site is also within 800m of a number of areas of open space,

IIA objective	SA36 (without mitigation)	Justification text	SA36 (with mitigation)	Justification text
		including Arnos Park, Broomfield Park, a Green Chain Corridor, and the New River, in addition to falling within 400m of a walking path.		including Arnos Park, Broomfield Park, a Green Chain Corridor, and the New River, in addition to falling within 400m of a walking path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.		Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Bowes Road Local Centre.	+	Site is within Bowes Road Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Arnos Grove tube station and Palmers Green railway station, and 350m of at least one bus stop. The site is also next to Bowes Road, which is a Local Centre.	++	Site is located within 1km of Arnos Grove tube station and Palmers Green railway station, and 350m of at least one bus stop. The site is also next to Bowes Road, which is a Local Centre.
IIA13: Biodiversity	-?	Site is located within 250- 750m of Arnos Park SINC, Broomfield Park SINC and New River SINC.	-?	Site is located within 250- 750m of Arnos Park SINC, Broomfield Park SINC and New River SINC.
IIA14: Historic environment	-?	Site is within 500m of Broomfield House Registered Park and Garden, in addition to a Grade II* listed building (East Wall of Broomfield Park including attached		The Council's assessment of heritage considerations and impacts on Archaeological

IIA objective	SA36 (without mitigation)	Justification text	SA36 (with mitigation)	Justification text
		garden house and stable block) and four Grade II listed buildings (Junior and Infant School, Bowes Road Library, Bowes Road Clinic, South Walls of Broomfield Park and inner garden walls). Although there is built development between the site and the Registered Park and Garden and listed buildings, its development could affect the setting of these heritage assets.		Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of New Southgate and contains built development.	+?	Site is located within the settlement of New Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.	<del></del>	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.
IIA18: Water	?	Site falls within Source Protection Zone 2.	?	Site falls within Source Protection Zone 2.

### SA37: Main Avenue Site (housing site) – formerly referred to as SBC2/LP1107

IIA objective	SA37 (without mitigation)	Justification text	SA37 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++/?	Site is located within 400m of a GP surgery. The site is also located within 800m of a number of open spaces,	++/?	Site is located within 400m of a GP surgery. The site is also located within 800m of a number of open spaces,

IIA objective	SA37 (without mitigation)	Justification text	SA37 (with mitigation)	Justification text
		including Bush Hill Local Park. However, the site contains some walking paths which could be lost as a result of new development.		including Bush Hill Local Park. However, the site contains some walking paths which could be lost as a result of new development.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Main Avenue Bush Hill Park Local Centre and Percival Road Enfield Local Centre.	+	Site is adjacent to Main Avenue Bush Hill Park Local Centre and Percival Road Enfield Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Enfield Town railway station, Bush Hill Park railway station and Southbury railway station, and 350m of at least one bus stop. The site is also next to Main Avenue Bush Hill Park and Percival Road Enfield, which are Local Centres.	++	Site is located within 1km of Enfield Town railway station, Bush Hill Park railway station and Southbury railway station, and 350m of at least one bus stop. The site is also next to Main Avenue Bush Hill Park and Percival Road Enfield, which are Local Centres.
IIA13: Biodiversity	-?	Site is within 250m of a Priority Habitat.	-?	Site is within 250m of a Priority Habitat.
IIA14: Historic environment	-?	Site is within 500m of Bush Hill Park Conservation Area, which contains a Grade II listed building (2 Queen Anne's Place). Although the	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a

IIA objective	SA37 (without mitigation)	Justification text	SA37 (with mitigation)	Justification text
		site contains built development, its redevelopment could affect the setting of these heritage assets.		Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Bush Hill Park and contains built development.	+?	Site is located within the settlement of Bush Hill Park and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	<u></u>	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	ł	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

### SA38: Land at Ritz Parade (mixed-use site) – formerly referred to as SGC2/LP1159

IIA objective	SA38 (without mitigation)	Justification text	SA38 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Arnos Park, Broomhill Park and the New River Green Chain, in addition to falling within 400m of a walking path. The site is also located within 400m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Arnos Park, Broomhill Park and the New River Green Chain, in addition to falling within 400m of a walking path. The site is also located within 400m of a GP surgery.

IIA objective	SA38 (without mitigation)	Justification text	SA38 (with mitigation)	Justification text
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the re-provision of existing retail uses on site. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the re-provision of existing retail uses on site. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Bowes Road Local Centre.	+	Site is within Bowes Road Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Arnos Grove tube station and Palmers Green railway station, and 350m of at least one bus stop. The site is also within Bowes Road, which is a Local Centre.	++	Site is located within 1km of Arnos Grove tube station and Palmers Green railway station, and 350m of at least one bus stop. The site is also within Bowes Road, which is a Local Centre.
IIA13: Biodiversity	-?	Site is located within 250- 750m of the Arnos Park SINC, Broomfield Park SINC and New River SINC.	-?	Site is located within 250- 750m of the Arnos Park SINC, Broomfield Park SINC and New River SINC.
IIA14: Historic environment	-?	Site is within 500m of Broomfield House Registered Park and Garden, which contains a number of Grade II* and Grade II listed buildings. The site is also within 500m of a two Grade II listed buildings	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.

IIA objective	SA38 (without mitigation)	Justification text	SA38 (with mitigation)	Justification text
		(Junior and Infant School, and Bowes Road Library and Arnos Pool). Although there is built development between the site, Conservation Area and listed buildings, its development could affect the setting of these heritage assets.		
IIA15: Landscape and townscape	+?	Site is located within the settlement of New Southgate and contains built development.	+?	Site is located within the settlement of New Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.
IIA18: Water	?	Site falls within Source Protection Zone 2.	?	Site falls within Source Protection Zone 2.

# SA39: Travis Perkins Palmers Green, Bridge Drive, Bloomfield Lane (mixed-use site) – formerly referred to as PAC8/LP656

IIA objective	SA39 (without mitigation	Justification text	SA39 (with mitigation	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++/?	Site is located within 400m of a GP surgery. However, a cycle path crosses through the site, which could be lost as a result of development.	++/?	Site is located within 400m of a GP surgery. However, a cycle path crosses through the site, which could be lost as a result of development.

IIA objective	SA39 (without mitigation	Justification text	SA39 (with mitigation	Justification text
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Palmers Green District Centre.	+	Site is adjacent to Palmers Green District Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Palmers Green railway station and 350m of at least one bus stop. The site is also next to Palmers Green, which is a District Centre.	++	Site is located within 1km of Palmers Green railway station and 350m of at least one bus stop. The site is also next to Palmers Green, which is a District Centre.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and within 250m of Broomfield Park SINC and New River SINC.	?	Site is located within 100m of a Priority Habitat and within 250m of Broomfield Park SINC and New River SINC.
IIA14: Historic environment	?	Site is adjacent to The Lakes Estate Conservation Area and within 500m of Broomfield House Registered Park and Garden which contains a number of Grade II* and Grade II listed buildings and four Grade II listed buildings (Wall to the	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.

IIA objective	SA39 (without mitigation	Justification text	SA39 (with mitigation	Justification text
		north of number 176, Truro House, Front wall and gate piers to west of number 176, and National Westminster Bank). The site is also within 500m of some Grade II listed buildings outside of the Registered Park and Garden. Although the site contains built development, its redevelopment could affect the setting of these heritage assets.		
IIA15: Landscape and townscape	+?	Site is located within the settlement of Palmers Green and contains built development.	+?	Site is located within the settlement of Palmers Green and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zone 1.	?	Site falls within Source Protection Zone 1.

### SA40: Land known as Brimsdown Sports Ground (mixed-use site) – formerly referred to as CFS217

IIA objective	SA40 (without mitigation)	Justification text	SA40 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	?/+	Site contains a walking path which could be lost as a result of new development. However, the site is located	?/+	Site contains a walking path which could be lost as a result of new development. However, the site is located

IIA objective	SA40 (without mitigation)	Justification text	SA40 (with mitigation)	Justification text
		within 400-800m of a GP surgery.		within 400-800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of social and community infrastructure. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of social and community infrastructure. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Green Street & Mayfield Road Local Centre.	+	Site is adjacent to Green Street & Mayfield Road Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. The site is also next to Brimsdown Avenue and Green Street & Mayfield Road, which are Local Centres.	++	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. The site is also next to Brimsdown Avenue and Green Street & Mayfield Road, which are Local Centres.
IIA13: Biodiversity	-?	Site is located within 250- 750m of the Lea Valley SINC.	-?	Site is located within 250- 750m of the Lea Valley SINC.

IIA objective	SA40 (without mitigation)	Justification text	SA40 (with mitigation)	Justification text
IIA14: Historic environment	-?	Site is within 500m from two Grade II listed buildings (The White Horse Public House, and 98 and 100 Green Street). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Highway and contains built development.	+?	Site is located within the settlement of Enfield Highway and contains built development.
IIA16: Efficient use of land and materials		Site is relatively large in size and on greenfield land classed as Urban land.		Site is relatively large in size and on greenfield land classed as Urban land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 150mm and partially falls within Flood Zone 2. The site is also on greenfield land.	-	Site has a predicted peak flood depth of greater than 150mm and partially falls within Flood Zone 2. The site is also on greenfield land.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

### SA41: Albany Leisure Centre and Car Park, 55 Albany Road (housing site) – formerly referred to as CFS207

IIA objective	SA41 (without mitigation)	Justification text	SA41 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Albany Park and a number of amenity green spaces, in addition to	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Albany Park and a number of amenity green

IIA objective	SA41 (without mitigation)	Justification text	SA41 (with mitigation)	Justification text
		falling within 400m of a cycle path.		spaces, in addition to falling within 400m of a cycle path.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Enfield Wash Local Centre.	+	Site is within Enfield Wash Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Turkey Street railway station and Enfield Lock railway station, and 350m of at least one bus stop. The site is also within Enfield Wash, which is a Local Centre.	++	Site is located within 1km of Turkey Street railway station and Enfield Lock railway station, and 350m of at least one bus stop. The site is also within Enfield Wash, which is a Local Centre.
IIA13: Biodiversity	0	Site is not located within close proximity of any biodiversity assets.	0	Site is not located within close proximity of any biodiversity assets.
IIA14: Historic environment	-?	Site is within 500m of Turkey Street Conservation Area and two Grade II listed buildings (The Bell Inn, and 472-474 Hertford Road). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	0?	The Council's assessment of heritage considerations records this site as 'Green' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Wash	+?	Site is located within the settlement of Enfield Wash

IIA objective	SA41 (without mitigation)	Justification text	SA41 (with mitigation)	Justification text
		and contains built development.		and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	-	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zone 2.	?	Site falls within Source Protection Zone 2.

### SA42: Fords Grove Car Park (housing site) – formerly referred to as CFS223

IIA objective	SA42 (without mitigation)	Justification text	SA42 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Paulin Ground and the New River Green Chain Corridor, in addition to falling within 400m of a walking and cycle path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Paulin Ground and the New River Green Chain Corridor, in addition to falling within 400m of a walking and cycle path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.

IIA objective	SA42 (without mitigation)	Justification text	SA42 (with mitigation)	Justification text
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.		Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Winchmore Hill Broadway Local Centre.	+	Site is adjacent to Winchmore Hill Broadway Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located 1km of Winchmore Hill railway station and 350m of at least one bus stop. The site is also next to Winchmore Hill Broadway, which is a Local Centre.	++	Site is located 1km of Winchmore Hill railway station and 350m of at least one bus stop. The site is also next to Winchmore Hill Broadway, which is a Local Centre.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and within 250m of the Paulin Ground Woods and New River SINC.	?	Site is located within 100m of a Priority Habitat and within 250m of the Paulin Ground Woods and New River SINC.
IIA14: Historic environment	-?	Site is within 500m of Winchmore Hill Green Conservation Area and three Grade II listed buildings (Police Station, Post Office Sorting Office, and forecourt railings to Post Office Sorting Office). Although there is built development between the site and the Conservation Area and the listed buildings, its development could affect the setting of these heritage assets.	0?	The Council's assessment of heritage considerations records this site as 'Green' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Winchmore Hill	+?	Site is located within the settlement of Winchmore Hill

IIA objective	SA42 (without mitigation)	Justification text	SA42 (with mitigation)	Justification text
		and contains built development.		and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.
IIA18: Water	?	Site falls within Source Protection Zone 1.	?	Site falls within Source Protection Zone 1.

### SA43: Lodge Drive Car Park (inl. Depot) (housing site) – formerly referred to as CFS226

IIA objective	SA43 (without mitigation)	Justification text	SA43 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Broomfield Park, Hazelwood Sports Ground and the New River Green Chain Corridor, in addition to falling within 400m of a walking and cycle path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Broomfield Park, Hazelwood Sports Ground and the New River Green Chain Corridor, in addition to falling within 400m of a walking and cycle path.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the	0	The location of development will not affect the achievement of this objective.

IIA objective	SA43 (without mitigation)	Justification text	SA43 (with mitigation)	Justification text
		achievement of this objective.		
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Palmers Green District Centre.	+	Site is adjacent to Palmers Green District Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Palmers Green railway station and 350m of at least one bus stop. The site is also next to Palmers Green, which is a District Centre.	++	Site is located within 1km of Palmers Green railway station and 350m of at least one bus stop. The site is also next to Palmers Green, which is a District Centre.
IIA13: Biodiversity	?	Site is located within 250m of the New River SINC.	?	Site is located within 250m of the New River SINC.
IIA14: Historic environment	-?	Site is within 500m of The Lakes Estate Conservation Area, Broomfield House Registered Park and Garden and four Grade II listed buildings (Wall to North of Number 176, Truro House, Front Wall and Gate Piers to West of No 176, and National Westminster Bank). Although there is built development between the site, Conservation Area, Registered Park and Garden and listed buildings, its development could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Palmers Green and contains built development.	+?	Site is located within the settlement of Palmers Green and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.

IIA objective	SA43 (without mitigation)	Justification text	SA43 (with mitigation)	Justification text
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zone 1.	?	Site falls within Source Protection Zone 1.

### Other proposed site allocations outside of the place making areas (outside urban areas)

#### SA44: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road (mixed-use site) – formerly referred to as CHC5/LP11388

IIA objective	CHC5/LP1 138 (without mitigation)	Justification text	SA44 (without mitigation)	Justification text	SA44 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/?	Site is within 800m of a number of areas of open space, including Forty Hall Park & Estate, The Dell, and the New River Green Chain. However, the site contains a cycle path which could be lost as a result of new development. Additionally, the site is not located within 800m of a GP surgery.	++/?	Site is within 800m of a number of areas of open space, including Forty Hall Park & Estate, The Dell, and the New River Green Chain. However, the site contains a cycle path which could be lost as a result of new development. Additionally, the site is not located within 800m of a GP surgery.	++/?	Site is within 800m of a number of areas of open space, including Forty Hall Park & Estate, The Dell, and the New River Green Chain. However, the site contains a cycle path which could be lost as a result of new development. Additionally, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.

<sup>&</sup>lt;sup>8</sup> Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road was previously appraised as a housing site (CHC5/LP1138). It has now been appraised as a mixed use site (SA45).

IIA objective	CHC5/LP1 138 (without mitigation)	Justification text	SA44 (without mitigation)	Justification text	SA44 (with mitigation)	Justification text
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy		Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of social and community infrastructure. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of social and community infrastructure. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Turkey Street railway station and 350m of at least one bus	++/-	Site is located within 1km of Turkey Street railway station and 350m of at least one bus stop. However, the site is	++/-	Site is located within 1km of Turkey Street railway station and 350m of at least one bus stop. However, the site

IIA objective	CHC5/LP1 138 (without mitigation)	Justification text	SA44 (without mitigation)	Justification text	SA44 (with mitigation)	Justification text
		stop. However, the site is only within 401-800m of Kemp Road Freezywater, which is a Local Centre.		only within 401-800m of Kemp Road Freezywater, which is a Local Centre.		is only within 401-800m of Kemp Road Freezywater, which is a Local Centre.
IIA13: Biodiversity	?	Site is located within 250m of the New River SINC and Forty Hall Park & Estate SINC, and 100m of a Priority Habitat.	?	Site is located within 250m of the New River SINC and Forty Hall Park & Estate SINC, and 100m of a Priority Habitat.	?	Site is located within 250m of the New River SINC and Forty Hall Park & Estate SINC, and 100m of a Priority Habitat.
IIA14: Historic environment	?	Site is adjacent to the Forty Hill Conservation Area, which contains a number of Grade II listed buildings. There is limited built development between the site and the Conservation Area and its development could adversely affect the setting of these heritage assets.	?	Site is adjacent to the Forty Hill Conservation Area, which contains a number of Grade II listed buildings. There is limited built development between the site and the Conservation Area and its development could adversely affect the setting of these heritage assets.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	?	Site is large in scale and located on the edge of Forty Hill.	?	Site is large in scale and located on the edge of Forty Hill.	?	Site is large in scale and located on the edge of Forty Hill.
IIA16: Efficient use of land and materials	?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.	?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.	?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm.		Site has a predicted peak flood depth of greater than 300mm. However, the site		Site has a predicted peak flood depth of greater than 300mm. However, the

## Appendix G IIA findings for the site options 2021

IIA objective	CHC5/LP1 138 (without mitigation)	Justification text	SA44 (without mitigation)	Justification text	SA44 (with mitigation)	Justification text
		However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		is on brownfield land and does not fall within Flood Zones 2 or 3.		site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zone 1 and New River runs along its western boundary.	?	Site falls within Source Protection Zone 1 and New River runs along its western boundary.	?	Site falls within Source Protection Zone 1 and New River runs along its western boundary.

### SA45: Land between Camlet Way and Crescent Way, Hadley (housing site) – formerly referred to as COC8/LP465

IIA objective	SA45 (without mitigation)	Justification text	SA45 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Hadley Wood and Camlet Way Railway Embankment, in addition to falling within 400m of a cycle path. However, the site is not located within 800m of a GP surgery.	++/-	Site is within 800m of a number of areas of open space, including Hadley Wood and Camlet Way Railway Embankment, in addition to falling within 400m of a cycle path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy		Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Hadely Wood Local Centre.	+	Site is adjacent to Hadely Wood Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/	Site is located within 1km of Hadley Wood railway station	++/	Site is located within 1km of Hadley Wood railway station

IIA objective	SA45 (without mitigation)	Justification text	SA45 (with mitigation)	Justification text
		and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.		and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and within 250m from Broadgates Pastures SINC.	?	Site is located within 100m of a Priority Habitat and within 250m from Broadgates Pastures SINC.
IIA14: Historic environment	?	Site overlaps Hadley Wood Conservation Area and is within 500m of a Grade II* listed building (St Martha's Convent (the Mount House) with attached Stable Block) and three Grade II listed buildings (Number 83 and attached wall, gate pier and gate, Number 87 and attached wall, gate pier and gate, and Pegasus). The site is located on the edge of Hadley Wood and its large-scale development could adversely affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	?	Site is large in scale and located on the edge of Hadley Wood.	?	Site is large in scale and located on the edge of Hadley Wood.
IIA16: Efficient use of land and materials	?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.	?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding	-	Site partially falls within Flood Zone 3. However, the site is on brownfield land and is not at risk of surface water flooding.	-	Site partially falls within Flood Zone 3. However, the site is on brownfield land and is not at risk of surface water flooding.
IIA18: Water	?	Site contains Monken Mead Brook within its boundary, as well as other brooks.	?	Site contains Monken Mead Brook within its boundary, as well as other brooks.

## **Employment and growth site allocations outside of the placemaking areas (SP E1)**

## SA49: Land to the south of Millmarsh Lane, Brimsdown Industrial Estate (industrial site) – formerly referred to as CFS134

IIA objective	SA49 (without mitigation)	Justification text	SA49 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+	Site is under 10ha in size.	+	Site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. However, the site is within 401-800m of	++/-	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. However, the site is within 401-800m of Brimsdown

IIA objective	SA49 (without mitigation)	Justification text	SA49 (with mitigation)	Justification text
		Brimsdown (Brimsdown Avenue) Local Centre.		(Brimsdown Avenue) Local Centre.
IIA13: Biodiversity	?	Site is located within 250m of the Chingford Reservoirs SSSI and SINC and Lea Valley SINC.	?	Site is located within 250m of the Chingford Reservoirs SSSI and SINC and Lea Valley SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non- designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Brimsdown and contains built development.	+?	Site is located within the settlement of Brimsdown and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.
IIA18: Water	?	Site falls within Source Protection Zone 2 and a watercourse runs along its eastern edge.	?	Site falls within Source Protection Zone 2 and a watercourse runs along its eastern edge.

### SA50: 6 Morson Road (industrial site) – formerly referred to as CFS136

IIA objective	SA50 (without mitigation)	Justification text	SA50 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.

IIA objective	SA50 (without mitigation)	Justification text	SA50 (with mitigation)	Justification text
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	+	Site falls within the 10% and 20% most deprived areas within England.	+	Site falls within the 10% and 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+	The site is under 10ha in size.	+	The site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	0	Site scored 0 in the air quality appraisal.	0	Site scored 0 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Ponders End railway station and 350m of at least one bus stop. However, the site is only within 401-800m of South Street Ponders End, which is a Local Centre.	++/-	Site is located within 1km of Ponders End railway station and 350m of at least one bus stop. However, the site is only within 401-800m of South Street Ponders End, which is a Local Centre.
IIA13: Biodiversity	?	Site is located within 250m of the Chingford Reservoirs SSSI and SINC and Lea Valley SINC and is within 100m of a Priority Habitat.	?	Site is located within 250m of the Chingford Reservoirs SSSI and SINC and Lea Valley SINC and is within 100m of a Priority Habitat.
IIA14: Historic environment	-?	Site is within 500m from Ponders End Flour Mills Conservation Area and four Grade II listed buildings (House to East of Old Mill Building now used as offices, Old Mill Building, Mill Owner's House, Barn to South of Mill Owner's House). Although the site	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.

IIA objective	SA50 (without mitigation)	Justification text	SA50 (with mitigation)	Justification text
		contains built development, its redevelopment could affect the setting of these heritage assets.		
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of Ponders End.	-?	Site is not large in scale but is located on the edge of Ponders End.
IIA16: Efficient use of land and materials	+	Site is relatively small and on brownfield land.	+	Site is relatively small and on brownfield land.
IIA17: Flooding	-	Site partially falls within Flood Zone 3. However, the site is on brownfield land and is not at risk of surface water flooding.	-	Site partially falls within Flood Zone 3. However, the site is on brownfield land and is not at risk of surface water flooding.
IIA18: Water	?	Site is adjacent to a watercourse that runs along the eastern edge of the site.	?	Site is adjacent to a watercourse that runs along the eastern edge of the site.

### SA51: Montagu Ind Estate (industrial site) – formerly referred to as CFS153

IIA objective	SA51 (without mitigation)	Justification text	SA51 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.

IIA objective	SA51 (without mitigation)	Justification text	SA51 (with mitigation)	Justification text
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+	The site is under 10ha in size.	+	The site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. The site is also within 201-400m of Craig Park Road, which is a Local Centre.	++	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. The site is also within 201-400m of Craig Park Road, which is a Local Centre.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and is 250m-750m within the Lea Valley SINC.	?	Site is located within 100m of a Priority Habitat and is 250m- 750m within the Lea Valley SINC.
IIA14: Historic environment	?	Site is adjacent to Montagu Cemeteries Conservation Area. Although the site contains built development, its redevelopment could affect the setting of the heritage asset.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Edmonton Green and contains built development.	+?	Site is located within the settlement of Edmonton Green and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm and falls mainly within Flood Zone 3. However, the site is on brownfield land.		Site has a predicted peak flood depth of greater than 300mm and falls mainly within Flood Zone 3. However, the site is on brownfield land.

IIA objective	SA51 (without mitigation)	Justification text	SA51 (with mitigation)	Justification text
IIA18: Water	?	Site falls within Source Protection Zones 1 and 2.	?	Site falls within Source Protection Zones 1 and 2.

### SA52: Land West of Ramney Marsh (industrial site) – formerly referred to as ELC3/LP606

IIA objective	SA52 (without mitigation)	Justification text	SA52 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++	Site is over 10ha in size.	++	Site is over 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.

IIA objective	SA52 (without mitigation)	Justification text	SA52 (with mitigation)	Justification text
IIA12: Sustainable transport	++/-	Site is located within 1km of Enfield Lock railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Freezywater (Hertford Road), which is a Local Centre.	++/-	Site is located within 1km of Enfield Lock railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Freezywater (Hertford Road), which is a Local Centre.
IIA13: Biodiversity	?	Site contains a Priority Habitat and within 250m of the Lea Valley SINC.	?	Site contains a Priority Habitat and within 250m of the Lea Valley SINC.
IIA14: Historic environment	?	Site is within 500m of a Grade II listed building (Bridge at Ramney Lock). There is no built development between the site and listed building and therefore its development could have an adverse effect on the heritage asset and its setting.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Lock and contains built development.	+?	Site is located within the settlement of Enfield Lock and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large and on brownfield land.	++	Site is relatively large and on brownfield land.
IIA17: Flooding	<del></del>	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.
IIA18: Water	?	Site falls within Source Protection Zones 1 and 2 and a watercourse runs along the eastern edge of the site.	?	Site falls within Source Protection Zones 1 and 2 and a watercourse runs along the eastern edge of the site.

### SA53: Car Park Site, Wharf Road (industrial site) – formerly referred to as POC5/LP694/CFS135

IIA objective	SA53 (without mitigation)	Justification text	SA53 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA53 (without mitigation)	Justification text	SA53 (with mitigation)	Justification text
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+	Site is under 10ha in size.	+	Site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	0	Site scored 0 in the air quality appraisal.	0	Site scored 0 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Ponders End railway station and 350m of at least one bus stop. However, the site is only within 401-800m of South Street Ponders End, which is a Local Centre.	++/-	Site is located within 1km of Ponders End railway station and 350m of at least one bus stop. However, the site is only within 401-800m of South Street Ponders End, which is a Local Centre.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and is within 250m of the Chingford Reservoirs SSSI, Chingford Reservoirs SSSI and Lea Valley SINC.	?	Site is located within 100m of a Priority Habitat and is within 250m of the Chingford Reservoirs SSSI, Chingford Reservoirs SSSI and Lea Valley SINC.

IIA objective	SA53 (without mitigation)	Justification text	SA53 (with mitigation)	Justification text
IIA14: Historic environment	?	Site is within 500m from Ponders End Flour Mills Conservation Area and five Grade II listed buildings (Barn to South of Mill Owner's House, Old Mill Owner's House, Old Mill Building, House to East of Old Mill building now used as offices, and Former Well Station of Thames Water Authority). There is limited built development between the site and the Conservation Areas and the listed buildings, therefore its development could affect the setting of these heritage assets.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of Ponders End.	-?	Site is not large in scale but is located on the edge of Ponders End.
IIA16: Efficient use of land and materials	+	Site is relatively small and on brownfield land.	+	Site is relatively small and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.
IIA18: Water	?	Site falls within Source Protection Zones 1 and 2 and a watercourse runs along the southern and eastern edges of the site.	?	Site falls within Source Protection Zones 1 and 2 and a watercourse runs along the southern and eastern edges of the site.

### SA54: Land East of Junction 24 (industrial site) – formerly referred to as CFS155

IIA objective	SA54 (without mitigation)	Justification text	SA54 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA54 (without mitigation)	Justification text	SA54 (with mitigation)	Justification text
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+	The site is under 10ha in size.	+	The site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	/+	Site is more than 800m from a Major, District and Local Centre. However, the site is located within 350m of at least one bus stop.	/+	Site is more than 800m from a Major, District and Local Centre. However, the site is located within 350m of at least one bus stop.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and is 250m-750m within Plumridge, Vault Hill & Little Beechill Woods SINC.	?	Site is located within 100m of a Priority Habitat and is 250m- 750m within Plumridge, Vault Hill & Little Beechill Woods SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and	-?	The Council's assessment of impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment

IIA objective	SA54 (without mitigation)	Justification text	SA54 (with mitigation)	Justification text
		effects may extend beyond 500m.		should be undertaken and mitigation provided.
IIA15: Landscape and townscape	?	Site is large in scale and located in an undeveloped area.	?	Site is large in scale and located in an undeveloped area.
IIA16: Efficient use of land and materials	?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.	?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zone 2 or 3.		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zone 2 or 3.
IIA18: Water	?	Site contains a water body and a brook runs along its eastern edge.	?	Site contains a water body and a brook runs along its eastern edge.

### SA55: Land to the North West of Innova Park (industrial site) – formerly referred to as CFS148

IIA objective	SA55 (without mitigation)	Justification text	SA55 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.

IIA objective	SA55 (without mitigation)	Justification text	SA55 (with mitigation)	Justification text
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+	The site is under 10ha in size.	+	The site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Enfield Lock railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Freezywater (Hertford Road), which is a Local Centre.	++/-	Site is located within 1km of Enfield Lock railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Freezywater (Hertford Road), which is a Local Centre.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and is within 250m of the Lea Valley SINC.	?	Site is located within 100m of a Priority Habitat and is within 250m of the Lea Valley SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Lock	+?	Site is located within the settlement of Enfield Lock and contains built development.

IIA objective	SA55 (without mitigation)	Justification text	SA55 (with mitigation)	Justification text
		and contains built development.		
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.
IIA18: Water	?	Site falls within Source Protection Zones 1 and 2 and a brook runs along the northern and southern edges of the site.	?	Site falls within Source Protection Zones 1 and 2 and a brook runs along the northern and southern edges of the site.

## Policy SP CL4: Promoting sporting excellence

### SA56: Picketts Lock/Lee Valley Leisure Centre (leisure uses site) – formerly referred to as LOC2/LP675

IIA objective	SA56 (without mitigation)	Justification text	SA56 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	The development of a leisure uses site will not affect the achievement of this objective.	0	The development of a leisure uses site will not affect the achievement of this objective.
IIA4: Health and wellbeing	++	The development of a leisure uses site would have beneficial effects on people's health and wellbeing.	++	The development of a leisure uses site would have beneficial effects on people's health and wellbeing.
IIA5: Services and facilities	0	The development of a leisure uses site will not affect the achievement of this objective.	0	The development of a leisure uses site will not affect the achievement of this objective.

IIA objective	SA56 (without mitigation)	Justification text	SA56 (with mitigation)	Justification text
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	0	The development of a leisure uses site will not affect the achievement of this objective.	0	The development of a leisure uses site will not affect the achievement of this objective.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	+	Site is located within 350m of at least one bus stop. The site is also within 201-400m of Nightingale Road, Edmonton, which is a Local Centre.	+	Site is located within 350m of at least one bus stop. The site is also within 201-400m of Nightingale Road, Edmonton, which is a Local Centre.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and is within 250m of the Lea Valley SINC.	?	Site is located within 100m of a Priority Habitat and is within 250m of the Lea Valley SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	?	Site is large in scale and located on the edge of Lower Edmonton.	?	Site is large in scale and located on the edge of Lower Edmonton.
IIA16: Efficient use of land and materials		Site is relatively large and on greenfield land classed as Urban land.		Site is relatively large and on greenfield land classed as Urban land.

IIA objective	SA56 (without mitigation)	Justification text	SA56 (with mitigation)	Justification text
IIA17: Flooding		Site has a predicted peak flood depth of greater than 150mm and partially falls within Flood Zone 2. The site is also on greenfield land.		Site has a predicted peak flood depth of greater than 150mm and partially falls within Flood Zone 2. The site is also on greenfield land.
IIA18: Water	0	The development of a leisure uses site will not affect the achievement of this objective.	0	The development of a leisure uses site will not affect the achievement of this objective.

### SA62: Tottenham Hotspur's training centre (sport and recreation site) – formerly referred to as CFS218

IIA objective	SA62 (without mitigation)	Justification text	SA62 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	The development of a sport and recreation site will not affect the achievement of this objective.	0	The development of a sport and recreation site will not affect the achievement of this objective.
IIA4: Health and wellbeing	++	The development of a sport and recreation site would have beneficial effects on people's health and wellbeing.	++	The development of a sport and recreation site would have beneficial effects on people's health and wellbeing.
IIA5: Services and facilities	0	The development of a sport and recreation site will not affect the achievement of this objective.	0	The development of a sport and recreation site will not affect the achievement of this objective.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA62 (without mitigation)	Justification text	SA62 (with mitigation)	Justification text
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	0	The development of a sport and recreation site will not affect the achievement of this objective.	0	The development of a sport and recreation site will not affect the achievement of this objective.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	+/-	Site is within 1km of Turkey Street railway station but not within 350m of a bus stop. The site is only within 401-800m of Bullsmoor Lane/A10, which is a Local Centre.	+/-	Site is within 1km of Turkey Street railway station but not within 350m of a bus stop. The site is only within 401-800m of Bullsmoor Lane/A10, which is a Local Centre.
IIA13: Biodiversity	?	Site contains a Priority Habitat and is located within 250m of the New River SINC and Forty Hall Park & Estate SINC.	?	Site contains a Priority Habitat and is located within 250m of the New River SINC and Forty Hall Park & Estate SINC.
IIA14: Historic environment	-?	Over half of the site falls within Forty Hill Conservation Area, which contains a number of listed buildings as well as Myddelton House Registered Park and Garden. Myddelton House Registered Park and Garden falls partially within the site and the site is adjacent to a number of Grade II listed buildings. Due to the fact this site is allocated as a sport and recreation site which could contain limited development, its development could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	-?	Site is large in scale and located in a relatively undeveloped area. Due to	-?	Site is large in scale and located in a relatively undeveloped area. Due to the

IIA objective	SA62 (without mitigation)	Justification text	SA62 (with mitigation)	Justification text
		the fact the site is allocated as a sport and recreation site which could contain limited development, its development could affect the landscape.		fact the site is allocated as a sport and recreation site which could contain limited development, its development could affect the landscape.
IIA16: Efficient use of land and materials	?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.	?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. The site is also on greenfield land.		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. The site is also on greenfield land.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

### Policy DM BG19: Burial and crematorium spaces

### SA58: Alma Road Open Space (cemetery) – formerly referred to as CFS167

IIA objective	SA58 (without mitigation)	Justification text	SA58 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	The development of a cemetery will not affect the achievement of this objective.	0	The development of a cemetery will not affect the achievement of this objective.
IIA4: Health and wellbeing	?	Site contains an area of open space, Durants Park	?	Site contains an area of open space, Durants Park

IIA objective	SA58 (without mitigation)	Justification text	SA58 (with mitigation)	Justification text
		Metropolitan Open Land, which would be lost to the cemetery.		Metropolitan Open Land, which would be lost to the cemetery.
IIA5: Services and facilities	0	The development of a cemetery will not affect the achievement of this objective.	0	The development of a cemetery will not affect the achievement of this objective.
IIA6: Social inclusion	0	The development of a cemetery will not affect the achievement of this objective.	0	The development of a cemetery will not affect the achievement of this objective.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	0	The development of a cemetery will not affect the achievement of this objective.	0	The development of a cemetery will not affect the achievement of this objective.
IIA10: Town and local centres	0	The development of a cemetery will not affect the achievement of this objective.	0	The development of a cemetery will not affect the achievement of this objective.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal. Site scored 0 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal. Site scored 0 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Brimsdown Avenue, which is a Local Centre.	++/-	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Brimsdown Avenue, which is a Local Centre.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and is 250-750m of the Lea Valley SINC and Chingford Reservoirs SSSI.	?	Site is located within 100m of a Priority Habitat and is 250- 750m of the Lea Valley SINC and Chingford Reservoirs SSSI.
IIA14: Historic environment	0	The development of a cemetery will not affect the	0	The Council's assessment of heritage considerations and impacts on Archaeological

IIA objective	SA58 (without mitigation)	Justification text	SA58 (with mitigation)	Justification text
		achievement of this objective.		Priority Areas has not recorded anything.
IIA15: Landscape and townscape	0	The development of a cemetery will not affect the achievement of this objective.	0	The development of a cemetery will not affect the achievement of this objective.
IIA16: Efficient use of land and materials	0	The development of a cemetery will not affect the achievement of this objective.	0	The development of a cemetery will not affect the achievement of this objective.
IIA17: Flooding	-	Site is on greenfield land. However, the site does not fall within Flood Zones 2 or 3 and is not at risk of surface water flooding.	-	Site is on greenfield land. However, the site does not fall within Flood Zones 2 or 3 and is not at risk of surface water flooding.
IIA18: Water	?	Site falls within Source Protection Zone 2.	?	Site falls within Source Protection Zone 2.

### SA59: Firs Farm Recreation Ground (Part) (crematorium) – formerly referred to as CFS168

IIA objective	SA59 (without mitigation)	Justification text	SA59 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.
IIA4: Health and wellbeing	?	Site contains an area of open space, Firs Farm & Clowes Sportsgrounds Metropolitan Open Land, and a cycle path, both of which could be lost to the crematorium.	?	Site contains an area of open space, Firs Farm & Clowes Sportsgrounds Metropolitan Open Land, and a cycle path, both of which could be lost to the crematorium.
IIA5: Services and facilities	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.

IIA objective	SA59 (without mitigation)	Justification text	SA59 (with mitigation)	Justification text
IIA6: Social inclusion	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.
IIA10: Town and local centres	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	+	Site is located within 350m of at least one bus stop. The site is also within 201-400m of Firs Lane, which is a Local Centre.	+	Site is located within 350m of at least one bus stop. The site is also within 201-400m of Firs Lane, which is a Local Centre.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and is 250-750m of the Paulin Ground Woods SINC, Tatem Park SINC and New River SINC.	?	Site is located within 100m of a Priority Habitat and is 250- 750m of the Paulin Ground Woods SINC, Tatem Park SINC and New River SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape		Development of this site would result in the loss of Firs Farm & Clowes Sportsgrounds Metropolitan Open Land.		Development of this site would result in the loss of Firs Farm & Clowes Sportsgrounds Metropolitan Open Land.

IIA objective	SA59 (without mitigation)	Justification text	SA59 (with mitigation)	Justification text
IIA16: Efficient use of land and materials		Site is relatively large and on greenfield land classed as Urban land.	-	Site is relatively large and on greenfield land classed as Urban land.
IIA17: Flooding	<del></del>	Site has a predicted peak flood depth of greater than 300mm and is on greenfield land. However, the site does not fall within Flood Zones 2 or 3.	-	Site has a predicted peak flood depth of greater than 300mm and is on greenfield land. However, the site does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zone 1.	?	Site falls within Source Protection Zone 1.

### SA60: Sloemans Farm (natural burial site) – formerly referred to as CFS171

IIA objective	SA60 (without mitigation)	Justification text	SA60 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	The development of a natural burial site will not affect the achievement of this objective.	0	The development of a natural burial site will not affect the achievement of this objective.
IIA4: Health and wellbeing	0	Site does not comprise an open space.	0	Site does not comprise an open space.
IIA5: Services and facilities	0	The development of a natural burial site will not affect the achievement of this objective.	0	The development of a natural burial site will not affect the achievement of this objective.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect	0	The location of development will not affect the achievement of this objective.

IIA objective	SA60 (without mitigation)	Justification text	SA60 (with mitigation)	Justification text
		the achievement of this objective.		
IIA9: Economy	0	The development of a natural burial site will not affect the achievement of this objective.	0	The development of a natural burial site will not affect the achievement of this objective.
IIA10: Town and local centres	0	The development of a natural burial site will not affect the achievement of this objective.	0	The development of a natural burial site will not affect the achievement of this objective.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.	++/	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	?	Site contains a Priority Habitat and is 250m of the Crews Hill to Bowes Park Railsides SINC and Forty Hall Park & Estate SINC.	?	Site contains a Priority Habitat and is 250m of the Crews Hill to Bowes Park Railsides SINC and Forty Hall Park & Estate SINC.
IIA14: Historic environment	0	The development of a natural burial site will not affect the achievement of this objective.	0	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided. However, it is assumed that the development of a natural burial site will not affect the achievement of this objective.
IIA15: Landscape and townscape	0	The development of a natural burial site will not affect the achievement of this objective.	0	The development of a natural burial site will not affect the achievement of this objective.
IIA16: Efficient use of land and materials	0	The development of a natural burial site will not affect the achievement of this objective.	0	The development of a natural burial site will not affect the achievement of this objective.
IIA17: Flooding		Site partially falls within Flood Zone 3 and is on greenfield land. However,	-	Site partially falls within Flood Zone 3 and is on greenfield land. However, the site is not

IIA objective	SA60 (without mitigation)	Justification text	SA60 (with mitigation)	Justification text
		the site is not at risk of surface water flooding.		at risk of surface water flooding.
IIA18: Water	?	Site contains three brooks within its boundary.	?	Site contains three brooks within its boundary.

### SA61: Church Street Recreation Ground (crematorium) – formerly referred to as CFS230

IIA objective	SA61 (without mitigation)	Justification text	SA61 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.
IIA4: Health and wellbeing	?	Site falls within Church Street Recreation Ground Metropolitan Open Land, which would be lost to the crematorium.	?	Site falls within Church Street Recreation Ground Metropolitan Open Land, which would be lost to the crematorium.
IIA5: Services and facilities	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.

IIA objective	SA61 (without mitigation)	Justification text	SA61 (with mitigation)	Justification text
IIA10: Town and local centres	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	+	Site is located within 350m of at least one bus stop. The site is also within 201-400m of Hazelbury Road Edmonton, which is a Local Centre.	+	Site is located within 350m of at least one bus stop. The site is also within 201-400m of Hazelbury Road Edmonton, which is a Local Centre.
IIA13: Biodiversity	?	Site contains a Priority Habitat and is 250-750m of the Pymme's Park SINC.	?	Site contains a Priority Habitat and is 250-750m of the Pymme's Park SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	-	Development of this site would result in the loss of Church Street Recreation Ground Metropolitan Open Land.		Development of this site would result in the loss of Church Street Recreation Ground Metropolitan Open Land.
IIA16: Efficient use of land and materials	-	Site is relatively large in size and on greenfield land, classed as Urban land.		Site is relatively large in size and on greenfield land, classed as Urban land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm and is on greenfield land. However, the site does not fall within Flood Zones 2 or 3.	-	Site has a predicted peak flood depth of greater than 300mm and is on greenfield land. However, the site does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zone 2.	?	Site falls within Source Protection Zone 2.

### **Nature recovery site**

### SA57: Whitewebbs Golf Course, Beggar's Hollow (nature recovery site) – formerly referred to as CFS161

IIA objective	SA57 (without mitigation)	Justification text	SA57 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.
IIA4: Health and wellbeing	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.
IIA5: Services and facilities	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.
IIA6: Social inclusion	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.
IIA10: Town and local centres	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.

IIA objective	SA57 (without mitigation)	Justification text	SA57 (with mitigation)	Justification text
IIA12: Sustainable transport	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.
IIA13: Biodiversity	++	The development of a nature recovery site would have a significant positive effect on biodiversity.	++	The development of a nature recovery site would have a significant positive effect on biodiversity.
IIA14: Historic environment	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The Council's assessment of heritage considerations records this site as 'Red' and states that a Heritage Impact Assessment should be undertaken and mitigation provided. However, it is assumed that the development of a nature recovery site will not affect the achievement of this objective.
IIA15: Landscape and townscape	+	The development of a nature recovery site would have a positive effect on the landscape.	+	The development of a nature recovery site would have a positive effect on the landscape.
IIA16: Efficient use of land and materials	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150m, partially falls within Flood Zone 3 and is on greenfield land.	-	Site has a predicted peak flood depth of greater than 150m, partially falls within Flood Zone 3 and is on greenfield land.
IIA18: Water	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.

## Site options appraised but not allocated

### **Housing sites**

CHC1/LP031: Warmerdams Nursery, Cattlegate Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of Whitewebbs Park and 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	?	Site is located within 250m of Crews Hill Golf Course SINC and Crews Hill Bowes Park Railsides SINC, and 100m of a Priority Habitat.
IIA14: Historic environment	-?	Site is within 500m of a Grade II* listed building (The Paddocks) and a Grade II listed building (Glasgow Stud Farmhouse). Although there is built development between the site and the listed buildings, its development could affect the setting of both heritage assets.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Crews Hill and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.

IIA objective	Effect	Justification text
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

### CHC10/LP179: Site at Oak Farm and Homestead Nursery, Cattlegate Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	+/-	Site is within 400m of a walking path but not within 800m of an area of open space. The site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	/+	Site is more than 800m from a Major, District and Local Centre. However, the site is within 1km of Crews Hill railway station.
IIA13: Biodiversity	?	Site is located within 250m of Crews Hill Golf Course SINC and Crews Hill Bowes Park Railsides SINC, and 100m of a Priority Habitat.
IIA14: Historic environment	-?	Site is within 500m of a Grade II* listed building (The Paddocks) and two Grade II listed buildings (2 Barns North West of Farmhouse at the Paddocks and Glasgow Stud Farmhouse). There is limited built development between the site and the listed buildings to the north west (The Paddocks and 2 Barns North West of Farmhouse at the Paddocks). Its development could therefore affect the setting of these heritage assets.
IIA15: Landscape and townscape	-?	Site is located within the settlement of Crews Hill but does not contain built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.

IIA objective	Effect	Justification text
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

### CHC11/LP472 - Parcel 1: Land to the rear of Jesus Christ Church, Parcel 1

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is next to Forty Hall Park & Estate and within 800m of a number of other open spaces, in addition to falling within 400m of a walking path and cycle path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	/+	Site is more than 800m from a Major, District and Local Centre. However, the site is within 1km of Turkey Street railway station.
IIA13: Biodiversity	?	Site is located within 250m of Forty Hall Park & Estate SINC and New River SINC, and 100m of a Priority Habitat.
IIA14: Historic environment	?	Site is within 500m two Grade I listed buildings (Screen Wall, Gateway and North Pavilions to West of Forty Hall and Forty Hall) and a number of Grade II listed buildings. Due to the proximity of the site to these listed buildings, its development could affect the setting of these heritage assets.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of Forty Hill.

IIA objective	Effect	Justification text
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zone 1.

CHC12/LP472 - Parcel 2: Land to the south of Forty Hill Church of England School, Forty Hill, Parcel 2

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of Forty Hall Park & Estate and a number of other open spaces, in addition to falling within 400m of a walking path and cycle path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/	Site is within 1km of Turkey Street railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	?	Site is located within 250m of New River SINC and Forty Hall Park & Estate SINC, and 100m of a Priority Habitat.
IIA14: Historic environment	?	Site is within 500m of two Grade I listed buildings (Screen Wall, Gateway, and North Pavilions to West of Forty Hall and Forty Hall) and a number of Grade II listed buildings. Due to the proximity of the site to these listed buildings, its development could affect the setting of these heritage assets.

IIA objective	Effect	Justification text
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of Forty Hill.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zone 1 and there is a brook along its south eastern boundary.

# CHC14/LP637: Land north of Goat Lane

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Forty Hall Park & Estate and the New River Green Chain, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	-	Site is within 401-800m of Carterhatch Lane/A10, which is a Local Centre. The site is more than 1km from a railway station and 350m from a bus stop and does not have an existing cycle route passing the site.
IIA13: Biodiversity	?	Site is located within 250m of New River SINC and 100-250m of a Priority Habitat (deciduous woodland).
IIA14: Historic environment	-?	Site is within 500m of the Forty Hill Conservation Area (to the north west of the site), which contains a number of Grade II listed buildings. Although there is built development between the site and the

IIA objective	Effect	Justification text
		Conservation Area, its development could affect the setting of these heritage assets.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of Forty Hill.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zone 1 and New River runs along its eastern boundary.

# CHC17/LP645: Towneley Nurseries, Theobalds Park

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of Whitewebbs Park and 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and 250m-750m of Crews Hill Golfcourse SINC, Crews Hill to Bowes Park Railsides SINC and Whitewebbs Wood SINC.
IIA14: Historic environment	-?	Site is within 500m of a Grade II listed building (Glasgow Stud Farmhouse). Although there is built development between the site and

IIA objective	Effect	Justification text
		the listed building, its development could affect the setting of the heritage asset.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Crews Hill and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.
IIA18: Water	?	Site contains a brook within the western part of its boundary.

# CHC18/LP649: Brown's Garden Village, Theobalds Park Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	+/-	Site is within 800m of Whitewebbs Park but not within 400m of a walking or cycling path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	-?	Site is located within 250m-750m of Crews Hill Golfcourse SINC, Crews Hill to Bowes Park Railsides SINC, Whitewebbs Wood SINC and 100-250m of a Priority Habitat.

IIA objective	Effect	Justification text
IIA14: Historic environment	-?	Site is within 500m of a Grade II listed building (Glasgow Stud Farmhouse). Although there is built development between the site and the listed building, its development could affect the setting of the heritage asset.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Crews Hill and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

# CHC2/LP056: Wolden Garden Centre, Cattlegate Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	+/-	Site is within 400m of a walking path but not within 800m of an area of open space. The site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	?	Site is located within 250m of Crews Hill Golf Course SINC and Crews Hill to Bowes Park Railsides SINC, and 100m of a Priority Habitat.

IIA objective	Effect	Justification text
IIA14: Historic environment	-?	Site is within 500m of a Grade II* listed building (The Paddocks) and a Grade II listed building (Glasgow Stud Farmhouse). Although there is built development between the site and the listed buildings, its development could affect the setting of these heritage assets.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Crews Hill and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

# CHC3/LP107: Burton Farm Ride

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	+/-	Site is within 800m of Whitewebbs Park but not within 400m of a walking or cycling path. The site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	-?	Site is located within 250-750m of Whitewebbs Wood SINC.

IIA objective	Effect	Justification text
IIA14: Historic environment	?	Site is within 500m of a Grade II listed building (Glasgow Stud Farmhouse). Due to the fact the site is adjacent to the listed building, its development could affect the setting of this heritage asset.
IIA15: Landscape and townscape	-?	Site is not large in scale and located on the edge of Crews Hill.
IIA16: Efficient use of land and materials	?	Site is relatively small in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150m, partially falls within Flood Zone 3 and is on greenfield land.
IIA18: Water	?	A brook runs along the eastern edge of the site.

# HIC10/LP642: Land opposite Jolly Farmers

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including West Enfield Parklands and Worlds End Lane Open Space, in addition to falling within 400m of a walking path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is within 200m of Enfield Road/Linkside, which is a Local Centre. The site is also within 350m of at least one bus stop.

IIA objective	Effect	Justification text
IIA13: Biodiversity	?	Site contains a Priority Habitat and within 250-750m from Boxer's Lake and Lonsdale Drive Woods SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.
IIA15: Landscape and townscape	+?	Site is located within the settlement of World's End and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.
IIA18: Water	?	Site contains a brook along its eastern boundary and another one cutting the site across from east to west.

# HIC11/LP707: Vicarage Farm, Land between Hadley Road and Enfield Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including West Enfield Parklands, Trent Park and Lakeside, in addition to falling within 400m of a walking path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.

IIA objective	Effect	Justification text
IIA12: Sustainable transport	++	Site is located within 1km of Oakwood tube station and Gordon Hill railway station, and 350m of at least one bus stop. The site is also within 201-400m of Oakwood, which is a Local Centre.
IIA13: Biodiversity	?	Site contains a Priority Habitat and within 250m of Trent Park Golf Course, Lakeside and Trent Park SINC.
IIA14: Historic environment	?	Site is adjacent to Trent Park Conservation Area, which contains a number of Grade II listed buildings, Trent Park Registered Park and Garden and a Scheduled Monument (Moated site, Camlet Moat, Moat Wood). There is no built development between the site and the Conservation Area, listed buildings and Scheduled Monument. Its development could therefore adversely affect the setting of these heritage assets.
IIA15: Landscape and townscape	?	Site is large in scale and located on the edge of World's End.
IIA16: Efficient use of land and materials	?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm, partially falls within Flood Zone 3 and is on greenfield land.
IIA18: Water	?	Site contains a number of brooks within its boundary, including Merryhills Brooks and Legging Beech Gutter.

# HIC6/LP1153: Bramley Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	+	Site is located within 400-800m of a GP surgery. The site is also within 800m of a number of areas of open space, including Trent Park, Lakeside and Broxers Lake Open Space, but is not within 400m of a walking or cycle path.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.

IIA objective	Effect	Justification text
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Oakwood Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Oakwood tube station and 350m of at least one bus stop. The site is also next to Oakwood, which is a Local Centre.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and within 250m of Trent Park Golf Course and Lakeside SINC.
IIA14: Historic environment	?	Site is within Trent Park Conservation Area and within 500m of a Grade II* listed building (Oakwood Underground Station) and a Grade II listed building (Station Sign to North of Oakwood Station). Due to the fact that the site is within the Trent Park Conservation Area, its development could affect the setting of these heritage assets.
IIA15: Landscape and townscape	?	Site is large in scale and located on the edge of World's End.
IIA16: Efficient use of land and materials	?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm and is on greenfield land. However, the site does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

# HIC9/LP623: Land south of Enfield Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Trent Park, Lakeside and West Enfield Parklands, in addition to falling within 400m of a walking path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.

IIA objective	Effect	Justification text
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Gordon Hill railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Highlands Village Grange Park, which is a Local Centre.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and within 250m of Boxer's Lake and Lonsdale Drive Woods SINC and Lakeside SINC.
IIA14: Historic environment	-?	Site is within 500m of Highlands Conservation, which contains a Grade II listed building (Former Ambulance Station at Highlands Hospital). Although there is built development between the Conservation Areas and the site, its development could affect the setting of these heritage assets.
IIA15: Landscape and townscape	+?	Site is located within the settlement of World's End and contains built development.
IIA16: Efficient use of land and materials	?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm and is on greenfield land. However, the site does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

# CFS162\_A: Land to the Rear of Arnold House (West)

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 units.

IIA objective	Effect	Justification text
IIA4: Health and wellbeing	+	Site is located within 400-800m of a GP surgery. The site is also within 800m of an area of open space, Lee View Amenity Space, but not within 400m of a walking or cycle path.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/	Site is located within 1km of Gordon Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and is within 250-750m of Crews Hill to Bowes Park Railsides SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of World's End.
IIA16: Efficient use of land and materials	?	Site is relatively small in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm and is on greenfield land. However, the site does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

# CFS162\_B: Land to the Rear of Arnold House (East)

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.

IIA objective	Effect	Justification text
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Lee View Amenity Green Space and Slades Close, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/	Site is located within 1km of Gordon Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	?	Site contains a Priority Habitat and is within 250-750m of Crews Hill to Bowes Park Railsides SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of World's End.
IIA16: Efficient use of land and materials	-	Site is relatively small in size and on greenfield land classed as Urban land.
IIA17: Flooding	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

### CFS162\_C: Arnold House

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Lee View Amenity Space and Slades Close, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/	Site is located within 1km of Gordon Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	?	Site contains a Priority Habitat and is within 250-750m of Crews Hill to Bowes Park Railsides SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of World's End.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

CFS159: Wyevale Garden Centre, Cattlegate Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of an area of open space, Whitewebbs Park, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District, and Local Centre.
IIA13: Biodiversity	?	Site is located within 250m of Crews Hill Golf Course SINC and Crews Hill to Bowes Park Railsides SINC.
IIA14: Historic environment	-?	Site is within 500m of a Grade II* listed building (The Paddocks) and two Grade II listed buildings (2 Barns North West of Farmhouse at the Paddocks, and Glasgow Stud Farmhouse). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Crews Hill and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

CFS169: Kings Oak Equestrian Centre (Part)

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of Whitewebbs Park and Hilly Fields, in addition to falling within 400m of a walking and cycle path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and is within 250-750m of Crews Hill Golf Course and Crews Hill to Bowes Park Railsides SINC.
IIA14: Historic environment	-?	Site is within 500m of Clay Hill Conservation Area and a Grade II listed building (Bridge at West End of Lane, Whitewebbs Wood). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of Crews Hill.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

CFS210: Southgate Library, High Street, Southgate

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Grovelands Park, Oakwood Park and Ivy Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Southgate District Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also next to Southgate, which is a District Centre.
IIA13: Biodiversity	-?	Site is located within 250-750m of the Grovelands Park and Priory Hospital SINC.
IIA14: Historic environment	-?	Site is adjacent to a Grade II listed building (Avington Cottage) and within 500m of three Conservation Areas (Southgate Circus, Southgate Green, and Meadway), two Grade II* listed buildings (Southgate Underground Station and station pylons to north and south of Southgate Station) and a number of Grade II Listed buildings. Although the site contains built development, its redevelopment could affect the setting of these heritage assets.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.

IIA objective	Effect	Justification text
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

# **Mixed-use sites**

UPP24 (19/02718/RE3): Meridian Water Orbital Business Park (and adjoining land including Land South of Argon Road and Land Known as IKEA Clear and Gas Holder Leeside Road), 5 Argon Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	?	Site contains a cycle path which could be lost as a result of new development. In addition, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is next to a Strategic Industrial Location and over 10ha in size. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++/	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	?	Site is located within 100m of a Priority Habitat and 250m of the Lea Valley SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.
IIA15: Landscape and townscape	?	Site is large in scale and located on the edge of Upper Edmonton.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.

IIA objective	Effect	Justification text
IIA17: Flooding		Site mainly falls within Flood Zone 3 and has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land.
IIA18: Water	?	Site falls within Source Protection Zone 2 and partially within Source Protection Zone 1 (northern part of the site). The site also contains watercourses and waterbodies along its eastern and western boundaries.

# UPP32 (16/01197/RE3): Meridian Water, Willoughby Lane and Meridian Way

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Kenninghall Open Space and Craig Park, in addition to falling within 400m of a walking and cycle path. The site is also located within 400-800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is close to Strategic Industrial Locations and Locally Significant Industrial Sites. The site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	+	Site is adjacent to Dysons Road Edmonton Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. The site is also next to Dysons Road Edmonton, which is a Local Centre.
IIA13: Biodiversity	?	Site contains a Priority Habitat and is between 250-750m of the Lea Valley SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.

IIA objective	Effect	Justification text
IIA15: Landscape and townscape	+?	Site is located within the settlement of Upper Edmonton and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.
IIA18: Water	?	Site falls within Source Protection Zones 1 and 2 and is located adjacent to a brook along its northern boundary.

# UPC2/LP1130: Tesco Extra, 1 Glover Drive

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Kenninghall Open Space and Craig Park, in addition to falling within 400m of a walking and cycle path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is close to Strategic Industrial Locations and Locally Significant Industrial Sites. The site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. The site is also within 201-400m of Dysons Road Edmonton, which is a Local Centre.
IIA13: Biodiversity	-?	Site is located within 250-750m of the Lea Valley SINC.

IIA objective	Effect	Justification text
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Upper Edmonton and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding		Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	?	Site falls within Source Protection Zone 1 and 2.

# UPC1/LP1111: IKEA Meridian Water

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of Kenninghall Open Space and Ladysmith Road Open Space. In addition, the site is within 400m of a walking and cycle path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is close to a Strategic Industrial Location. The site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. The site is also within 201-400m of Dysons Road Edmonton, which is a Local Centre.

IIA objective	Effect	Justification text
IIA13: Biodiversity	?	Site is located within 250m of the Lea Valley SINC and between 250-750m of the Walthamstow Reservoirs SSSI.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Upper Edmonton and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm and partially falls within Flood Zone 2. However, the site is on brownfield land.
IIA18: Water	?	Site falls within Source Protection Zone 2 and the northern part of the site falls within Source Protection Zone 1. Some brooks are also located within the site boundary

# **Appendix H**

# IIA findings for the Issues and Options Local Plan 2018

- **H.1** This appendix sets out the IIA findings for the plan options that were presented in the 2018 Issues and Options consultation document for the Enfield Local Plan. The options in that document comprised the draft vision and growth objectives, a set of seven growth (spatial distribution) options and a number of policy approaches presented under nine themes:
  - Historic environment
  - Design
  - Housing
  - Economy
  - Town centre
  - Social infrastructure
  - Green infrastructure
  - Transport
  - Sustainable infrastructure
- **H.2** The options in the 2018 Issues and Options document have been appraised against the current IIA framework and the IIA findings presented in this IIA Report to help meet the SEA Regulations, which require the likely effects of the plan and 'reasonable alternatives' to be assessed and described. The IIA findings for the 2018 draft vision and growth objectives are discussed first, followed by the findings for the seven growth (or spatial distribution) options, and then the findings for each set of policy options in the order of the nine themes listed above.

#### IIA findings for the 2018 draft vision and growth objectives

H.3 The draft vision in the 2018 Issues and Options document was as follows:

#### A Place for Affordability & Accessibility

By 2036, Enfield will be a borough that provides for its residents with a choice of homes and public services to meet actual need and affordability through the successful delivery of thriving neighbourhoods that are environmentally conscious and embrace active, resilient and healthy lifestyles.

### A Place of Opportunity & Enterprise

New economies are secured to bring competitiveness of the borough's employment areas to attract regional, national and international investors across all sectors to successfully deliver new jobs and assist in securing the provision of employment training opportunities for local residents.

Enfield will be a place of local entrepreneurs and 'makers' of craft and creativity where people want to innovate and do business; where levels of educational attainment, economic activity and entrepreneurship are the greatest in London; where people have access to jobs in sectors that enjoy prosperity and long-term growth; and where high-speed communications and smart technologies will lead the way in accommodating and being part of London's growth sectors.

#### A Place for Diversity & Equality

Prosperity is shared across the whole borough to enable people to reach their potential through access to high quality schools and learning. Enfield residents will enjoy an opportunity for active and attractive places to live and work in healthy environments. Our youth and most vulnerable residents will be supported through improved health, education and skill levels to enable everyone to fulfil their potential.

New and regenerated neighbourhoods will be safe and defined by the highest standards of well designed, affordable, accessible and eco-friendly homes and with access to public spaces.

Residents will have improved health and wellbeing and quality of life, improvements to open spaces, as well as new employment opportunities, ensuring that the benefits of growth, regeneration and investment reach everyone in the borough.

#### A Place that Delivers

Enfield will be an exemplar borough of how joined up partnerships, approaches to regeneration and investment can maximise opportunities to deliver for local people. The Council will deliver on several key regeneration schemes including our flagship Meridian Water project.

New transport infrastructure projects for rail, road and cycling will deliver reduced congestion and improved air quality. The early delivery of Four Tracking of the West Anglia Mainline as an early stage of Crossrail 2 will increase rail capacity, unlock and begin the accelerated regeneration of the eastern corridor and prepare for Crossrail 2.

H.4 The Council then set out a series of growth objectives to achieve the draft vision, under four overarching objectives:

#### 1. Promoting and managing growth

- To promote growth and help achieve sustainable patterns of development by focusing new development in the borough's main town centres and areas around all stations, transport corridors, housing estate renewal and regeneration programmes, the eastern corridor and low density industrial areas, and through a strategic plan-led approach to the release of Green Belt land where they are accessible and sustainable;
- To meet locally assessed housing need across the borough through the creation of high quality developments in a phased programme to help meet existing and future housing needs;
- To build strong and inclusive communities by providing diversity of type, size and tenure of housing including affordable homes to meet local housing needs, tackle homelessness and to deliver as a minimum the annual housing target of at least 1,876 new homes as set out by the draft new London Plan;
- Respect and enhance the character of the borough's cultural, built heritage and neighbourhoods;
- Encourage and maintain a mixture of town centre uses in Enfield Town, Angel Edmonton, Edmonton Green, Palmers Green and Southgate, and the borough's local centres and local parades;
- To improve the health and wellbeing of Enfield's population and reduce health inequalities through promoting good growth and spatial planning, supporting healthier lifestyles and environmental improvements, as well as ensuring appropriate access to health facilities; and
- To enhance the quantity, quality and density of the borough's Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), including the possibility for substitution and consolidation, to enable new and emerging businesses in sectors, whilst supporting opportunities for a mixture of uses and co-location.

#### 2. Achieving design excellence

- To promote high quality, safe and sustainable designed buildings, places and streets; and
- To promote and protect high levels of amenity and quality of life to make Enfield an attractive, successful and vibrant place for all residents, workers and people visiting.

#### 3. Enhancing Enfield's assets

- To enhance the unique historic environment of Enfield and the character, distinctiveness of the borough's conservation areas and other historic and valued buildings, cultural spaces and places;
- To improve access to existing open spaces and manage open space deficiency; and
- To protect conditions for biodiversity.
- 4. Promoting a green environment

- To provide a strategic spatial planning strategy for growth aligned with, and able to secure the regeneration benefits of, planned new and improved strategic and major transport infrastructure;
- To drive investment in rail, roads and cycling infrastructure to improve connectivity and support economic development;
- To encourage cleaner air;
- To promote low carbon living and working;
- To support the delivery of sustainable infrastructure in the emerging growth areas to enable sustainable mixed-use developments; and
- To manage flood risk.

**H.5 Table H.1** below summarises the sustainability effects for the 2018 draft vision and growth objectives in relation to the IIA objectives, and the findings are described below the table.

Table H.1: IIA findings for the 2018 draft vision and growth objectives

IIA objective	Draft vision	1. Promoting and managing growth	2. Achieving design excellence	3. Enhancing Enfield's assets	4. Promoting a green environment
IIA1: Climate change mitigation	+?/-?	+?/-?	+	0	+?/-?
IIA2: Climate change adaptation	0	0	+	0	0
IIA3: Housing	+?	++	0	0	0
IIA4: Health and wellbeing	+?	+	+	+	0
IIA5: Services and facilities	+?	0	0	0	0
IIA6: Social inclusion	+?	+	0	0	0
IIA7: Crime and community safety	0	0	0	0	0
IIA8: Road safety	0	0	0	0	0
IIA9: Economy	+?	0	+	0	+
IIA10: Town and local centres	0	++	0	0	0
IIA11: Air pollution	+?/-?	+?/-?	0	0	+?/-?
IIA12: Sustainable transport	+?/-?	+?/-?	0	0	+?/-?
IIA13: Biodiversity	0	0	0	+?	0
IIA14: Historic environment	0	+	0	+	0
IIA15: Landscape and townscape	0	0	0	0	0
IIA16: Efficient use of land and materials	+/-	0	0	0	0

IIA objective	Draft vision	1. Promoting and managing growth	2. Achieving design excellence	3. Enhancing Enfield's assets	4. Promoting a green environment
IIA17: Flooding	0	0	0	0	+?
IIA18: Water	0	0	0	0	0

#### Explanation of IIA findings for the 2018 draft vision and growth objectives

#### **Draft vision**

- **H.6** The draft vision sets out a general ambition for development to take place in a sustainable way, embracing a mix of social, economic and environmental aspirations. This will enable the Borough to be an attractive place to live, work and invest.
- **H.7** If the draft vision is achieved, it can be expected to lead to minor positive effects against the following IIA objectives. All effects are recorded as minor because the vision is aspirational and specifics are provided on the exact ways in which the vision will be achieved through the supporting growth objectives (see next section).
  - **IIA3: Housing**, because the draft vision embraces growth which provides a choice of homes to meet actual need and affordability.
  - IIA4: Health and wellbeing, because it seeks to improve residents' health and wellbeing and quality of life, in addition to improvements to open spaces. The draft vision also seeks to deliver neighbourhoods that embrace active, resilient and healthy lifestyles.
  - **IIA5: Services and facilities**, because the provision of education and skills training, in addition to other services, is specifically mentioned in the draft vision.
  - IIA6: Social inclusion, because the draft vision seeks to make LBE a diverse and equal place, where prosperity is shared across the Borough.
  - **IIA9: Economy**, because the vision embraces growth by securing new economies that bring competitiveness to the Borough's employment areas, to attract regional, national and international investors across all sectors to successfully deliver new jobs and assist in securing the provision of employment training opportunities for local residents.
- **H.8** The draft vision is also expected to lead to mixed minor positive and minor negative effects against the following IIA objectives:
  - IIA1: Climate change mitigation, because although new transport infrastructure projects for rail, road and cycling will help minimise CO₂ emissions, improvements to roads may also encourage use of the private car and an associated increase in emissions.
  - **IIA11: Air pollution**, because although improvements to roads will reduce congestion and minimise air pollution, the improvements could also promote use of the private car and exacerbate existing air pollution problems.
  - IIA12: Sustainable transport, because although new transport infrastructure projects for rail, road and cycling will be delivered and encourage more sustainable and active travel choices, improving roads could encourage use of the private car
- **H.9** Due to the fact they are not specifically mentioned, the vision's contribution to the achievement of the following objectives is likely to be negligible: **IIA2: Climate change adaptation**, **IIA7: Crime and community safety**, **IIA8: Road safety**, **IIA10:**

Town and local centres, IIA13: Biodiversity, IIA14: Historic environment, IIA15: Landscape and townscape, IIA16: Efficient use of land and materials, IIA17: Flooding and IIA18: Water.

**H.10** All of the effects of the draft vision are subject to some uncertainty since their achievement will depend on the details of the Local Plan policies and site allocations which are designed to implement it.

**Growth objectives** 

#### 1. Promoting and managing growth

**H.11** Growth objective 1 is expected to have a significant positive effect in relation to **IIA3: Housing** because it seeks to meet locally assessed housing needs across the Borough by providing a diversity of type, size and tenure of housing including affordable homes, in addition to tackling homelessness. For this reason, a minor positive effect is also expected in relation to **IIA6: Social inclusion**. A significant positive effect is expected against **IIA10: Town and local centres** because the objective focuses growth in the Borough's main town centres, whilst also maintaining a mixture of town centre uses in Enfield Town, Angel Edmonton, Edmonton Green, Palmers Green and Southgate, as well as the Borough's local centres and local parades.

H.12 Minor positive effects are expected in relation to IIA4: Health and wellbeing because the objective seeks to improve the health and wellbeing of Enfield's population and reduce health inequalities through promoting good growth and spatial planning, supporting healthier lifestyles and access to health facilities. A minor positive effect is expected against IIA14: Historic environment because the objective sets out that all development must respect and enhance the character of the Borough's cultural and built heritage. Mixed minor positive and minor negative but uncertain effects are expected in relation to IIA1: Climate change mitigation, IIA11: Air pollution and IIA12: Sustainable transport because although this objective supports growth at town centres and areas around stations, which may reduce use of the private car and associated emissions, it also promotes growth along transport corridors, namely Great Cambridge Road (A10) and North Circular Road (A406). Therefore, it may also encourage use of the private car and exacerbate existing air quality issues. Lastly, growth objective 1 is expected to have a mixed minor positive and minor negative effect in relation to IIA16: Efficient use of land and materials because although it supports development of previously developed land at town centres and areas around stations, it also supports development in the Green Belt, much of which is undeveloped.

#### 2. Achieving design excellence

**H.13** Growth objective 2 promotes sustainably designed buildings and may therefore help to mitigate the effects of climate change through reductions in CO<sub>2</sub> emissions, whilst also adapting to climate change. Therefore, minor positive effects are expected in relation to **IIA1: Climate change mitigation** and **IIA2: Climate change adaptation**. This growth objective also seeks to protect amenity and quality of life, by making LBE an attractive, successful and vibrant place to be. Therefore, minor positive effects are also expected in relation to **IIA4: Health and wellbeing** and **IIA9: Economy**.

#### 3. Enhancing Enfield's assets

**H.14** Minor positive effects are expected in relation to **IIA4: Health and wellbeing**, **IIA13: Biodiversity** and **IIA14: Historic environment** because this objective seeks to enhance the historic environment in LBE, whilst also improving access to existing open spaces and managing open space deficiency, in addition to protecting conditions for biodiversity. The effect against IIA14 is recorded as uncertain because the objective does not specify in what ways biodiversity will be protected.

#### 4. Promoting a green environment

H.15 Growth objective 4 supports the delivery of rail, road and cycling infrastructure improvements, which will support economic development. Therefore a minor positive effect is expected in relation to IIA9: Economy. However, due to the fact improvements will be made to roads so as to reduce congestion, people may be more inclined to use the car. Therefore, mixed minor positive and minor negative but uncertain effects are expected in relation to IIA1: Climate change mitigation, IIA11: Air pollution and IIA12: Sustainable transport. A minor positive but uncertain effect is expected in relation to IIA17: Flooding because the objective seeks to manage flood risk but does not set out in what ways this will be achieved.

H.16 It is noted that none of the growth objectives explicitly address IIA7: Crime and community safety, IIA8: Road safety, IIA15: Landscape and townscape and IIA18: Water.

# IIA findings for the growth options considered in the 2018 Issues and Options consultation document

**H.17** This section presents the IIA findings for the 'growth' (or spatial distribution) options that are set out in the Local Plan Issues and Options consultation document. Seven broad options for where new housing, employment and other land uses should go to meet the growth being planned for at the time (i.e. the draft London Plan target of 1,876 homes a year for the next 10 years from 2018), as follows:

- Option 1: Main town centres and areas around all stations;
- Option 2: Transport corridors;
- Option 3; Existing estate renewal and regeneration programmes;
- Option 4: Eastern corridor and low density industrial areas;
- Option 5: Future Crossrail 2 Growth Corridor;
- Option 6: The New Southgate and Upper Lee Valley Opportunity Areas; and
- Option 7: Strategic plan-led approach to Green Belt.

H.18 It should be noted that these spatial distribution options are not mutually exclusive, and the Issues and Options consultation document recognised that individually they would not be able to deliver the overall growth required for the Borough, therefore choices would need to be made about which elements of these options would form the spatial strategy in the Enfield Local Plan. However, based on the potential development locations associated with each option as shown on the Strategic Growth Options diagram at Figure 2.2 in the Issues and Options consultation document, the IIA has assumed that more development would be able to be delivered under Options 1 and 2 than the remaining five options. In addition, it is noted that Option 5: Future Crossrail 2 Growth Corridor is no longer a reasonable alternative due to the Government's decision in November 2020 and notice to Transport for London to end spending on Crossrail 2. However, it has been appraised and presented for completeness to reflect the point in time at which it was being considered as a growth option for the Enfield Local Plan.

**H.19 Table H.2** summarises the IIA effects of the seven spatial distribution options and the findings are described below the table. Given the 'mix and match' nature of these spatial distribution options, there are sustainability pros and cons with each of them, and no one option comes out as performing the 'best' in sustainability terms. However, Option 1: Main town centres and areas around all stations has the most potentially significant positive effects, because it would provide the most opportunities for new residents to reach employment, education, services and facilities via active and/or sustainable transport modes, which has multiple benefits in terms of health, inclusivity, reducing inequalities, reducing car travel and CO<sub>2</sub> emissions and maximising efficient use of land. This option would still have some potential negative effects on the more environmental IIA objectives in particular. Option 7: Strategic plan-led approach to Green Belt has the most potentially significant negative effects as although some are on the same IIA objectives as for Option 1 (e.g. biodiversity and historic environment), unlike Option 1, it would not provide new development in proximity to sustainable transport opportunities or existing services and facilities, resulting in negative effects on health, access to services, reducing car travel, CO<sub>2</sub> emissions and also efficient use of land (due to the necessary reliance on greenfield sites).

Table H.2: Summary of IIA effects for the growth options considered in the 2018 Issues and Options document

IIA objective	1. Main town centres and areas around all stations	2. Transport corridors	3. Existing estate renewal and regeneration programmes	4. Eastern corridor and low density industrial areas	5. Future Crossrail 2 Growth Corridor	6. New Southgate and Upper Lee Valley Opportunity Areas	7. Strategic plan- led approach to Green Belt
IIA1: Climate change mitigation	++?	/+?	+?	+?/-	++?	+?	?/+?
IIA2: Climate change adaptation	0	0	0	0	0	0	0
IIA3: Housing	++?/-	++?/-	-	+?	+?	+?	+?
IIA4: Health and wellbeing	++/?	/+	+/-	+/-	+/-	+/-	/+
IIA5: Services and facilities	++/-?	+/-?	+?	+?	+?	+?	
IIA6: Social inclusion	+/-	++/-	++	++	++	++	+
IIA7: Crime and community safety	-?	-?	+?	-?	-?	-?	-?
IIA8: Road safety	0	0	0	0	0	0	0
IIA9: Economy	++	++/-	+?	++/?	++/?	+/-?	?/+?
IIA10: Town and local centres	++	/+	+	+	+	+	0
IIA11: Air pollution	++?/	/+?	+?/-	/+?	++?/	+?/-	/+?
IIA12: Sustainable transport	++?	/+?	+?	+?/-	++?	+?	/+?
IIA13: Biodiversity	?	?	?	?	?	?	?
IIA14: Historic environment	?	-?	0?	-?	-?	-?	?
IIA15: Landscape and townscape			+?	/+?	/+?	/+?	

# Appendix H IIA findings for the Issues and Options Local Plan 2018

IIA objective	Main town     centres and     areas around all     stations	2. Transport corridors	3. Existing estate renewal and regeneration programmes	4. Eastern corridor and low density industrial areas	5. Future Crossrail 2 Growth Corridor	6. New Southgate and Upper Lee Valley Opportunity Areas	7. Strategic plan- led approach to Green Belt
IIA16: Efficient use of land and materials	++	++	++	++	++	++	-
IIA17: Flooding	-?	-?	-?	-?	-?	-?	-?
IIA18: Water	-?	-?	-?	-?	-?	-?	-?

Appendix H
IIA findings for the Issues and Options Local Plan 2018

Enfield Local Plan: Integrated Impact Assessment December 2023

# IIA objective 1: Ensure the Local Plan serves to minimise LBE's per capita CO<sub>2</sub> emissions such that the Council will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040

H.20 Options 1: Main town centres and areas around all stations and 5: Future Crossrail 2 Growth Corridor promote development around tube and railway stations, with Option 1 also supporting development at town centres where everyday services and facilities are located within walking distance of one another. The town centres are highly accessible and also contain multiple bus routes, whilst Crossrail 2 would provide a four train per hour service into the new Meridian Water, Ponders End, Brimsdown and Enfield Lock stations from 2028. These two options are therefore likely to reduce use of the private car and associated CO<sub>2</sub> emissions, with significant positive effects expected in relation to IIA1: Climate change mitigation. However, the effects are recorded as uncertain because levels of walking and cycling within the Borough are not very high and in the case of Option 5, which promotes development along the proposed Crossrail 2 route, delivery of this strategic infrastructure project had not been confirmed at the time of the 2018 Issues and Options consultation. It is also unknown whether people will choose public transport in place of the private car, as this will depend on a number of factors such as cost, timing of services and proximity to their final destination. Options 3: Existing estate renewal and regeneration programmes and 6: New Southgate and Upper Lee Valley Opportunity Areas are expected to have minor positive effects in relation to this objective because the estates proposed for renewal/regeneration and Opportunity Areas are located within close proximity of some tube and railway stations and may therefore encourage use of public transport. These effects are recorded as uncertain because it is unknown whether people will choose public transport as a replacement to the private car, particularly because Census data from 2011 indicates that the majority of residents use a private car to get work instead of public transport.

H.21 Option 2: Transport corridors is expected to have a mixed significant negative and minor positive effect against IIA1 because it supports development along the transport corridors and partially falls within the built-up urban areas where a number of services and facilities are present. People can therefore easily walk to various amenities. However, the transport corridors comprise Great Cambridge Road (A10) and North Circular Road (A406) and this option would therefore support use of the private car, generating associated CO2 emissions. The positive effect is recorded as uncertain because levels of walking and cycling within the Borough are not very high, in addition to public transport use. Option 7: Strategic plan-led approach to Green Belt is also expected to have a mixed significant negative and minor positive effect in relation to this objective because the Green Belt in LBE is not located within close proximity to public transport, apart from the area around Crews Hill railway station. Therefore, depending on where development is located, this option would be likely to increase reliance on the private car. However, emphasis is placed on the Crews Hill area in the supporting text to this option, which would potentially reduce reliance on the private car and associated CO<sub>2</sub> emissions. The effect is recorded as uncertain because it is unknown whether people would choose public transport in place of the private car and whether some areas within the Green Belt that are not close to the Crews Hill railway stations would be developed or not. Option 4: Eastern Corridor and low density industrial areas is expected to have a mixed minor positive and minor negative effect against IIA1: Climate change mitigation because although it supports development in the eastern corridor, which contains a number of railway stations and would be within close proximity of the proposed Crossrail 2 infrastructure project, it also contains some areas that are not within close proximity of public transport infrastructure, in addition to everyday services and facilities. Conversely, including industrial land in this growth option provides the opportunity for greater variety in employment, housing and density, reducing distances between homes, schools, the workplace, community and town centres. The positive effect for Option 4 is recorded as uncertain because it is unknown whether people will choose public transport in place of the private car.

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

**H.22** Given the high-level nature of these seven options, it is not possible to distinguish between them with respect to climate change adaptation. The distribution of development is not likely to influence sustainable design and construction techniques in development or respond to extreme weather effects as a result of climate change, which will be dealt with through other policies in the plan. Flood risk is dealt with separately under IIA objective 17. All growth options are expected to have negligible effects in relation to this objective.

IIA objective 3: Deliver housing to meet agreed targets and support an appropriate mix of housing types and tenures, including affordable and specialist housing, including housing for the elderly and disabled people

**H.23** Options 1: Main town centres and areas around all stations and 2: Transport corridors are expected to deliver the highest amount of growth when compared to the other five options and would include a mix of housing and employment development, in

addition to healthcare, schools, open space and social and community infrastructure. Options 1 and 2 would be achieved by increasing densities and building heights of new development. However, this would not provide the range of housing types needed in the Borough and instead deliver a high proportion of flats, studios and 1-bedroom apartments. This could discriminate against certain groups of people, such as large families or those with specialist housing requirements. For this reason, Options 1 and 2 are both expected to have a mixed significant positive and minor negative effect in relation to this objective. The positive effect is recorded as uncertain because it is unknown what number of new homes would be delivered. Options 4: Eastern corridor and low density industrial areas, 5: Future Crossrail 2 Growth Corridor, 6: New Southgate and Upper Lee Valley Opportunity Areas and 7: Strategic plan-led approach to the Green Belt are expected to have minor positive effects in relation to this objective because although they are not likely to deliver as much growth as Options 1 and 2, they are still expected to deliver a considerable number of new homes. The effects are recorded as uncertain because it is unknown exactly how many new homes will be provided under these four options. The Issues and Options document noted that the Council is currently running a programme of estate renewal and under Option 3: Existing estate renewal and regeneration programmes, would deliver 3,000 new homes in New Southgate, Ponders End and Edmonton. Therefore, although this option would deliver 3,000 new homes, it would not provide the total number of new homes required across the Borough. Option 3 is therefore expected to have a minor negative effect against this objective.

# IIA objective 4: Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the Borough

H.24 In LBE, there is an east-west divide in terms of inequality and this correlates with health indicators. According to ONS, LBE is the fifth worst Borough in England for obesity, with significantly high levels of obesity in the east when compared to the west. Option 1: Main town centres and areas around all stations focuses growth around tube and railway stations, as well as town centres, where a number of services and facilities are available, including primary healthcare facilities. Therefore, people would be within walking distance of a number of amenities, which may encourage more active travel choices. This would have beneficial effects on people's physical health and mental wellbeing. However, the amount of development that would be delivered under Option 1 would place a significant amount of pressure on existing services, particularly GP surgeries. Further to this, the supporting text to Option 1 states that the amount of development delivered under this option could potentially require a relaxation in standards for open space provision. This is particularly concerning following the COVID-19 pandemic which has highlighted significant inequalities in access to open space. For these reasons, Option 1 is expected to have a mixed significant positive and significant negative effect against this objective. The negative effect is recorded as uncertain because it is unknown whether open space would be lost or not.

**H.25** Option 2: Transport corridors supports development along Great Cambridge Road (A10) and North Circular Road (A406), which partially fall within built up urban areas where a number of services and facilities are present. However, both corridors also include areas where a range of services are not available, which may limit access to healthcare and also discourage more active travel choices (i.e. walking and cycling). Locating development along these A roads is also problematic in that residents would be located adjacent to sources of air pollution, which can have adverse effects on people's health, particularly those who suffer from asthma. Therefore, Option 2 is expected to have a mixed significant negative and minor positive effect in relation to this objective. Option 7: Strategic plan-led approach to Green Belt is also expected to have a mixed significant negative and minor positive effect against IIA4: Health and wellbeing. This is due to the fact there are no GP surgeries located within the Green Belt in the north-west of the Borough and therefore residents would not have easy access to healthcare. However, large-scale development under this option offers an opportunity to provide new GP surgeries.

**H.26** According to the IIA Scoping Report, there are very few GP surgeries on the estates within LBE. As such, the delivery of 3,000 new homes under Option 3: Existing estate renewal and regeneration programmes could place a considerable amount of pressure on the limited number of surgeries available. Therefore, Option 3 is expected to have a minor negative effect in relation to this objective. However, this is mixed with a minor positive effect because regenerating estates within the Borough offers an opportunity to deliver new healthcare facilities and improve quality of life through improved housing stock. Options 4: Eastern Corridor and low density industrial areas and 5: Future Crossrail 2 Growth Corridor are expected to have mixed minor positive and minor negative effects against this objective because both options contain areas that are located within close proximity of a number of services and facilities (e.g. primary healthcare facilities) and others that are not. Option 6 focuses development in the Opportunity Areas only and may therefore result in an increase in pressure on existing healthcare facilities in those areas, which are likely to experience considerable population growth. However, it is likely that development of these Opportunity Areas will provide an opportunity to deliver new healthcare facilities in order to meet the needs of a growing population. Therefore, Option 6 is expected to have a mixed minor positive and minor negative effect in relation to this objective.

# IIA objective 5: Support good access to services, facilities and wider community infrastructure, for new and existing residents, mindful of the potential for community needs to change over time

**H.27** Option 1 is expected to have a significant positive effect against IIA5: Services and facilities because it supports development in main town centres and around tube and railway stations, which are built up urban areas where a number of existing services and facilities are present. New residents would therefore not be required to travel far to reach these services, as they would be within walking distance of them. For example, there are a number of primary and secondary schools located within close proximity of most of the tube and railway stations. However, the amount of development likely to be delivered under this option would place increasing strain on services, such as schools, although this is uncertain. Therefore, Option 1 is also expected to have a minor negative but uncertain effect against this objective.

**H.28** Option 7 is expected to have a significant negative effect in relation to IIA5 because the Green Belt in the north west of the Borough contains a very small number of schools which are located on the very edge of the Green Belt and not within close proximity of the Crews Hill area.

**H.29** Options 2: Transport corridors, 3: Existing estate renewal and regeneration programmes, 4: Eastern corridor and low density industrial areas, 5: Future Crossrail 2 Growth Corridor and 6: New Southgate and Upper Lee Valley Opportunity Areas are expected to have minor positive effects in relation to this objective because although they tend to be located within built up urban areas where services and facilities are present, these options also contain areas that are not within close proximity of services (e.g. schools). For example, all five options propose development near Angel Road, where only one existing primary school is present and no secondary schools. Option 2 is also expected to have a minor negative effect in relation to this objective because the volume of development would place a lot of pressure on existing services, such as primary and secondary school places, although this is uncertain.

#### IIA objective 6: Encourage social inclusion, promotion of equality and a respect through diversity

H.30 In LBE, there is an east-west divide in terms of inequality and deprivation. The eastern part of the Borough contains ten Lower Super Output Areas that fall within the 10% most deprived nationally. Options 3: Existing estate renewal and regeneration programmes, 4: Eastern corridor and low density industrial areas, 5: Future Crossrail 2 Growth Corridor and 6: New Southgate and Upper Lee Valley Opportunity Areas are expected to have significant positive effects in relation to IIA6: Social inclusion because they focus growth in the east of the Borough in some of the most deprived areas, including through estate renewal/regeneration and redevelopment of the Upper Lee Valley Opportunity Area. Option 2: Transport corridors is also expected to have a significant positive effect in relation to this objective because one of two transport corridors, Great Cambridge Road (A10), is located in the east of the Borough, and North Circular Road (A406) runs from east to west, also falling within some of the most deprived areas within the Borough. However, the effect is mixed with a minor negative effect because focusing growth along the transport corridors may exclude those who do not have access to a private car. Option 7: Strategic plan-led approach to Green Belt is expected to have a minor positive effect in relation to this objective because it focuses development in the Green Belt located in the north west of the Borough, and therefore does not address the east-west divide. However, this area of Metropolitan Green Belt does fall within the 30% most deprived areas nationally and is therefore still likely to address poverty and social exclusion to some extent. Option 1: Main town centres and areas around all stations is expected to have a mixed minor positive and minor negative effect against IIA6 because it supports development in the town centres and areas surrounding tube and railway stations, but due to the fact the town centres and tube/railway stations are spread fairly evenly across the majority of the Borough, development would not be directed solely into the more deprived areas. Therefore, although this option would, to an extent, help regenerate the more deprived areas of the Borough, it would also enhance the least deprived areas and not specifically address the gap in inequality between the east and west.

#### IIA objective 7: Reduce crime and increase community safety

**H.31** The spatial distribution of development is not likely to influence levels of crime, anti-social behaviour, fear of crime and perceptions of safety, which will be more influenced by policies which seek to deliver inclusive design. As set out in the IIA Scoping Report, crime is generally concentrated in the east of LBE and at Southgate, Palmers Green and the boundary LBE shares with Haringey Council, in addition to around public transport nodes. Crime levels have been rising in the area, partly due to the fact LBE has the largest youth population in Greater London, with some of the highest levels of crime recorded in the school-transport corridors. Option 3: Existing estate renewal and regeneration programmes supports the renewal and regeneration of existing estates across the Borough and may therefore help reduce levels of crime, anti-social behaviour and fear of crime at these estates. Therefore, Option 3 is expected to have a minor positive but uncertain effect against IIA7: Crime

and community safety. Options 4: Eastern corridor and low density industrial areas, 5: Future Crossrail 2 Growth Corridor and 6: New Southgate and Upper Lee Valley Opportunity Areas focus development in the east of the Borough, with Option 6 also supporting development of the New Southgate Opportunity Area in the south west of the Borough. Option 2: Transport corridors promotes growth along the transport corridors and Option 1: Main town centres and areas around all stations promotes a more even spread of development across the Borough, including around the tube and railway stations of Southgate and Palmers Green, respectively. Option 7: Strategic plan-led approach to Green Belt, on the other hand, focuses development in the Green Belt in the north west of the Borough. These options are expected to have minor negative but uncertain effects in relation to IIA7: Crime and community safety, unless there are policies in place to support high quality development, in addition to a high quality public realm that supports the integration of communities and natural surveillance including through the co-location of shops, services, community centres and green spaces. Options 1 and 2 are expected to provide the largest amount of new development and may therefore have more of an adverse effect than others because the increase in population could result in higher levels of crime.

#### IIA objective 8: Focus on delivering the 'Vision Zero' target for road safety

**H.32** The distribution of development will not affect the achievement of this objective, which relates to healthy streets principles that encourage walking and cycling, and these could be encouraged through design policies. Therefore, all of the spatial distribution/growth options are likely to have negligible effects in relation to IIA8: Road safety.

#### IIA objective 9: Support a strong, diverse and resilient economy that provides opportunities for all

- **H.33** Option 1: Main town centres and areas around all stations promotes growth at the town centres within LBE, in addition to the tube and railway stations. The town centres offer job opportunities and locating growth around tube and railway stations ensures that people have good access to job opportunities elsewhere within and outside the Borough. Development under this option would not result in any loss of existing commercial and industrial floorspace and would instead provide more employment floorspace. According to the supporting text to this option, employment uses are often accommodated in single storey structures and with good design, most employment uses can be located alongside or below homes. Therefore, Option 1 is expected to have a significant positive effect in relation to this objective.
- **H.34** Options 4: Eastern corridor and low density industrial areas and 5: Future Crossrail 2 Growth Corridor support development within the east of the Borough, where most of Enfield's industrial land is located. A large amount of businesses are concentrated on the older low density industrial sites but due to the proximity of these sites to the proposed Crossrail 2 strategic infrastructure project, their future use may need to be reconsidered so as to make the best use of this land. Therefore, development under this option could potentially result in the loss of some industrial land, although this is uncertain. Conversely, the London Plan identifies LBE as a location where strategic demand for industrial logistics and related uses are anticipated to be strongest and a large number of jobs are expected to be provided under these options. As set out in the supporting text to these options, existing industrial land can be used more efficiently through the introduction of mezzanines, basements and smaller infill units. The proposed Crossrail 2 infrastructure project could also accelerate delivery of new development sites which would in turn deliver much-needed new homes, jobs and economic growth, whilst also improving connectivity into Central London. Therefore, both options are expected to have a mixed significant positive and significant negative effect, with uncertainty recorded against the negative effect.
- **H.35** Under Option 2: Transport corridors, development would be delivered in similar ways to those described under Option 1. There are likely to be opportunities for intensification of large retail and employment uses, as well as highways land. However, not all of the available sites along the transport corridors are within close proximity of public transport. Therefore, people would not have as easy access to employment opportunities elsewhere within the Borough, unless they have access to a car. For this reason, Option 2 is expected to have a mixed significant positive and minor negative effect in relation to this objective.
- **H.36** Option 7: Strategic plan-led approach to the Green Belt is expected to have a mixed significant negative and minor positive but uncertain effect in relation to this objective because there is only one railway station located in the Green Belt in the north west of the Borough, at Crews Hill. Therefore, depending on where development would be located, residents may not have easy access to employment opportunities elsewhere within the Borough. The north west of the Borough is fairly isolated and not within walking distance of many workplaces. However, some job opportunities may be provided alongside housing development and support the rural economy, although this is uncertain.

Appendix H
IIA findings for the Issues and Options Local Plan 2018

Enfield Local Plan: Integrated Impact Assessment December 2023

**H.37** Option 3: Estate renewal and regeneration programmes is expected to have a minor positive but uncertain effect in relation to this objective because the renewal and intensification of housing estates could contribute to new job opportunities, in addition to supporting the local economy by ensuring homes are available to working age people.

**H.38** Option 6: New Southgate and Upper Lee Valley Opportunity Areas is expected to have a mixed minor positive and minor negative effect in relation to this objective, with uncertainty recorded against the negative effect. According to the supporting text to this option, the Upper Lee Valley Opportunity Area will require the reconfiguration, relocation, consolidation, intensification and optimisation of Strategic Industrial Land (SIL). Therefore, although not stated, this option could potentially result in some loss of SIL. However, both the Upper Lee Valley and New Southgate and Opportunity Areas are expected to deliver new employment opportunities, in addition to supporting the local economy through the provision of new homes. The Upper Lee Valley Opportunity Area will also be located within close proximity to Crossrail 2, which will drive economic growth.

#### IIA objective 10: Support the vitality of the Borough's town and local centres

H.39 Concentrating development at the town centres will increase footfall and enhance the vitality and vibrancy of LBE's Town, District and Local Centres. Option 1: Main town centres and areas around all stations is therefore expected to have a significant positive effect in relation to this objective. Option 3: Existing estate renewal and regeneration programmes is expected to have a minor positive effect against this objective because one of the estates proposed for regeneration is located around the Ponders End Local Centre. Therefore, the development of new homes would increase footfall, enhancing the vitality and vibrancy of this local centre. Options 4: Eastern Corridor and low density industrial areas, 5: Future Crossrail 2 Growth Corridor and 6: New Southgate and Upper Lee Valley Opportunity Areas focus development in the east of the Borough, with Option 6 also supporting development of the New Southgate Opportunity Area in the south west of the Borough. These three options contain areas that only fall within close proximity of Edmonton Green District Centre and Ponders End Local Centre. Therefore, Options 4, 5 and 6 are expected to have minor positive effects in relation to this objective. Option 2: Transport corridors supports development along Great Cambridge Road (A10) and North Circular Road (A406), and therefore only falls within close proximity of Palmers Green District Centre and Bush Hill Park Local Centre. According to the supporting text to this option, there may be an opportunity to intensify Colosseum Retail Park and Enfield Retail Park. However, this would take business away from the town centres. Therefore, Option 2 is also expected to have a mixed significant negative and minor positive effect in relation to this objective. Option 7: Strategic plan-led approach to Green Belt focuses growth away from the town centres, instead supporting growth in a more rural and isolated area. Therefore, Option 7 is expected to have a negligible effect against this objective.

### **IIA objective 11: Minimise air pollution**

**H.40** Options 1: Main town centres and areas around all stations and 5: Future Crossrail 2 Growth Corridor promote development around tube and railway stations, with Option 1 also supporting development at town centres where everyday services and facilities are located within walking distance of one another. The town centres are highly accessible and also contain multiple bus routes, whilst Crossrail 2 would provide a four train per hour service from 2028. These two options are therefore likely to reduce reliance on the private car, which could help minimise air pollution. However, the actual use of more active and sustainable modes of travel will depend on people's behaviour and Crossrail 2 had not been confirmed at the time of the 2018 Issues and Options consultation. The positive effects are therefore recorded as uncertain. Further to this, LBE experiences severe problems with air quality, especially between the east and west of the Borough, with the entire Borough being declared an Air Quality Management Area (AQMA). Therefore, although both options focus development within close proximity to sustainable travel modes, where services and facilities are within walking and cycling distance of one another, the amount of development that would be delivered under both options would have significant adverse effects on air quality through population increase and a higher presence of cars. However, walking and cycling could be encouraged through the design of new development and incorporation of Healthy Streets principles. Overall, both options are expected to have a mixed significant positive and significant negative effect.

**H.41** Option 7: Strategic plan-led approach to Green Belt supports development within the Green Belt in the north west of the Borough, where only one railway station is located in the Crews Hill area. Bus services are less frequent and services and facilities are not within easy walking distance of one another. Therefore, new residents would be more reliant on the private car, contributing towards air pollution. The amount of development delivered under this option is also expected to increase the number of cars on the road. However, the supporting text to Option 7 focuses on the Crews Hill area, which is accessible via public transport. Overall, therefore, Option 7 is expected to have a mixed significant negative and minor positive effect against IIA11: Air pollution. Although Option 2: Transport corridors contains some areas that fall within the urban area where everyday

Appendix H
IIA findings for the Issues and Options Local Plan 2018

Enfield Local Plan: Integrated Impact Assessment December 2023

amenities are available and within walking distance of one another, supporting development along Great Cambridge Road (A10) and North Circular Road (A406) would encourage use of the private car and result in an increase in air pollution, particularly if there are more cars on the road as a result of population increase. Option 2 is therefore also expected to have a mixed significant negative and minor positive effect in relation to this objective. Option 4: Eastern corridor and low density industrial areas is expected to have a mixed significant negative and minor positive effect against IIA11 because although it supports development in the eastern corridor where a number of railway stations are located, including the proposed Crossrail 2 infrastructure project, it also includes some areas that are not within close proximity of public transport infrastructure, in addition to everyday facilities. The development delivered under this option would also contribute to the number of cars on the road. All positive effects are recorded as uncertain because the actual use of more active and sustainable modes of travel will depend on people's behaviour.

**H.42** Options 3: Existing estate renewal and regeneration programmes is expected to have a mixed minor positive and minor negative effect in relation to this objective because the estates proposed for redevelopment are located within close proximity of some tube and railway stations and may therefore reduce reliance on the private car. However, the provision of 3,000 new homes may increase the number of cars on the road, with adverse effects on air quality. Option 6: New Southgate and Upper Lee Valley Opportunity Areas also supports development in areas within close proximity of tube and railway stations and would also not result in as large amount of development as that proposed by the other options. Therefore, it is also expected to have a mixed minor positive and minor negative effect in relation to this objective. All positive effects are recorded as uncertain because the actual use of more active and sustainable modes of travel will depend on people's behaviour.

#### IIA objective 12: Minimise the need to travel and support a modal shift away from the private car

**H.43** Options 1: Main town centres and areas around all stations and 5: Future Crossrail 2 Growth Corridor promote development around tube and railway stations, with Option 1 also supporting development at town centres where everyday services and facilities are located within walking distance of one another. The town centres are highly accessible and also contain multiple bus routes, whilst Crossrail 2 would provide a four train per hour service from 2028. These two options are therefore likely to reduce reliance on the private car and increase more sustainable modes of transport. However, the use of more active and sustainable modes of transport will depend on people's behaviour, especially following the COVID-19 pandemic where there has been a significant reduction in people using public transport. The Crossrail 2 strategic infrastructure project had also not been confirmed at the time of the 2018 Issues and Options consultation. These two options are therefore expected to have a significant positive but uncertain effect in relation to this objective.

**H.44** Option 2: Transport corridors contains some areas that fall within the urban area where everyday amenities are available and within walking distance of one another. However, it also supports development along Great Cambridge Road (A10) and North Circular Road (A406), which would encourage use of the private car. Option 2 is therefore expected to have a mixed significant negative and minor positive effect in relation to this objective. Option 7: Strategic plan-led approach to Green Belt supports development within the Green Belt in the north west of the Borough, where only one railway station is located in the Crews Hill area. Bus services are less frequent and services and facilities are not within easy walking distance. Therefore, new residents would be more reliant on the private car, which would prevent a modal shift away from the private car. However, the supporting text to Option 7 focuses on the Crews Hill area, which is accessible via public transport. Overall, Option 7 is expected to have a mixed minor positive and minor negative effect against this objective.

**H.45** Options 3: Existing estate renewal and regeneration programmes and 6: New Southgate and Upper Lee Valley Opportunity Areas are expected to have minor positive but uncertain effects in relation to this objective because they are both located within close proximity of some tube and railway stations and may therefore reduce reliance on the private car, although this is dependent on people's travel behaviour. Option 4: Eastern corridor and low density industrial areas is expected to have a mixed minor positive and minor negative effect against IIA12 because although it supports development in the eastern corridor where a number of railway stations are located, including the proposed Crossrail 2 infrastructure project, it also includes some areas that are not within close proximity of public transport infrastructure, in addition to everyday facilities. All positive effects are recorded as uncertain because the actual use of more active and sustainable modes of travel will depend on people's behaviour.

## IIA objective 13: Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks

**H.46** LBE does not contain a Special Protection Area (SPA), Special Area of Conservation (SAC) or a Ramsar site. However, it is located within close proximity to the Lee Valley SPA and Ramsar site which is located to the north and south of the Borough in Lee Valley Regional Park, which runs along the eastern edge of LBE. The Epping Forest SAC is also located just outside of the Borough, to its east. The Chingford Reservoir Site of Special Scientific Interest (SSSI) is located within the Borough, along its eastern edge. There is also one Local Nature Reserve (LNR) within the Borough, known as Covert Way, located just south of Hadley Wood in the south west of the Borough. A large number of Sites of Importance in Nature Conservation (SINC) are spread across the Borough.

H.47 Options 4: Eastern corridors and low density industrial areas, 5: Future Crossrail 2 Growth Corridor and 6: New Southgate and Upper Lee Valley Opportunity Areas promote development within the east of the Borough, where the Chingford Reservoir SSSI is located, in addition to three SINCs. Therefore, all three options could potentially result in a significant negative but uncertain effect in relation to IIA13: Biodiversity due to the potential for new development to cause disturbance to species, habitat loss or fragmentation and other effects such as air pollution. Option 3: Existing estate renewal and regeneration programmes also supports development within the east of the Borough, in addition to around Arnos Grove tube station, where some additional SINCs are located. For this reason, Option 3 is also expected to have a significant negative but uncertain effect in relation to this objective. As mentioned already, SINCs are spread across the Borough and therefore Option 1: Main town centres and areas around all stations, which supports fairly even development across the Borough, is also expected to have a significant negative but uncertain effect. This is particularly due to the fact most SINCs contain or are located adjacent to a railway station, where development is supported under this option. The largest proportion of SINCs are located in the north west of the Borough, within the Green Belt, whilst the strategic transport corridors abut a number of SINCs. Options 2: Transport corridors and 7: Strategic plan-led approach to Green Belt and therefore also expected to have significant negative but uncertain effects in relation to this objective.

### IIA objective 14: Sustain and enhance the significance of heritage assets

H.48 The northern edge of LBE does not contain a large proportion of heritage assets whereas the remainder of the Borough does, especially the more built-up areas such as Enfield Town. A number of Conservation Areas are located along the periphery of the built-up area within the edge of the Green Belt, the largest being Trent Park which is also a Registered Park and Garden. Option 1: Main town centres and areas around all stations supports development within the main town centres and around tube and railway stations, which tend to be located within close proximity of a large number of Listed Buildings, whilst also falling within or close to Conservation Areas. Therefore, Option 1 is expected to have a significant negative but uncertain effect in relation to IIA14: Historic environment. Option 7: Strategic plan-led approach to Green Belt supports development within the Green Belt in the north west of the Borough, where a number of Conservation Areas, Listed Buildings, Scheduled Monuments and Registered Parks and Gardens are present. Option 7 is therefore also expected to have a significant negative but uncertain effect against this objective. Options 2: Transport corridors, 4: Eastern corridor and low density industrial areas, 5: Future Crossrail 2 Growth Corridor and 6: New Southgate and Upper Lee Valley Opportunity Areas are expected to have minor negative but uncertain effects in relation to this objective because they do not contain as many heritage assets as the other two options, and there are no Scheduled Monuments or Registered Parks and Gardens present. Option 3: Existing estate renewal and regeneration programmes is expected to have a negligible but uncertain effect in relation to this objective because it seeks to regenerate existing estates, with no adverse effects on the historic environment expected. However, the effect is recorded as uncertain because the actual effect will depend on the regeneration of the estate, such as the design, scale and layout of development.

### IIA objective 15: Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes

**H.49** Options 1: Main town centres and areas around all stations and 2: Transport corridors are expected to deliver the highest amount of growth compared to the other five options by increasing density and the building heights of new development, which would significantly alter the character of the urban area. Options 1 and 2 are therefore expected to have a significant negative effect in relation to this objective. Option 7: Strategic plan-led approach to Green Belt supports development within the Green Belt, which could potentially alter the landscape in the north west of the Borough. Therefore, Option 7 is also expected to have a significant negative effect in relation to this objective.

**H.50** Options 4: Eastern corridor and low density industrial areas, 5: Future Crossrail 2 Growth Corridor and 6: New Southgate and Upper Lee Valley Opportunity Areas support development within the east of the Borough, with Option 6 also supporting development of the New Southgate Opportunity Area in the south west of the Borough. The east of the Borough contains a lot of Enfield's industrial land, most of which is low density. According to the Issues and Options document, if the Crossrail 2 strategic infrastructure project is confirmed, Enfield would need to provide a further 40,000 plus new homes out of the 200,000 homes to be realised through land released by Crossrail 2. However, LBE cannot meet this requirement without the strategic reconfiguration of land within the eastern corridor. Therefore, a significant amount of redevelopment would need to take place if Crossrail 2 were to be confirmed. This redevelopment would fundamentally alter the character of the area but could also potentially enhance any disused previously developed land. Options 4, 5 and 6 are therefore expected to have a mixed significant negative and minor positive effect against this objective, with uncertainty recorded against the positive effect.

**H.51** Option 3 would deliver 3,000 new homes through the regeneration of existing estates within the Borough, which could potentially enhance the townscape. Therefore, Option 3 is expected to have a minor positive but uncertain effect in relation to this objective. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development.

### IIA objective 16: To achieve efficient use of land and materials

**H.52** All options with the exception of one (Option 7) support development on previously developed land that is classified under the best and most versatile agricultural land system as land predominantly in urban use. All six options are therefore expected to have significant positive effects in relation to IIA16: Efficient use of land and materials. Option 7: Strategic plan-led approach to Green Belt promotes development within the Green Belt in the north west of the Borough, which comprises a mixture of both greenfield and brownfield sites, all of which are classified as Grade 3 agricultural land. Therefore, although this option would promote the development of previously developed land, it would also promote the development of greenfield land, which is not an efficient use of land. Therefore, Option 7 is expected to have a minor negative effect in relation to this objective.

### IIA objective 17: To manage and reduce the risk of flooding

H.53 The River Lee, in addition to King George's Reservoir and William Girling Reservoir located along the eastern edge of LBE create a flood risk. The immediate area surrounding these waterbodies falls within Flood Zones 3a and 3b, as well as Flood Zone 2. The NPPF discourages the development of housing within areas at the highest risk of flooding and major development should incorporate surface water management measures, such as sustainable drainage systems. Option 2: Transport corridors supports development along two transport corridors, one of which is the North Circular Road (A406). However, Pymme's Brook runs along this road, making it an area of high flood risk. Options 4: Eastern corridor and low density industrial areas, 5: Future Crossrail 2 Growth Corridor and 6: New Southgate and Upper Lee Valley Opportunity Areas focus development in the east of the Borough, whilst Option 3: Existing estate renewal and regeneration programmes supports the regeneration of existing estates. Option 7: Strategic plan-led approach to Green Belt supports development of Green Belt land in the north west of the Borough, some of which comprises greenfield land. As such, development would reduce the amount of permeable surface available and potentially contribute to surface water run-off, increasing flood risk. Option 1: Main town centres and areas around all stations promotes development within town centres and at tube and railway stations, some of which are located in the east of the Borough. The aforementioned flood zones also stretch to the west of the Borough along New River (Old Course) and a number of brooks, most of which are located within close proximity to tube and railway stations. Overall, all options are expected to have minor negative but uncertain effects in relation to IIA7: Flooding.

#### IIA objective 18: Minimise water use and protect water quality

**H.54** LBE is covered entirely by the London Water Resource Zone, with its potable water and waste water services supplied by Thames Water. Greater London is mostly supplied by surface water resources (80%), with the remainder delivered through groundwater abstractions. Given the high-level nature of these options, it is not possible to distinguish between them with respect to water resources, water quality and wastewater treatment capacity. Water resources is a key issue in LBE, given that the Thames Water Supply is designated as "seriously water stressed" and that climate change may lead to limited water availability in the future, particularly in the summer. The Borough contains a fairly high proportion of land covered by Source Protection Zones 1 and 2<sup>288</sup>, and it is therefore unlikely that development would be able to avoid these Source Protection Zones.

<sup>&</sup>lt;sup>288</sup> There is no land in LBE covered by Source Protection Zone 3.

Development in some locations could therefore contaminate water supplies without mitigation. All options with the exception of one (Option 7) support development in existing built-up areas and therefore any effect on Source Protection Zones is likely to be limited. Due to the fact these options contain land that falls within Source Protection Zones 1 and 2 but already contain built development, minor negative but uncertain effects are expected. Although a large proportion of Green Belt land under Option 7: Strategic plan-led approach to Green Belt does not contain built development, only a very small proportion of Green Belt land falls within Source Protection Zones 1 and 2. For this reason, Option 7 is also expected to have a minor negative but uncertain effect in relation to this objective.

# IIA findings for the policy approaches considered in the 2018 Issues and Options document

**H.55** This section presents the IIA findings for the reasonable alternative policy approaches that are set out in the 2018 Local Plan Issues and Options consultation document, under the same headings used within the consultation document.

### Historic environment policy options

**H.56** The likely sustainability effects of the historic environment policy approaches are set out in **Table H.3** and described below the table.

Table H.3: IIA results for the 2018 historic environment policy options

IIA objective	HE1: Design quality and local character	HE2: Designated heritage assets, their setting and archaeology	HE3: Locally listed and undesignated heritage assets and cultural practices	HE4: Views
IIA1: Climate change mitigation	0	0	0	0
IIA2: Climate change adaptation	0	0	0	0
IIA3: Housing	0	0	0	0
IIA4: Health and wellbeing	0	0	0	0
IIA5: Services and facilities	0	0	0	0
IIA6: Social inclusion	0	0	0	0
IIA7: Crime and community safety	0	0	0	0
IIA8: Road safety	0	0	0	0
IIA9: Economy	0	0	0	0
IIA10: Town and local centres	0	0	0	0
IIA11: Air pollution	0	0	0	0
IIA12: Sustainable transport	0	0	0	0
IIA13: Biodiversity	0	0	0	0

IIA objective	HE1: Design quality and local character	HE2: Designated heritage assets, their setting and archaeology	HE3: Locally listed and undesignated heritage assets and cultural practices	HE4: Views
IIA14: Historic environment	++	++	++	++
IIA15: Landscape and townscape	+	0	+	++
IIA16: Efficient use of land and materials	0	0	0	0
IIA17: Flooding	0	0	0	0
IIA18: Water	0	0	0	0

**H.57** These four policies seek to preserve, protect and enhance the London Borough of Enfield's historic environment. Policy HE1 addresses design quality and local character, Policy HE2 examines designated heritage assets, their setting and archaeology, Policy HE3 promotes locally listed and undesignated heritage assets and cultural practices and Policy HE4 covers views. These policies have a specific focus and as a result are unlikely to affect the majority of IIA objectives.

H.58 All four policies are anticipated to have significant positive effects in relation to IIA14: Historic environment. The policies all support the integrity, special interest, character, appearance and historic setting of heritage assets, both designated and non-designated. Policy HE2: Designated heritage assets, their setting and archaeology requires development proposals affecting a designated heritage asset, its setting or a property within a conservation area, to submit a Heritage Statement. Policies HE1: Design quality and local character and HE3: Locally listed and undesignated heritage assets and cultural practices also promote increasing access to and understanding of heritage, both in areas where heritage is underrepresented and with the general public. Furthermore, minor positive effects are anticipated for policies HE1: design quality and local character and HE3: Locally listed and undesignated heritage assets and cultural practices in relation to IIA15: Landscape and townscape as they both highlight the role that heritage assets play in forming and reinforcing a sense of local distinctiveness and character in Enfield Borough. A significant positive effect is also expected for Policy HE4: Views in relation to this objective as the policy seeks to protect strategic and local views. This is key as the view to and from natural or built assets enhances local distinctiveness and character

**H.59** Negligible effects are expected in relation to IIA1: Climate change mitigation, IIA2: Climate change adaptation, IIA3: Housing, IIA4: Health and wellbeing, IIA5: Services and facilities, IIA6: Social inclusion, IIA7: Crime and community safety, IIA8: Road safety, IIA9: Economy, IIA10: Town and local centres, IIA11: Air pollution, IIA12: Sustainable transport, IIA13: Biodiversity, IIA16: Efficient use of land and materials, IIA17: Flooding and IIA18: Water.

### **Design policy options**

H.60 The likely sustainability effects of the design Policy approaches are set out in **Table H.4** and described below the table.

Table H.4: : IIA results for the 2018 design policy options

IIA objective	D1: Achieving design excellence	D2: Character and density	D3: Design for co-location and mixed use development	D4: Designing for a sustainable, safe and inclusive Borough
IIA1: Climate change mitigation	+	0	+	++
IIA2: Climate change adaptation	0	0	0	++
IIA3: Housing	++	0	++	0
IIA4: Health and wellbeing	+	0	+	++
IIA5: Services and facilities	0	0	+	0
IIA6: Social inclusion	+	0	0	0
IIA7: Crime and community safety	+	+	0	+
IIA8: Road safety	0	+	0	0
IIA9: Economy	0	0	0	0
IIA10: Town and local centres	0	0	0	0
IIA11: Air pollution	+	0	+	0
IIA12: Sustainable transport	++	0	++	0
IIA13: Biodiversity	0	0	0	0
IIA14: Historic environment	0	+	0	0
IIA15: Landscape and townscape	++	++	0	0
IIA16: Efficient use of land and materials	+	++	++	++
IIA17: Flooding	0	0	0	+
IIA18: Water	0	0	0	0

**H.61** These four policies seek to address good design in new developments. Policy D1 relates to achieving design excellence, Policy D2 covers character and density, Policy D3 addresses design for co-location and mixed use development and Policy D4 promotes design for a sustainable, safe, and inclusive Borough. These policies have a narrow focus and as a result are unlikely to adversely affect the IIA objectives.

**H.62** Policy D4: Designing for a safe and inclusive Borough is expected to have significant positive effects in relation to **IIA1**: **Climate change mitigation** and **IIA2**: **Climate change adaptation** because it encourages use of the BRE Home Quality Mark, which could help reduce CO<sub>2</sub> emissions associated with residential development, whilst directly promoting sustainable design and resilience to climate change environmental hazards and emergencies.

Appendix H
IIA findings for the Issues and Options Local Plan 2018

Enfield Local Plan: Integrated Impact Assessment December 2023

**H.63** Policy D1: Achieving design excellence states that affordable homes must be designed to the same or higher standards as the private housing element of new developments, whilst also advocating the successful integration of different tenure types in new development. A significant positive effect is therefore expected for this policy in relation to **IIA3: Housing**. Further to this, the policy requires developments across the Borough to meet space standards, which will have beneficial effects on people's health and wellbeing. A minor positive effect is therefore expected in relation to **IIA4: Health and wellbeing**. Policy D3: Design for co-location and mixed use development and the co-location of different uses, which is an efficient use of space and also enables new homes to be built. A significant positive is therefore also expected for this policy in relation to **IIA3: Housing**. Policy D3: Design for co-location and mixed use development is also expected to have a minor positive effect in relation to **IIA4: Health and wellbeing** because when co-locating residential development or social infrastructure with industrial uses, consideration will be given to health and residential amenity. With the promotion of mixed use development, Policy D3: Design for co-location and mixed use development is also expected to have a minor positive effect in relation to **IIA5: Services and facilities**.

**H.64** A minor positive effect is anticipated for Policy D1: Achieving design excellence in relation to IIA6: Social inclusion. Both the policy and its supporting text seek to improve design quality across all types of development and across all tenures, ensuring that affordable homes are designed to the same or higher standards as the private housing element of new developments. Through improving design quality in the Borough, it is anticipated that living standards will be improved for those in more deprived areas. Further to this, Policy D1: Achieving design excellence promotes pepper potting tenure mixes across housing sites to provide choice and opportunity for all. Policies D1: Achieving design excellence, D2: Character and density and D4: Designing for a safe and inclusive Borough are expected to have minor positive effects in relation to **IIA7: Crime and community safety**. This is because both policies D1 and D4 make reference to the role that design can play in creating sustainable and safe environments, whilst the supporting text to Policy D2 highlights the importance of ensuring tall, high rise buildings are safe from fire risk.

H.65 Significant positive effects are expected in relation to IIA12: Sustainable transport because policies D1: Achieving design excellence and D3: Design for co-location promote sustainable modes of transport. Policy D1 states that all developments must facilitate local movement, public access through sites, sustainable transport and easy way-finding, whilst Policy D3 and its supporting text promote mixed use development and co-location, as they can encourage healthier lifestyles through walking and cycling. Furthermore, encouraging more sustainable transport choices will help minimise air pollution and greenhouse gas emissions associated with use of the private car. As such, minor positive effects are expected for policies D1: Achieving design excellence and D3: Design for co-location and mixed use development in relation to IIA1: Climate change mitigation and IIA11: Air pollution. A minor positive effect is also anticipated with Policy D2: Character and density against IIA8: Road safety, as the policy states that the Council will refuse proposals which negatively impact road and pedestrian safety or traffic flow.

**H.66** A significant positive is anticipated in relation to policies D1: Achieving design excellence and D2: Character and density in relation to **IIA15**: **Landscape and townscape** as both enhance the landscape and townscape in Enfield Borough. The supporting text of Policy D1: Achieving design excellence recognises the role that tall buildings play in generating a strong sense of place in the Borough, whilst Policy D2: Character and density states that the Council will seek to protect and build on the existing positive character and individual context of the Borough. Furthermore, Policy D2: Character and density also makes reference to protect Enfield Borough's areas of historic value, therefore a minor positive is also expected in relation to Policy D2: Character and density and to **IIA14**: **Historic Environment**.

H.67 All four policies are expected to have positive effects in relation to IIA16: Efficient use of land and materials. Significant positive effects are expected for policies D2: Character and density, D3: Design for co-location and mixed use development and D4: Designing for a safe and inclusive Borough in relation to this objective, as all three policies promote efficient use of land. Policy D2: Character and density promotes small scale infill and extension developments, whilst Policy D3: Design for co-location and mixed use development promotes mixed use development, as well as the co-location of different uses. Policy D4: Designing for a safe and inclusive Borough encourages sustainable design policies and standards in development proposals, by maximising possibilities for the reuse of materials and minimise waste generated during the construction of development. The supporting text to Policy D1: Achieving design excellence states that brownfield land must be used efficiently through infill and extension development. A minor positive effect is therefore expected for Policy D1: Achieving design excellence in relation to IIA16: Efficient use of land and materials.

**H.68** Finally, whilst the topic of flooding is not directly referenced in Policy D4: Designing for a safe and inclusive Borough, the promotion of sustainable and resilient design is likely to positively affect **IIA17: Flooding**. A minor positive is therefore expected in relation to this objective.

**H.69** Negligible effects are expected in relation to IIA9: Economy, IIA10: Town and local centres, IIA13: Biodiversity and IIA18: Water.

### **Housing policy options**

H.70 The likely sustainability effects of the housing policy approaches are set out in Table H.5 and described below the table.

Table H.5: IIA results for the 2018 housing policy options

IIA objective	H1: Housing growth and quality	H2: Affordable housing	H3: Small sites	H4: Housing mix	H5: Private rented sector and build-to-rent	H6: Custom and self-build housing	H7: Supported and specialist housing	H8: Gypsy and traveller accommodation
IIA1: Climate change mitigation	+	0	+	0	0	0	+	0
IIA2: Climate change adaptation	0	0	0	0	0	0	0	0
IIA3: Housing	++	++	++	++	++	++	++	++
IIA4: Health and wellbeing	0	0	0	0	0	0	0	0
IIA5: Services and facilities	0	0	0	0	0	0	+	+
IIA6: Social inclusion	0	+	0	0	0	+	+	0
IIA7: Crime and community safety	0	0	0	0	0	0	0	0
IIA8: Road safety	0	0	0	0	0	0	0	0
IIA9: Economy	+	+	+	+	+	+	+	+
IIA10: Town and local centres	0	0	0	0	0	0	0	0
IIA11: Air pollution	+	0	+	0	0	0	+	0
IIA12: Sustainable transport	+	0	+	0	0	0	+	0
IIA13: Biodiversity	+	0	0	0	0	0	0	0
IIA14: Historic environment	+	0	0	0	0	0	0	0
IIA15: Landscape and townscape	+	0	0	0	0	+?/-?	0	0
IIA16: Efficient use of land and materials	++	0	++	0	0	0	0	0
IIA17: Flooding	0	0	0	0	0	0	0	+
IIA18: Water	0	0	0	0	0	0	0	0

- **H.71** All housing policy options will contribute to a sufficient supply of homes in the Borough and seek to ensure that the mixed demands of a growing population are met by a variety of housing sizes, types, tenures, and specialist accommodation. These policies would directly address the identified key sustainability issues of a deficiency in housing supply and availability of affordable housing across LBE and, therefore, significant positive effects are expected in relation to **IIA3: Housing**. These policies will also support the local economy by ensuring that opportunities for housing development and therefore commerce and employment are secured. Therefore, minor positive effects are expected in relation to **IIA9: Economy**.
- H.72 Policy H7: Supported and specialist housing will ensure that development contributes to the creation of inclusive and sustainable neighbourhoods and offers easy access to community facilities, public transport, and other services and facilities. Therefore, minor positive effects are expected against IIA5: Services and facilities and IIA6: Social inclusion in relation to this policy. A minor positive effect is also expected against IIA6: Social inclusion in relation to Policy H2: Affordable housing, as the policy is likely to improve social inclusion through mixed residential schemes that include both market and affordable housing. The provision of affordable housing will also help to address inequalities between different groups of people in the Borough, particularly in regard to the divide between the east and west of the Borough, which has been identified as a key sustainability issue. Policy H6: Custom and self-build housing is expected to have a minor positive effect in relation to IIA6: Social inclusion because it enables people to design a home to suit their needs, which may include specialist needs.
- **H.73** Policy H8: Gypsy and traveller accommodation will ensure that the development of new or existing gypsy and traveller accommodation has good access to services and facilities and supports development of these sites within Flood Zone 1, thereby reducing the risk of damage to people and property, resulting in minor positive effects against **II5: Services and facilities** and **IIA17: Flooding**.
- H.74 Policy H1: Housing growth and quality seeks to prioritise the delivery of new homes around the emerging growth and investment areas outlined in Chapter 2 of the Issues and Options Local Plan. Therefore, the policy promotes more compact development where people will be located closer to other development including employment centres and may be able to walk or cycle to local services/facilities and workplaces. Policy H3: Small sites will encourage housing delivery and intensification on small sites with good accessibility to public transport and the Borough's town centres. In addition, Policy H7: Supported and specialist housing sets out the Council's approach to meeting the specialist needs of more vulnerable people such as the elderly. The policy seeks to ensure that development proposals are accessible to public transport, workplaces, shops, and other services and facilities. This is likely to reduce the reliance on private vehicles and encourage the use of public transport. These policies would therefore promote and facilitate the use of more sustainable modes of transport, including walking, cycling, and public transport, and reduce vehicular emissions in the Borough. As such, minor positive effects are expected against IIA1: Climate change mitigation, IIA11: Air pollution and IIA12: Sustainable transport in relation to these policies.
- H.75 Individuals wishing to self/custom build their home rather than buy it from a traditional housebuilder are likely to be motivated by a desire to have greater influence on the design and layout, and to have the ability to create a home to suit their individual needs and aspirations. In seeking to provide the flexibility for this to happen, there is a risk that Policy H6: Custom and self-build housing, which facilitates provision of new homes via self and custom build, could result in inappropriate design and layout (e.g. inconsistent with surrounding landscape and townscape) with potential minor negative effects in relation to IIA15: Landscape and townscape. On the other hand, the variations in design may enhance the landscape and townscape. It is noted that these developments would also be subject to the requirements of the Design policies, which seek to avoid adverse impacts. Therefore, the effect is mixed with a minor positive effect and recorded as uncertain.
- **H.76** Policy H1: Housing growth and quality seeks to promote higher density development in suitable, accessible locations as well as ensure that vacant and new homes are occupied, while Policy H3: Small sites will encourage infill development on vacant or underused sites as well as the redevelopment of flats and non-residential buildings in order to deliver additional housing. As such, significant positive effects are expected against **IIA16: Efficient use of land and materials**.
- **H.77** Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA4: Health and wellbeing, IIA7: Crime and community safety, IIA8: Road safety, IIA10: Town and local centres and IIA18: Water.

#### **Economy policy options**

H.78 The likely sustainability effects of the economy policy approaches are set out in Table H.6 and described below the table.

Table H.6: IIA results for the 2018 economy policy options

IIA objective	E1: Business and job growth	E2: Approach to employment land	E3: Office	E4: Supporting small business	E5: Skills and access to employment	E6: Digital infrastructure	E7: Creative Enterprise Zone
IIA1: Climate change mitigation	+/-?	+/-?	+	+	0	+	0
IIA2: Climate change adaptation	0	0	0	0	0	0	0
IIA3: Housing	0	+	0	0	0	0	0
IIA4: Health and wellbeing	0	0	0	0	0	0	0
IIA5: Services and facilities	0	0	0	0	++	0	0
IIA6: Social inclusion	0	0	0	0	+	+	0
IIA7: Crime and community safety	0	0	0	0	0	0	0
IIA8: Road safety	0	0	0	0	0	0	0
IIA9: Economy	++	++	++	++	++	++	++
IIA10: Town and local centres	+	+	+	+	0	0	+
IIA11: Air pollution	+	+/-?	+	+	0	+	0
IIA12: Sustainable transport	+	+/-?	+	+	0	+	0
IIA13: Biodiversity	0	0	0	0	0	0	0
IIA14: Historic environment	0	0	0	0	0	0	+
IIA15: Landscape and townscape	0	0	0	0	0	0	0
IIA16: Efficient use of land and materials	++	++/-	++/-	++	0	0	++
IIA17: Flooding	0	0	0	0	0	0	0
IIA18: Water	0	0	0	0	0	0	0

**H.79** All economy policy options will contribute to the protection and enhancement of the local economy by aiming to attract and retain investment from existing and emerging growth sectors in order to ensure that opportunities for commerce and employment within the Borough of Enfield are secured. Policy E1: Business and job growth in particular, seeks to promote employment, industry and logistics. All policy options are therefore expected to have significant positive effects in relation to **IIA9: Economy**.

**H.80** Policies E1: Business and job growth, E2: Approach to employment land and E3: Office will ensure that employment growth is focused on emerging growth and investment areas including town centres, as well as intensified at Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) in order to support economic growth and a higher job density and to achieve more efficient use of employment land. In addition, Policy E4: Supporting small business will support existing and new

businesses in the Borough through the provision of new business floorspace in mixed use or commercial schemes with particular consideration for development within town centres, and Policy E7: Creative Enterprise Zone will encourage the temporary use of vacant buildings and sites for creative workspace and industries. These policies would therefore promote more compact development patterns and encourage the efficient use of land within the Borough, including within the town centres. As such, minor positive effects are expected against IIA10: Town and local centres and significant positive effects are expected against IIA16: Efficient use of land and materials. By supporting more compact development and proposals for mixed-use development, policies E1 to E4 would also reduce the need to travel within the Borough and are therefore likely to result in minor positive effects in relation to IIA1: Climate change mitigation and IIA11: Air pollution, as well as IIA12: Sustainable transport.

- **H.81** Policies E2: Approach to employment land and E3: Office state that they will support floorspace for new purpose built office and business accommodation throughout the Borough. Although this will be focused within growth and investment areas and other land previously identified for employment purposes, these policies may result in the use of previously unused land. As such, minor negative effects are expected in relation to **IIA16**: **Efficient use of land and materials**, resulting in mixed significant positive and minor negative effects for policies E2: Approach to employment land and E3: Office.
- **H.82** Policy E2: Approach to employment will support mixed-use, employment-led schemes which include housing, as long as the uses are compatible. As such, a minor positive effect is expected against **IIA3: Housing** in relation to this policy.
- **H.83** Policy E5: Skills and access to employment will seek to enhance the employability and long-term employment prospects for all residents, regardless of health or disability. The policy states that it will provide support for improvements to skills and educational attainment, as well as childcare and training provision. The policy also seeks to increase the proportion of underrepresented groups within the construction industry workforce. In addition, the policy supports the development of educational facilities and the provision of new training opportunities, skills development and apprenticeships. Therefore, this policy is likely to provide a higher number of residents with access to services in the District, with a significant positive effect is expected against **IIA5: Services and facilities** in relation to this policy. In addition, Policy E6: Digital infrastructure sets out the approach of the Council to promote the development of high quality communications infrastructure in order to support economic growth and more accessible and inclusive communities. The policy is therefore likely to reduce social exclusion in the Borough, resulting in minor positive effects in relation to **IIA6: Social inclusion**.
- **H.84** In addition, Policy E5: Skills and access to employment states that the Council will work with their partners to enhance the employability and long-term employment prospects for all residents within Enfield, regardless of health or disability status. As such, a minor positive effect is expected against **IIA6: Social inclusion** in relation to this policy.
- H.85 Policy E2: Approach to employment land states that the Council will support further development of Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), as well as development at new locations that are accessible to the strategic road network. This could result in increased pressure on the transport system and potential traffic congestion, as well as potential impacts on air pollution which has been identified as a key sustainability issue in the Borough. As such, minor negative effects are expected against IIA1: Climate change mitigation, IIA11: Air pollution, and IIA12: Sustainable transport. However, the policy will also seek to ensure that impacts on the transport network as a result of development within LSIS are mitigated. As such, these effects are uncertain as the potential negative impacts are dependent on the implementation of mitigation measures. As a result, uncertain mixed minor positive and minor negative effects are expected against IIA1: Climate change mitigation, IIA11: Air pollution and IIA12: Sustainable transport in relation to Policy E2: Approach to employment land.
- **H.86** In addition, Policy E6: Digital infrastructure sets out the Council's approach to promoting the development of high quality communications infrastructure and will improve digital connectivity. The policy is therefore likely to encourage people to work from home, reducing the need to travel and the use of private vehicles. As such, minor positive effects are expected in relation to **IIA1: Climate change mitigation**, **IIA11: Air pollution** and **IIA12: Sustainable transport.**
- **H.87** Policy E7: Creative Enterprise Zone outlines how the Council will promote Meridian Water as a creative enterprise zone, which will build upon the heritage of the area. The policy will therefore help to foster heritage-led regeneration within the Borough and is likely to have a minor positive effect in relation to **IIA14: Historic environment**.
- **H.88** Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA4: Health and wellbeing, IIA7: Crime and community safety, IIA8: Road safety, IIA13: Biodiversity, IIA15: Landscape and townscape, IIA17: Flooding and IIA18: Water.

### Town centre policy options

**H.89** The likely sustainability effects of the town centre policy approaches are set out in **Table H.7** and described below the table.

Table H.7: IIA results for the 2018 town centre policy options

Table 11.7. IIA results for the 2010 town centre policy options				
IIA objective	TC1: Town centres	TC2: Successful town centres	TC3: Meanwhile uses	TC4: Evening and night time economy
IIA1: Climate change mitigation	+	+	0	0
IIA2: Climate change adaptation	0	0	0	0
IIA3: Housing	0	+	0	0
IIA4: Health and wellbeing	0	+	0	+/-
IIA5: Services and facilities	+	+	+	+
IIA6: Social inclusion	0	+	0	+
IIA7: Crime and community safety	0	+	0	0
IIA8: Road safety	0	0	0	0
IIA9: Economy	++	++	+	++
IIA10: Town and local centres	++	++	++	++
IIA11: Air pollution	+	+	0	0
IIA12: Sustainable transport	+	+	0	0
IIA13: Biodiversity	0	0	0	0
IIA14: Historic environment	0	0	0	0
IIA15: Landscape and townscape	0	+	+	0
IIA16: Efficient use of land and materials	0	+	0	0
IIA17: Flooding	0	+	0	0
IIA18: Water	0	0	0	0

**H.90** All town centre policy options will contribute to the maintenance, enhancement and regeneration of the vitality and viability of the town and local centres in the Borough of Enfield's town centre hierarchy through appropriate development, and would therefore all have significant positive effects against **IIA10: Town and local centres**. By encouraging and focusing development within town centre locations, all of these policies are likely to increase the provision of and improve access to, services and facilities within the Borough. As such, minor positive effects are expected against **IIA5: Services and facilities**.

**H.91** These policies will also support the local economy by ensuring that opportunities for town and local centre development and therefore commerce and employment are secured. Therefore, significant positive effects are expected in relation to **IIA9**: **Economy** in relation to policies TC1: Town centres, TC2: Successful town centres and TC4: Evening and night time economy, while the effect is likely to be less significant in relation to Policy TC3: Meanwhile uses and so a minor positive effect is expected.

**H.92** In order to support and avoid significant impacts to the role and function of town centres in the Borough, Policy TC1: Town centres will support proposals for town centre uses within the emerging growth and investment areas identified in the Issues and Options Local Plan. Policy TC2: Successful town centres also seeks to ensure that the Council works with key stakeholders to support improvements to public transport and access to transport, services and facilities. This is likely to reduce the need to travel as well as promote and facilitate the use of more sustainable modes of transport, including walking and cycling. Therefore, these policies are expected to have minor positive effects against **IIA1: Climate change mitigation** and **IIA12: Sustainable transport**. By supporting development within existing town and local centres, these policies avoid the creation of new air pollution hotspots and help to address the identified key issues relating to air quality in the Borough. Therefore, minor positive effects are also expected against **IIA11: Air pollution** in relation to these policies.

**H.93** Policy TC2: Successful town centres will encourage the redevelopment of underused space in the Borough's centres, including car parks, for residential use, in order to promote a better use of available land. This policy would directly address the key sustainability issue of a housing supply deficiency and ensure the efficient use of land. As such, minor positive effects are expected against **IIA3: Housing** and **IIA16: Efficient use of land and materials**.

**H.94** Policies TC2: Successful town centres and TC4: Evening and night time economy will also seek to ensure that public and residential amenity in the Borough's centres is protected, for example by requiring that development proposals provide appropriate attenuation measures in locations with high levels of noise. In addition, Policy TC2: Successful town centres states that the Council will support uses in town centres that have a positive impact on health and well-being and would therefore help to address the identified key sustainability issue of health deficiencies in Enfield. Therefore, minor positive effects are expected for both policies against **IIA4: Health and wellbeing**.

**H.95** Policy TC4: Evening and night time economy outlines the Council's approach to food and drink establishments, as well as arts, culture and leisure uses. It will support improvements to green spaces in the Borough, specifically to the west of Church Street/Windmill Hill and the entrances to the town centre in order to create attractive public areas and will also promote the use of empty shop units as community use hubs. This will result in the provision of, and improved access to, open spaces and community facilities within town centres in the Borough, as well as contribute to an attractive and safe public realm. Therefore, minor positive effects are expected against **IIA5: Services and facilities** and **IIA6: Social inclusion** in relation to this policy. However, as the policy supports the provision of developments including fast food establishments, public houses and nightclubs, this may encourage residents and visitors to lead unhealthy lifestyles. As such, the effect expected against **IIA4: Health and wellbeing** is mixed with a minor negative effect.

**H.96** Policy TC2: Successful town centres will seek to review town centre boundaries and ensure that travel routes and nodes across the Borough are convenient, attractive, and safe. Therefore, this policy is likely to increase the perception of safety from crime and reduce the fear of crime, as well as promote the public realm as a safe and attractive place to use by pedestrians. As such, minor positive effects are expected against **IIA6: Social inclusion** and **IIA7: Crime and community safety**.

**H.97** Policy TC2: Successful town centres will seek to protect the role and character of centres in the Borough and so will contribute to the conservation of local distinctiveness and sense of place. In addition, this policy will aim to prevent development in areas that are at risk of flooding. As such, minor positive effects are expected in relation to **IIA15**: **Landscape and townscape** and **IIA17**: **Flooding**. In addition, Policy TC3: Meanwhile uses will ensure that proposals for meanwhile uses will be supported where they contribute to the regeneration and enhancement of the area's character. As such, a minor positive effect is expected against **IIA15**: **Landscape and townscape** in relation to this policy.

**H.98** Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA8: Road safety, IIA13: Biodiversity, IIA14: Historic environment and IIA18: Water.

### Social infrastructure policy options

**H.99** The likely sustainability effects of the social infrastructure policy approaches are set out in **Table H.8** and described below the table.

Table H.8: IIA results for the 2018 social infrastructure policy options

IIA objective	SI1: Social and community infrastructure	SI2: Health and wellbeing	Sl3: Arts and cultural facilities
IIA1: Climate change mitigation	+	+	0
IIA2: Climate change adaptation	0	0	0
IIA3: Housing	+	+	0
IIA4: Health and wellbeing	++	++	0
IIA5: Services and facilities	++	++	++
IIA6: Social inclusion	+	++	+
IIA7: Crime and community safety	0	++	0
IIA8: Road safety	0	++	0
IIA9: Economy	+	+	+
IIA10: Town and local centres	++	0	+
IIA11: Air pollution	+	++	0
IIA12: Sustainable transport	++	+	0
IIA13: Biodiversity	0	+	0
IIA14: Historic environment	0	0	0
IIA15: Landscape and townscape	+	0	0
IIA16: Efficient use of land and materials	+	0	0
IIA17: Flooding	0	0	0
IIA18: Water	0	0	0

**H.100** These three policies seek to increase the provision of social infrastructure in the Borough. Policy SI1 relates to social and community infrastructure, Policy SI2 covers health and wellbeing and Policy SI3 addresses arts and cultural facilities.

**H.101** Policies SI1: Social and community infrastructure and SI2: Health and wellbeing are expected to have minor positive effects in relation to **IIA3: Housing**. This is because Policy SI1 encourages mixed use development, including housing to support viability, security and efficient land use, whilst Policy SI2 states that future development proposals must include measures to improve housing quality. Whilst this is in the context of improving health outcomes, it is thought that this policy will improve the general condition of housing stock in the Borough.

**H.102** Policies SI1: Social and community infrastructure and SI2: Health and wellbeing are expected to have significant positive effects in relation to **IIA4: Health and wellbeing**. Policy SI1 seeks to prioritise the provision of community health

facilities and services, whilst Policy SI2 states that development proposals must incorporate measures to improve public health i.e. promote healthy eating and create new/improved health facilities. Significant positive effects are also expected in relation to policies SI1: Social and community infrastructure, SI2: Health and wellbeing and SI3: Arts and cultural facilities in relation to IIA5: Services and facilities, as all three policies support improved access to services, facilities and wider community infrastructure. Policy SI1: Social and community infrastructure encourages development and modernisation of new and existing social infrastructure in the Borough, including educational facilities, as well as supporting the investment plans of educational bodies to expand and enhance their operations within the Borough. Policy SI2: Health and wellbeing highlights the key role that development proposals must play in recognising and promoting access to community facilities. Policy SI3: Arts and cultural facilities seeks to enhance existing arts, cultural, entertainment, leisure, recreation and sport uses in venues across the Borough.

- **H.103** A minor positive effect is anticipated for policies SI1: Social and community infrastructure and SI3: Arts and cultural facilities in relation to **IIA6: Social inclusion**, as they both promote the need for community facilities to be accessible, welcoming, inclusive and open and available to all members of the local community. Policy SI2: Health and wellbeing is also expected to have a significant positive effect in relation to this objective because it requires development proposals to directly respond to issues surrounding poverty and inequality in the Borough. The policy also references the need for new or improved, or access to inclusive open space for local communities. Policy SI2: Health and wellbeing is also expected to have a significant positive in relation to **IIA7: Crime and community safety** because it highlights the role that development proposals must have in responding to issues surrounding crime through better urban design and housing mix.
- H.104 Policy SI1: Social and community infrastructure and its supporting text highlight the need for community facilities to be located in places that are or will be accessible by a range of sustainable means of transport, including walking and cycling. They also promote the co-location of facilities and services, encouraging journeys to be undertaken by sustainable modes of transport. A significant positive effect is therefore expected in relation to IIA12: Sustainable transport. Similarly, Policy SI2: Health and wellbeing states that development proposals must recognise the importance of facilitating and promoting walking and cycling in future developments. As this policy promotes sustainable modes of transport in new developments, a minor positive effect is also expected in relation to IIA12: Sustainable transport. Furthermore, encouraging more sustainable transport choices will help minimise air pollution and greenhouse gas emissions associated with use of the private car. As such, minor positive effects can be expected for both policies in relation to IIA1: Climate change mitigation and for Policy SI1: Social and community infrastructure in relation to IIA11: Air pollution. Policy SI2: Health and wellbeing is anticipated to have a significant positive effect in relation to IIA11: Air pollution as the policy also includes reference to improving Enfield Borough's air quality and reducing exposure to airborne pollutants.
- H.105 Minor positive effects are anticipated for all policies in relation to IIA9: Economy. Policy SI1: Social and community infrastructure promotes the development and retention of educational community facilities, which will help produce a skilled workforce with greater access to employment opportunities. Likewise, Policy SI2: Health and wellbeing states that development proposals must respond to issues surrounding improving employment in the Borough. This may subsequently result in the generation of new local employment. Further to this, Policy SI1: Social and community infrastructure states that town centres and areas with good accessibility will be prioritised for the location of community facilities, where they will help to promote access to services across the Borough. A significant positive effect is therefore expected for Policy SI1: Social and community infrastructure in relation to IIA10: Town and local centres. Policy SI3: Arts and cultural facilities also directly supports the development of arts, cultural, entertainment, leisure and sport uses in the Borough, which could have beneficial effects on the economy by attracting more visitors to the area. For this reason, a minor positive effect is expected in relation to IIA10: Town and local centres, as the policy promotes the protection and enhancement of locations for cultural activities in the Borough, which tend to be located within the town and local centres.
- **H.106** Whilst in the context of improving health outcomes, Policy SI2: Health and wellbeing encourages access to food growing and blue and green spaces in the Borough. The provision of such spaces would increase and strengthen LBE's ecological/green infrastructure networks. A minor positive is therefore expected in relation to **IIA13: Biodiversity**.
- H.107 Policy SI1: Social and community infrastructure states that development proposals must be outwardly looking, address the street and neighbourhood in their design. A minor positive effect is therefore expected in relation to IIA15: Landscape and townscape, as the policy seeks to enhance the landscape and townscape of the Borough through appropriate layout and design. Finally, a minor positive effect is anticipated in relation to Policy SI1: Social and community infrastructure and IIA16: Efficient use of land and materials, as it supports the co-location of facilities and services in the Borough and encourages mixed use formats to support the viability, security and efficient use of land.

**H.108** Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA14: Historic environment, IIA17: Flooding and IIA18: Water.

### **Green infrastructure policy options**

**H.109** The likely sustainability effects of the green infrastructure policy approaches are set out in **Table H.9** and described below the table.

Table H.9: : IIA results for the 2018 green infrastructure policy options

IIA objective	GI1: Green and blue spaces	GI2: Green Belt and Metropolitan Open Land	GI3: Greening the Borough	G14: Biodiversity and Sites of Importance for Nature Conservation	GI5: Blue Ribbon Network	GI6: Burial space and crematorium
IIA1: Climate change mitigation	0	0	+	+	0	0
IIA2: Climate change adaptation	0	0	+	0	0	0
IIA3: Housing	0	0	0	0	0	0
IIA4: Health and wellbeing	++	++	+	+	++	0
IIA5: Services and facilities	++	++	0	0	0	+
IIA6: Social inclusion	+	0	+	0	0	0
IIA7: Crime and community safety	0	0	0	0	0	0
IIA8: Road safety	0	0	0	0	0	0
IIA9: Economy	0	0	0	0	0	0
IIA10: Town and local centres	0	0	0	0	0	0
IIA11: Air pollution	0	0	+	+	0	0
IIA12: Sustainable transport	0	0	+	0	+	0
IIA13: Biodiversity	+	-	++	++	++	+
IIA14: Historic environment	0	0	0	0	0	0
IIA15: Landscape and townscape	+	+/-	0	0	0	+
IIA16: Efficient use of land and materials	0	0	0	0	0	0
IIA17: Flooding	0	0	+	0	++	0
IIA18: Water	0	0	0	0	0	+

**H.110** The green infrastructure policy options set out the Council's approach to the network of green, blue and open spaces within Enfield Borough and the provision of this infrastructure to ensure that it is sufficient to meet the identified growth and demand in the Borough. Policies GI1: Green and blue spaces and GI2: Green Belt and Metropolitan Open Land seek to protect

Appendix H
IIA findings for the Issues and Options Local Plan 2018

Enfield Local Plan: Integrated Impact Assessment December 2023

and enhance the quality and quantity of green infrastructure such as open space in the Borough and improve access to these spaces for the Borough's residents in order to meet the needs of future and existing residents, particularly within areas of identified deficiency, as well as emerging growth and investment areas. In addition, policies GI1: Green and blue spaces and GI2: Green Belt and Metropolitan Open Land will seek to promote the multifunctional and shared use of open space and the provision of new outdoor leisure facilities, whilst also supporting development that improves access to the Green Belt for beneficial uses including outdoor sport and recreation. These policies would therefore promote sports, active recreation and more healthy lifestyles, and would enable development in the Borough to address identified key sustainability issues including the imbalance of green space availability between the east and west of the Borough and health issues relating to access to green spaces and obesity. As a result, these policies are expected to have significant positive effects against IIA4: Health and wellbeing and IIA5: Services and facilities. Policy GI1: Green and blue spaces also has the potential to increase spontaneous social interaction between members of the public in areas of public open space, with a minor positive effect expected against IIA6: Social inclusion.

H.111 Policies GI3: Greening the borough and GI4: Biodiversity and Sites of Importance for Nature Conservation outline the Council's approach to the protection and enhancement of the Borough's natural environment and will seek to enhance biodiversity through the retention and provision of trees, greening of the public realm, as well as improvements to access, connectivity and creation of new habitats. An increase in the quality and quantity of green infrastructure and vegetation would contribute to the improvement of local air quality in the Borough, bringing both physical and mental health benefits to residents. As such, minor positive effects are expected against IIA1: Climate change mitigation, IIA4: Health and wellbeing and IIA11: Air pollution, while significant positive effects are expected against IIA13: Biodiversity in relation to these policies. Policy GI1: Green and blue spaces is also expected to have a significant positive effect in relation to IIA13: Biodiversity because it seeks to enhance the quality of open space, which includes green open space. Policy GI2: Green Belt and Metropolitan Open Land, on the other hand, may have a minor negative effect in relation to IIA13: Biodiversity because supporting development which improves access to Green Belt areas could result in adverse effects on biodiversity as a result of increased recreational activity. The provision of green infrastructure such as trees, particularly at the roadside as set out within Policy GI3: Greening the borough, would contribute to the creation of attractive streets that encourage residents to walk and cycle. The supporting text to Policy GI3: Greening the borough also makes reference to softer landscaping and states that increasing the number of trees can help to reduce the impact of higher summer temperatures and reduce rainfall run-off rates, which will contribute to reducing the risk of surface water flooding. This policy will also maximise the provision of gardens and garden space, with the supporting text making a particular reference to community gardens and allotments, which play an important role in social cohesion. Therefore, minor positive effects are expected against IIA2: Climate change adaptation, IIA6: Social inclusion, IIA12: Sustainable transport and IIA17: Flooding in relation to Policy GI3: Greening the borough.

H.112 The Council's approach to the protection and enhancement of the Boroughs 'Blue Ribbon Network' is set out within Policy GI5: Blue Ribbon Network, which recognises the importance of the multi-functional role that rivers and waterways play and contribute to the Borough. The policy will seek to promote the enhancement of waterways and improve access to them through the provision of infrastructure that supports walking, cycling, leisure and recreation, as well as river-based transport, providing alternative modes of transport that may contribute to the alleviation of road traffic congestion. This policy is therefore likely to have a significant positive effect in relation to IIA4: Health and wellbeing and a minor positive effect in relation to IIA12: Sustainable transport. Policy GI5: Blue Ribbon Network recognises the role that the Blue Ribbon Network of waterbodies in the Borough plays in flood and surface water management by seeking to safeguard access to flood defences and promoting the use of sustainable drainage systems in new developments. The policy also recognises the importance of the network to biodiversity and will ensure that habitats in the network are protected and that adverse impacts on waterside environments and waterbodies in the Borough. As such, significant positive effects are expected in relation to IIA13: Biodiversity and IIA17: Flooding.

H.113 Policy GI6: Burial space and crematorium will seek to identify and meet the requirements of religious groups in regard to burial provision and ensure that burial space shortages are addressed where they are identified. The supporting text highlights the importance of these spaces in providing green, quiet areas for people, and in contributing to biodiversity within the Borough. Through the protection of existing land and the provision of new land for burial grounds and crematoriums, this policy will maintain and improve access to key facilities and religious places as well as provide opportunities for biodiversity enhancement in LBE. Therefore, minor positive effects are expected against IIA5: Services and facilities and IIA13: Biodiversity. A minor positive effect is also expected in relation to IIA15: Landscapes and townscapes because the policy seeks to maintain the landscape when providing new burial space.

- H.114 Policy GI1: Green and blue spaces is expected to have a minor positive effect in relation to IIA15: Landscape and townscape because protecting existing open spaces from development would protect the landscape/townscape. As Policy GI2: Green Belt and Metropolitan Open Land would support particular development of land within the Green Belt, the policy may result in the fragmentation of valued landscapes in the Borough. As such, a minor negative effect is expected against IIA15: Landscapes and townscapes. However, this is mixed with a minor positive effect because the policy also resists development in the Green Belt, which would help protect the landscape.
- **H.115** Policy GI5: Blue Ribbon Network states that the Council will work with the Environment Agency and other partners in order to promote the improvement of water quality within the Blue Ribbon Network. The policy also seeks to ensure that where a development proposal is likely to have a significant adverse impact, assessment of the impact of the proposal on the status of the waterbody is provided. The policy will therefore contribute to the improvement of water quality in Enfield and help to address the water quality issues that impact the Borough. As such, a minor positive effect is expected against **IIA18: Water**.
- **H.116** Negligible effects are expected in relation to IIA3: Housing, IIA7: Crime and community safety, IIA8: Road safety, IIA9: Economy, IIA10: Town and local centres, IIA14: Historic environment and IIA16: Efficient use of land and materials.

### **Transport policy options**

**H.117** The likely sustainability effects of the transport policy approaches are set out in **Table H.10** and described below the table.

Table H.10: IIA results for the 2018 transport policy options

IIA objective	T1: Making the public transport more accessible and the natural choice for longer trips	T2: Reducing the impact of private vehicles on our streets	T3: Making active travel the natural choice	T4: Making more school trips safe, sustainable and healthy
IIA1: Climate change mitigation	++/-	++	++	++
IIA2: Climate change adaptation	0	+	0	0
IIA3: Housing	0	0	0	0
IIA4: Health and wellbeing	++/-	++	++	++
IIA5: Services and facilities	+	+	+	+
IIA6: Social inclusion	+	+	+	+
IIA7: Crime and community safety	0	0	0	0
IIA8: Road safety	++	++	++	++
IIA9: Economy	+	0	0	0
IIA10: Town and local centres	0	0	0	0
IIA11: Air pollution	++/-	++	++	++
IIA12: Sustainable transport	++/-	++	++	++

IIA objective	T1: Making the public transport more accessible and the natural choice for longer trips	T2: Reducing the impact of private vehicles on our streets	T3: Making active travel the natural choice	T4: Making more school trips safe, sustainable and healthy
IIA13: Biodiversity	0	0	0	0
IIA14: Historic environment	0	0	0	0
IIA15: Landscape and townscape	-	0	0	0
IIA16: Efficient use of land and materials	0	0	0	0
IIA17: Flooding	0	+	0	0
IIA18: Water	0	0	0	0

**H.118** All transport policy options will contribute to the improvement of access and movement in the Borough, particularly in regard to sustainable transport modes. As the reliance on private vehicles has been identified as a key sustainability issue in the Borough, the support of improvements to transport infrastructure and the promotion of more sustainable modes of transport set out within these policies will directly address this issue. In particular, Policy T1: Making the public transport more accessible and the natural choice for longer trips will support improvements to public transport infrastructure and the road network in order to reduce traffic congestion and improve connectivity between the east and west of the Borough. This will help to address the transport severance between these areas.

All of these policy options seek to directly address the use of more active and sustainable modes of transport including walking and cycling. Policies T1: Making the public transport more accessible and the natural choice for longer trips and T2: Reducing the impact of private vehicles on our streets both seek to promote and maximise opportunities for cycling and walking by creating well connected, high-quality and convenient, safe cycle and walking routes to support alternative, more sustainable modes of transport for access to employment, education and services. Policy T3: Making active travel the natural choice sets out the Council's approach to encouraging more sustainable and active modes of transport, including the facilitation of walking and increasing the use of bicycles. The policy seeks to enable and encourage more active modes of transport by requiring that developments protect and enhance existing footpaths and cycleways and make provision for the provision of new routes which are accessible, inclusive, safe, and linked to town centres, public transport infrastructure and green spaces. Policy T4: Making more school trips safe, sustainable and healthy seeks to ensure that new residential development includes the provision of convenient, safe and well connected cycle and walking routes that link to local schools in order to provide safe, sustainable and healthy school trips. Policies T1 and T2 will also seek to promote the use of public transport in the Borough through the enhancement and development of transport infrastructure that is accessible and well-connected, particularly between the eastern and western areas of the Borough. As a result, these policies are likely to reduce the use of private vehicles via the promotion of alternative transport methods that are more sustainable, active and safe, thereby reducing traffic congestion and associated emissions and contributing to the improvement of air quality, as well as physical and mental health in the Borough. Therefore, significant positive effects are expected against IIA1: Climate change mitigation, IIA4: Health and wellbeing, IIA8: Road safety, IIA11: Air pollution and IIA12: Sustainable transport in relation to these policies. Due to the fact Policy T1 will promote the development of strategic and major road network enhancements as well as localised improvements to the highway network, the policy may encourage the use of private cars. The effects against IIA1: Climate change mitigation, IIA4: Health and wellbeing, IIA11: Air pollution and IIA12: Sustainable transport are therefore mixed with minor negative effects. In addition, accessibility within the Borough of Enfield is likely to be improved through these policies by the development of transport routes that are well connected to local services and facilities. As such, minor positive effects are expected against IIA5: Services and facilities and IIA6: Social inclusion.

- **H.120** In addition to outlining the Council's approach to tackling climate change, Policy T2: Reducing the impact of private vehicles on our streets also sets out measures to mitigate and adapt to climate change in the Borough. Although the construction of transport infrastructure, which is supported by several policies, could result in a larger area of land covered in impermeable surfaces, Policy T2 seeks to ensure that development proposals within Enfield are sensitively designed to reduce the impact of expected changes in climate, including permeable surfaces that reduce surface water runoff. As such, minor positive effects are expected against **IIA2: Climate change adaptation** and **IIA17: Flooding**.
- **H.121** An improved transport system, including enhanced access throughout the Borough may improve accessibility to employment opportunities, and as such Policy T1: Making the public transport more accessible and the natural choice for longer trips may have a minor positive effect in relation to **IIA9: Employment opportunities**. The development of new transport infrastructure associated with these improvements may also result in the fragmentation of landscapes within the Borough. Therefore, a minor negative effect is expected against **IIA15: Landscapes and townscapes**. However, this depends on the location and extent of improvements and so the effect is uncertain.
- **H.122** Negligible effects are expected in relation to IIA3: Housing, IIA7: Crime and community safety, IIA10: Town and local centres, IIA13: Biodiversity, IIA14: Historic environment, IIA16: Efficient use of land and materials and IIA18: Water.

### Sustainable infrastructure policy options

**H.123** The likely sustainability effects of the sustainable infrastructure policy approaches are set out in **Table H.11** and described below the table.

Table H.11: IIA results for the 2018 sustainable infrastructure policy options

IIA objective	SUS1: Sustainable building	SUS2: Sustainable living and working	SUS3: Sustainable infrastructure	SUS4: Minimising flood risk	SUS5: Surface water management
IIA1: Climate change mitigation	+	++	++	0	0
IIA2: Climate change adaptation	++	0	++	++	++
IIA3: Housing	0	0	0	0	0
IIA4: Health and wellbeing	0	+	0	0	+
IIA5: Services and facilities	0	0	0	0	0
IIA6: Social inclusion	0	0	+	0	0
IIA7: Crime and community safety	0	0	0	0	0
IIA8: Road safety	0	0	0	0	0
IIA9: Economy	0	0	++	0	0
IIA10: Town and local centres	0	0	0	0	0
IIA11: Air pollution	0	++	+	0	+
IIA12: Sustainable transport	0	++	++	0	0

IIA objective	SUS1: Sustainable building	SUS2: Sustainable living and working	SUS3: Sustainable infrastructure	SUS4: Minimising flood risk	SUS5: Surface water management
IIA13: Biodiversity	++	+	0	+	+
IIA14: Historic environment	0	0	0	0	0
IIA15: Landscape and townscape	0	0	0	0	0
IIA16: Efficient use of land and materials	+	0	0	0	0
IIA17: Flooding	0	0	0	++	++
IIA18: Water	++	++	++	0	++

- **H.124** These five policies seek to implement sustainable infrastructure networks in the Borough. Policy SUS1 relates to sustainable building, Policy SUS2 covers sustainable living and working, Policy SUS3 addresses sustainable infrastructure, Policy SUS4 covers minimising flood risk and policy SUS5 looks at surface water management.
- Policy SUS1: Sustainable building promotes the use of existing and emerging standards and assessment methods such as BREEAM, Home Quality Mark One (HQM1) and Environmental Impact Assessments in climate change mitigation, which are expected to help reduce emissions associated with built development. As such, a minor positive effect is expected in relation to IIA1: Climate change mitigation. Policy SUS2: Sustainable living and working seeks to minimise energy demand and carbon emissions in new and refurbished buildings, with reference made to BREEAM, while Policy SUS3: Sustainable infrastructure promotes sustainable and reduced resource consumption relating to energy. A significant positive effect is therefore likely for both policies against IIA1: Climate change mitigation. Significant positive effects are largely expected against IIA2: Climate change adaptation in relation to policies SUS1: Sustainable building, SUS3: Sustainable infrastructure, SUS4: Minimising flood risk and SUS5: Surface water management. Policy SUS1: Sustainable building directly commits to higher standards of environmental sustainability in building practices, by minimising construction and operations waste, sourcing sustainable new materials and maximising reuse of recovered materials in line with circular economy principals. Policy SUS3: Sustainable infrastructure similarly promotes sustainable and reduced resource consumption in the Borough. Policy SUS4: Minimising flood risk requires developments to minimise current and future risk of flooding to people and property, whilst Policy SUS5: Surface water management states that development should be designed in a way that minimises flood risk and incorporates surface water drainage measures. All policies therefore promote the incorporation of sustainable design and construction techniques in development.
- **H.126** Minor positive effects are anticipated for both SUS2: Sustainable living and working and SUS5: Surface water management in relation to **IIA4: Health and wellbeing**. The supporting text of SUS2: Sustainable living and working outlines the crucial role that sustainable transport (i.e. walking and cycling) plays in increasing health and wellbeing in the Borough. Additionally, the policy seeks to reduce air pollution, which would have beneficial effects on people's health. Likewise, the supporting text to Policy SUS5: Surface water management promotes the use of Sustainable Drainage Systems (SuDS) in relation to the improved health and wellbeing of residents. The policy states that SuDS improve air quality, increase amenity space and create aesthetic improvements to the public realm, subsequently contributing to an increased quality of life for residents in the Borough. A minor positive effect can therefore be expected in relation to **IIA4: Health and wellbeing**.
- **H.127** A significant positive effect is also expected in relation to SUS3: Sustainable infrastructure against **IIA9: Economy** as the policy states that with respect to waste management facilities, development proposals will be expected to provide job creation and social value benefits, including skills, training and apprenticeship opportunities. This will subsequently promote

socio-economic growth in Borough. The policy also notes that in areas of high deprivation, employers must match or exceed the London Living Wage. This will have a subsequent minor positive effect in relation to **IIA6: Social inclusion**, as it would work to reduce poverty and social exclusion in deprived areas.

- **H.128** Policy SUS2: Sustainable living and working seeks to address issues of air quality by monitoring and improving air quality and reducing congestion, with a focus on enabling use of sustainable, particularly active, modes of transport such as walking and cycling. A significant positive effect is therefore likely in relation to **IIA11: Air pollution**. As per above, the supporting text to Policy SUS5: Surface water management supports the incorporation of living roofs into new development, which would help improve air quality. This is therefore anticipated to result in a minor positive effect in relation to **IIA11: Air pollution**.
- **H.129** Policies SUS2: Sustainable living and working and SUS3: Sustainable infrastructure are anticipated to have a significant positive effect in relation to **IIA12: Sustainable transport**. This is because Policy SUS2: Sustainable living and working promotes the use of sustainable and particularly active modes of transport, whilst Policy SUS3 states that development proposals must provide access to high quality digital connectivity services from a range of providers. This would therefore reduce the need to travel and support smart city concepts. Policy SUS3 also states that development proposals must be supported by and connected to sufficient, up to date and distributed sustainable infrastructure for transport. For this reason, a minor positive effect is expected in relation to **IIA11: Air pollution** because supporting smart city concepts and promoting sustainable travel choices will help minimise air pollution.
- H.130 Policy SUS1: Sustainable building states that development proposals must result in net gain to, or at minimum level no net loss of local environmental quality. Therefore, it is expected to have a significant positive effect in relation to IIA13:

  Biodiversity. Policy SUS2: Sustainable living and working on the other hand promotes the provision of and improvements in supply of green infrastructure, with a minor positive effect expected in relation to IIA13: Biodiversity. A minor positive is also anticipated for policies SUS4: Minimising flood risk and SUS5: Surface water management in relation to this objective; Policy SUS4: Minimising flood risk makes reference to improving the ecological functioning of river corridors, whilst SUS5: Surface water management promotes the use of SuDS which would result in increased urban greening in the Borough. With SuDS significantly reducing flood risk, this policy would be likely to have a significant positive effect in relation to IIA17: Flooding. Similarly, Policy SUS4: Minimising flood risk states that the Council will require developments to minimise current and future risk of flooding to people and property, taking into account climate change, without increasing flood risk elsewhere. A significant positive is also therefore anticipated for SUS4: Minimising flood risk and IIA17: Flooding. Policy SUS1: Sustainable building is expected to have a minor positive effect in relation to IIA16: Efficient use of land and materials because the policy states that development proposals are expected to assess, protect and improve soil quality.
- **H.131** Finally, significant positive effects are likely for policies SUS1: Sustainable building, SUS2: Sustainable living and working, SUS3: Sustainable infrastructure and SUS5: Surface water management in relation to **IIA18: Water**, as they address issues surrounding water quality. Policy SUS1: Sustainable building states that development proposals must assess, protect and improve groundwater quality, particularly where it occurs within an Inner Source Protection Zone or on sites where historic contamination is likely to present a significant risk to groundwater, whilst Policy SUS2: Sustainable living and working promotes the restriction of mains water to 105 litres per head per day or less. Policy SUS3: Sustainable infrastructure states that development proposals must deliver or improve sustainable water supply, drainage and sewerage infrastructure, while Policy SUS5: Surface water management encourages all major developments to implement SuDS.
- **H.132** Negligible effects are expected in relation to IIA3: Housing, IIA5: Services and facilities, IIA7: Crime and community safety, IIA8: Road safety, IIA10: Town and local centres, IIA14: Historic environment and IIA15: Landscape and townscape.

### **Appendix I**

### **Audit trail of site selection**

**I.1** Enfield Council has provided an audit trail of the site selection process, which can be found overleaf. The table lists all of the sites appraised in the IIA, with the final column setting out the Council's reasons for the selection of sites for allocation and why other sites were discounted.

Table I.1: Audit trail of site selection for allocation in the Enfield Local Plan

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
CFS291	Land west of The Ridgeway and Fairview Road, Gordon Hill, Enfield	Mixed-use	No	This site has not been allocated as a stand alone site. The land forms a part of a wider strategic allocation (SA10.2) to bring about the benefits of accelerated housing delivery and associated infrastructure requirements.
LP1146	Land to the South of William Girling Reservoir	Industrial/ employment	No	This site has been identified as not developable within the plan period, it also has multiple environmental constraints, including being located within Flood Risk Zone 3.
20/02710/FUL	23 -25 Crescent East	Residential	No	Site has extant planning consent. A site allocation is not deemed necessary or appropriate given its scale. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
PP-08780079	364 Green Lanes	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
PP-08746655	357 Cockfosters Road	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
GRD6	London Road Island	Mixed-use	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
GRD4	BT Exchange, Cecil Road	Residential	No	Whilst the site was identified as a potential development site within the Enfield Town Masterplan it is not possible to allocate as we do not have confirmation of availability. Therefore could not reasonably be expected to come forward in the plan period.
GRD3	Gladbeck Way Car Park	Mixed-use	No	Partially unknown availability.
UPM1_r	Joyce Avenue & Snells Park Estate	Residential	No	This Site was proposed as an allocation (SA15) at Reg 18. A minor amendment has been made to the southern boundary to reflect the outline planning application associated with the Site. The updated site allocation reference is SA4.1. The site remains an allocation - the boundary of the site has been revised to reflect the Planning Application associated with the site - 22/03346/OUT.
BUE32	Esso and neighbouring block plus car park on Ayley Croft	Residential	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG.
WIC23	Car park / garages (with Scout Hut at the end) at Wilson Street	Residential	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period.
TUE12a	Consolidate car parks on Dendridge Close/Auckland Close	Residential	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period.
19/02717/RE3	Meridian Water Orbital Business Park, Adjoining Land At Leeside Road, South Of Argon Road,and Land At Former Stonehill Industrial Estate, Anthony Way And Adjoining Land, Land East Of Harbet Road	Industrial/ employment	No	Development would result in a net loss of emp floorspace

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
GRS7	1-6 Clock Parade	Mixed-use	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG.
SOS19	Chase Road	Mixed-use	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG.
JUS5	Land at Lincoln Road and Great Cambridge Road	Mixed-use	No	Site is within designated SIL. The evidence base indicates there will be a need for further employment land in the borough by the end of the plan period. As a result the release SIL for other uses would not enable this objective to be met. SIL should be retained to retain existing employment capacity. The site is therefore considered inappropriate for residential development as it is proposed it should be retained for ongoing/future employment use.
POS43	Peerglow Estate	Mixed-use	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. In addition, the site is located within LSIS and there is a need to retain industrial capacity within the borough.
TUS5	Lidl Store And Parking, Hertford Road	Mixed-use	No	Whilst this is an ideal brownfield site in the urban area, the site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG.
BUS1	Express Dairies	Mixed-use	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				plan period. As a result it cannot be considered for allocation in line with the PPG.
POS44	Hertford Road High Street	Mixed-use	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. In addition, the site is located within LSIS and there is a need to retain industrial capacity within the borough.
CHS16	Land At Waterworld, Bullsmoor Lane /Great Cambridge Road	Residential	No	Construction on site has started, not appropriate to allocate.
POS29	318 Lincoln Road	Mixed-use	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG.
GRS8	52 London Road	Mixed-use	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG.
17/03059/FUL	102 East Duck Lees Lane	Industrial/ employment	No	No allocation needed given extant consent.
BOS2	Open Space	Residential	No	The site is currently designated MOL. Loss of open space could lead to deficiency to access to open space in the urban area.
UPS15	Commercial Road	Mixed-use	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
POS45	Queensway	Mixed-use	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. In addition, the site is located within LSIS and there is a need to retain industrial capacity within the borough.
SGS13	Land Adj To New Southgate Station, Station Road	Mixed-use	No	Development in this location has been completed.
PGG1	Unit 3 C & D, Regents Avenue Industrial Estate	Mixed-use	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. In addition, the site is located within LSIS and there is a need to retain industrial capacity within the borough.
CFS311	East Lodge Nursery	Residential	No	Isolated inaccessible site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy.
CFS320	Land at Rectory Farm (south)	Residential	No	The site is a greenfield site located within the Green Belt. It is not anticipated that the scale of development that could be accommodated here could support delivery of enhancement of the required social infrastructure and services in isolation.
CFS249	Bullsmoor Lane , EN1 4SE - McDonalds, BP and Burger King	Mixed-use	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period.
CFS250	Churchfield Recreation Ground, Great Cambridge Rd, London N9 9LE	Mixed-use	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
CFS188	Covert Way Fields	Nature recovery	No	The site is heavily wooded and can only be accessed via a residential cul-de-sac. The site would not be appropriate to accommodate significant visitors that could be associated with a SANG. It is already designated as a Borough SINC. Any future nature recovery would be compatible with the existing designation.
CFS251	David LLoyd, Carterhatch Ln, Enfield EN1 4LF	Mixed-use	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period.
CFS252	Land north of Lower Hill Lane Walkpath (N18) and to the South of William Girling Reservoir	Mixed-use	No	Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy.
CFS255	Toby Carvery, 801 Great Cambridge Rd, Enfield EN1 3PN	Residential	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG.
CFS307	Phoenix Rose Homes and Gardens, Cattlegate Road, Crews Hill Enfield EN2 9DP	Residential	No	The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation. However, the site could potentially suitable for allocation as part of wider site allocation within the Crews Hill broad location as it is brownfield land and due to its proximity to a railway station.
CFS295	Jollyes Pet Store, 139 Theobalds Road	Residential	No	The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation. However, the site could potentially suitable for allocation as part of wider site allocation

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				within the Crews Hill broad location as it is brownfield land and due to its proximity to a railway station.
CFS267	298-348 Hoe Lane,	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
CFS268	34-80 and 82-116 Enfield Road, EN2	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
CFS269	16-48 Holmwood Road	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
CFS270	2-12 Tenniswood Road, EN1	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
CFS271	Jeremy's Green Estate N18,	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. In addition, large portions of the site are in Flood Zone 3 and therefore would not be suitable for residential accommodation.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
CFS168	Firs Farm Recreation Ground (Part)	Burial/ crematorium	No	The site is considered to be in excess to burial needs requirements as set out in the Enzygo Burial Needs Assessment. The evidence base within the Blue and Green Infrastructure Audit identifies the site as a high value open space. The site also has a number of green links running through the site as part of the Council's Green and Blue Infrastructure Strategy. There have also been a number of recent wetlands proposals in nearby proximity, within the park.
CFS273	Massey Close and High Road N11	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
CFS275	Reservoir Road, N14	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
CFS276	Silver Street, N11, To the north of the A406 North Circular and Silver Street to the east of the junction with the A10 Great Cambridge Road	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
CFS284	"Bulls Cross Nursery	Mixed-use	No	Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
CFS313	Part Rectory Farm	Residential	No	Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy.
CFS318	Land at Braeside	Residential	No	Isolated inaccessible site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. In addition, existing leases on the site mean that the land could not reasonably be expected to come forward within the plan period.
CFS319	Land at Leslie	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. The site is also located in an isolated Green Belt location and therefore would not accord with the spatial strategy.
CFS322	Land to the east of Snakes Lane, N14 4UW	Residential	No	Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy.
CFS323	Land south of Clay Hill, Strayfield Road, EN2 9JA	Residential	No	Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy.
CFS279	Land adjoining Salmons Brook	Green infrastructure	No	Insufficient information provided to demonstrate availability, suitability and deliverability of uses. A very wide range of uses have been proposed. Subject to further evidence the SANG strategy may identify this as a suitable site in future iterations of evidence.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
CFS225	Camlet Way Land South, Camlet Way, Enfield	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. The site also currently has a local open space designation.
CFS253	St Michael's Primary Care Centre, Gater Dr, Enfield EN2 0JB	Residential	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period.
CFS181	Alma House 301 Alma Road Enfield EN3 7BB	Mixed-use	No	The site is a single piecemeal site being proposed for mixed use development within LSIS. It is not deemed appropriate for residential development.
CFS236	Lombard House, 339 Southbury road	Mixed-use	No	Site is within designated SIL. The evidence base indicates there will be a need for further employment land in the borough by the end of the plan period. As a result, the release SIL for other uses would not enable this objective to be met. The site is therefore considered inappropriate for residential development as it is proposed it should be retained for ongoing/future employment use.
CFS263	Clarence Road Estate	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
CFS304	South east area of Archers Yeomans Way Estate located south of Brick Lane and west of the A1010 Hertford Rd. EN3	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				considered to contribute to the overall total of homes expected to be delivered within the plan period.
PP-08601612	1-39 Haslam Court, Waterfall Road	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. In addition, there is an extant planning consent on the site. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
CFS327	5 Picketts Lock Lane - Abra Wholesale	Mixed-use	No	Not an appropriate location for small scale residential accommodation. No nearby services/facilities and no nearby public transport. Loss of currently active commercial use is to be resisted.
20/01815/FUL	41-52 Gilda Avenue	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
CFS280	Land at Holly Hill	Green infrastructure	No	Insufficient information provided to demonstrate availability, suitability and deliverability of uses. A number of the proposed uses would not be compatible uses within Green Belt and there is no demonstrable need for such uses.
UPS21a	Upton Road And Raynham Road (a)	Residential	No	Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Site also has potential to contribute to

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				placemaking vision. Suitable for allocation as part of wider site allocation.
BL1	Crews Hill Broad Location	Mixed-use	No	The Crews Hill place making areas is not a single site allocation. The place making area is subdivided into 6 separate Site Allocation parcels, which have been developed and prepared through a master planning approach.  The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.
BL2	Chase Park Broad Location	Mixed-use	No	The Chase Park place making areas is not a single site allocation. The place making area is subdivided into 4 separate Site Allocation parcels, which have been developed and prepared through a master planning approach.  The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.
CFS149	Land at Brimsdown Industrial Estate	Mixed-use	No	Site is within designated SIL. The evidence base indicates there will be a need for further employment land in the borough by the end of the plan period. As a result the release SIL for other uses would not enable this objective to be met. SIL should be retained to retain existing employment capacity. The

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				site is therefore considered inappropriate for residential development as it is proposed it should be retained for ongoing/future employment use.
20/03530/FUL	Land End, 18 And Bush Hill Cottage, 20 Bush Hill	Residential	No	Site has extant planning consent. A site allocation is not deemed necessary or appropriate given its scale. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
17/02543/FUL	Unit 2c Martinbridge Industrial Estate 240-242 Lincoln Road Enfield	Industrial/ employment	No	No allocation needed given extant consent.
17/04671/FUL	Unit 1, 46 East Duck Lees Lane	Industrial/ employment	No	No allocation needed given extant consent.
18/03760/FUL	196, Great Cambridge Road, EN1 1UQ	Industrial/ employment	No	Development will result in net loss of emp floorspace
19/00432/PRJ	Lincoln House Lincoln Road Enfield EN3 4AH,	Industrial/ employment	No	Development will result in net loss of emp floorspace
19/00986/FUL	Laundry Site 199 Brettenham Road London N18 2HE	Industrial/ employment	No	Development completed

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
CFS326	Tennis grounds Sherbrook Gardens Winchmore Hill London N21 2NU	Leisure/ sports and recreation	No	The continued use of the site as Tennis Courts does not warrant a site allocation.
19/01505/FUL	477-479 Green Lanes London N13 4BS,	Industrial/ employment	No	Development would result in a net loss of emp floorspace
19/01716/FUL	419-421 Hertford Road Enfield EN3 5PT,	Industrial/ employment	No	Site has extant planning consent and is beneath the size threshold established for allocations within the site selection methodology (25 homes / 0.25ha). A site allocation is not deemed necessary or appropriate given its scale. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
19/02749/FUL	Meridian Water Meridian Works, Units 4, 5, 6, 9 And 9A And Adjacent Land At Orbital Business Park 5 Argon Road Edmonton	Industrial/ employment	No	Development completed, which resulted in a net loss of emp floorspace
20/00926/FUL	Ponders End Industrial Estate, East Duck Less Lane	Industrial/ employment	No	Development in progress
20/01003/PRJ	2B Mottingham Road London N9 8DY,	Industrial/ employment	No	Development completed, which resulted in a net loss of emp floorspace
20/01343/PRJ	292 - 308 Southbury Road Enfield EN1 1TS,	Industrial/ employment	No	Development would result in a net loss of emp floorspace

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
20/02083/CEA	Unit At Rear Of 15-20 Heddon Court Parade Cockfosters Road Enfield EN4 0DB,	Industrial/ employment	No	Development completed
20/03914/PRJ	Blocks A-H And Solar House 282 -288 Chase Road London N14 6HA,	Industrial/ employment	No	Development would result in a net loss of emp floorspace
20/04196/FUL	Rear Of 78 Aldermans Hill London N13 4PP,	Industrial/ employment	No	Scale of development not sufficient to merit a site allocation
21/00811/FUL	BAKER STREET, EN1 3HA	Industrial/ employment	No	Scale of development not sufficient to merit a site allocation
21/01220/FUL	Unit 2, Great Cambridge Industrial Estate Lincoln Road Enfield EN1 1SH,	Industrial/ employment	No	Development would not result ina net gain of emp floorspace
21/01949/FUL	Marconi Place, N11 1PE	Industrial/ employment	No	Scale of development not sufficient to merit a site allocation
21/02685/FUL	Firs Farm Community Hub, Firs Farm Playing Fields Firs Lane	Industrial/ employment	No	Scale of development not sufficient to merit a site allocation

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
	London N13 5QW,			
21/02875/FUL	MILLMARSH LANE, EN3 7QG	Industrial/ employment	No	Scale of development not sufficient to merit a site allocation
21/02881/FUL	Tesco Express, Green Lanes, N21 2SA	Industrial/ employment	No	Scale of development not sufficient to merit a site allocation
21/03375/RE4	Affordable Workspaces (Good Growth Fund), Garages 1 To 15 Rear Of 101-132 Snell's Park Estate, Snells Park London N18 2SY,	Industrial/ employment	No	Consent is only for a temporary 5 year permission
21/03496/FUL	Hertford Road, EN3 5AX	Industrial/ employment	No	Scale of development not sufficient to merit a site allocation
21/03849/FUL	SEGRO Park Enfield, The proposals will not affect the existing buildings., EAST DUCK LEES LANE, EN3 7SS	Industrial/ employment	No	Scale of development not sufficient to merit a site allocation
21/03947/FUL	DAY OF THE DOG LTD, REAR GROUND FLOOR OUTBUILDING, 1D Grovelands Road Palmers Green N13 4RJ,	Industrial/ employment	No	Scale of development not sufficient to merit a site allocation

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
21/04087/FUL	Redburn Industrial Estate, Unit 28, Woodall Road, EN3 4LE	Industrial/ employment	No	No allocation needed given extant consent and no net change in employment floorspace.
CHC7	Crews Hill Golf Club	Residential	No	The site is located within the Green Belt. The site alone does not have a clear defensible boundary, and therefore this would suggest that release from the Green Belt in isolation would be inappropriate in accordance with the NPPF. However, the site could form part of a wider comprehensive allocation within the wider Crews Hill broad location.
21/04271/RE4	All of Beck House is affected. The garages to the east of the site are affected. Only the lower ground and ground floors of Scott House are affected within the entire building., Upton Road And Raynham Road London N18 2LJ,	Industrial/ employment	No	This site has not been allocated for employment and industrial uses. The site has been allocated for Housing and Mixed use (SA4.2) to support the objectives of the place making policies.
CFS132	Land at 135 Theobalds Park Road, Crews Hill, Enfield,	Industrial/ employment	No	This site has not been allocated as a standalone site. This site falls within the Crews Hill Place Making area and forms apart of Site Allocation 11.6.
CFS139	Harbet Road Industrial Estate, Harbet Road	Mixed-use	No	This site has not been allocated - it has been superseded by CFS257. The site boundary for CFS139 was assessed at Regulation 18. CFS257 submission provided updated site information relating to land ownership following the Call for Site 2022 exercise. The Regulation 19 Site Allocation reference associated with this site is SA 5.6. The site is wholly within SIL and Flood Zone 2 policy designations, and partially within a

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				Flood Zone 3 designation, consideration through design and/or mitigation as a part of the redevelopment will be required.
CFS144	Land adjacent to King George V Reservoir, Lea Valley Road	Industrial/ employment	No	The site has not been allocated for Industrial/ employment. The site is potentially available, however there are potential access constraints to this site. In addition, it also has multiple environmental constraints, including being located within Flood Risk Zone 3 and SINC.
CFS153_r	Montagu Ind Est, Montagu Road, Edmonton	Industrial/ employment	No	This site has not been allocated as a standalone site. The area this site boundary is located within has been allocated to bring forward a comprehensive approach to redevelopment of industrial/employment provision within an area of SIL.
CFS155	Junction 24 (Part New Cottage and Holly Hill Farm) EN6 5QS	Industrial/ employment	No	CFS 155 has not been allocated, the site is located in the boughs of Hertsmere and Enfield. 50% of CFS155 is located within the borough of Enfield, the area of the site which falls within the borough of Enfield has been put forward as a Site Allocation, the area of the site within Hertsmere has been excluded from allocation. The site has been identified as an available greenfield site suitable to provide industrial uses. The site is situated within Green Belt, the site is not within a Flood Zone Risk area, but some areas of the site are at risk of surface water flooding. The site is suitable for allocation to support the borough to meet its employment needs, it has good strategic access, mitigations could support the redevelopment of this site. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
CFS257	Harbet Road Industrial Estate,Harbet Road, Meridian Water	Industrial/ employment	No	This site has been allocated. The site boundary was assessed at Regulation 18 under the CFS reference CFS139. CFS257 submission provided updated site information relating to land ownership following the Call for Site 2022 exercise. The Regulation 19 Site Allocation reference associated with this site is SA 5.6.

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CFS258	West Bank, Meridian Water	Industrial/ employment	No	This site has not been allocated. The land within this site boundary has been divided into multiple parcels (SA 5.1, 5.2, 5.3, 5.4 and 5.7) which have been allocated for Regulation 19.
CFS294	Parkview Nursery Crews Hill	Residential	No	The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation. However, the site could potentially suitable for allocation as part of wider site allocation within the Crews Hill broad location as it is brownfield land and due to its proximity to a railway station.
CFS315	Rectory Farm	Mixed-use	No	This site has not been allocated as a standalone site. A small portion of land forms a part of a wider strategic allocation (SA10.2) to bring about the benefits of accelerated housing delivery and associated infrastructure requirements including improvements to blue and green infrastructure.
CHC9	Whitewebbs Rd	Residential	No	The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation.
P12-02202PLA	New Ladderswood - Estate Regeneration, New Ladderswood - Estate Regeneration, Ladderswood Estate, Station Road, N11	Industrial/ employment	No	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the New Southgate (PL7) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process and to positively shape any future

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				changes to extant planning consent. The site has been proposed for allocation (SA7.2).
ELC2	Canal & River Trust, Enfield Lock, Ordnance Road, Enfield	Mixed-use	No	60% in Flood Zone 3 and remaining 40% in Flood Risk Zone 2 constraints. This would render the site unsuitable for residential development.
POC4	Redburn Industrial Estate, Woodall Road, Enfield	Residential	No	Site is within designated SIL. The evidence base indicates there will be a need for further employment land in the borough by the end of the plan period. As a result, the release SIL for other uses would not enable this objective to be met. SIL should be retained to retain existing employment capacity. The site is therefore considered inappropriate for residential development as it is proposed it should be retained for ongoing/future employment use.
CHC19	Theobalds Park Road Nursery	Residential	No	The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation. However, the site could potentially form part of a wider allocation for whole Crews Hill area.
HIC11_r	Vicarage Farm, Land between Hadley Road & Enfield Rd	Mixed-use	No	This site has not been allocated as a standalone site. The land forms a part of a wider strategic allocations (SA10.1, SA10.2, SA10.3 and SA 10.4) to bring about the benefits of accelerated housing delivery and associated infrastructure requirements.
SGC6	Arnos Grove Sidings	Mixed-use	No	A large proportion of submitted site contains operational tube tracks, in use. No information has been submitted to demonstrate acceptable access could be achieved in order to facilitate development in this location. As a result, it is not considered appropriate for allocation.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
CFS158a	Owls Hall Estate, Cattlegate Road (Parcel a) - east of road	Mixed-use	No	Isolated inaccessible site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy.
GRC2	126 Wades Hill, Winchmore Hill, London	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
COC1	Saracens ARFC, Green Rd	Residential	No	Site is within MOL in the urban area. Loss of community facility is not acceptable. Impact on MOL from denser form of development would not be acceptable.
SBC3	Verve House Baird Road	Mixed-use	No	Not suitable for allocation due to existing SIL designation and need to retain industrial capacity within the borough.
POC1	Car Park High Street	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
POC2	Alma Road Open Space	Residential	No	Site is MOL and has open space/recreation value.
CHC8	Anglo Aquatic Plant Co, Strayfield Road, Enfield	Residential	No	Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy.
COC2	Rear of 1-91 Westpole Avenue	Residential	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				plan period. As a result it cannot be considered for allocation in line with the PPG.
GRC9	3-49 The Orchard	Residential	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period.
GRC10	10-44 The Orchard	Residential	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG.
CFS158b	Owls Hall Estate, Cattlegate Road - (Parcel b) - west of road	Mixed-use	No	Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy.
CHC13	Land to the south of Jesus Church, Parcel 3	Residential	No	Isolated inaccessible site located within the Green Belt. Site is not in a sustainable location. The site is also heavily wooded which acts as a constraint to development and is adjacent to a SINC. Allocation of the site would not accord with the spatial strategy.
LP637	Land north of Goat Lane	Residential	No	Inaccessible location within the Green Belt. Not appropriate for allocation.
CHC15	Land to the North of Crews Hill Station	Residential	No	Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy.
SBC6	46 Crown Rd, Enfield	Mixed-use	No	Site is within designated SIL. The evidence base indicates there will be a need for further employment land in the borough by the end of the plan period. As a result, the release SIL for other uses would not enable this objective to be met. SIL should be retained to retain

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				existing employment capacity. The site is therefore considered inappropriate for residential development as it is proposed it should be retained for ongoing/future employment use.
19/03036/FUL	Montagu Industrial Estate Permission - Enfield London N18 2NG	Industrial/ employment	No	Development completed.
COC10	Cockfosters Terminus Railway Depot, Bramley Road, London	Mixed-use	No	A large proportion of submitted site contains operational tube tracks, in use. No information has been submitted to demonstrate acceptable access could be achieved in order to facilitate development in this location. As a result, it is not considered appropriate for allocation.
GRC13	Enfield Town Station, Southbury Road, Enfield	Mixed-use	No	Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets.  Potential to contribute for site to placemaking vision.
TUC6a	Dendbridge Close (Next to Scouts Hut) A	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
BOC5	Tottenhall Rd	Residential	No	No confirmation of availability.
TUC8	Mason Rd Car Park, Masons Rd	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
SGC8	Highview Gardens	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
SOC8b	Barnet and Southgate College (Parcel b)	Mixed-use	No	This site has been promoted through the Call for Sites exercise. It is a brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Site also has potential to contribute to placemaking vision. The site has not been allocated as a single site but promoted alongside SOC8a. Through further engagement with the interested parties the promoted sites form a part of a larger site allocation (SA6.2) so bring fforwarda broader range of improvements to the college campus and the wider Southgate placemaking area.
SOC8a	Barnet and Southgate College (Parcel a)	Mixed-use	No	This site has been promoted through the Call for Sites exercise. It is a brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Site also has potential to contribute to placemaking vision. The site has not been allocated as a single site but promoted alongside SOC8a. Through further engagement with the interested parties the promoted sites form a part of a larger site allocation (SA6.2) so bring forward a broader range of improvements to the college campus and the wider Southgate placemaking area.
COC9a	Cockfosters Station Car Park (Parcel a) Cockfosters Road, Barnet	Mixed-use	No	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the placemaking vision. The site is partially located within Green Belt designation. This site has been put forward to positively shape any future changes to extant planning consent. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
LP662	Car park / garages (with Scout Hut at the end) at Wilson Street	Industrial/ employment	No	This site is potentially developable; however, it has not been allocated as it has been assessed as not developable within the plan period.
UPC34	Land at Bull Lane	Mixed-use	No	Application has come in for an industrial use for most of the site. There is a safeguarded waste site. Some factories are early 20th century - might be non-designated heritage assets. Full application. 22/03672/FUL. No longer considered available for residential development.
CFS223	Stable Yard Broomfield Park, Broomfield Lane, London	Residential	No	The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period.
CFS169	Kings Oak Equestrian Centre	Residential	No	The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation. However, the site could potentially be suitable for allocation as part of wider site allocation within the Crews Hill broad location as it is brownfield land and due to its proximity to a railway station.
CFS213	Enfield Lawn Tennis Club, 26 Woodridge Close, Enfield	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. In addition, the site currently has a local open space designation.
CFS174	Sunbeam Stud	Residential	No	Isolated inaccessible site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy.
CFS208	Land North of Waggon Road, Chase and Slopers Pond Farm, Stagg Hill	Residential	No	Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
CFS224	Camlet Way land North, Crescent East, Enfield	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. The site also currently has a local open space designation.
CFS212	Botany Bay Cricket Club, East Lodge Lane, Enfield	Residential	No	Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy.
19/01706/PRJ	Lincoln HouseLincoln RoadEnfieldEN3 4AH,	Industrial/ employment	No	Development would result in a net loss of emp floorspace
CFS214	North Lodge Farm Buildings South, North Lodge Farm, The Ridgeway,	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. The site is also within an isolated location within the Green Belt and therefore would not accord with the spatial strategy.
CFS159	Wyevale Garden Centre, Cattlegate Road	Residential	No	The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation. However, the site could potentially be suitable for allocation as part of wider site allocation within the Crews Hill broad location as it is brownfield land and due to its proximity to a railway station.
CFS199-9	Land at Palmerston Crescent and Bowes Road, Palmers Green, Enfield,	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
CFS162	Land to the rear of 66 The Ridgeway (west)	Residential	No	This is a Green belt site, which sits on the edge of the urban area, and good access to public transport. The site has not been allocated as a

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				standalone site, the promoted site forms a part of a proposed site allocation (SA 10.2) located within the Chase Park place making area.
				The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.
CFS177_r	Arnold House, 66 The Ridgeway (east)	Residential	No	This is a Gren belt site, which sits on the edge of the urban area, and good access to public transport. The site has not been allocated as a standalone site, the promoted site forms a part of a proposed site allocation (SA 10.2) located within the Chase Park place making area.
				The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.
CFS145	Land adjacent to New River north of Hoe Lane PS, Goat Lane	Residential	No	Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy.
CFS160	Land surrounding Crews Hill station - Silverdale One	Mixed-use	No	The site is located within the Green Belt. The site does not have a defensible boundary, and therefore this would suggest that release from the Green belt in isolation would be inappropriate in accordance with the NPPF. It is not anticipated that the scale of development that could be accommodated here could support delivery of enhancement of the required social infrastructure and services in isolation. However, the site could form part of a wider comprehensive allocation within the wider Chase Park broad location.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
UPC6a	Meridian Water Area (excluding planning application areas) - West bank	Mixed-use	No	This could form part of a wider allocation for the whole Meridian Water area but would not warrant an allocation in itself.
BUP6	Bury Lodge Depot Bury Street West London	Residential	No	Site has extant planning consent. A site allocation is not deemed necessary or appropriate given its scale. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
LOP9	St Edmunds Church 115 Hertford Road	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. In addition, there is an extant planning consent on the site. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
LOP20	434 Montagu Road London	Residential	No	Site has existing extant consent for non-residential uses.
EDP9	Garages Adjacent To 43,47-53 And Rear Of 17-32 Gatward Green London	Mixed-use	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. In addition, there is an extant planning consent on the site. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
HIP5	1-64 Hansart Way Enfield	Residential	No	The site has an extant planning consent. In addition, the estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. It is not considered a site allocation would be appropriate for this site. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
UPP7	Dover House 28 Bolton Road, London	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				the overall total of homes expected to be delivered within the plan period as the site has an extant planning consent.
SBP13	38 Crown Road, Enfield	Residential	No	The site has an extant planning consent. In addition, the estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. It is not considered a site allocation would be appropriate for this site. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
COP39	42 Beech Hill Barnet	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
CHP12	New Cottage 501 The Ridgeway Enfield	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. In addition, there is an extant planning consent on the site. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
PAP17	Honeysuckle House 1A Oakthorpe Road London	Residential	No	The estimated net capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. In addition, there is an extant planning consent on the site. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
BUP22	1-24 River Bank London	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				the overall total of homes expected to be delivered within the plan period.
20/01568/FUL	Rear Of 255-257 Green Lanes	Industrial/ employment	No	Development completed
COP49	Alexandra Court London	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period as the site has an extant planning consent.
HIP26	1-44 Avalon Close	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
HIP27	79 Windmill Hill Enfield	Residential	No	Site has extant planning consent. A site allocation is not deemed necessary or appropriate given its scale. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
CHP19	Barn Whitewebbs Farm Whitewebbs Road Enfield	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. In addition, there is an extant planning consent on the site. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
CHP22	Longbourn Forty Hill Enfield EN2 9EU	Mixed-use	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				the overall total of homes expected to be delivered within the plan period.
COP70	64 Beech Hill Barnet	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period as the site has an extant planning consent.
UPP32	Meridian Water Willoughby Lane And Meridian Way London	Mixed-use	No	Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Site also has potential to contribute to placemaking vision. Suitable for allocation as part of wider site allocation.
16/01452/FUL	21 And Rear Of 23 And 25 Lancaster Avenue Barnet	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.
18/03508/FUL	Royal British Legion Club Holtwhites Hill Enfield	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period as the site has an extant planning consent.
19/04385/FUL	391 Cockfosters Road Barnet	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
SA3.1	Edmonton Green Shopping Centre	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Edmonton Green (PL3) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. There is a planning permission associated with this site.
SA7.1	Gas Holder, Pinkham Way, London, N11 1QJ	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban sites. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the New Southgate (PL7) placemaking vision. The site is not located within Flood Zones 1,2 and 3, a minimal area of the site is at risk of surface water flooding which is expected to be addressed through design and mitigation measures. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
R.02	Land between Camlet Way and Crescent West, Hadley	Residential	Yes	The site is within the Green Belt, however it is at the edge of the urban area with good access to public transport. Green Belt land will be required to help ensure the Council can meet its housing targets.  The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
U.17	Main Avenue Site	Residential	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA1.6	100 Church Street, Enfield	Residential	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Enfield Town placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA1.3	Southbury Road Superstore Area	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Enfield Town placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. This site will require the demolition of existing buildings and reprovision of existing uses in addition to the delivery of housing.
R.01	Land opposite Enfield Crematorium (aka The Dell). Great Cambridge Road	Mixed-use	Yes	The site is within Green Belt and local open space designation, the site is at the edge of the urban area, within close proximity to services. Whilst adjacent to landscape character areas and heritage assets there is potential to mitigate these effects. Detailed transport testing is required to ensure safe and adequate vehicular access can be

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				achieved.
				The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.
SA1.1	Palace Gardens Shopping Centre Enfield,	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Enfield Town placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. Significant potential costs due to the need for existing uses on site to be decanted, demolished and potentially relocated.
SA8.4	Travis Perkins Palmers Green, Bridge Drive, Broomfield Lane	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the New Southgate (PL7) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA.11.1	Crews Hill North West	Mixed-use	Yes	The release of Green Belt will be required to help assist with meeting the Council's housing target and need beyond 2029.  The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.
U.09	Exeter Road Estate (Land at former Wessex Hall Building)	Mixed-use	Yes	This site has been identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. Allocations should positively shape any future changes to extant planning consent.
SA2.6	Sainsburys Crown Road	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Southbury (PL2) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. This site will require the demolition of existing buildings and reprovision of existing uses in addition to the delivery of housing.
SA2.3	Morrisons, Southbury Road	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Southbury (PL2) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. This site would have to come forward as a part of a larger master planned development, landowner

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				coordination and infrastructure delivery has been identified as a constraint. Delivery will require the demolition of existing buildings and reprovision of existing uses in addition to the delivery of housing.
U.19	Albany Leisure Centre and Car Park, 55 Albany Road, Enfield	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. The site is partially designated as MOL and adjacent to MOL. Potential for impacts to be mitigated through design. Potential for site to deliver enhanced community facilities, contribute to enhancements in the adjacent open space. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.01	Land known as Brimsdown Sports Ground, Goldsdown Road, Enfield,	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the placemaking vision. The site has a local open space designation, the site is not currently accessible and therefore does not offer any amenity/recreation benefits to residents. The site has potential to deliver open space through redevelopment. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.26	Ford's Grove Car Park, Ford's Grove, Enfield	Residential	Yes	This site has been identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. Due to the minor scale nature of the site, any site allocation would be a simple allocation confirming the

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				acceptability of the principle of development and with an indicative estimate of capacity.
SA1.7	Oak House, 43 Baker Street,	Residential	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Enfield Town placemaking vision. There are no known technical constraints.
SA2.5	Tesco, Ponders End, 288 High Street, Enfield	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Southbury (PL2) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. This site will require the demolition of existing buildings and reprovision of existing uses in addition to the delivery of housing.
SA2.4	Southbury Leisure Park Enfield	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Southbury (PL2) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. Delivery will require the demolition of existing buildings, in addition to the delivery of housing.
U.12	241 Green Street	Mixed-use	Yes	This has been identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with

Enfield Local Plan: Integrated Impact Assessment

December 2023

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. The site is partially located within Flood Zone 2, mitigations could support the redevelopment of this site. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. Allocations should positively shape any future changes to extant planning consent.
SA4.5	Public House 50-56 Fore Street London	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Angel Edmonton (PL4) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA6.1	Southgate Office Village 286 Chase Road London.	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Southgate Office (PL6) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA4.1	Joyce Avenue & Snells Park Estate	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Angel Edmonton (PL4) placemaking vision. The site is partially located within Flood Zones 2 and 3 and has Local Open Space designations, these will require consideration through design and/or mitigation as a part of the redevelopment of the housing estate. Viability has been tested

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA7.4	Arnos Grove Station Car Park	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the New Southgate (PL7) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA2.1	Colosseum Retail ParkDearsley Road Enfield	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Southbury (PL2) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. This site will require the demolition of existing buildings and reprovision of existing uses in addition to the delivery of housing. The site has a hybrid planning permission.
SA1.5	St Annes Catholic High School for Girls, Enfield	Residential	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Enfield Town placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. The school playing fields are identified as Local Open Space but does not form a part of the proposed developable area and is not currently publicly accessible.

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U.21	Moorfield Health Centre, 2 Moorfield Road	Mixed-use	Yes	This site has been identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. Allocations should positively shape any future changes to extant planning consent.
U.22	Oakwood Station Car Park, Bramley Road, London	Residential	Yes	This site has been identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA1.4	Civic Centre	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Enfield Town placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA7.5	Coppice Wood Lodge, 10 Grove Road, Southgate	Residential	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the New Southgate (PL7) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				Plan Viability but further detailed testing will be required through the planning application process.
U.05	New Avenue Estate, London	Mixed-use	Yes	This site has been identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. Allocations should positively shape any future changes to extant planning consent.
SA7.3	Ladderswood Estate	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the New Southgate (PL7) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.14	Four Hills Estate, Lavender Hill	Residential	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.24	Fore Street Estate	Residential	Yes	This site has been identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.25	Pevency Avenue, EN1	Residential	Yes	This site has been identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.23	Stoneleigh Avenue Estate. EN1, Off Hoe Lane	Residential	Yes	This site has been identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA8.1	Morrisons. 19 Alderman's Hill, Palmers Green.	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Palmers Green (PL8) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. Also, to safeguard against future changes to extant planning permission.
SA8.3	Corner of Green Lances and the North Circular	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				housing targets and the potential to contribute to the Palmers Green (PL8) placemaking vision. The site is partially located within LSIS and Flood Risk 2 designations, mitigations could support the redevelopment of this site. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. Allocation would safeguard against future changes to extant planning permissions.
U.10	Alma Estate	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. Allocations should positively shape any future changes to extant planning consent.
U.03	Former Chase Farm Hospital, The Ridgeway	Mixed-use	Yes	This site has been identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. Allocations should positively shape any future changes to extant planning consent.
U.11	The Royal Chace HotelThe RidgewayEnfieldEN2 8AR	Residential	Yes	This site has been identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				process. Allocations should positively shape any future changes to extant planning consent.
U.20	Cuckoo Hall Lane Estate	Residential	Yes	This site has been identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. The site is partially designated as Local Open Space, development should provide improvements to existing green space. The site is also partially located within Flood Zone 2, mitigations could support the redevelopment of this site. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. Allocations should positively shape any future changes to extant planning consent.
U.13	Hertford Road, Archers and Roman Way, Larksfield Grove Caterhatch, Lytchet Way and Sherbourne Avenue Estate,	Residential	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.15	Kettering Rd Estate, EN3	Residential	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.27	South Street. EN3,	Residential	Yes	This site has been identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA4.3	Langhedge Lane Industrial Estate	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Angel Edmonton (PL4) placemaking vision. The site is located within Locally Significant Industrial Land designation, the site is identified as suitable to provide housing and must re-provide non-residential light industrial use to maximise its employment development potential within LSIS. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA2.2	Heritage House, 345 Southbury Road	Industrial/ employment	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Southbury (PL2) placemaking vision. The site is not located within Flood Zones 1,2 and 3, a minimal area of the site is at risk of surface water flooding which is expected to be addressed through design and mitigation measures. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.31	Snowbird foods extension, Snowbird Foods Ltd.14 Wharf RoadEnfieldEN3 4TD,	Industrial/ employment	Yes	This site has been identified as an available brownfield urban site without constraints suitable to provide industrial uses. A minimal area of the site is at risk of surface water flooding which is expected to be addressed through design and mitigation measures Viability has been

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.35	Riverwalk Business Park 24 Riverwalk RoadEnfield	Industrial/ employment	Yes	This site has been identified as an available brownfield urban site without constraints suitable to provide industrial uses. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.34	5 Picketts Lock Lane	Industrial/ employment	Yes	This site has been identified as an available brownfield urban site without constraints suitable to provide industrial uses. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
R.03	Land to the north of Mollison Avenue, south of the M25 and east of Freezywater (also known as Land west of Rammey Marsh)	Industrial/ employment	Yes	This site has been identified as an available brownfield suitable to provide industrial uses. The site is situated within Green Belt and partially within Flood Zone 2 and 3. The site is suitable for allocation to support the borough to meet its employment needs, it has good strategic access, mitigations could support the redevelopment of this site. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
R.05	Land to North West of Innova Park	Industrial/ employment	Yes	This site has been identified as an available brownfield site without constraints suitable to provide industrial uses. The site is situated within Green Belt and partially within Flood Zone 2. The site is suitable for allocation to support the borough to meet its employment needs, it has good strategic access, mitigations could support the redevelopment of this site. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
R.04	Junction 24 - Part New Cottage and Holly Hill Farm	Industrial/ employment	Yes	This site has been identified as an available greenfield site suitable to provide industrial uses. The site is situated within Green Belt, the site is not within a Flood Zone but some areas of the site are at risk of surface water flooding. The site is suitable for allocation to support the borough to meet its employment needs, it has good strategic access, mitigations could support the redevelopment of this site. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.33	6 Morson Road	Industrial/ employment	Yes	This site has been identified as an available brownfield urban site without constraints suitable to provide industrial uses. The site is situated within Locally Significant Industrial Land and partially within Flood Risk Zone 2, mitigations could support the redevelopment of this site. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA2.7	Crown Road Lorry Park	Industrial/ employment	Yes	This site has been identified as an available brownfield urban site suitable to provide industrial uses. The site is located within Locally Significant Industrial Land and Contaminated Land. This location is suitable to deliver intensification of Class B uses, consideration through design and/or mitigation as a part of the redevelopment will be required to mitigate risks of surface water flooding. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.29	Land to the south of Millmarsh Lane	Industrial/ employment	Yes	This site has been identified as an available brownfield urban site without constraints suitable to provide industrial uses. The site is located within Strategic Industrial Land and contaminated land, it is also partially within Flood Zone 2. This location is suitable to deliver industrial uses, consideration through design and/or mitigation as a part of the redevelopment. Viability has been tested through the

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				Whole Plan Viability but further detailed testing will be required through the planning application process.
R.06	Land at Picketts Lock	Leisure/ sports and recreation	Yes	The site has been identified as an available greenfield site, with some brownfield land, suitable to provide leisure uses. This site is located within Gren Belt, MOL and the Lee Valley Regional Park designations. The site is partially within Flood Zones 2 and 3, mitigations could support the redevelopment of this site, proposed uses could be considered acceptable despite the planning policy designations.
U.36	Church Street Recreation Ground	Burial/ crematorium	Yes	This site has been promoted through the Call for Sites and is identified as an available site suitable for delivering burial needs in the borough. The site is wholly within MOL and Local Open Space designations. The site is not located within Flood Zones 1,2 and 3, a minimal area of the site is at risk of surface water flooding which is expected to be addressed through design and mitigation measures. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.28	Land and buildings to the south east of Stockingswater Lane, Brimsdown	Industrial/ employment	Yes	This site has been identified as an available brownfield urban site without constraints suitable to provide industrial uses. The site is located within Strategic Industrial Land, this designation is suitable to deliver industrial uses. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.32	Claverings, Centre Way, London	Industrial/ employment	Yes	This site has been identified as an available brownfield urban site without constraints suitable to provide industrial uses. The site is located within Strategic Industrial Land and Flood Risk Zone 2 designations. These designations are deemed suitable to deliver industrial uses, mitigations could support the redevelopment of this site, with the existing uses established. Viability has been tested

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.02	Cockfosters Station Car Park (Parcel a & b) Cockfosters Road, Barnet	Residential	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the placemaking vision. The site is partially located within Green Belt designation. This site has been put forward to positively shape any future changes to extant planning consent. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.30	Montagu Ind Estate	Industrial/ employment	Yes	This site has been identified as an available brownfield urban site without constraints suitable to provide industrial uses. The site is located within Strategic Industrial Land and partially located within Flood Risk Zone 2, this designations are deemed suitable to deliver industrial uses, mitigations could support the redevelopment of this site. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.07	Sainsburys Green Lanes	Mixed-use	Yes	This site has been identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA5.4	Tesco Extra, Meridian Water	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				housing targets and the potential to contribute to the Meridian Water (PL5) placemaking area. The small portion of the site (below 1.5%) is located within Flood Zone 3, consideration through design and/or mitigation as a part of the redevelopment will be required. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA5.3	Former IKEA Meridian Water	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Meridian Water (PL5) placemaking vision. The site is partially located within a Flood Zone 2 and 3 designations, consideration through design and/or mitigation as a part of the redevelopment will be required. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA5.8	Kenninghall Industrial Estate South,Kenninghall Road, London, N18 2PE	Industrial/ employment	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's employment targets and the potential to contribute to the Meridian Water (PL5) placemaking vision. The majority of the site is within an LSIS designation, it is also located within a Flood Zone 2 designation, consideration through design and/or mitigation as a part of the redevelopment will be required. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA5.7	Ravenside Retail Park	Industrial/ employment	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's employment targets and the potential to contribute to the Meridian Water (PL5) placemaking vision. The site is partially located within Flood Zone 2 and 3 designations, consideration through design and/or

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				mitigation as a part of the redevelopment will be required. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA5.6	Meridian East - Harbert Road	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing and employment targets and the potential to contribute to the Meridian Water (PL5) placemaking area. The site is wholly within SIL and Flood Zone 2 policy designations, and partially within a Flood Zone 3 designation, consideration through design and/or mitigation as a part of the redevelopment will be required. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA5.2	Meridian 13 (Tear Drop Site)	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Meridian Water (PL5) placemaking area. A significant proportion of the site is located within a Flood Zone 2 and partially located within Flood Zone 3 designations, consideration through design and/or mitigation as a part of the redevelopment will be required. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA5.1	Meridian Water Phase 1	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Meridian Water (PL5) placemaking area. The site is partially located within Flood Zone 2 designation and a small portion of the site within Flood Zone 3 designation, consideration through design and/or mitigation as a part of the redevelopment will be required. Viability has been tested

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA4.4	South-east corner of the North Middlesex UniversityHospital Trust of Sterling Way, London	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Angel Edmonton (PL4) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
COC9a and COC9b	Cockfosters Station Car Park, Cockfosters Road, Barnet	Residential	No	The estimated capacity of the site is beneath 25 homes and therefore beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period as the site has an extant planning consent.
NA001	Ravenside Retail Park	Industrial/ employment	No	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. The site has been put forward for allocation (SA5.7) forming a part of the wider Meridian Water masterplan. All brownfield sites within the urban area will be required to help with delivering the Council's employment targets and the potential to contribute to the Meridian Water (PL5) placemaking vision. The site is partially located within Flood Zone 2 and 3 designations, consideration through design and/or mitigation as a part of the redevelopment will be required. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
LP675	Picketts Lock/Lee Valley Leisure Centre	Leisure/ sports and recreation	No	This site has been promoted through the Call for Sites. The promoted site forms a part of a larger proposed site allocation (R.06) to bring forward. The proposed uses are to provide outdoor sporting and

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				leisure/recreation with supporting ancillary facilities. This would be compatible with the Green Belt use. Acceptability of the scheme would be subject to proposals adhering to Green Belt purposes. It is not proposed to remove the site from the Green Belt.
CFS218	Tottenham Hotspur's training centre	Leisure/ sports and recreation	No	The estimated capacity of the site is beneath 25 homes, and the site is beneath 0.25ha and therefore the site is beneath the threshold for consideration of allocation. However, the estimated capacity of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period should the site considered suitable for development.
CFS161	Whitewebbs Golf Course, Beggar's Hollow	Nature recovery	No	CFS161 has not been allocated as a standalone site allocation. The parcel forms a part of a wider strategic Site Allocation - R.07 (Whitewebbs Golf Course & Tottenham Hotspur Football Club - Training Ground) - to bring forward nature recovery uses alongside professional sport, recreation and community sports/leisure uses. As identified in the Site Selection process this parcel has sufficient size to accommodate SANG uses and has existing access. Subject to outcomes of SANG strategy, it is considered that this could be an appropriate SANG location.
CFS167	Alma Road Open Space	Burial/ crematorium	No	The site is excess to burial needs requirements as set out in the Enzygo Burial Needs Assessment. This identifies a total need for only 7.7ha of land by 2041. The site is designated MOL and is identified as being a priority open space for enhancement within the local plan evidence base. The ward boundaries have shifted since the B&G Infrastructure audit evidence was produced, however, the ward adjacent to the south - Ponders End - is identified as having deficient levels of open space for the population currently, which will only worsen with growth within the plan period. Therefore, it is not considered appropriate to allocate this site for other uses.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
SA19	IKEA store; Tesco Extra, 1 Glover Drive; Meridian Water, Willoughby Lane and Meridian Way	Mixed-use	No	This site has not been allocated as a Site Allocation. The site forms a part of two Site Allocations (SA5.1 and 5.5). There is a planning applications associsated with UPP32. The site forms a part of the wider Meridian Water place making vision and associated draft policy (PL5). The Site Allocation boundaries refelct the Reg 18 IIA assement boundaries.  UPP24 has been allocated as Site Allocaiton 5.2. The Site Allocation has been identified through the planning application 19/02718/RE3 associated with the site. The site forms a part of the wider Meridian Water place making vision and associated draft policy (PL5). The Site Allocation boundaries refelct the Reg 18 IIA assement boundaries.  UPC1 has been allocated as Site Allocaiton 5.4. The site forms a part of the wider Meridian Water place making vision and associated draft policy (PL5). The Site Allocation boundaries refelct the Reg 18 IIA assement boundaries.  UPC2 has been allocated as Site Allocaiton 5.3. The site boundary aligns to the IKEA development brief and forms a part of the wider Meridian Water place making vision and associated draft policy (PL5). The Site Allocation boundaries refelct the Reg 18 IIA assement boundaries.
CFS183	Enfield Town Station and Former Enfield Arms, Genotin Road	Residential	No	This site has not been allocated as the site has an implented planning application associated with the site.
CHC14	Land north of Goat Lane	Residential	No	Inaccessible location within the Green Belt. Not appropriate for allocation.
CFS210	Southgate Library, High Street, Southgate	Residential	No	This is a locally listed asset and was not considered suitable for redevelopment.
CFS162_B	Land to the Rear of Arnold House (East)	Residential	No	This site has not been allocated as a stand alone site. The land forms a part of a wider strategic allocation (SA10.2) to bring about the

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				benefits of accelerated housing delivery and associated infrastructure requirements.
CFS162_A	Land to the Rear of Arnold House (West)	Residential	No	This site has not been allocated as a stand alone site. The land forms a part of a wider strategic allocation (SA10.2) to bring about the benefits of accelerated housing delivery and associated infrastructure requirements.
CFS162_C	Arnold House	Residential	No	This site has not been allocated as a stand alone site. The land forms a part of a wider strategic allocation (SA10.2) to bring about the benefits of accelerated housing delivery and associated infrastructure requirements. Arnold House has been granted planning approval 22/11/23 - 23/00032/FUL
UPS21	Upton Road and Raynham Road	Residential	No	The entire site has not been confirmed as available and therefore is only potentially developable. As a result, the site has not been allocated. Parcel USP21a has been excluded from allocation on this basis.
SA28	Land at Chase Park	Residential	No	This site has not been allocated as a stand alone site. The land forms a part of a wider strategic allocation (SA10.2) to bring about the benefits of accelerated housing delivery and associated infrastructure requirements.
SGC1	Site between North Circular Road and Station Road	Residential	No	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. This site has been put proposed as a site allocation (SA7.1). All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the New Southgate (PL7) placemaking vision. The site is not located within Flood Zones 1,2 and 3, a minimal area of the site is at risk of surface water flooding which is expected to be addressed through design and mitigation measures. Viability has been tested through the Whole Plan Viability but further

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				detailed testing will be required through the planning application process.
HIC10	Land opposite Jolly Farmers	Residential	No	Large proportion of site is constrained by Level 2 constraints. The borough's SFRA suggests that the extent of the site that is covered by Flood Risk Zone 3 would render the site undevelopable for residential development. It is therefore not considered appropriate for allocation.
HIC11	Chase Park	Residential	No	The release of Green Belt will be required to help assist with meeting the Council's housing target and need beyond 2029.  The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.  Potentially suitable for allocation as part of wider site allocation.
CHC1	Warmerdams Nursery, Cattlegate Road	Residential	No	The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation.
CHC2	Wolden Garden Centre, Cattlegate Road	Residential	No	The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation.
CHC5	Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road	Residential	No	Whilst within designated Green Belt and local open space designation, site is at the edge of the urban area, within close proximity to services. Whilst adjacent to landscape character areas and heritage assets

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				potential for site to mitigate these effects. Will require detailed transport testing to ensure safe and adequate vehicular access can be achieved.
				The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.
HIC6	HIC6/LP1153: Bramley Road	Residential	No	The site is located within the Green Belt. The site does not have a defensible boundary, and therefore this would suggest that release from the Green belt in isolation would be inappropriate in accordance with the NPPF. It is not anticipated that the scale of development that could be accommodated here could support delivery of enhancement of the required social infrastructure and services in isolation. However, the site could form part of a wider comprehensive allocation within the wider Chase Park broad location.
CHC10	Site at Oak Farm and Homestead Nursery, Cattlegate Road	Residential	No	The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation.
CHC11	Parcel 1: Land to the rear of Jesus Christ Church, Parcel 1	Residential	No	Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy.
CHC12	Parcel 2: Land to the south of Forty Hill Church of England School, Forty Hill, Parcel 2	Residential	No	Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
CHC17	Towneley Nurseries, Theobalds Park	Residential	No	The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation.
CHC18	Brown's Garden Village, Theobalds Park Road	Residential	No	The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation.
CHC21	Land at Crews Hill	Residential	No	The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services/infrastructure improvements to be delivered nearby or as part of the site allocation to support growth in this location. It is considered unsustainable.
HIC9	Land south of Enfield Road	Residential	No	The site is a greenfield site located within the Green Belt. It is not anticipated that the scale of development that could be accommodated here could support delivery of enhancement of the required social infrastructure and services in isolation.
PAC39	Sainsburys Green Lanes	Mixed-use	No	This site has been promoted through the Call for Sites exercise and identified at Regulation 18 for allocation (SA U.07) This site has been identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.

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SOE9	Asda Southgate, 130 Chase Side, Southgate	Mixed-use	No	Updated information has been received from the landowner (LBE) indicating that the store lease is for another 90 years. No indication has been received from the long leaseholder as to intent for redevelopment. As such it is not considered this site could reasonably be expected to come forward for development within the plan period.
CFS135	Car Park Site, Wharf Road	Industrial/ employment	No	This site has not been allocated as it has multiple environmental constraints, including being located within Flood Zone 2 and Green Belt.
UPM1	Joyce Avenue and Snells Park Estate	Residential	No	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. This site has been put forward for allocations (SA4.1) All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Angel Edmonton (PL4) placemaking vision. The site is partially located within Flood Zones 2 and 3 and has Local Open Space designations, these will require consideration through design and/or mitigation as a part of the redevelopment of the housing estate. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SOS11	M&S Food	Mixed-use	No	Information received from the landowners indicates that the site could come forward in 15+ years. The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result, it cannot be considered for allocation in line with the PPG.
SGS14	Station Road, New Southgate	Residential	No	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. This site has been put proposed as a site allocation (SA7.2). All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the New Southgate (PL7)

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				placemaking vision. The site is not located within Flood Zones 1,2 and 3, a minimal area of the site is at risk of surface water flooding which is expected to be addressed through design and mitigation measures. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
CFS153	Montagu Ind Estate	Industrial/ employment	No	CFS153 has not been allocated as a standalone site. The site forms a part of a wider strategic allocation (SA U.30) to optimise the intensification and delivery of employment and industrial uses within SIL and LSIS designations.
CFS177	Arnold House	Residential	No	This is a Green Belt site, which sits on the edge of the urban area, and good access to public transport. The site has not been allocated as a standalone site; the promoted site forms a part of a proposed site allocation (SA 10.2) located within the Chase Park place making area.  The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.
CHC3	Burton Farm Ride	Residential	No	The site is located within the Green Belt. The site is not located in close proximity to local services. The site also has numerous policy constraints that would make it inappropriate for allocation in isolation. It is partially covered by Flood Zone 3, Flood Zone 2 and is within a designated site of importance for nature conservation.
GRC1	St Anne's Catholic High School for Girls	Residential	No	The site was promoted through the Call for Sites exercise. The site is identified as an available brownfield urban site. All brownfield sites

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Enfield Town placemaking vision. The site includes an area of Local Open Space. The Site Allocation proposed excludes the area of Local Open Space.
CFS165	South east corner of North Middlesex University Hospital Trust of Sterling Way	Residential	No	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Angel Edmonton (PL4) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. This site has been assessed and proposed as a site allocation (SA4.4)
CFS150	Minchenden Car Park and Alan Pullinger Centre	Residential	No	This site was promoted through the Call for Sites exercise alongside CFS 189. The site has been proposed as a single Site Allocation combined with CFS 189 to bring forward the delivery of new homes and non-residential floorspace and enable the re-provision of existing community uses associated with CFS150. The proposed site allocation associated with this site boundary is SA6.3, located within the Southgate placemaking area.
CFS242	Southbury Leisure Park	Residential	No	This site has been proposed for allocation (SA2.4). This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Southbury (PL2) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				process. Delivery will require the demolition of existing buildings, in addition to the delivery of housing.
CFS183	Enfield Town Station and Former Enfield Arms, Genotin Road	Mixed-use	No	This site has not been allocated as the site has an implemented planning application associated with the site.
SGC1	Site between North Circular Road and Station Road	Mixed-use	No	This site has been promoted through the Call for Sites and is identified as an available brownfield urban sites. This site has been put proposed as a site allocation (SA7.1). All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the New Southgate (PL7) placemaking vision. The site is not located within Flood Zones 1,2 and 3, a minimal area of the site is at risk of surface water flooding which is expected to be addressed through design and mitigation measures. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
CHC5	Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road	Crematorium	No	"Whilst within designated Green Belt and local open space designation, site is at the edge of the urban area, within close proximity to services. Whilst adjacent to landscape character areas and heritage assets potential for site to mitigate these effects. Will require detailed transport testing to ensure safe and adequate vehicular access can be achieved.  The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required. "

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
SGS14	Station Road, New Southgate	Mixed-use	No	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. This site has been put proposed as a site allocation (SA7.2). All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the New Southgate (PL7) placemaking vision. The site is not located within Flood Zones 1,2 and 3, a minimal area of the site is at risk of surface water flooding which is expected to be addressed through design and mitigation measures. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
CFS242	Southbury Leisure Park	Residential	No	This site has been proposed for allocation (SA2.4). This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Southbury (PL2) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. Delivery will require the demolition of existing buildings, in addition to the delivery of housing.
SA11.2	Land South of Cattlegate Road	Residential	Yes	The release of Green Belt will be required to help assist with meeting the Council's housing target and need beyond 2029.  The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
SA7.2	Homebase, Station Road, New Southgate	Residential	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the New Southgate (PL7) placemaking vision. The site is not located within Flood Zones 1,2 and 3, a minimal area of the site is at risk of surface water flooding which is expected to be addressed through design and mitigation measures. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA4.2	Upton Road And Raynham Road (b)	Residential	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Angel Edmonton (PL4) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. Suitable for allocation as part of wider site allocation.
SA1.2	Enfield Town Station, Southbury Road, Enfield	Residential	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Enfield Town placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. There is a significant potential cost due to there being an operational railway station on site.
U.06	Former Middlesex University Trent Park Bramley Road	Residential	Yes	This site has been identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. Allocations should positively shape any future changes to extant planning consent.
U.08	Hoe, Eastfield, Cherry and Bouvier Estates	Residential	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There is a local open space designation partially on the site, any development of this site allocation should improve existing green spaces. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA2.8	Land and buildings north of Lincoln Road	Industrial/ employment	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Southbury (PL2) placemaking vision. The site is not located within Flood Zones 1,2 and 3, a minimal area of the site is at risk of surface water flooding which is expected to be addressed through design and mitigation measures. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA6.3	Minchenden CP- adj to Leigh Hunt drive & Alan Pullinger Centre, 1 John Bradshaw Road, Southgate	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Southgate Office (PL6) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				Plan Viability but further detailed testing will be required through the planning application process.
SA6.2	Barnet and Southgate College (Parcel a & b)	Education	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Southgate Office (PL6) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA11.5	Land South of Theobalds Park Road	Residential	Yes	The release of Green Belt will be required to help assist with meeting the Council's housing target and need beyond 2029.  The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.
SA5.5	Meridian 13 (Tear Drop Site)	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing and employment targets, with the potential to contribute to the Meridian Water (PL5) placemaking area. The site is partially located within in Flood Zone 2 designation, primarily affecting the existing railway line and existing Meridian Water station, consideration through design and/or mitigation as a part of the redevelopment will be required. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
SA.11.3	Land South of M25	Residential	Yes	The release of Green Belt will be required to help assist with meeting the Council's housing target and need beyond 2029.  The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.
SA.11.4	Land North and South of Cattlegate Road, Crews Hill	Mixed-use	Yes	The release of Green Belt will be required to help assist with meeting the Council's housing target and need beyond 2029.  The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.
SA11.6	Crews Hill East	Mixed-use	Yes	The release of Green Belt will be required to help assist with meeting the Council's housing target and need beyond 2029.  The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.
R.08	Sloemans Farm	Natural burial	Yes	The site has been identified as an available greenfield site, suitable to deliver natural burial uses. The site is situated within Green Belt, Grade 3 Agricultural Land, SINC and contaminated land. The site is

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				not within a Flood Risk Zone but is at risk of surface water flooding in some areas of the site. Mitigations could support the redevelopment of this site, proposed uses could be considered acceptable despite the planning policy designations
SA10.2	Arnold House and Land to the rear	Residential	Yes	The release of Green Belt will be required to help assist with meeting the Council's housing target and need beyond 2029.  The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.
SA10.1	Land at Chase Park South	Mixed-use	Yes	The release of Green Belt will be required to help assist with meeting the Council's housing target and need beyond 2029.  The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.
SA10.3	Chase Park North East	Mixed-use	Yes	The release of Green Belt will be required to help assist with meeting the Council's housing target and need beyond 2029.  The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				within the urban area, thus indicating that Green Belt release is likely to be required.
SA10.4	Chase Park North West	Mixed-use	Yes	The release of Green Belt will be required to help assist with meeting the Council's housing target and need beyond 2029.  The deliverability of many of the urban sites is questionable and therefore Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be technical constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.
R.07	Whitewebbs Golf Course & Tottenham Hotspur Football Club - Training Ground	Nature recovery/ Sports, leisure and recreation	Yes	The site has been identified as an available greenfield site, suitable to deliver nature recovery uses, and sporting and leisure use. The site is situated within Green Belt, Grade 3 Agricultural Land and partially within a SINC, Flood Zone 2 and 3 designations. Mitigations could support the redevelopment of this site, proposed uses could be considered acceptable despite the planning policy designations
SA3.2	Chiswick Road Estate (Osward and Newdales)	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban sites. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Edmonton Green (PL3) placemaking vision. The site is partially located within Flood Zones 2 and 3, redevelopment of the site is to be situated on areas outside of the Flood Risk Zones identified. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.18	Land at Ritz Parade	Residential	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's

Site option ID	Site name	Proposed use	Selected for allocation?	Enfield Council's reasons for selecting or discounting sites
				housing targets and the potential to contribute to the Spatial Strategy. The site is partially located within Flood Zone 2, mitigations could support the redevelopment of this site. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
SA8.2	Lodge Drive Car Park Palmers Green including depot	Mixed-use	Yes	This site has been promoted through the Call for Sites and is identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the New Southgate (PL7) placemaking vision. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process.
U.16	188-200 Bowes Road, London	Mixed-use	Yes	This site has been identified as an available brownfield urban site. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. Allocations should positively shape any future changes to extant planning consent.
U.04	Blackhorse Tower, Holbrook House And Churchwood House and 116 Cockfosters Road	Mixed-use	Yes	This site has been identified as an available brownfield urban site without constraints. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets and the potential to contribute to the Spatial Strategy. There are no known technical constraints. Viability has been tested through the Whole Plan Viability but further detailed testing will be required through the planning application process. Allocations should positively shape any future changes to extant planning consent.