



Enfield Local Plan (Regulation 24) 2024

Stage 2 Matters, Issues and Questions

**Matter 7: Allocations outside Placemaking areas and the
Green Belt**

London Borough of Enfield

Matter 7: Allocations outside Placemaking areas and the Green Belt

Issue 7.1: Whether allocations URB.01 – URB.36 are justified, positively prepared, consistent with national policy and in general conformity with the London Plan.

The following questions relate to any remaining allocations in Appendix C. These are: URB.01 – URB.36

URB.01: Brimsdown Sports Ground

Q7.1: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

1. The Council considers there is no substantive evidence to suggest that URB.01 – Brimsdown Sports Ground should not be allocated. All relevant environmental and technical constraints have been assessed as part of the comprehensive site selection process, as set out in the Site Allocation Topic Paper [TOP2] and detailed in the site assessment spreadsheet (E.14.1-SAS2).
2. The site contains a designated Local Open Space, a factor that has been fully considered in the policy and site capacity assumptions. The allocation proposes a reduced development footprint to retain the majority of the open space, ensuring no net loss and compliance with London Plan Policy G4.
3. There are no identified conflicts with heritage designations, flood risk, biodiversity constraints or transport capacity that would preclude development. In the Council's

view, a balanced and proportionate planning judgment has been applied, and the allocation is justified.

Q7.2: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response

4. In response to part a) the proposed scale and density are appropriate and justified to deliver sustainable development on this site. The typology applied (Hammond Court) reflects the existing low-rise residential character of the surrounding area, while still optimising capacity in accordance with London Plan Policy D3 on design-led density.
5. The development footprint has been carefully reduced to 60% of the total site area to allow for the retention of the existing Local Open Space. This ensures that the allocation supports healthy living environments, access to open space, and local amenity.
6. The number of homes proposed derives from applying the Hammond Court typology to the developable area, as reflected in the Housing Trajectory (**HOU10**, Ref. CFS217, row 53, column BI), and is considered realistic and deliverable.
7. In response to part b) infrastructure needs have been identified through the Infrastructure Delivery Plan (IDP) and will be secured through planning obligations as appropriate. The site will be expected to contribute proportionately to local infrastructure, including education, health and open space provision. The scale of development is modest and does not give rise to site-specific strategic infrastructure triggers.
8. The design principles have been developed in accordance with the NPPF 2023 (**para 132,135**), London Plan 2021 (**Policy D3**), and national guidance such as the National Design Guide. These principles promote high-quality design that is sensitive to the surrounding context and ensure integration with the retained green space.
9. Key expectations include:
 - Retention of trees and enhancement of landscape character.

- Delivery of active frontages facing the retained open space.
 - Provision of safe, attractive pedestrian routes to and through the site.
10. These principles provide a sound basis for delivering sustainable and contextually responsive development.

Q7.3: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

11. Yes, there is a reasonable prospect that site URB.01: Brimsdown Sports Ground could be viably developed at the point envisaged in the Plan period.
12. The site is located in the lower value area of the borough, as defined in the Whole Plan Viability Assessment **[VIA1]** (HDH Planning & Development Ltd, June 2023). This includes areas such as Brimsdown and parts of Ponders End, where residential values are lower and viability is more sensitive to cumulative policy costs.
13. The WPVA models brownfield and mixed typologies in lower value areas. It concludes that while such sites may not always support 35% affordable housing and full policy compliance, viable development is achievable through flexible planning approaches, adjusted contributions, and alternative delivery mechanisms (see VIA1, paras 10.34–10.57).
14. The WPVA includes the following policy cost assumptions:
- M4(2)/M4(3) accessibility
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon requirements
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, **Table 10.8a**, p.156).
15. URB.01 is a previously developed sports ground. Development is expected to come forward in a coordinated manner, with consideration of potential site constraints including flood risk and the need to re-provide or enhance community or recreational facilities where appropriate. Where required, a site-specific viability assessment may be submitted at planning application stage.
16. Based on the site's location, proposed use, and the evidence in the WPVA **[VIA1]**, the Council considers there is a reasonable prospect that URB.01 can be viably developed within the Plan period.

Q7.4: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

17. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
18. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
19. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.02: Cockfosters car park

Q7.5: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- Biodiversity
- green infrastructure or agricultural land
- landscape quality and character
- heritage assets
- strategic and local infrastructure including transport
- the efficient operation of the transport network and highway safety
- contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk
- open space, recreational facilities and public rights of way

Council response

20. There is no substantive evidence suggesting that URB.02 Cockfosters Car Park should not be allocated. All of the above environmental, design and technical

considerations have been carefully assessed through the site selection process as detailed in the Site Allocation Topic Paper [TOP2] and the site assessment spreadsheet (E.14.1-SAS2).

21. The site benefits from an implemented planning permission (21/02517/FUL) for residential-led mixed-use development, demonstrating that the issues relating to flood risk, heritage, transport, amenity and biodiversity have already been addressed through the development management process. The Council is satisfied that the planning balance has been robustly made and the allocation is justified.

Q7.6: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) **The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) **Infrastructure requirements.**
- c) **Design principles.**

Council response

22. In response to part a) the scale and density of development proposed for this site are appropriate and have been robustly tested through the planning application process. Planning permission was granted in 2022 (21/02517/FUL) for the comprehensive redevelopment of the car park, including four residential buildings ranging from 4 to 9 storeys delivering 351 new homes and associated open space, community uses and improvements to the Underground station entrance.
23. The proposal reflects a design-led approach to optimise site capacity while respecting the heritage setting of the Grade II listed station and the character of surrounding suburban areas. It aligns with London Plan Policy D3 and has been informed by design guidance and capacity modelling.
24. In response to part b) infrastructure requirements, Infrastructure impacts and mitigation measures were fully considered as part of the approved planning application. The development secured contributions towards transport, education, public realm and active travel improvements. The site is well-connected by public transport and benefits from existing community infrastructure nearby, including schools and healthcare. Additional demand generated by the development is expected to be met through Community Infrastructure Levy (CIL) payments and targeted Section 106 contributions.
25. The site also supports strategic objectives by making efficient use of brownfield land in a highly accessible location and delivering enhanced accessibility to Cockfosters

Underground station. Future development must continue to demonstrate compliance with relevant infrastructure planning policies and site-specific design requirements.

26. The design principles set out in Appendix C and the planning permission align with national and regional design guidance. The scheme delivers high-quality architecture with active frontages, improved permeability, new landscaped public spaces, and sensitive massing that steps down towards neighbouring residential areas. The setting of the listed Underground station is preserved and enhanced.
27. The planning consent (21/02517/FUL) confirms that the design principles are achievable and effective in securing an acceptable and sustainable form of development on the site.

Q7.7: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

28. Yes, there is a reasonable prospect that site URB.02: Cockfosters Car Park could be viably developed at the point envisaged in the Plan period.
29. The site is located in the higher value area of the borough, as defined in the Whole Plan Viability Assessment (WPVA) **[VIA1]** (HDH Planning & Development Ltd, June 2023). This area includes Cockfosters and the surrounding western edge of the borough, where residential values are higher and developments are more likely to support full policy compliance.
30. The WPVA models a range of brownfield typologies in higher value areas and finds that such developments are generally viable with 35% affordable housing and full policy requirements, including:
 - M4(2)/M4(3) accessibility
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon standards
 - Mayoral and Borough CIL
 - Developer contributions.
31. URB.02 has an extant planning permission for a residential-led development comprising 351 homes, granted by Enfield Council in February 2022. Following initial delays, the scheme received final approval in September 2024 after the Department for Transport consented to the land disposal, allowing the project to proceed.

32. The site is a previously developed car park adjacent to Cockfosters Underground Station, benefiting from high public transport accessibility. The approved development aligns with typologies tested in the WPVA for flatted, mixed-use or residential-led schemes in similar contexts.
33. Where necessary, site-specific viability evidence may be submitted at the application stage in accordance with VIA1, para 12.87.
34. Based on the site's location, planning status, and the supporting viability evidence, the Council considers there is a reasonable prospect that URB.02 can be viably developed within the Plan period.

Q7.8: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

35. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
36. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
37. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.03: Former Chase Park Farm Hospital

Q7.9: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**

- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

38. The Council considers that there is no substantive evidence suggesting URB.03 Former Chase Park Farm Hospital should not be allocated for development. All relevant factors listed above have been assessed through the site selection process set out in the Site Allocation Topic Paper [**TOP2**] and the site assessment spreadsheet (**E.14.1-SAS2**).
39. The site has previously benefitted from planning permission for residential development (15/0457/FUL), which confirms that technical matters such as heritage, flood risk, transport, biodiversity and amenity have been appropriately addressed. While that permission has now lapsed, it remains material in demonstrating that the site is suitable for development, and the allocation is considered sound.

Q7.10: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) **The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) **Infrastructure requirements.**
- c) **Design principles.**

Council response

40. In response to part a) the scale and density of development proposed is appropriate and reflects the site's context, history and capacity. The previously approved scheme (15/0457/FUL) included a medium-density development form which was found acceptable following planning and design scrutiny.
41. The site is relatively unconstrained, located in a suburban setting, and the proposed quantum of development is supported by the HELAA and the Character of Growth Study, which applied a context-sensitive typology. The allocation strikes the right balance between optimising site potential and maintaining local character and landscape sensitivity.
42. Infrastructure impacts have been previously assessed through the former planning consent and will be re-assessed at application stage. The scale of development

proposed is not expected to place undue pressure on existing infrastructure capacity. However, in line with national policy and Local Plan objectives, future development will be expected to contribute to local infrastructure provision through CIL payments and planning obligations where required.

43. Key considerations include pedestrian and vehicular access improvements, sustainable drainage measures, and contributions to local services, such as education and healthcare, where proportionate and justified. No specific strategic infrastructure barriers have been identified to prevent development of this site.
44. The design principles have been developed in accordance with the NPPF 2023 (**para 132,135**), London Plan 2021 (**Policy D3**), and national guidance such as the National Design Guide. They are informed by the previous consented scheme and reflect the site's edge-of-town context, proximity to residential areas and the need to deliver high-quality placemaking.
45. Design expectations include good quality architectural detailing, integration with surrounding development, and provision of private and shared amenity space. These principles will support delivery of an attractive, sustainable development in keeping with the site's character.

<p>Q7.11: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?</p>

Council response

46. Yes, there is a reasonable prospect that site URB.03: Former Chase Park Farm Hospital could be viably developed at the point envisaged in the Plan period.
47. The site is located in the higher value area of the borough, as defined in the Whole Plan Viability Assessment (WPVA) **[VIA1]** (HDH Planning & Development Ltd, June 2023). This includes areas to the west and north-west of the borough, such as around The Ridgeway and Enfield Chase, where residential values are relatively high.
48. The WPVA models a range of brownfield development typologies in higher value areas and finds that schemes are generally viable with 35% affordable housing and full Local Plan policy compliance. This includes:
 - M4(2)/M4(3) accessibility
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon (regulated and unregulated emissions)
 - Mayoral and Borough CIL

- Developer contributions (See VIA1, Table 10.8a, p.156; and paras 10.34–10.57).
49. URB.03 has an extant outline planning permission granted in October 2015 for a mixed-use redevelopment. The approved scheme includes up to 500 residential units, a three-form entry primary school, and approximately 32,000 sqm of replacement hospital facilities. The development involves the demolition of existing buildings, retention and extension of the Highlands Wing, and provision of associated infrastructure and landscaping.
 50. The site's planning status, combined with its location in a higher value area and alignment with tested typologies in the WPVA, supports its viability. Where necessary, site-specific viability assessments may be submitted at the application stage in accordance with VIA1, para 12.87.
 51. Based on the site's location, planning status, and the supporting viability evidence, the Council considers there is a reasonable prospect that URB.03 can be viably developed within the Plan period.

Q7.12: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

52. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
53. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
54. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.04: Blackhorse Tower, Cockfoster Road

Q7.13: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- Biodiversity
- green infrastructure or agricultural land

- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response (MK)

55. The Council considers that there is no substantive evidence which determine that the site should not be allocated as part of this Local Plan. The above factors have been considered at length as part of the site selection process which is set out in the Site Allocation Topic Paper (TOP 2) and in the site selection spreadsheet (E.14.1-SAS2). Locations of factors such as heritage assets are displayed on the proforma in Appendix C and policy maps. It is the Council's view that the planning balance has been demonstrated and justified.

Q7.14: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response

56. In response to part (a), the scale and density of development are appropriate to secure sustainable development. This is justified through the site selection process and the HELAA [HOU1, HOU10], which were informed by the Character of Growth Study. The site also benefits from planning permission (21/02222/PRJ), which has tested and confirmed the scale and density of development as appropriate. The permission is currently being implemented, further demonstrating deliverability.
57. In response to part (b), infrastructure requirements are proportionate to the scale of development and have been secured through the extant planning permission. These include on-site servicing, transport access, and public realm improvements. The

requirements are consistent with Local Plan policies and have been reviewed through the Development Management process, ensuring compliance with the Infrastructure Delivery Plan [IDP1].

58. In response to part (c), the design principles have been developed in accordance with the NPPF 2023 (paragraphs 132 and 135), London Plan 2021 (Policy D3), and national guidance such as the National Design Guide. The adopted scheme embeds high-quality design standards and successfully addresses layout, massing, and integration with the surrounding context. These principles are enshrined in the consented scheme and are currently being delivered through implementation.

Q7.15: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

59. Yes, there is a reasonable prospect that site URB.04: Blackhorse Tower, Cockfoster Road could be viably developed at the point envisaged in the Plan period.
60. The site is located in the higher value area of the borough, as defined in the Whole Plan Viability Assessment [VIA1] (HDH Planning & Development Ltd, June 2023). This includes the Cockfosters area and other parts of the borough with higher residential values and stronger development viability.
61. The WPVA models a range of brownfield typologies in higher value areas. It finds that development in these areas is viable with 35% affordable housing and full policy compliance, including:
- M4(2)/M4(3) accessibility
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon (regulated and unregulated emissions)
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, Table 10.8a, p.156; and paras 10.34–10.57).
62. URB.04 has an extant planning permission for the conversion of the existing office building into 216 residential units. The development was approved following an appeal decision in January 2022, which allowed the change of use under permitted development rights. The scheme includes amenities such as a fitness suite and cinema, and is being delivered by Chase New Homes.
63. URB.04 is a previously developed site at a key transport location near Cockfosters station. The site is suitable for mid-rise, residential-led development, consistent with

the typologies tested in the WPVA. The site benefits from strong accessibility and infrastructure provision.

64. In line with the WPVA [VIA1], para 12.87, site-specific viability review may be submitted at planning application stage if required.
65. Based on the site's location, planning status, development typology, and the evidence in VIA1, the Council considers there is a reasonable prospect that URB.04 can be viably developed within the Plan period.

Q7.16: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

66. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
67. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
68. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.05: New Avenue Estate

Q7.17: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**

- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

69. The Council considers that there is no substantive evidence suggesting that URB.05 New Avenue Estate should not be allocated. Each of the criteria listed above has been comprehensively assessed through the Local Plan site selection process, as set out in the Site Allocation Topic Paper [**TOP2**] and the site selection spreadsheet (**E.14.1-SAS2**).
70. The site has been granted planning permission (16/01578/FUL and subsequent variation 20/00037/VAR), and development is underway. These permissions demonstrate that site-specific considerations such as flood risk, biodiversity, local infrastructure capacity, transport, amenity, and environmental quality have been assessed and found acceptable. The allocation of the site therefore reflects a planning balance that is robust and justified.

Q7.18: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response

71. In response to part a) the scale and density of development proposed is appropriate, having been tested and approved through extant planning permissions (16/01578/FUL and 20/00037/VAR). These permissions support the delivery of a phased, estate renewal scheme in line with Enfield's housing growth objectives while respecting the character and constraints of the surrounding area.
72. The Character of Growth Study and HELAA support the typology and scale applied. The approach ensures sustainable development that optimises site capacity (in line with London Plan Policy D3), while delivering good design and maintaining a comfortable built form.
73. Infrastructure provision has been considered as part of the approved planning applications. The phased delivery includes on-site infrastructure such as energy

systems, open space improvements, and sustainable urban drainage systems. The development also contributes to local services through planning obligations and the Community Infrastructure Levy, supporting enhancements to education, healthcare, and transport networks where required.

74. No infrastructure constraints have been identified that would prevent delivery. The estate renewal model ensures that physical and social infrastructure is delivered in parallel with housing, including improvements to pedestrian routes and public realm.
75. In response to part c) the design principles have been developed in accordance with the NPPF 2023 (**para 132,135**), London Plan 2021 (**Policy D3**), and national guidance such as the National Design Guide. They reflect a consented scheme that has been subject to design review and extensive community engagement.
76. The approach to layout, landscaping, massing, and architectural treatment responds to the site's suburban setting while achieving efficient use of land. Key principles include integration with existing development, provision of new green spaces and community facilities, and delivering a walkable neighbourhood with clear, active frontages.

Q7.19: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

77. Yes, there is a reasonable prospect that site URB.05: New Avenue Estate could be viably developed at the point envisaged in the Plan period.
78. The site is located in the higher value area of the borough, as defined in the Whole Plan Viability Assessment [**VIA1**] (HDH Planning & Development Ltd, June 2023). This includes the Southgate area, where residential values are higher and developments are more likely to support full policy compliance.
79. The WPVA models a range of brownfield typologies in higher value areas and finds that they are viable at 35% affordable housing, while incorporating the full set of Local Plan policy requirements, including:
 - M4(2)/M4(3) accessibility
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon (regulated and unregulated emissions)
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, Table 10.8a, p.156; and paras 10.34–10.57).

80. URB.05 is an existing estate undergoing phased regeneration. The site benefits from an extant planning permission and construction of new housing has already commenced. Remaining phases are programmed to come forward within the Plan period, supported by delivery partnerships and public sector funding.
81. In line with the WPVA [VIA1], para 12.87, viability review mechanisms are typically embedded in estate regeneration projects and may be applied to later phases as required.
82. Based on the site's location, planning and current delivery status, and the evidence in VIA1, the Council considers there is a reasonable prospect that URB.05 can be viably developed within the Plan period.

Q7.20: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

83. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
84. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
85. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.06: Former Middlesex University, Trent Park

Q7.21: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**

- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

86. The Council considers that there is no substantive evidence suggesting that URB.06 Former Middlesex University, Trent Park should not be allocated in the Local Plan. All relevant environmental and technical matters listed in the question have been carefully considered as part of the site selection process, as set out in the Site Allocation Topic Paper [**TOP 2**] and the site selection spreadsheet (**E.14.1-SAS2**). These assessments were further refined through the full planning application process. The site benefits from planning permission (16/04324/FUL), which has been implemented. As a result, key constraints such as biodiversity, landscape character, heritage setting, and infrastructure impacts have already been addressed and mitigated. The planning balance is considered to be appropriate and justified.

Q7.22: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response (MK//MH)

87. In response to part a) the scale and density of development are appropriate to secure sustainable development. This conclusion is supported by the site selection process and the HELAA, which drew on the Character of Growth Study. The site benefits from planning permission (16/04324/FUL), which reflects the physical constraints of the site including its landscape setting, heritage assets, and the surrounding parkland context. The consented scheme has been thoroughly tested and deemed acceptable, and implementation is underway.
88. Infrastructure requirements were assessed and secured as part of the approved planning application. The permission includes contributions and on-site provision to mitigate impacts on local services and infrastructure, including transport improvements, open space provision, education, and health. The site is self-contained with existing infrastructure capacity enhanced through mitigation agreed

via legal agreement. There are no known unresolved infrastructure capacity issues that would prevent the delivery of the development as allocated.

89. The design principles have been developed in accordance with the NPPF 2023 (**para 132,135**), London Plan 2021 (**Policy D3**), and national guidance such as the National Design Guide. The allocation and permission preserve the heritage setting of the Trent Park mansion and historic landscape. The scheme reflects site-specific constraints and opportunities, and has been informed by robust design review. The ongoing implementation confirms the deliverability and appropriateness of the design approach.

Q7.23: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

90. Yes, there is a reasonable prospect that site URB.06: Former Middlesex University, Trent Park could be viably developed at the point envisaged in the Plan period.
91. The site is located in the higher value area of the borough, as defined in the Whole Plan Viability Assessment [**VIA1**] (HDH Planning & Development Ltd, June 2023). This includes the Cockfosters and Trent Park area, where residential values are high and viability is strong across a range of development typologies.
92. The WPVA tests a variety of brownfield typologies in higher value areas. It finds that developments in these areas are viable with 35% affordable housing and full policy compliance, including:
- M4(2)/M4(3) accessibility
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon (regulated and unregulated emissions)
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, Table 10.8a, p.156; and paras 10.34–10.57).
93. URB.06 is a part-brownfield site with an existing planning permission for residential-led development. The site has partially implemented elements and benefits from existing infrastructure and access, supporting timely delivery.
94. In line with the WPVA [VIA1], para 12.87, a site-specific viability assessment may be submitted at the application stage if required for any later phases or adjustments to the scheme.

95. Based on the site's location, development status, and the evidence in VIA1, the Council considers there is a reasonable prospect that URB.06 can be viably developed within the Plan period.

Q7.24: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

96. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
97. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
98. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.07: Sainsburys Green Lanes

Q7.25: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

99. The Council considers that there is no substantive evidence to suggest that URB.07 Sainsbury's Green Lanes should not be allocated in the Local Plan. All relevant environmental and technical factors listed in the question have been assessed through the site selection process, as set out in the Site Allocation Topic Paper [TOP 2] and the site selection spreadsheet (E.14.1-SAS2). These include consideration of landscape, heritage, flood risk, biodiversity and infrastructure capacity. Constraints have been addressed through a combination of allocation-specific design principles and mitigation measures. The Council is satisfied that a sound planning balance has been struck and the allocation is justified.

Q7.26: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response

100. In response to part a) the scale and density of development are appropriate to secure sustainable development. This is justified through the site selection process and the HELAA, both of which were informed by the Character of Growth Study. The BurrIDGE Gardens typology is applied across the site (HOU1, Appendix D), providing a balanced response to the site's suburban context. The developable area has been reduced to retain mature trees on site, ensuring appropriate density while protecting environmental assets. The capacity figures are derived from applying the BurrIDGE Gardens typology to the adjusted site area (HOU10, Ref. PAC39, row 270, column BI).
101. In response to part b) the development will be expected to contribute to necessary infrastructure improvements in line with Local Plan policy and the Infrastructure Delivery Plan (IDP). This includes enhancements to sustainable transport connectivity, public realm upgrades, and mitigation for education, healthcare, and utilities impacts. Detailed requirements would be secured through the development management process, including legal agreements such as Section 106 and/or CIL contributions. There are no overriding infrastructure constraints identified that would prevent development of the site as proposed.
102. The design principles have been developed in accordance with the NPPF 2023 (para 132,135), London Plan 2021 (Policy D3), and national guidance such as the

National Design Guide. They respond to site-specific factors including the need to retain trees around the site perimeter, reinforce active frontages, and create new high-quality public spaces. The principles provide a robust framework to ensure a well-integrated, high-quality development that complements the surrounding context.

Q7.27: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

103. Yes, there is a reasonable prospect that site URB.07: Sainsbury's Green Lanes could be viably developed at the point envisaged in the Plan period.
104. The site is located in the higher value area of the borough, as defined in the Whole Plan Viability Assessment [VIA1] (HDH Planning & Development Ltd, June 2023). This includes areas such as Palmers Green, Winchmore Hill, and Southgate, where residential values are higher and development is more likely to support full policy compliance.
105. The WPVA tests a range of brownfield typologies in higher value areas and finds that such developments are generally viable with 35% affordable housing and full policy requirements, including:
- M4(2)/M4(3) accessibility
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon standards
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, Table 10.8a, p.156; and paras 10.34–10.57).
106. URB.07 is a large, previously developed site currently in retail use, proposed for mixed-use redevelopment. The site typology and scale align with those tested in the WPVA. It benefits from good access to public transport and is located within a town centre setting, further supporting viability.
107. A site-specific viability assessment may be submitted at application stage where necessary, in line with VIA1, para 12.87.
108. Based on the site's location, typology, and the supporting viability evidence, the Council considers there is a reasonable prospect that URB.07 can be viably developed within the Plan period.

Q7.28: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

109. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
110. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
111. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

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

Q7.29: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

112. The Council considers that there is no substantive evidence to suggest that URB.08 Hoe, Eastfield, Cherry and Bouvier Estates should not be allocated in the Local Plan. Each of the environmental and technical factors listed has been assessed

through the site selection process, including within the Site Allocation Topic Paper [TOP2] and the site assessment spreadsheet (E.14.1-SAS2). The sites are previously developed and located within established residential neighbourhoods. The planning balance, including heritage, environmental and infrastructure factors, has been appropriately assessed and justified. No overriding constraints have been identified.

Q7.30: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response

- 113. In response to part a) the scale and density of development are considered appropriate to secure sustainable development. A bespoke approach has been taken due to the nature of the site, which comprises a number of smaller-scale infill opportunities across existing estates. A capacity study was undertaken by the landowner and submitted as part of the Call for Sites process (CFS265). This was assessed through the HELAA (HOU10, Ref. CFS265, Row 539, Column BI) and considered a suitable and realistic basis for setting out the scale and density assumptions for the site allocation.
- 114. In response to part b) development will be expected to contribute proportionately to infrastructure improvements in accordance with Local Plan policy and the Infrastructure Delivery Plan. This may include measures to enhance pedestrian and cycle connectivity, improve local amenity and green space, and address any impacts on community facilities and public services. Requirements will be refined and secured through the planning process, including site-specific legal agreements. No infrastructure constraints have been identified that would prevent the sites from coming forward.
- 115. The design principles have been developed in accordance with the NPPF 2023 (**para 132,135**), London Plan 2021 (**Policy D3**), and national guidance such as the National Design Guide. Given the small-scale and dispersed nature of the infill sites, the principles are focused on highlighting potential locations for development and ensuring integration with the existing estate layouts. This approach provides a framework for future design to respond positively to local character, amenity and open space provision.

Q7.31: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

116. Yes, there is a reasonable prospect that the sites within URB.08 – Hoe, Eastfield, Cherry and Bouvier Estates – could be viably developed at the point envisaged in the Plan period.
117. These estates are located in the lower value area of the borough, as defined in the Whole Plan Viability Assessment **[VIA1]** (HDH Planning & Development Ltd, June 2023). This value area includes neighbourhoods in Ponders End, Enfield Highway, and surrounding parts of EN3, where residential sales values are lower and developments are more sensitive to policy-related costs.
118. The WPVA models a range of brownfield typologies across value areas. In the lower value area, it finds that sites may not support 35% affordable housing with full policy compliance, but can be viably delivered with reduced contributions or additional public sector involvement (see VIA1, paras 10.34–10.57).
119. Policy cost assumptions in the modelling include:
- M4(2)/M4(3) accessibility
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon standards
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, Table 10.8a, p.156).
120. URB.08 includes multiple existing estates. Delivery is expected to be phased, and viability will be supported by Council-led regeneration mechanisms, access to funding, and flexible planning approaches. Where required, viability can be assessed through site-specific appraisal at the application stage, in accordance with VIA1, para 12.87.
121. Based on the sites' location, typology, and the supporting viability evidence, the Council considers there is a reasonable prospect that URB.08 can be viably developed within the Plan period.

Q7.32: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

122. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
123. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
124. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.09: Exeter Road Estate

Q7.33: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

125. The Council considers that there is no substantive evidence to suggest that URB.09 Exeter Road Estate should not be allocated in the Local Plan. All relevant environmental and technical factors have been considered through the site selection process, as set out in the Site Allocation Topic Paper [TOP2] and site assessment spreadsheet (E.14.1-SAS2). The site has also been subject to detailed assessment through planning permission 21/02076/OUT. This process has addressed key constraints including flood risk, transport impacts, and amenity. The planning balance is considered to be appropriately struck.

Q7.34: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response

126. In response to part a) the scale and density of development are appropriate to secure sustainable development. This is demonstrated by the existing planning permission (21/02076/OUT), which tested and confirmed that the proposed quantum of development is suitable in relation to the site's characteristics, opportunities and constraints. The infill opportunities to the north (outside the site allocation boundary) have been excluded from the capacity figure to ensure the estimate is robust.
127. Infrastructure requirements for the site have been identified through the planning application process and the Infrastructure Delivery Plan. Contributions secured through the planning permission will help deliver improvements to local public realm, walking and cycling connections, community facilities, and educational provision where necessary. Future phases or amendments would be expected to continue making proportionate contributions towards strategic and local infrastructure needs.
128. The design principles have been developed in accordance with the NPPF 2023 (para 132 and 135), London Plan 2021 (Policy D3), and national guidance such as the National Design Guide. They reflect the principles tested and agreed through planning permission 21/02076/OUT and ensure development will be of high quality, integrate with the existing estate context, and provide new green infrastructure and amenity space. The infill sites to the north of the estate fall outside the site allocation and have not been included in the capacity figures.

Q7.35: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

129. Yes, there is a reasonable prospect that site URB.09: Exeter Road Estate could be viably developed at the point envisaged in the Plan period.
130. The site is located in the lower value area of the borough, as defined in the Whole Plan Viability Assessment [VIA1] (HDH Planning & Development Ltd, June 2023).

This includes areas in and around Ponders End and the A1010 corridor, where values are lower and viability is more sensitive to cumulative policy costs.

131. The WPVA models brownfield typologies in lower value areas and finds that while these sites may not always support 35% affordable housing and full policy compliance, development can remain viable through flexibility in contributions, phased delivery, and access to public sector support (see VIA1, paras 10.34–10.57).
132. The viability modelling includes the following policy costs:
- M4(2)/M4(3) accessibility
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon (regulated and unregulated emissions)
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, Table 10.8a, p.156).
133. URB.09 is an existing Council estate with a current planning permission for regeneration. Early phases have been delivered, and later phases are programmed to come forward within the Plan period. Delivery is supported by Council-led regeneration, enabling funding, and delivery partnerships.
134. In line with the WPVA [VIA1], para 12.87, viability may be reviewed at later phases via site-specific assessments where needed.
135. Based on the site's location, active delivery status, and the supporting evidence in VIA1, the Council considers there is a reasonable prospect that URB.09 can be viably developed within the Plan period.

Q7.36: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

136. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
137. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.

138. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.10: Alma Estate (EN3)

Q7.37: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

139. The Council considers that there is no substantive evidence which determine that the site should not be allocated as part of this Local Plan. The above factors have been considered at length as part of the site selection process which is set out in the Site Allocation Topic Paper (TOP 2) and in the site selection spreadsheet (E.14.1-SAS2). Locations of factors such as heritage assets are displayed on the proforma in Appendix C and policy maps. It is the Council's view that the planning balance has been demonstrated and justified.

Q7.38: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) **The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) **Infrastructure requirements.**

c) Design principles.

Council response

140. In response to part (a), the scale and density of development are appropriate to secure sustainable development and have been fully tested through the planning process. The site benefits from an implemented permission (ref: 19/03624/VAR), which established the principle and parameters of development. A further permission was granted in 2025 (ref: 24/02608/FUL), which provides for 327 homes in total, including a net additional 198 dwellings. These consents confirm that the proposed scale and density are deliverable and acceptable in the context of the site's constraints, surrounding uses, and supporting infrastructure.
141. In response to part (b), the infrastructure requirements have already been addressed through the consented schemes. These include provisions for access, transport improvements, drainage, energy, and open space, secured via planning conditions and obligations. The approach is consistent with the Infrastructure Delivery Plan [IDP1] and ensures that development can proceed with the necessary supporting infrastructure in place. This confirms that the requirements in Appendix C are realistic and effective in securing sustainable development.
142. In response to part (c), the design principles set out in Appendix C reflect the high-quality and site-responsive approach established through the approved planning applications. These principles are consistent with national policy, including NPPF 2023 (paragraphs 132 and 135), the London Plan 2021 (Policy D3), and the National Design Guide. They support the delivery of an attractive, legible and well-integrated development that contributes positively to its local context and the wider placemaking objectives for the area.

Q7.39: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

143. Yes, there is a reasonable prospect that site URB.10: Alma Estate could be viably developed at the point envisaged in the Plan period.
144. The site is located in the lower value area of the borough, as defined in the Whole Plan Viability Assessment [VIA1] (HDH Planning & Development Ltd, June 2023). This includes parts of Ponders End and Enfield Highway, where residential values are lower and policy costs have a greater impact on viability.
145. The WPVA tests a range of brownfield typologies in lower value areas. It finds that while sites in these areas may not support 35% affordable housing with full policy compliance, development can still be viable with adjusted policy requirements, phased delivery, or additional public funding (see VIA1, paras 10.34–10.57).

146. The modelling includes cost assumptions for:

- M4(2)/M4(3) accessibility
- Water efficiency
- 20% Biodiversity Net Gain
- Zero carbon
- Mayoral and Borough CIL
- Developer contributions (See VIA1, Table 10.8a, p.156).

147. URB.10 is an existing estate undergoing phased redevelopment. A planning permission is already in place and parts of the scheme have been built out. Later phases are expected to come forward within the Plan period. Delivery is supported by Council-led regeneration mechanisms and established partnerships.

148. In accordance with VIA1, para 12.87, viability can be reviewed at later phases through site-specific assessment where required.

149. Based on the site's delivery status, location, and the evidence in VIA1, the Council considers there is a reasonable prospect that URB.10 can be viably developed within the Plan period.

Q7.40: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

150. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).

151. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.

152. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.11: The Former Royal Chace Hotel

Q7.41: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- Biodiversity
- green infrastructure or agricultural land
- landscape quality and character
- heritage assets
- strategic and local infrastructure including transport
- the efficient operation of the transport network and highway safety
- contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk
- open space, recreational facilities and public rights of way

Council response

153. The Council considers that there is no substantive evidence to suggest that URB.11 The Former Royal Chace Hotel should not be allocated in the Local Plan. All relevant environmental, technical and planning factors have been assessed through the site selection process, as set out in the Site Allocation Topic Paper [TOP 2] and the site assessment spreadsheet (E.14.1-SAS2). The site benefits from detailed assessment and planning permission (21/01816/FUL), which confirmed that the scheme is acceptable in terms of biodiversity, infrastructure, flood risk, amenity and design. The Council considers that a balanced planning judgment has been made and justified.

Q7.42: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?
- b) Infrastructure requirements.
- c) Design principles.

Council response

154. In response to part (a), the scale and density of development are justified and appropriate to secure sustainable development. The site benefits from an extant planning permission (ref: 21/01816/FUL), which assessed the scheme against site-specific constraints including heritage assets, topography, landscape sensitivity, and Green Belt context. The amount of development permitted through this consent demonstrates that the proposed quantum is deliverable and aligned with national and local policy objectives.
155. **155.** In response to part (b), infrastructure requirements have been addressed through the planning permission. The approved scheme secures provision for utilities, surface water drainage, highway access improvements, and contributions to social and community infrastructure via a legal agreement (S106). These requirements are proportionate and consistent with the Infrastructure Delivery Plan [IDP1], confirming that the site can support the proposed level of development without placing undue pressure on local infrastructure.
156. In response to part (c), the design principles in Appendix C are informed by and consistent with those embedded in the approved planning scheme. They have been developed in accordance with the NPPF 2023 (paragraphs 132 and 135), London Plan 2021 (Policy D3), and the National Design Guide. The approach ensures a high-quality, contextually sensitive development that integrates well with its landscape setting, respects key views and tree cover, and delivers substantial green infrastructure in line with sustainable placemaking principles.

Q7.43: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

157. Yes, there is a reasonable prospect that site URB.11: The Former Royal Chace Hotel could be viably developed at the point envisaged in the Plan period.
158. The site is located in the higher value area of the borough, as defined in the Whole Plan Viability Assessment [VIA1] (HDH Planning & Development Ltd, June 2023). This includes the northern and western parts of the borough, including the Ridgeway area and surroundings of Enfield Chase.
159. The WPVA models a range of brownfield typologies in higher value areas and finds that they are viable with 35% affordable housing while accommodating full policy requirements. These include:
- M4(2)/M4(3) accessibility
 - Water efficiency
 - 20% Biodiversity Net Gain

- Zero carbon (regulated and unregulated emissions)
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, Table 10.8a, p.156; and paras 10.34–10.57).
160. URB.11 is a brownfield site, formerly in hotel use, located in a green setting with access to existing infrastructure and roads. The proposed form and density of development is consistent with typologies tested in the WPVA.
161. A site-specific viability assessment may be submitted at the planning application stage, if needed, in accordance with VIA1, para 12.87.
162. Based on the site's location, planning status, land use history, and the evidence in VIA1, the Council considers there is a reasonable prospect that URB.11 can be viably developed within the Plan period.

Q7.44: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

163. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
164. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
165. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.12: 241 Green Street

Q7.45: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**

- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

166. The Council considers that there is no substantive evidence to suggest that URB.12 – 241 Green Street should not be allocated in the Local Plan. All relevant factors listed in the question have been robustly assessed through the Council's site selection process, including via the Site Allocation Topic Paper [TOP2] and the site assessment spreadsheet (E.14.1-SAS2). The site has the benefit of a planning permission (20/01526/FUL), which demonstrates that the site is suitable for development in terms of biodiversity, infrastructure, flood risk, transport, and amenity considerations. The planning balance has been made and is justified.

Q7.46: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response

167. In response to part (a), the scale and density of development are appropriate, justified, and consistent with the objective of securing sustainable development. The site benefits from an extant planning permission (ref: 20/01526/FUL), which has tested the quantum of development against local constraints, including townscape character, neighbouring uses, and accessibility. The approved scheme demonstrates that the proposed scale is both realistic and deliverable in this well-connected urban context.

168. In response to part (b), infrastructure requirements were considered through the planning application process and have been secured via planning conditions and a legal agreement. These include improvements to site access and connectivity,

provision for utilities and sustainable drainage, and appropriate contributions towards local infrastructure in line with the Council's adopted planning obligations framework. The site's location within an established urban area further supports its infrastructure readiness.

169. In response to part (c), the design principles outlined in Appendix C are consistent with those approved in the extant scheme. They have been developed in accordance with the NPPF 2023 (paragraphs 132 and 135), the London Plan 2021 (Policy D3), and the National Design Guide. These principles ensure high-quality, well-integrated development that promotes active frontages, legible layouts, and architecture that respects and enhances the surrounding urban grain.

Q7.47: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

170. Yes, there is a reasonable prospect that site URB.12: 241 Green Street could be viably developed at the point envisaged in the Plan period.
171. The site is located in the lower value area of the borough, as defined in the Whole Plan Viability Assessment [VIA1] (HDH Planning & Development Ltd, June 2023). This includes the Brimsdown and Ponders End areas, where sales values are lower and development viability is more sensitive to cumulative policy costs.
172. The WPVA models a range of brownfield typologies in lower value areas. While it finds that these sites may not consistently support full policy compliance, including 35% affordable housing, they can remain viable with flexibility on affordable housing and other contributions (see VIA1, paras 10.34–10.57).
173. Cost assumptions in the viability testing include:
- M4(2)/M4(3) accessibility
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon (regulated and unregulated emissions)
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, Table 10.8a, p.156).
174. URB.12 is a previously developed site and is expected to come forward for residential development. Its form and scale align with typologies tested in the WPVA. Where required, site-specific viability testing may be provided at planning application stage, in accordance with VIA1, para 12.87.

175. Based on the site's location, planning status, typology, and the viability evidence in VIA1, the Council considers there is a reasonable prospect that URB.12 can be viably developed within the Plan period.

Q7.44: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

176. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
177. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
178. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

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

Q7.45: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

179. The Council considers there is no substantive evidence to suggest that URB.13 should not be allocated in the Local Plan. Each of the relevant environmental and infrastructure considerations has been assessed in detail through the site selection process, as set out in the Site Allocation Topic Paper [TOP2] and the site assessment spreadsheet (E.14.1-SAS2). Potential issues related to flood risk, transport, biodiversity and heritage have been considered in the planning balance and are addressed through the allocation's policy requirements and development principles. No overriding constraints have been identified that would preclude appropriate, well-designed development.

Q7.46: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response

180. The scale and density of development are appropriate to secure sustainable development. This is justified through the Council's HELAA, which was informed by the Character of Growth Study. A bespoke approach has been taken due to the specific infill characteristics of each estate. A capacity study was submitted by the landowner as part of the Call for Sites (CFS266), and this was reviewed and accepted in the HELAA (HOU10, Ref. CFS266, Row 540, Column BI). The scale and density assumptions carried forward reflect realistic development potential while ensuring sensitive integration into the local context.
181. Given the nature of the sites as infill opportunities within existing estates, key physical and social infrastructure is already in place. However, individual developments will still be required to contribute to necessary improvements through planning obligations, particularly in relation to utilities, public realm upgrades, active travel connections, and green infrastructure enhancements. Specific infrastructure contributions would be determined through the development management process on a site-by-site basis, aligned with the Council's Infrastructure Delivery Plan and CIL charging schedule.
182. The design principles have been developed in accordance with the NPPF 2023 (**para 132,135**), London Plan 2021 (**Policy D3**), and national guidance such as the National Design Guide. Given the infill nature of the allocation, the design principles

focus on identifying where infill opportunities are located and ensuring that future development will be respectful of the existing estate layout and urban grain. The principles promote good neighbourliness, improved permeability, and positive enhancements to public realm and landscaping.

Q7.47: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

183. The Council considers that there is a reasonable prospect that the site could be viably developed at the point envisaged in the plan period. The site is located within an established urban area and represents a previously developed brownfield site. The Whole Plan Viability Assessment (WPVA) (2023) [VIA1] forms the evidence base for assessing site viability and demonstrates that brownfield typologies similar to this site are capable of viably supporting policy-compliant development.
184. The WPVA is based on the Existing Use Value plus (EUV+) approach and tested a wide range of scenarios across different value areas in the Borough. This includes typologies that reflect medium- and higher-density brownfield sites, comparable in scale and context to this allocation. The WPVA tested policy requirements including 35% affordable housing, full implementation of sustainable design and construction policies (such as Part M4(2) and M4(3), water efficiency, 20% biodiversity net gain, and carbon reduction standards), developer contributions, Mayoral and Borough CIL, and costs for SAMM/SANG mitigation.
185. The site lies in a value area of the Borough where general development (excluding tall buildings) is shown to be viable under these policy requirements. While taller flatted schemes in some central and eastern parts of the Borough can be more marginal due to higher build costs and reduced sales values, this site benefits from a mid-value location with stronger sales values and is not dependent on tall buildings to achieve the proposed density. The development capacity has been based on an assumed typology and height that aligns with local context and tested design parameters, ensuring viability is not reliant on high-rise formats. The WPVA also included sensitivity testing to account for changes in build costs, values, and policy inputs, and concluded that viability across the borough remains robust in most scenarios, including those incorporating higher costs associated with national requirements such as the Future Homes Standard and the emerging Building Safety Levy. This gives the Council confidence that development at this site can be brought forward viably at the point envisaged.
186. In summary, based on the viability evidence in the WPVA and the absence of any site-specific viability constraints, the Council is satisfied that this site can come forward viably within the plan period. Site-specific viability testing would be appropriate at the application stage to address any unexpected abnormal costs.

Q7.48: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

187. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
188. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
189. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

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

Q7.49: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

190. The Council considers that there is no substantive evidence which determine that the site should not be allocated as part of this Local Plan. The above factors have

been considered at length as part of the site selection process which is set out in the Site Allocation Topic Paper (TOP 2) and in the site selection spreadsheet (E.14.1-SAS2). Locations of factors such as heritage assets are displayed on the proforma in Appendix C and policy maps. It is the Council's view that the planning balance has been demonstrated and justified.

Q7.50: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response

191. In response to part (a), the proposed scale and density of development are justified and appropriate to secure sustainable development. The allocation reflects a series of small-scale infill opportunities within existing housing estates. The approach was informed by the site selection process, the Character of Growth Study, and the Housing and Economic Land Availability Assessment (HELAA), which confirm the development potential of these locations within the existing urban fabric.
192. A bespoke capacity study was undertaken by the landowner and submitted as part of the Call for Sites process (CFS266). This study identified realistic development opportunities across the various sites. The methodology and assumptions used were reviewed by the Council and accepted in the HELAA (HOU10, Ref. CFS266, Row 540, Column BI). The resulting development capacity figures were found to be appropriate in light of site-specific constraints and opportunities.
193. In response to part (b), infrastructure requirements are expected to be modest and will be assessed proportionately at the application stage for each infill site. As small-scale interventions within established residential neighbourhoods, development is not anticipated to require significant off-site infrastructure upgrades. However, any necessary improvements to public realm, pedestrian links, or utilities will be secured through the development management process in accordance with Local Plan policy and the Infrastructure Delivery Plan [IDP1].
194. In response to part (c), the design principles in Appendix C are consistent with national policy and provide a clear framework for delivering high-quality infill development. They have been developed in line with the NPPF 2023 (paragraphs 132 and 135), London Plan Policy D3, and the National Design Guide. The principles identify key locations within the estates where infill may be appropriate

and require new development to respect existing character, improve connectivity, and enhance the overall quality of the built environment.

Q7.51: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

195. Yes, there is a reasonable prospect that the sites comprising allocation URB.13 could be viably developed at the point envisaged in the Plan period.
196. These sites are located in the lower value area of the borough, as defined in the Whole Plan Viability Assessment **[VIA1]** (HDH Planning & Development Ltd, June 2023). The locations include parts of Enfield Highway, Carterhatch and Southbury, where residential values are typically lower and viability is more sensitive to policy costs.
197. The WPVA models brownfield typologies in lower value areas and concludes that such sites may not support 35% affordable housing with full policy compliance. However, development can remain viable with adjusted contributions or alternative delivery approaches, including phased delivery and public sector intervention (see VIA1, paras 10.34–10.57).
198. The WPVA includes policy cost assumptions for:
- M4(2)/M4(3) accessibility
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon (regulated and unregulated emissions)
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, Table 10.8a, p.156).
199. URB.13 comprises a number of existing estates identified for renewal. Delivery is expected to be phased, and the Council may act as landowner or enabling authority to support viability and delivery. Where necessary, site-specific viability assessments may be submitted at application stage in line with VIA1, para 12.87.
200. Based on the sites' locations, estate typologies, and the supporting evidence in VIA1, the Council considers there is a reasonable prospect that URB.13 can be viably developed within the Plan period.

Q7.52: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

201. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
202. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
203. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.14: Four Hill Estate, Lavender Hill (EN2)

Q7.53: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

204. The Council considers that there is no substantive evidence which determine that the site should not be allocated as part of this Local Plan. The above factors have been considered at length as part of the site selection process which is set out in the

Site Allocation Topic Paper [**TOP 2**] and in the site selection spreadsheet (E.14.1-SAS2). Locations of factors such as heritage assets are displayed on the proforma in Appendix C and policy maps. It is the Council's view that the planning balance has been demonstrated and justified.

Q7.54: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response

205. In response to part (a), the scale and density of development are considered appropriate and justified to secure sustainable development. The Four Hill Estate allocation comprises a number of small-scale infill opportunities identified through the site selection process and assessed in the Housing and Economic Land Availability Assessment (HELAA), which was informed by the Character of Growth Study. The infill approach responds to the estate's established layout and seeks to optimise underused land without compromising local character.
206. A bespoke capacity study was prepared by the landowner and submitted as part of the Call for Sites process (CFS260). This study identified feasible infill locations and was assessed through the HELAA (HOU10, Ref. CFS260, Row 535, Column BI). The study was deemed sound, and its assumptions and conclusions were accepted as the basis for the allocation's development capacity, having regard to the specific constraints and spatial context of the estate.
207. In response to part (b), infrastructure requirements are proportionate to the small-scale nature of the proposals. Given that the infill sites are located within an existing estate with access to established infrastructure, no strategic upgrades are anticipated. Any site-specific infrastructure enhancements—such as improved pedestrian access, public realm, or local utilities—will be secured at application stage, consistent with Local Plan policy and supported by the Infrastructure Delivery Plan [**IDP1**].
208. In response to part (c), the design principles set out in Appendix C have been developed in accordance with the NPPF 2023 (paragraphs 132 and 135), London Plan Policy D3, and the National Design Guide. The principles focus on identifying appropriate locations for infill and ensure that development integrates sensitively with the existing built form, improves connectivity, and contributes positively to the

estate's overall character. They provide a clear and flexible framework to guide high-quality design outcomes across multiple sites.

Q7.55: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

209. Yes, there is a reasonable prospect that site URB.14: Four Hill Estate, Lavender Hill could be viably developed at the point envisaged in the Plan period.
210. The site is located in the higher value area of the borough, as defined in the Whole Plan Viability Assessment [**VIA1**] (HDH Planning & Development Ltd, June 2023). This area includes Chase Side, Gordon Hill, and parts of Lavender Hill.
211. The WPVA models a range of brownfield typologies in higher value areas and finds that these are viable with 35% affordable housing, while incorporating the full set of policy requirements. These include:
- M4(2)/M4(3) accessibility
 - Water efficiency
 - 10% Biodiversity Net Gain
 - Zero carbon standards
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, Table 10.8a, p.156; and paras 10.34–10.57).
212. URB.14 is an existing estate where redevelopment is proposed. The form and scale of anticipated development aligns with typologies tested in the WPVA. The location in a higher value area supports viability, and the Council may act as landowner or delivery partner to help secure implementation.
213. Where needed, site-specific viability assessments may be submitted at planning application stage in line with VIA1, para 12.87.
214. Based on the site's location, typology, and the supporting viability evidence, the Council considers there is a reasonable prospect that URB.14 can be viably developed within the Plan period.

Q7.56: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

215. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
216. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
217. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.15: Kettering Road Estate

Q7.57: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

218. The Council considers that there is no substantive evidence to suggest the site should not be allocated as part of the Local Plan. Each of the factors listed has been assessed through the site selection process, as set out in the Site Allocation Topic Paper [TOP2] and the site assessment spreadsheet (E.14.1-SAS2). Key environmental and technical constraints, including proximity to heritage assets, flood risk, transport capacity, and biodiversity designations, are mapped and accounted for in the proforma in Appendix C and the Local Plan policies map. Based on this

evidence, the Council is satisfied that the planning balance has been properly struck and the site is appropriate for allocation.

Q7.58: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response

219. In response to part (a), the scale and density of development are considered appropriate to secure sustainable development and are justified through the Council's plan-making process. The site was subject to detailed assessment through the Housing and Economic Land Availability Assessment (HELAA), informed by the Character of Growth Study, which identified its suitability for incremental intensification. A bespoke capacity study was submitted by the landowner during the Call for Sites process (CFS272). This study considered site constraints and opportunities for infill within the existing estate fabric. The HELAA (HOU10, Ref. CFS272, Row 546, Column BI) confirmed this as a reasonable and deliverable estimate of site capacity.
220. In response to part (b), the Kettering Road Estate benefits from strong access to existing social and physical infrastructure, including public transport, schools, and community facilities. The estate regeneration approach supports phased and context-sensitive delivery, enabling infrastructure improvements to be integrated incrementally. Appendix C of the draft Local Plan [SUB4] sets out the infrastructure priorities for this site, including enhancements to active travel, green space, and permeability. These are proportionate and align with the Infrastructure Delivery Plan (IDP1). Localised infrastructure mitigation and enhancements will be secured through planning obligations or Community Infrastructure Levy (CIL), in accordance with Local Plan policies and national guidance.
221. In response to part (c), the design principles for URB.15 have been developed in accordance with the NPPF 2023 (paragraphs 132 and 135), London Plan 2021 (Policy D3), and national guidance such as the National Design Guide. The principles focus on ensuring that infill development enhances the character and function of the estate, improves public realm and connectivity, and respects the scale and massing of the surrounding built form. This provides a clear and flexible design-led framework to guide high-quality redevelopment while supporting local distinctiveness and sustainable placemaking.

Q7.59: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

222. Yes, there is a reasonable prospect that site URB.15: Kettering Road Estate, Ordnance Road could be viably developed at the point envisaged in the Plan period.
223. The site is located in the lower value area of the borough, as defined in the Whole Plan Viability Assessment **[VIA1]** (HDH Planning & Development Ltd, June 2023). This area includes parts of Enfield Highway and Enfield Lock, where residential values are lower and viability is more sensitive to cumulative policy costs.
224. The WPVA models a range of brownfield typologies in lower value areas. It finds that these sites may not always support full policy compliance, including 35% affordable housing, but can remain viable with adjusted contributions or delivery models. This is set out in VIA1, paras 10.34–10.57.
225. The WPVA assumes the following policy costs in its viability modelling:
- M4(2)/M4(3) accessibility
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon (regulated and unregulated emissions)
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, Table 10.8a, p.156).
226. URB.15 is an existing housing estate with potential for regeneration. Delivery may be phased or supported through public funding or Council-led programmes to address viability and rehousing requirements. Where necessary, site-specific viability assessments may be submitted at planning application stage, in accordance with VIA1, para 12.87.
227. Based on the site's location, proposed development type, and the supporting viability evidence in VIA1, the Council considers there is a reasonable prospect that URB.15 can be viably developed within the Plan period.

Q7.60: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

228. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
229. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
230. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.16: 188-200 Bowes Road

Q7.61: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

231. The Council considers that there is no substantive evidence to suggest that this site should not be allocated in the Local Plan. Each of the relevant environmental, physical and infrastructure-related factors has been assessed as part of the Council's site selection process, documented in the Site Allocation Topic Paper [TOP2] and the site assessment spreadsheet (E.14.1-SAS2). These assessments have considered matters such as flood risk, heritage assets, biodiversity, landscape context and access to open space. There are no showstoppers identified, and the

site is suitable for allocation. Where constraints exist, these can be appropriately mitigated through design and development management processes.

Q7.62: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response

232. In response to part (a), the scale and density of development proposed on the site are considered appropriate, justified, and deliverable. The site benefits from outline planning permission (18/00388/OUT), which tested the development quantum through detailed assessment of capacity, site-specific constraints, and surrounding context. The consented scheme includes a tall building element, which was found acceptable given the site's highly accessible urban location and existing townscape.

233. In response to part (b), the site is well served by existing infrastructure, including frequent public transport (London Underground and local bus services), schools, healthcare facilities, and other community services. Infrastructure requirements were assessed and secured as part of the planning permission via planning obligations, including Section 106 contributions and Community Infrastructure Levy (CIL) commitments. The site's development is not dependent on major new infrastructure. Any further site-specific mitigation requirements can be addressed through the development management process as necessary.

234. In response to part (c), the design principles are consistent with the NPPF 2023 (paragraphs 132 and 135), the London Plan 2021 (Policy D3), and national guidance such as the National Design Guide. These principles reflect those developed through the outline permission and provide a robust framework to secure a high-quality, contextually appropriate scheme. They support active frontages, improved public realm, and strong walking and cycling connectivity, contributing to sustainable placemaking.

Q7.63: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

235. Yes, there is a reasonable prospect that site URB.16: 188–200 Bowes Road could be viably developed at the point envisaged in the Plan period.
236. The site is located in the higher value area of the borough, as defined in the Whole Plan Viability Assessment [**VIA1**] (HDH Planning & Development Ltd, June 2023). This includes the New Southgate and Bowes areas in the south-west of the borough.
237. The WPVA models brownfield typologies in higher value areas and finds that these sites are viable at 35% affordable housing, while meeting the full range of policy requirements, including:
- M4(2)/M4(3) accessibility standards
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon (regulated and unregulated emissions)
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, Table 10.8a, p.156; and paras 10.34–10.57).
238. URB.16 is a brownfield, previously developed site fronting Bowes Road, proposed for redevelopment for housing. The anticipated form and scale of development aligns with the typologies tested in the WPVA. The site is located close to public transport and local amenities, supporting delivery.
239. Where required, a site-specific viability assessment may be submitted at planning application stage, in line with VIA1, para 12.87.
240. Based on the site's location, planning status, development typology, and evidence in VIA1, the Council considers there is a reasonable prospect that URB.16 can be viably developed within the Plan period.

Q7.64: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

241. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
242. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the

Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.

243. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.17: Main Avenue Estate

Q7.65: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

244. The Council considers that there is no substantive evidence to suggest that this site should not be allocated in the Local Plan. Each of the relevant considerations listed including biodiversity, heritage, infrastructure, flood risk, amenity and other environmental and technical matters has been assessed as part of the site selection process, as set out in the Site Allocation Topic Paper [TOP2] and the site assessment spreadsheet (E.14.1-SAS2). Constraints identified, such as existing buildings and local character, are reflected in the allocation boundary and the indicative capacity. Where mitigation is required, it can be appropriately secured through design and development management processes. No overriding constraints have been identified.

Q7.66: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) **The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) **Infrastructure requirements.**
- c) **Design principles.**

Council response

245. In response to part (a), the scale and density of development are considered appropriate and justified to secure sustainable development. The proposed quantum is informed by the Housing and Economic Land Availability Assessment (HELAA) and the Character of Growth Study, and has been further refined through a bespoke capacity study submitted by the landowner as part of the Call for Sites (CFS) process. This study was reviewed in the HELAA [HOU10, Ref: SBC2, Row 304, Column B1] and found to represent a reasonable and deliverable estimate of site capacity. The approach reflects the nature of the site as an established residential estate with identified infill opportunities.
246. In response to part (b), the site is well-connected and benefits from access to local infrastructure, including schools, healthcare, and public transport. Infrastructure requirements were considered as part of the site assessment process and are expected to be secured through planning obligations or Community Infrastructure Levy (CIL) contributions. No strategic infrastructure barriers to development have been identified. Future applications will be expected to demonstrate how development contributes to infrastructure capacity and quality, with proportionate mitigation measures secured through the development management process.
247. In response to part (c), the design principles have been developed in accordance with the NPPF 2023 (paragraphs 132 and 135), the London Plan 2021 (Policy D3), and the National Design Guide. The principles promote high-quality, contextually sensitive infill development that complements the existing estate layout, enhances the public realm, and supports a safe, attractive, and coherent residential environment.

Q7.67: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

248. Yes, there is a reasonable prospect that site URB.17: Main Avenue Estate, Lincoln Road could be viably developed at the point envisaged in the Plan period.
249. The site is located in the lower value area of the borough, as defined in the Whole Plan Viability Assessment **[VIA1]** (HDH Planning & Development Ltd, June 2023). This includes parts of eastern Enfield, such as Southbury and the area around

Lincoln Road, where development values are typically lower and more sensitive to policy costs.

250. The WPVA models brownfield typologies in lower value areas and finds that, while such sites may not always support 35% affordable housing alongside full policy compliance, they can be viable with adjusted contributions or alternative delivery approaches (see VIA1, paras 10.34–10.57).
- Assumptions in the viability testing include:
 - M4(2)/M4(3) accessibility
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon requirements
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, Table 10.8a, p.156).
251. URB.17 is an existing estate site and redevelopment may be brought forward as part of estate renewal, including the use of phased delivery, grant funding, or public sector intervention. These mechanisms can help support viability where private development alone would not deliver policy-compliant outcomes.
252. Site-specific viability assessments may be submitted at planning application stage, in line with VIA1, para 12.87.
253. Based on the site's location, type, and the supporting evidence in VIA1, the Council considers there is a reasonable prospect that URB.17 can be viably developed within the Plan period.

Q7.68: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

254. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
255. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.

256. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.18: Land at Ritz Parade

Q7.69: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

257. The Council considers that there is no substantive evidence to suggest that this site should not be allocated in the Local Plan. All relevant considerations including biodiversity, heritage, flood risk, contamination, landscape character, and infrastructure capacity have been carefully assessed as part of the site selection process, as documented in the Site Allocation Topic Paper [TOP2] and the site assessment spreadsheet (E.14.1-SAS2). The site is not subject to any overriding environmental or technical constraints that would prevent development. Any mitigation required, for example in relation to the retention of the locally listed building, can be secured through the planning process.

Q7.70: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) **The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**

b) Infrastructure requirements.

c) Design principles.

Council response (MK)

258. In response to part (a), the scale and density of development are considered appropriate and justified in securing sustainable development. The proposed quantum is underpinned by the site selection process and Housing and Economic Land Availability Assessment (HELAA), informed by the Character of Growth Study.

Scale:

259. The Brentford Lock West typology (HOU1, Appendix D) has been applied to ensure a built form that is sympathetic to the site's transitional context—adjacent to a low-rise residential neighbourhood and large-scale road infrastructure.

Density:

260. The site capacity is based on applying the Brentford Lock West typology to a reduced net developable area of 0.45 ha, accounting for the retention of the locally listed building. This approach is set out in HOU10 [Ref. SGC2, Row 564, Column BI], and reflects a proportionate and deliverable level of development.

261. In response to part (b), the site is located in a well-connected urban area with access to existing social and transport infrastructure, including public transport, shops, and community facilities. No strategic infrastructure constraints have been identified that would impede delivery. Infrastructure requirements will be secured through planning obligations and/or Community Infrastructure Levy (CIL), with site-specific interventions (such as public realm and transport improvements) addressed through the development management process, as appropriate. The Infrastructure Delivery Plan [IDP1] provides further detail on borough-wide infrastructure planning.

262. In response to part (c), the design principles have been developed in accordance with the NPPF 2023 (paragraphs 132 and 135), London Plan Policy D3 (2021), and the National Design Guide. These principles provide a clear framework to secure high-quality development that integrates sensitively with the surrounding townscape, retains the locally listed building as a heritage asset, and delivers active frontages, well-designed public realm, and appropriate transitions in height and massing.

Q7.71: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

263. Yes, there is a reasonable prospect that site URB.18: Land at Ritz Parade could be viably developed at the point envisaged in the Plan period.

264. The site is located in the higher value area of the borough, as defined in the Whole Plan Viability Assessment [VIA1] (HDH Planning & Development Ltd, June 2023). This includes the New Southgate area and other parts of the west and south-west of Enfield.
265. The WPVA models a range of brownfield typologies in higher value areas. It concludes that these sites are viable at 35% affordable housing while meeting the full set of Local Plan policy requirements, including:
- M4(2)/M4(3) accessibility standards
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon standards
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, Table 10.8a, p.156; and paras 10.34–10.57).
266. URB.18 is a small brownfield site with potential for mixed-use or residential-led development. Its typology is consistent with those tested in the WPVA. The site is in a location with existing infrastructure and public transport access.
267. Site-specific viability assessment may be provided at application stage where necessary, in line with VIA1, para 12.87.
268. Based on the site's location, typology, and the evidence in VIA1, the Council considers there is a reasonable prospect that URB.18 can be viably developed within the Plan period.

Q7.72: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

269. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
270. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
271. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for

soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.19: Albany Leisure Centre

Q7.73: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

272. The Council considers that there is no substantive evidence to suggest that the site should not be allocated as part of the Local Plan. All relevant matters including biodiversity, landscape character, heritage assets, flood risk, contamination, transport capacity and the efficient operation of the highway network have been considered in the site selection process, as detailed in the Site Allocation Topic Paper [TOP2] and the site assessment spreadsheet (E.14.1-SAS2). The site does not fall within any designated habitat areas or flood zones that would preclude development, and no overriding constraints have been identified that would render development unacceptable in principle. Any residual matters can be addressed through the development management process.

Q7.74: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) **The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) **Infrastructure requirements.**

c) Design principles.

Council response

273. In response to part a) the scale and density of development are appropriate to secure sustainable development. The site selection process, informed by the HELAA and the Character of Growth Study, supports the proposed development quantum.

Scale:

274. The Echoes typology (HOU1, Appendix D) has been applied across the site to guide a development form that responds to the civic nature of the site and the continued use of the leisure centre. The typology promotes a medium-rise development that is contextually appropriate and optimises land use.

Density:

275. The proposed number of homes is derived from applying the Echoes typology to the net developable area (HOU10, Ref. CFS207, row 466, column BI). The density respects the site's function and surroundings, ensuring good design while delivering much-needed homes.
276. The site is located in a part of the borough that is generally well served by local infrastructure, including schools, open spaces and transport links. No critical infrastructure constraints have been identified that would affect deliverability. Contributions from future development can help support infrastructure delivery, including active travel enhancements and community facilities, and will be secured via Section 106 agreements and CIL. As part of any future planning application, applicants will be expected to demonstrate how the scheme supports and integrates with existing and planned infrastructure in the area.
277. In response to part (c), the design principles have been developed in accordance with the NPPF 2023 (paragraphs 132 and 135), London Plan Policy D3 (2021), and the National Design Guide. These principles provide a clear framework to secure high-quality development that integrates sensitively with the surrounding townscape, retains the locally listed building as a heritage asset, and delivers active frontages, well-designed public realm, and appropriate transitions in height and massing.

Q7.75: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

278. Yes, there is a reasonable prospect that site URB.19: Albany Leisure Centre could be viably developed at the point envisaged in the Plan period.

279. The site is located in the lower value area of the borough, as defined in the Whole Plan Viability Assessment [VIA1] (HDH Planning & Development Ltd, June 2023). This value area includes parts of eastern Enfield, including areas around Turkey Street and the A1010 corridor.
280. The WPVA models a range of brownfield typologies in lower value areas. It concludes that development in these areas is more sensitive to policy costs, but can remain viable with flexibility in affordable housing delivery and other contributions (see VIA1, paras 10.34–10.57). The modelling includes the full set of emerging policy requirements:
- M4(2)/M4(3) accessibility standards
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon standards
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, Table 10.8a, p.156).
281. URB.19 is a brownfield site in existing community use. The allocation supports redevelopment for housing, with replacement leisure or community facilities to be provided either on-site or in the local area. The site form and scale is consistent with WPVA-tested typologies.
282. In accordance with VIA1, para 12.87, a site-specific viability assessment may be submitted at application stage if required.
283. Based on the site's location, use type, and supporting viability evidence, the Council considers there is a reasonable prospect that URB.19 can be viably developed within the Plan period.

Q7.76: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

284. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
285. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.

286. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.20: Cuckoo Hall Lane

Q7.77: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

287. The Council considers that there is no substantive evidence which determine that the site should not be allocated as part of this Local Plan. The above factors have been considered at length as part of the site selection process which is set out in the Site Allocation Topic Paper [TOP 2] and in the site selection spreadsheet (E.14.1-SAS2). Locations of factors such as heritage assets are displayed on the proforma in Appendix C and policy maps. It is the Council's view that the planning balance has been demonstrated and justified.

Q7.78: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) **The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) **Infrastructure requirements.**

c) Design principles.

Council response

288. In response to part (a), the scale and density of development proposed are considered appropriate to secure sustainable development. This is justified through the site selection process and the Housing and Economic Land Availability Assessment (HELAA), which was informed by the Character of Growth Study and local context. The allocation consists of a number of small-scale infill opportunities within an established residential area, where modest intensification is appropriate.
289. A bespoke approach has been adopted in light of the fragmented nature of the sites within the allocation. A capacity study was submitted by the landowner as part of the Call for Sites process (CFS261), and this was assessed through the HELAA [HOU10, Ref: CFS261, Row 304, Column BI] as a reasonable and deliverable estimate of capacity, reflecting the individual characteristics and constraints of each infill plot.
290. In response to part (b), the site benefits from access to existing infrastructure networks, including local transport, schools, healthcare, and utilities. Given the incremental nature of development proposed, infrastructure needs are expected to be modest and capable of being addressed through proportionate planning obligations or Community Infrastructure Levy (CIL) contributions. Any site-specific mitigation measures required will be secured through the development management process, ensuring that the delivery of new homes does not place undue pressure on local infrastructure.
291. **291.** In response to part (c), the design principles have been developed in accordance with the NPPF 2023 (paragraphs 132 and 135), London Plan Policy D3 (2021), and the National Design Guide. These principles are focused on ensuring high-quality infill development that integrates sensitively with the surrounding estate context, promotes active frontages where appropriate, and enhances the public realm. The principles also serve to guide appropriate scale, massing, and the relationship between new and existing buildings.

Q7.79: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

292. Yes, there is a reasonable prospect that site URB.20: Cuckoo Hall Lane could be viably developed at the point envisaged in the Plan period.
293. The site is located in the lower value area of the borough, as defined in the Whole Plan Viability Assessment [VIA1] (HDH Planning & Development Ltd, June 2023). This includes areas in the eastern part of the borough, including Edmonton and surrounding neighbourhoods.

294. The WPVA tests a range of brownfield typologies in lower value areas. It concludes that while development in these locations may be less likely to support 35% affordable housing with full policy compliance, schemes can still be viable with reduced contributions or alternative delivery mechanisms (see VIA1, paras 10.34–10.57).
295. Cost assumptions in the WPVA include:
- Accessibility standards (M4(2)/M4(3))
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon standards
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, Table 10.8a, p.156).
296. URB.20 is a brownfield site proposed for low- to mid-rise housing. The form and scale of development aligns with the typologies tested in the WPVA. Where required, the Council may accept a site-specific viability assessment to determine the appropriate level of affordable housing and contributions, in accordance with VIA1, para 12.87.
297. Based on the site's location, typology, and the evidence in VIA1, the Council considers there is a reasonable prospect that URB.20 can be viably developed within the Plan period.

Q7.80: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

298. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
299. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
300. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for

soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.21: Moorfield Health Centre

Q7.81: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

301. The Council considers that there is no substantive evidence suggesting that this site should not be allocated in the Local Plan. All relevant environmental and technical matters such as biodiversity, flood risk, air and water quality, heritage, and infrastructure capacity—have been assessed through the site selection process, as detailed in the Site Allocation Topic Paper **[TOP2]** and the site assessment spreadsheet (E.14.1-SAS2). The site does not lie within any protected ecological or landscape designations and presents no overriding constraints that would preclude allocation. Any site-specific issues that may arise can be addressed through the development management process.

Q7.82: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) **The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) **Infrastructure requirements.**

c) Design principles.

Council response

302. In response to part a) the scale and density of development proposed are appropriate and justified to deliver sustainable development. The site selection process, supported by the HELAA and Character of Growth Study, demonstrates that this brownfield site can support intensification.

Scale:

303. The Ryle Yard typology (HOU1, Appendix D) has been applied to guide development at an appropriate height and massing for the suburban context. A more recent planning permission was approved that exceeded this capacity, justified on balance by the delivery of a high proportion of affordable housing, which demonstrates the potential flexibility in approach.

Density:

304. The HELAA (HOU10, Ref. SBC5, row 308, column BI) provides a realistic capacity figure, based on the Ryle Yard typology, ensuring efficient use of land while respecting local context and constraints, such as proximity to existing residential development and retained trees.
305. The site is located in an established urban area with access to local services, public transport, and social infrastructure. No infrastructure capacity constraints have been identified that would prevent development from coming forward. Site-specific infrastructure requirements (e.g. utilities upgrades, active travel connections, and contributions to health or education facilities, where applicable) will be secured through the development management process, including via planning obligations and CIL, in accordance with the Infrastructure Delivery Plan.
306. The design principles have been developed in line with national and regional policy and guidance, including the NPPF, London Plan 2021, and the National Design Guide. They support the delivery of high-quality, context-sensitive development, including the retention of mature trees along Hertford Road and provision of active frontages, legible access points, and high-quality public realm.

Q7.83: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

307. Yes, there is a reasonable prospect that site URB.21: Moorfield Health Centre could be viably developed at the point envisaged in the Plan period.

308. The site is located in the higher value area of the borough, as defined in the Whole Plan Viability Assessment [VIA1] (HDH Planning & Development Ltd, June 2023). This area includes parts of the borough such as Winchmore Hill and Grange Park, where residential values are higher and development is more likely to be viable with policy costs applied.
309. The WPVA models brownfield development typologies in higher value areas and finds that they are viable with 35% affordable housing, while meeting the full set of policy requirements. These include:
- M4(2) and M4(3) accessibility standards
 - Water efficiency targets
 - 20% Biodiversity Net Gain
 - Zero carbon standards (regulated and unregulated emissions)
 - Mayoral and Borough CIL
 - Developer contributions (See VIA1, Table 10.8a, p.156; and paras 10.34–10.57).
310. URB.21 is a brownfield site in an accessible suburban location. The proposed redevelopment aligns with typologies tested in the WPVA. The site is in health-related use, and the allocation allows for the provision of a new health facility as part of a mixed-use or residential-led scheme. The nature of redevelopment provides flexibility for phased or co-located delivery.
311. In accordance with VIA1, para 12.87, site-specific viability assessment may be undertaken at planning application stage if required.
312. Based on the site's location, development typology, and viability evidence in VIA1, the Council considers there is a reasonable prospect that URB.21 can be viably developed within the Plan period.

Q7.84: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

313. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
314. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.

315. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.22: Oakwood Station Car Park

Q7.85: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

316. The Council considers there is no substantive evidence to suggest that this site should not be allocated in the Local Plan. All relevant factors listed in the question biodiversity, landscape, heritage, flood risk, infrastructure capacity, and more have been considered through the robust site assessment process. This is documented in the Site Allocation Topic Paper [TOP2] and the site assessment spreadsheet (E.14.1-SAS2). While Oakwood Station is a listed building, the site allocation has been carefully framed to ensure its setting is respected. The proposed development boundary and design principles take account of tree cover, visual impacts, and other local sensitivities, and the planning balance has been appropriately made.

Q7.86: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) **The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**

b) Infrastructure requirements.

c) Design principles.

Council response

317. In response to part a) the scale and density of development proposed are appropriate to deliver sustainable development in this location. The site lies adjacent to a London Underground station and offers good accessibility. The Ryle Yard typology (HOU1, Appendix D) has been applied to ensure a modest, contextually sensitive form of development that is compatible with surrounding suburban character and the setting of Oakwood Station.
318. The density and capacity figure derive from the HELAA (HOU10, Ref. COC10, row 565, column BI), which accounts for a reduced site area to preserve mature trees and ensure the development is set back from the listed station building. The typology used avoids the need for tall buildings, recognising both the station's setting and local townscape.
319. The site is located in an area with good access to public transport and local services. It is within walking distance of Oakwood District Centre. No infrastructure capacity constraints have been identified that would prevent development at the point envisaged. Where appropriate, infrastructure requirements—including highways upgrades, active travel improvements, and healthcare or education contributions—will be secured via planning obligations in accordance with the Local Plan's Infrastructure Delivery Plan and CIL Regulation 122 tests. Discussions with TfL have clarified that any car park re-provision or mitigation related to station access will be addressed through the development management process.
320. In response to part (c), the design principles have been developed in accordance with the NPPF 2023 (paragraphs 132 and 135), London Plan Policy D3 (2021), and the National Design Guide. A statement of common ground has been agreed with Transport for London [SUB14j], confirming both parties' shared understanding of design expectations. These principles secure retention of mature trees, respect for the setting of the listed Oakwood Station, appropriate building heights and frontages, and enhanced pedestrian access. The principles are proportionate and will be effective in guiding a high-quality development that integrates well with the local context.

Q7.87: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

321. Yes, there is a reasonable prospect that site URB.22: Oakwood Station Car Park could be viably developed at the point envisaged in the Plan period.

322. The site is located in the higher value area of the borough, as defined in the Whole Plan Viability Assessment [VIA1] (HDH Planning & Development Ltd, June 2023). This value area includes Oakwood and surrounding areas in the west and north-west of the borough.
323. The WPVA models a range of brownfield development typologies in higher value areas. It concludes that these sites are viable at 35% affordable housing, even when tested with the full set of policy requirements, including:
- Accessibility standards (M4(2)/M4(3))
 - Water efficiency
 - 20% Biodiversity Net Gain
 - Zero carbon standards
 - Mayoral and Borough CIL
 - Developer contributions
(See VIA1, Table 10.8a, p.156; and paras 10.34–10.57).
324. URB.22 is a brownfield site adjacent to Oakwood Station, with strong public transport accessibility. The site is proposed for residential development on part of the existing car park, consistent with the scale and form of development modelled in the WPVA.
325. The Council recognises that site-specific viability assessments may be submitted at application stage if required, in accordance with VIA1, para 12.87.
326. Based on the location, typology, and evidence in VIA1, the Council considers there is a reasonable prospect that URB.22 can be viably developed within the Plan period.

Q7.88: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

327. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
328. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.

329. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.23: Stoneleigh Avenue Estate

Q7.89: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

330. The Council considers that there is no substantive evidence to suggest that the site should not be allocated in the Local Plan. All relevant constraints, including those listed in the Inspector's question, have been assessed as part of the site selection process, detailed in the Site Allocations Topic Paper [**TOP2**] and the site assessment spreadsheet [E14.1-SAS2].
331. Key environmental and infrastructure factors such as flood risk, heritage assets, landscape sensitivity, biodiversity, and transport capacity have been mapped and assessed in the proformas in Appendix C of the Plan and shown spatially on the Policies Map. No significant constraints have been identified that would preclude development in principle. Where necessary, mitigation measures are expected to be secured through the planning application process. The Council is satisfied that the allocation represents a sound planning judgement and a justified component of the Plan's wider spatial strategy.

Q7.90: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response

332. In response to part (a), the scale and density of development proposed are considered appropriate to secure sustainable development. This is justified through the Housing and Economic Land Availability Assessment (HELAA) [HOU10], which was informed by the Character of Growth Study [HOU1] and the strategic site selection process. The site comprises a number of infill opportunities within an established residential estate, where a modest level of intensification is appropriate and achievable.
333. A bespoke approach has been taken in recognition of the fragmented and context-specific nature of the infill plots. A capacity study was submitted by the landowner as part of the Call for Sites process (CFS278), which was subsequently reviewed and validated through the HELAA [HOU10, Ref: CFS278, Row 552, Column BI]. The proposed development quantum reflects a realistic and deliverable estimate of capacity, having regard to site-specific constraints and local character.
334. In response to part (b), the site benefits from access to existing infrastructure including schools, health facilities, utilities, and public transport. The infill nature of the proposals limits the scale of new demand, and infrastructure needs are expected to be modest. Where necessary, any localised impacts will be addressed through planning obligations or Community Infrastructure Levy (CIL) contributions, and no strategic infrastructure dependencies have been identified that would delay delivery.
335. In response to part (c), the design principles have been developed in accordance with the NPPF 2023 (paragraphs 132 and 135), London Plan Policy D3 (2021), and the National Design Guide. The principles focus on identifying appropriate locations for infill, ensuring new development integrates with the existing built form, and promoting good design that enhances the public realm and supports local character. This framework provides a sound basis for future planning applications and will support delivery of sustainable, high-quality development.

Q7.91: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

336. Yes, there is a reasonable prospect that site URB.23: Stoneleigh Avenue Estate could be viably developed at the point envisaged in the Plan period.
337. The site is located in the lower value area of the borough, as defined in the Whole Plan Viability Assessment [VIA1] (HDH Planning & Development Ltd, June 2023). This value area includes parts of eastern Enfield, such as Southbury and the A1010 corridor, where viability is more sensitive to policy costs and market values.
338. The WPVA models a range of brownfield typologies, including estate renewal and flatted development schemes, in lower value areas. It finds that these schemes may be less likely to support 35% affordable housing alongside full policy compliance, but can remain viable with adjusted policy costs (see VIA1, paras 10.34–10.57).
339. Cost assumptions in the modelling include all Local Plan policy requirements: accessibility standards (M4(2)/M4(3)), water efficiency, Biodiversity Net Gain, carbon targets, CIL, and developer contributions. Lower Borough CIL rates apply in this value area (see VIA1, Table 10.8a, p.156), which helps improve viability margins.
340. URB.23 is an existing Council estate with scope for estate regeneration, including infill or redevelopment. Council involvement in delivery supports site readiness, and a phased approach can be used to manage viability and delivery risks. The WPVA allows for site-specific viability assessments where necessary (VIA1, para 12.87).
341. Based on the site's location, policy requirements, and evidence in VIA1, the Council considers there is a reasonable prospect that URB.23 can be viably developed within the Plan period.

Q7.92: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

342. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
343. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
344. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.25: Pevensey Avenue

Q7.93: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

345. The Council considers there is no substantive evidence to suggest that the site should not be allocated in the Local Plan. All the relevant environmental, infrastructure, and technical matters listed in the question including biodiversity, landscape, transport, and flood risk have been comprehensively assessed through the site selection process, as set out in the Site Allocation Topic Paper [TOP 2] and the Site Assessment Spreadsheet (E.14.1-SAS2). Locations of heritage assets and environmental constraints are also identified in the site proforma in Appendix C and illustrated on the Policies Map. The planning balance has been carefully considered, and the Council is satisfied that the allocation is justified.

Q7.94: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) **The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) **Infrastructure requirements.**
- c) **Design principles.**

Council response

346. In response to part (a) the scale and density of development are appropriate to secure sustainable development. A bespoke approach has been taken in recognition of the small-scale, residential infill nature of the individual plots that comprise this allocation. A capacity study was submitted as part of the Call for Sites by the landowner (CFS278), and this was reviewed through the HELAA (HOU10, ref CFS278, Row 552, Column BI). The study confirmed that the proposed level of development could be accommodated within the constraints of the site, and this capacity has been carried forward into the Local Plan. The form of development does not rely on tall buildings and is compatible with the suburban character of the surrounding area.
347. In response to part (b), the site lies within a well-established residential area with existing access to local services, schools, and public transport. No critical infrastructure constraints have been identified that would delay or prevent delivery. Where required, infrastructure needs such as highway improvements, active travel links, or additional education or health capacity will be addressed through planning obligations or future CIL contributions, in line with the Council's Infrastructure Delivery Plan and national policy tests. These mechanisms ensure the site can be brought forward in a coordinated and sustainable manner.
348. In response to part (c), the design principles have been developed in accordance with the NPPF 2023 (paragraphs 132 and 135), London Plan Policy D3 (2021), and the National Design Guide. The principles focus on identifying appropriate locations for infill, ensuring new development integrates with the existing built form, and promoting good design that enhances the public realm and supports local character. This framework provides a sound basis for future planning applications and will support delivery of sustainable, high-quality development.

Q7.95: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

349. Yes, there is a reasonable prospect that site URB.25: Pevensey Avenue could be viably developed at the point envisaged in the Plan period.
350. The site is located in the medium value area of the borough, as defined in the Whole Plan Viability Assessment [VIA1] (HDH Planning & Development Ltd, June 2023). This area includes parts of EN1, such as Bush Hill Park, Southbury and Carterhatch.
351. The WPVA models a series of brownfield typologies in this value area. It finds that development is generally viable at 35% affordable housing where costs align with the tested typologies, including full policy requirements for design, sustainability, CIL and developer contributions (see VIA1, Table 10.8a, p.156; paras 10.34–10.57).

352. URB.25 is a brownfield infill site, with a development typology consistent with those tested in the WPVA. The Council recognises that site-specific viability assessments may be necessary in individual cases to account for abnormal costs or constraints, in line with VIA1, para 12.87.
353. Based on the site's location in a medium value area, the form of development proposed, and the supporting viability evidence, the Council considers there is a reasonable prospect that URB.25 can be viably developed within the Plan period.

Q7.96: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

354. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
355. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
356. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.26: Ford's Grove Car Park

Q7.97: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**

- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

357. The Council considers that there is no substantive evidence to suggest the site should not be allocated in the Local Plan. All relevant considerations including biodiversity, heritage, flood risk, and transport infrastructure have been assessed through the site selection process, as set out in the Site Allocation Topic Paper **[TOP2]** and the Site Assessment Spreadsheet (E.14.1-SAS2). Constraints and context, including the proximity to local heritage assets, are also reflected in the site-specific proforma in Appendix C and illustrated on the Policies Map. On this basis, the Council is satisfied that the site remains suitable and justified for allocation.

Q7.98: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) **The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) **Infrastructure requirements.**
- c) **Design principles.**

Council response

358. In response to part (a) the scale and density of development are considered appropriate to secure sustainable development. The site was assessed through the HELAA process, supported by the Characterisation and Growth Study, and found suitable for development. A medium-density typology Hammond Court is applied across the site (HOU1, Appendix D), which aligns with Policy D3 of the London Plan to optimise capacity while respecting the character of the surrounding low-rise residential context. The site is not reliant on tall buildings and allows for a sensitive approach to massing. LBE, as landowner, has confirmed support for the proposed scale and capacity in the Statement of Common Ground **[SUB14j]**.

359. In response to part (b) there are no identified infrastructure constraints that would prevent the timely delivery of the site. The location benefits from proximity to existing local services, education, and public transport provision. Where necessary, site-specific infrastructure improvements such as pedestrian access enhancements or public realm improvements will be secured through developer contributions and the Community Infrastructure Levy, in accordance with the Council's Infrastructure

Delivery Plan and national policy tests. This ensures that development can be brought forward with appropriate mitigation in place.

360. In response to part (c), the design principles have been developed in accordance with the NPPF 2023 (paragraphs 132 and 135), London Plan Policy D3 (2021), and the National Design Guide. They reflect the importance of integrating with surrounding residential areas, safeguarding amenity, and protecting existing mature trees on and around the site. The principles also support active frontages and legible access arrangements. The Council, as landowner, has confirmed its agreement with the form and content of the site allocation through a Statement of Common Ground.

Q7.99: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

361. Yes, there is a reasonable prospect that site URB.26: Ford's Grove Car Park could be viably developed at the point envisaged in the Plan period.
362. The site is located in the higher value area of the borough, as defined in the Whole Plan Viability Assessment [VIA1] (HDH Planning & Development Ltd, June 2023). The WPVA includes viability testing of a range of brownfield typologies in higher value areas.
363. According to the WPVA, brownfield sites in the higher value area are shown to be viable at 35% affordable housing, alongside full policy requirements. These include accessibility standards (M4(2)/M4(3)), water efficiency, 20% Biodiversity Net Gain, zero carbon, Mayoral and Borough CIL, and developer contributions (see VIA1, Table 10.8a, p.156; paras 10.34–10.57).
364. URB.26 is a Council-owned brownfield site, proposed for partial redevelopment while retaining or reconfiguring public parking. The proposed form of development aligns with the types tested in the WPVA.
365. Site-specific viability review may be undertaken at the application stage in line with VIA1, para 12.87, if required.
366. Based on the site's location, typology, and the supporting evidence in VIA1, the Council considers there is a reasonable prospect that URB.26 can be viably developed within the Plan period.

Q7.100: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

367. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
368. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
369. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.27: South Street

Q7.101: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

370. The Council considers that there is no substantive evidence to suggest the site should not be allocated in the Local Plan. All relevant constraints including biodiversity, heritage, landscape quality, flood risk, and infrastructure capacity have been assessed as part of the site selection process, which is set out in the Site Allocation Topic Paper [TOP2] and the Site Assessment Spreadsheet (E.14.1-SAS2). The specific location and extent of constraints, including the relationship to nearby townscape and green infrastructure, are recorded in the site proforma in

Appendix C and visualised on the Policies Map. The Council is satisfied that the planning balance has been appropriately considered and supports the site's allocation.

Q7.102: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response

371. In response to part a) the scale and density of development proposed is appropriate to secure sustainable development and has been justified through the site selection process and the HELAA, informed by the Character of Growth Study. A bespoke approach has been taken to reflect the nature of the infill opportunities within the wider estate. A capacity study submitted by the landowner through the call for sites (CFS277) formed the basis for assessment. The HELAA (HOU10, ref CFS277, row 551, column BI) confirmed this was a reasonable and deliverable approach, and this informed the capacity set out in the site allocation.
372. No critical infrastructure constraints have been identified that would preclude development. The site is well located in relation to existing public transport links, local shops, and community services, supporting its suitability for residential intensification. Infrastructure requirements will be addressed through the planning application process in line with the Infrastructure Delivery Plan. Mitigation will be secured through developer contributions or the Community Infrastructure Levy where appropriate, ensuring that development proceeds with necessary enhancements to utilities, public realm and social infrastructure.
373. In response to part (c), the design principles have been developed in accordance with the NPPF 2023 (paragraphs 132 and 135), London Plan Policy D3 (2021), and the National Design Guide. The principles focus on identifying appropriate locations for infill, ensuring new development integrates with the existing built form, and promoting good design that enhances the public realm and supports local character. This framework provides a sound basis for future planning applications and will support delivery of sustainable, high-quality development.

Q7.103: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

374. Yes, there is a reasonable prospect that site URB.27: South Street could be viably developed at the point envisaged in the Plan period.
375. The site is located in the lower value area of the borough as defined in the Whole Plan Viability Assessment [VIA1] (HDH Planning & Development Ltd, June 2023). The WPVA models brownfield typologies in lower, medium and higher value areas and considers a range of development scenarios and policy costs.
376. In the lower value area, the WPVA finds that flatted development is less likely to support full policy requirements, including 35% affordable housing (VIA1, paras 10.34–10.57). However, the evidence indicates that development can remain viable with adjusted levels of affordable housing and policy contributions, and subject to site-specific viability testing.
377. The WPVA includes sensitivity testing and analysis of the cumulative policy impacts, including design and sustainability policies, CIL, and developer contributions (see VIA1, Table 10.8a, p.156). The lower value area benefits from lower Borough CIL rates, which helps offset other cost assumptions.
378. URB.27 is a brownfield site identified for low- to mid-rise flatted development. It is of a scale and type consistent with the typologies tested in the WPVA. In line with VIA1, para 12.87, the Council may accept a site-specific viability assessment at application stage to determine the level of affordable housing and contributions that can be supported.
379. Based on the location, development typology, and supporting evidence in VIA1, the Council considers there is a reasonable prospect that URB.27 can be viably developed within the Plan period.

Q7.104: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

380. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
381. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
382. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for

soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.28: Land and buildings south east of Stockingswater Lane

Q7.105: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

383. The Council considers that there is no substantive evidence to suggest that the site should not be allocated. All the factors listed in the Inspector's question including biodiversity, flood risk, landscape character, heritage, and infrastructure capacity have been assessed through the site selection process, as detailed in the Site Allocations Topic Paper [TOP2] and site assessment spreadsheet [E14.1-SAS2]. These assessments are also reflected in the individual site proformas in Appendix C of the Plan and shown spatially on the Policies Map. Any potential impacts are capable of being addressed through standard mitigation at the planning application stage. constraints have been identified that would prevent development of the site in accordance with the principles of sustainable development.

Q7.106: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- | |
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| <p>a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?</p> <p>b) Infrastructure requirements.</p> <p>c) Design principles.</p> |
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Council response

384. In response to part (a), the scale and density of development proposed are considered appropriate to secure sustainable development and deliver meaningful employment intensification. The approach is supported by the site selection process [TOP4] and the Housing and Economic Land Availability Assessment [HOU1, HOU10], informed by the Employment Land Review [EMP1]. The site's location within the existing industrial area and its proximity to the A1055 and M25 junction make it well suited for intensified employment use.
385. The Employment Land Review [EMP1, paras 10.41–10.42] assessed the landowner's proposal and concluded that a floorspace uplift of around 25,000 sqm is realistic and deliverable, reflecting a viable form of development. This aligns with London Plan Policy D3 on optimisation and Policy E4 on the need to intensify industrial land. The site also falls within a designated tall buildings area (Appendix D, DES12, Area I.7), which allows for further vertical intensification subject to design quality and amenity considerations.
386. In response to part (b), infrastructure needs for this employment-focused allocation are limited and manageable. The site benefits from established road access and proximity to the A1055 corridor. Requirements for servicing, access upgrades, utilities, drainage, and active travel connections can be addressed at the application stage and, where necessary, secured via planning obligations. No strategic infrastructure barriers have been identified that would prevent or delay delivery.
387. In response to part (c), the design principles have been developed in accordance with the NPPF 2023 (paragraphs 132 and 135), London Plan Policy D3 (2021), and the National Design Guide. The policy includes principles that promote a degree of active frontage, perimeter greening, and high-quality landscaping to soften the edge of development and ensure compatibility with surrounding land uses. These are achievable within a modern industrial scheme and will support visual amenity and local environmental quality.

Q7.107: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

388. Yes, the Council considers there is a reasonable prospect that Site URB.28 (Land and buildings south east of Stockingswater Lane) could be viably developed within the Plan period as envisaged.
389. A Call for Sites submission from Areli confirmed a clear commercial appetite to bring forward redevelopment of this low-density, underutilised industrial site, with an ambition to deliver around 45,000 sqm of new industrial floorspace. This reflects both site-specific potential and market interest.
390. The Employment Land Review [EMP1, Table 10.3] noted that the site could accommodate over 100,000 sqm of industrial floorspace through maximum intensification. However, the promoter does not currently support development at this scale, and the Council recognises that achieving the upper end of capacity would likely be constrained by short-term viability challenges, as set out in the 2024 Employment Topic Paper [TOP4, para 4.12].
391. In this context, the Plan's assumption of approximately 45,000 sqm total industrial floorspace (equating to a net uplift of 25,375 sqm) represents a balanced and realistic estimate. It reflects market signals and evidence of developer interest and falls within a deliverable range that is likely to come forward in line with market conditions and policy support for industrial intensification.
392. The Council therefore considers that the development of the site is viable and achievable during the Plan period, consistent with paragraph 58 of the NPPF (2023).

Q7.108: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

393. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
394. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
395. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.29: Land to the south of Millmarsh Lane

Q7.109: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

³⁹⁶. The Council considers that there is no substantive evidence to suggest that the site should not be allocated in the Local Plan. All relevant constraints including biodiversity, flood risk, landscape character, contamination, infrastructure capacity, and proximity to heritage assets have been carefully assessed as part of the site selection process. This assessment is documented in the Site Allocation Topic Paper [TOP2] and the Site Assessment Spreadsheet (E.14.1-SAS2). The location and extent of environmental and physical constraints are illustrated on the Policies Map and in the proforma in Appendix C. The Council is satisfied that the planning balance has been robustly considered and the allocation is justified.

Q7.110: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) **The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) **Infrastructure requirements.**

c) Design principles.

Council response

397. In response to part (a) the scale and intensity of development proposed is appropriate to secure sustainable development. This is supported by the site selection process (TOP4) and the HELAA (HOU1 and HOU10), both of which were informed by the Employment Land Review (EMP1). The review (EMP1, para 10.38) assessed the landowner's proposals and concluded that 13,500 sqm of floorspace is a realistic and deliverable level of intensification, while recommending that the Council pursue greater optimisation where possible. The proposed tall building zone (Appendix D, DES12, Area I.8) provides scope to accommodate further intensification subject to design and impact considerations. The scale is appropriate for the industrial setting and supports the borough's economic objectives.
398. In response to part (b) there are no overriding infrastructure constraints preventing development of the site. The location benefits from proximity to strategic roads and existing utilities. Local transport and servicing requirements will be managed through the development management process, and any necessary upgrades to infrastructure such as highways improvements or utility connections will be secured via developer contributions or planning obligations. The Infrastructure Delivery Plan supports the borough-wide strategy for ensuring timely infrastructure delivery aligned with planned growth.
399. In response to part (c) The design principles are proportionate and appropriate, having been developed in accordance with the NPPF, the London Plan 2021, and the National Design Guide. The principles promote high-quality employment-led intensification while seeking improvements to the public realm, including enhanced greening and active frontage along key pedestrian and vehicular routes. These measures are intended to support a functional and visually cohesive employment area.

Q7.111: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

400. Yes, the Council considers there is a reasonable prospect that Site URB.29: Land to the south of Millmarsh Lane could be viably developed at the point envisaged within the Plan period.
401. A Call for Sites submission confirmed commercial interest in optimising the existing low-density employment use through redevelopment. The promoter indicated a realistic ambition to deliver around 32,500 sqm of new industrial and logistics floorspace (Use Classes B2/B8), reflecting market demand and site suitability.

402. The Employment Land Review [EMP1, Table 10.3] identified that the site could theoretically accommodate up to 98,000 sqm of intensified floorspace. However, this upper figure exceeds the landowner's current aspirations and would likely be constrained by short-term viability challenges. The 2024 Employment Topic Paper [TOP4, paragraph 4.12] acknowledges these constraints and reinforces the importance of adopting realistic assumptions in line with current market conditions.
403. The Local Plan's assumption of 35,500 sqm total floorspace (equating to a net uplift of 13,500 sqm) represents a reasonable and evidence-based estimate. It is supported by landowner interest and aligns with strategic objectives to intensify employment land in appropriate locations.
404. On this basis, the Council considers that development of the site is viable and deliverable over the plan period, in accordance with paragraph 58 of the NPPF (2023).

Q7.112: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

405. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
406. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
407. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.30: Montagu Industrial Estate

Q7.113: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- Biodiversity
- green infrastructure or agricultural land
- landscape quality and character
- heritage assets
- strategic and local infrastructure including transport
- the efficient operation of the transport network and highway safety
- contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk
- open space, recreational facilities and public rights of way

Council response

408. The Council considers that there is no substantive evidence to suggest that the site should not be allocated in the Local Plan. All relevant constraints including biodiversity, flood risk, landscape character, land stability, contamination, and the efficient operation of the transport network have been carefully assessed through the site selection process, as set out in the Site Allocation Topic Paper **[TOP2]** and Site Assessment Spreadsheet (E.14.1-SAS2). The presence of nearby heritage assets and environmental sensitivities has been taken into account, and their locations are clearly shown on the proforma in Appendix C and the Policies Map. The Council is confident that the planning balance has been appropriately weighed and the allocation is justified.

Q7.114: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?
- b) Infrastructure requirements.

c) Design principles.

Council response

409. In response to part a), the scale and density of development proposed for URB.30: Montagu Industrial Estate is considered appropriate and justified to deliver sustainable industrial intensification. This conclusion is supported by the site selection process [TOP2], the Housing and Economic Land Availability Assessment (HELAA) [HOU1 and HOU10], and the Employment Land Review [EMP1]. The site benefits from a resolution to grant outline planning permission (ref: 22/00168/OUT), which establishes an evidence-based and tested benchmark for the proposed quantum and type of development. The proposal includes both intensified employment floorspace and associated supporting infrastructure, demonstrating that the development scale is deliverable in planning, design, and operational terms.
410. In response to part (b), there are no known strategic infrastructure constraints that would prevent the site from coming forward within the Plan period. The Employment Land Review [EMP1] and the Infrastructure Delivery Plan [IDP1] confirm that local infrastructure networks can support the anticipated growth. Requirements for site-specific infrastructure such as upgraded utilities, servicing arrangements, access improvements, and transport mitigation have been identified through the planning application process and are to be secured via S106 obligations. Further improvements, where appropriate, can also be funded through the Community Infrastructure Levy (CIL), ensuring that infrastructure provision remains proportionate and effective.
411. In response to part (c), the design principles set out in Appendix C of the ELP [SUB4] have been developed in accordance with national and regional policy, including the NPPF 2023 (paragraphs 132 and 135), London Plan 2021 (Policy D3), and the National Design Guide. These principles are tailored to promote high-quality, design-led industrial intensification, drawing directly from the approach established in the live planning application. The design framework supports improved site legibility, accessibility, active frontages along key routes, enhanced green infrastructure, and an upgraded employment environment. Together, these requirements will ensure the site comes forward in a form that supports sustainable economic growth, in accordance with the objectives of the Plan.

Q7.115: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

412. Yes, there is a reasonable prospect that site URB.30: Montagu Industrial Estate could be viably developed at the point envisaged in the Plan period.

413. The site benefits from a resolution to grant outline planning permission (ref: 22/00168/OUT) for up to 40,000 sqm of employment floorspace (Use Classes B2 and B8). This establishes the planning acceptability and commercial intent to deliver intensified industrial use on this designated site. The associated viability assessment submitted with the planning application demonstrated that the proposed scale of development is financially viable, taking into account construction costs, infrastructure contributions, and market demand for modern logistics and industrial space.
414. The proposed development would result in a net uplift of 17,902 sqm of employment floorspace, which aligns with the Employment Land Review [EMP1] recommendations and forms part of the Plan's industrial intensification strategy. The resolution to grant permission, combined with identified developer interest and favourable market conditions for industrial floorspace in Enfield's strategic locations, supports the Council's view that the site can be delivered viably within the envisaged timeframe of the Local Plan.

Q7.116: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

415. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
416. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
417. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.31: Snowbirds Food Extension

Q7.117: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**

- landscape quality and character
- heritage assets
- strategic and local infrastructure including transport
- the efficient operation of the transport network and highway safety
- contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk
- open space, recreational facilities and public rights of way

Council response

418. The Council considers that there is no substantive evidence suggesting that the site should not be allocated in the Local Plan. All relevant matters such as biodiversity, flood risk, landscape character, land stability, and contamination have been fully assessed through the site selection process, as set out in the Site Allocation Topic Paper [TOP2] and Site Assessment Spreadsheet (E.14.1-SAS2). The site does not contain protected habitats or heritage assets and lies within an established employment area. Where constraints exist, these are clearly mapped in the Policies Map and proforma in Appendix C. The Council is satisfied that the planning balance has been appropriately exercised and the site allocation is justified.

Q7.118: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?
- b) Infrastructure requirements.
- c) Design principles.

Council response

419. In response to part (a), the scale and density of development proposed are considered appropriate to secure sustainable economic growth. This is justified through the Local Plan evidence base, including the site selection process [TOP2], the HELAA [HOU1 and HOU10], and the Employment Land Review [EMP1]. The site is identified as suitable for employment intensification through extension and enhancement of existing operations. The principle of the proposed development has been tested and confirmed through the grant of planning permission (ref:

21/00804/FUL), demonstrating that the quantum and form of development are both deliverable and acceptable in planning terms.

420. In response to part (b), there are no strategic or local infrastructure constraints that would prevent delivery within the plan period. The infrastructure requirements have already been addressed through the implemented planning permission, which secured appropriate servicing, access, drainage, parking, and layout arrangements. The Council's Infrastructure Delivery Plan and the Employment Land Review confirm that the incremental infrastructure demand associated with this type of intensification is limited and can be met within the existing local network capacity.
421. In response to part (c), the design principles are consistent with national policy, including the NPPF 2023 (paragraphs 132 and 135), London Plan Policy D3, and national guidance such as the National Design Guide. They reflect and build on the parameters established through the extant permission (21/00804/FUL), supporting the delivery of high-quality, fit-for-purpose employment floorspace. The principles ensure functional and efficient design for industrial use, while contributing positively to the character and operation of the surrounding employment area.

Q7.119: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

422. Yes, there is a reasonable prospect that site URB.31: Snowbirds Food Extension could be viably developed at the point envisaged in the Plan period. The site benefits from full planning permission (ref: 21/00804/FUL) for the erection of a new building for chilled storage (Use Class B2/B8), and implementation of this permission is underway. This confirms that viability has already been tested through the planning process and demonstrates the site's deliverability within the Plan timeframe.

Q7.120: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

423. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
424. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.

425. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.32: Claverings Industrial Estate

Q7.121: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

426. The Council considers that there is no substantive evidence to suggest that the site should not be allocated in the Local Plan. The full range of relevant constraints biodiversity, flood risk, heritage, landscape, contamination, infrastructure, and transport has been assessed as part of the site selection process, set out in the Site Allocation Topic Paper [TOP2] and the Site Assessment Spreadsheet (E.14.1-SAS2). The site lies within a long-established Strategic Industrial Location and contains no known environmental designations or constraints that would prevent intensification. Any impacts can be appropriately managed through the planning process, and the Council is satisfied that the allocation is sound and justified.

Q7.122: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) **The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) **Infrastructure requirements.**
- c) **Design principles.**

Council response

427. The proposed scale and density of development are appropriate to support the intensification and modernisation of this Strategic Industrial Location (SIL). This is justified through the site selection process [TOP2], the Housing and Economic Land Availability Assessment (HELAA) [HOU1, HOU10], and the Employment Land Review [EMP1], which identify the site as suitable for accommodating increased employment densities in response to growing demand for modern industrial space. Planning permission has recently been granted (ref: 24/03805/FUL), confirming that a slightly lower quantum of employment floorspace than that envisaged in the allocation remains acceptable in planning terms and is deliverable within the Plan period.
428. Infrastructure implications have been assessed through both the Local Plan evidence base and the planning application process. The consented scheme (24/03805/FUL) secures servicing arrangements, site access upgrades, and compliance with sustainable drainage requirements. The Council's Infrastructure Delivery Plan (IDP1) confirms that no strategic infrastructure is required to support delivery of this site. The development is compatible with the existing utilities network, highway access, and servicing arrangements in the local employment area.
429. The design principles are consistent with the NPPF 2023 (paragraphs 132 and 135), the London Plan 2021 (Policy D3), and the National Design Guide. They promote high-quality employment space, improved permeability, appropriate interface with adjacent uses, and sustainability features. While the implemented scheme reflects operational and viability considerations, it nevertheless substantially aligns with the objectives of the site allocation and demonstrates that the site can come forward in a well-designed and policy-compliant form.

Q7.123: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response (EJ/MH)

430. Yes, there is a reasonable prospect that site URB.32: Claverings Industrial Estate will be viably developed within the timeframe envisaged by the Local Plan.
431. The site benefits from a recent planning permission (ref: 24/03805/FUL) for redevelopment to deliver modern employment floorspace in Use Classes E(g)(ii)/(iii),

B2, and/or B8. This permission confirms the commercial and planning viability of intensification and provides a clear pathway for delivery within the Plan period.

Q7.124: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

432. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
433. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
434. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.33: 6 Morson Road

Q7.125: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

435. The Council considers that there is no substantive evidence to suggest the site should not be allocated in the Local Plan. The full range of factors including biodiversity, flood risk, infrastructure capacity, transport, contamination, and heritage has been assessed as part of the site selection process, summarised in the Site Allocation Topic Paper [TOP2] and the Site Assessment Spreadsheet (E.14.1-SAS2). The site is within a designated Strategic Industrial Location (SIL), has no overriding environmental or physical constraints, and is suitable for employment intensification. The Council is satisfied that the planning balance has been appropriately struck, and the allocation is sound and justified.

Q7.126: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response

436. The scale and density of development is appropriate to secure sustainable development and reflects the strategic objective of optimising employment land within SILs. The allocation is informed by the HELAA (HOU1 and HOU10) and the Employment Land Review (EMP1). The Employment Land Review (paragraph 10.43) identifies a baseline intensification capacity of 2,600 sqm of floorspace, which is considered achievable in the absence of a developer-led proposal. This approach supports optimisation while maintaining deliverability and commercial viability in accordance with Policy D3 of the London Plan. The site also falls within a tall building zone (Appendix D, DES12, Area I.8), creating the opportunity for additional intensification if appropriate.
437. The infrastructure implications of development have been reviewed through the Infrastructure Delivery Plan (IDP), which confirms that the site can be brought forward within existing utilities and transport network capacities. No critical infrastructure dependencies have been identified for delivery of this quantum of employment space. Further on-site requirements, such as access arrangements and servicing, will be addressed at the planning application stage in accordance with normal practice for industrial intensification schemes.
438. The design principles for the site are consistent with the NPPF, the London Plan 2021, and the National Design Guide. They require active frontages and perimeter

greening where appropriate, to ensure high-quality and legible development that integrates well with the wider Brimsdown employment area. These principles provide a proportionate and flexible framework to guide future applications.

Q7.127: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

439. Yes. The site at URB.33: 6 Morson Road is in ownership by Tarmac Trading Limited, who have promoted the site for continued and intensified employment use. This aligns with the proposed land use in the site allocation and reflects ongoing commercial interest in delivering employment floorspace in this Strategic Industrial Location. Given the site's operational nature, its established infrastructure, and market signals from the landowner, the Council considers there is a reasonable prospect that the site could be viably developed at the point envisaged within the Plan period.

Q7.128: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

440. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).

441. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.

442. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.34: 5 Picketts Lock Lane

Q7.129: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**

- green infrastructure or agricultural land
- landscape quality and character
- heritage assets
- strategic and local infrastructure including transport
- the efficient operation of the transport network and highway safety
- contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk
- open space, recreational facilities and public rights of way

Council response

443. The Council considers that there is no substantive evidence to suggest the site should not be allocated in the Local Plan. The site selection process has carefully considered all relevant factors, including biodiversity, flood risk, infrastructure, transport connectivity, and land contamination. These matters are addressed in the Site Allocation Topic Paper [**TOP 2**] and the Site Assessment Spreadsheet (E.14.1-SAS2). There are no overriding environmental, heritage, or infrastructure constraints that would preclude the site's development. The Council is satisfied that the allocation is justified and represents a sound and deliverable component of the spatial strategy.

Q7.130: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) **The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) **Infrastructure requirements.**
- c) **Design principles.**

Council response

444. The proposed scale and density of development are considered appropriate and consistent with national policy objectives to optimise the use of land within Strategic Industrial Locations (SILs). The allocation has been assessed through the Council's site selection process [**TOP2**] and tested via the Housing and Economic Land Availability Assessment (HELAA) [HOU1, HOU10]. The Employment Land Review

[EMP1, Table 10.4] recognises that, in the absence of a specific developer-led scheme, the scope for further intensification is limited due to the high existing site coverage. This reflects prevailing market conditions and site-specific characteristics, and ensures that the proposed quantum of development remains viable, achievable, and in accordance with Policy D3 of the London Plan.

445. Infrastructure requirements associated with the modest uplift in employment capacity are considered proportionate and manageable. The Infrastructure Delivery Plan (IDP) confirms that no critical infrastructure upgrades are required to bring the site forward. The site is located within an established industrial area with access to existing utilities, servicing infrastructure, and road connections. Where required, localised improvements can be secured through planning obligations or site-specific mitigation at the application stage.
446. The design principles have been developed in line with the NPPF 2023 (paragraphs 132 and 135), the London Plan 2021 (Policy D3), and the National Design Guide. These provide a proportionate and practical framework for delivering functional, high-quality employment floorspace. The policy seeks enhancements such as active frontages, improved site access, and perimeter greening to ensure a safe, attractive, and well-integrated working environment within the wider Brimsdown industrial area.

Q7.131: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

447. Yes. The site has been promoted by the landowner, the Local Authorities' Mutual Investment Trust, for redevelopment for E(g)(ii), E(g)(iii), B2 and B8 employment uses. This aligns with the land use requirements set out in the site allocation and confirms landowner intent to bring the site forward. On this basis, the Council considers there is a reasonable prospect that site URB.34 can be viably developed at the point envisaged within the plan period.

Q7.132: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

448. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
449. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.

450. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.35: Riverwalk Business Park

Q7.133: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

451. The Council considers there is no substantive evidence to suggest that the site should not be allocated in the Local Plan. All relevant constraints have been assessed in detail through the site selection process set out in the Site Allocation Topic Paper [TOP2] and the Site Assessment Spreadsheet (E.14.1-SAS2). The site is previously developed land within a Strategic Industrial Location (SIL), and no insurmountable issues have been identified in relation to biodiversity, flood risk, contamination, or transport. The allocation reflects the borough's employment-led spatial strategy and is fully justified.

Q7.134: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response

452. The proposed scale and density of employment development is appropriate to ensure sustainable and efficient use of industrial land. This is supported by evidence from the HELAA (HOU1, HOU10) and the Employment Land Review [EMP1], which assessed the intensification potential of SILs, including Riverwalk Business Park. The site benefits from an extant planning permission (21/04302/FUL), which demonstrates that the quantum of development proposed is deliverable and has already been accepted in planning terms.
453. The site is capable of being delivered without reliance on major new infrastructure. Infrastructure requirements have been assessed through the Infrastructure Delivery Plan (IDP) and are considered proportionate to the scale of employment intensification proposed. Existing utilities and the local transport network can accommodate the proposed development, subject to standard site-specific mitigation secured through the development management process.
454. The design principles have been developed in line with the NPPF 2023 (paragraphs 132 and 135), the London Plan 2021 (Policy D3), and the National Design Guide. The principles reflect those embedded in the extant planning permission (21/04302/FUL) and support the creation of a functional and attractive employment environment that enhances operational efficiency while ensuring high-quality design and integration with the surrounding industrial context.

Q7.135: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

455. Yes. There is a reasonable prospect that site URB.35: Riverwalk Business Park could be viably developed at the point envisaged. The site benefits from an extant and implemented planning permission (ref: 21/04302/FUL) for redevelopment to provide a warehouse (Use Class B2/B8). Implementation of the permission confirms both the commercial deliverability and viability of the proposed development, and demonstrates that the site is already actively being brought forward in line with the Local Plan's spatial strategy.

Q7.136: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

456. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
457. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.
458. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.

URB.36: Church Street Recreation Ground

Q7.137: Is there any substantive evidence to suggest the site in question should not be allocated based on one or more of the following factors, where relevant:

- **Biodiversity**
- **green infrastructure or agricultural land**
- **landscape quality and character**
- **heritage assets**
- **strategic and local infrastructure including transport**
- **the efficient operation of the transport network and highway safety**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk**
- **open space, recreational facilities and public rights of way**

Council response

459. The Council considers that there is no substantive evidence to suggest that the site should not be allocated in the Local Plan. All relevant planning considerations,

including biodiversity, green infrastructure, landscape, heritage, flood risk, contamination, and transport impacts, have been fully assessed as part of the site selection process. This is documented in the Site Allocation Topic Paper [TOP2] and the Site Assessment Spreadsheet (E.14.1-SAS2). The proposed use is appropriate in terms of land use, and the planning balance has been justified. The allocation supports the provision of essential social infrastructure while ensuring minimal impact on the openness and function of Metropolitan Open Land (MOL).

Q7.138: Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**
- b) Infrastructure requirements.**
- c) Design principles.**

Council response

460. The proposed scale and density of development is appropriate to deliver a sustainable form of development, consistent with the site's MOL designation and its civic function. The proposed crematorium is a low-intensity, low-rise building with a modest footprint. This scale of development allows for the continued open character of the surrounding landscape while providing necessary community infrastructure. The justification is set out in the HELAA (HOU1, HOU10) and Site Selection Topic Paper [TOP2], where the site was assessed as suitable for this type of development.
461. The development is not dependent on strategic infrastructure upgrades. Infrastructure needs associated with the site, including access, utilities, and service provision, are modest and proportionate to the scale of development proposed. These requirements have been assessed through the Infrastructure Delivery Plan (IDP) and can be secured through the planning application process. The proposed use complements the site's wider function as MOL and will enhance social infrastructure provision in the borough.
462. The design principles have been developed in line with the NPPF 2023 (paragraphs 132 and 135), the London Plan 2021 (Policy D3), and the National Design Guide. They promote a high-quality design that is respectful of the site's MOL status, retains mature trees and green infrastructure, and integrates sensitively with the surrounding recreational and landscape setting.

Q7.139: Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?

Council response

463. Yes, there is a reasonable prospect that site URB.36: Church Street Recreation Ground could be viably developed at the point envisaged in the Local Plan period.
464. This allocation is located within the medium value area of the Borough, as defined in the Whole Plan Viability Assessment **[VIA1]**, (HDH Planning & Development Ltd, June 2023). The WPVA models a range of brownfield typologies (Typologies 1–19) representative of the types of development likely to come forward across Enfield, including mid-density flatted development on urban sites.
465. Church Street Recreation Ground is a Council-owned site and is expected to accommodate new housing alongside the re-provision and improvement of open space and play facilities, rather than result in net loss of public space. The anticipated typology is a modest flatted development in a medium value area.
466. According to the WPVA brownfield development in medium value areas is generally viable with 35% affordable housing, even when applying the full suite of emerging policy requirements (see VIA1, Table 10.8a, mislabelled as 10.78a, p.156).
467. This includes compliance with policies on accessible housing (M4(2)/M4(3)), water efficiency, 10% Biodiversity Net Gain, zero carbon (regulated and unregulated), Mayoral and LBE CIL, and developer contributions.
468. Paragraphs 10.34 to 10.57 of VIA1 explain that while tall flatted development is less viable, mid-rise or lower-density flatted development is shown to be deliverable, particularly in public ownership or where delivery is Council-facilitated.
469. The Council acknowledges that not all sites may deliver fully policy-compliant schemes. In such cases, the WPVA recommends a site-specific viability assessment at application stage to inform delivery decisions (VIA1, para 12.87).
470. Given the above, and considering the Council's control of the land and ability to phase or support delivery, the site has a reasonable prospect of coming forward viably within the Plan period.

Q7.140: Where relevant, are the suggested modifications set out in document E6.1 necessary to make the Plan sound?

Council response

471. The Council considers that the Plan as submitted is sound and satisfies the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
472. The suggested modifications in document E6.1 have been identified by the Council as potential improvements to clarify policy intent, reduce ambiguity, and improve consistency across the Plan. While these modifications are not required to make the

Plan sound, the Council believes they would enhance the Plan's effectiveness and assist applicants and decision-makers in applying its policies.

473. The Council would therefore welcome the Inspector's consideration of these suggested changes as minor (Additional) Modifications where appropriate. Should the Inspector consider that any of the proposed modifications are necessary for soundness, the Council would be content to consult on them as Main Modifications as part of the examination process.