

Enfield Council

**Enfield Local Plan
Integrated Impact
Assessment
Publication stage
(Regulation 19
consultation)**

Final report

Prepared by LUC
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Enfield Council

Enfield Local Plan Integrated Impact Assessment
 Publication stage (Regulation 19 consultation)

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Chapter 1

Introduction

1.1 Enfield Council commissioned LUC in March 2021 to carry out an Integrated Impact Assessment (IIA), comprising Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Community Safety Impact Assessment (CSIA), of the Enfield Local Plan. As explained later in this chapter, the SA/SEA, HIA, EqIA and CSIA have been undertaken together as part of the IIA. Therefore, for simplicity within this report we mostly refer just to the IIA, which should be taken as incorporating SA/SEA, HIA, EqIA and CSIA.

1.2 IIA is an assessment process designed to consider and report upon the significant sustainability issues and effects of emerging plans and policies, including their reasonable alternatives. IIA iteratively informs the plan-making process by helping to refine the contents of such documents, so that they maximise the benefits of sustainable development and avoid, or at least minimise, the potential for adverse effects.

The Local Plan area

1.3 The London Borough of Enfield (LBE) lies within the north of Greater London (see **Figure 1.1**) and is home to approximately 333,000 people and 130,000 households. The Borough sits entirely within the M25, north of the River Thames. Central London is approximately 15 miles to the south. LBE shares boundaries with three other London Boroughs: Waltham Forest to the east, Haringey to the south and Barnet to the west. Enfield Borough adjoins the counties of Hertfordshire and Essex to the north and east, respectively. It is also positioned within the London-Stansted-Cambridge Innovation Corridor.

1.4 LBE is faced by a significant number of planning constraints, specifically the Green Belt which covers 3,000ha (37%) of the Borough, Metropolitan Open Land which covers 249ha (3%) of the Borough and over 400ha (5%) of industrial land, of which approximately 326ha (4%) is classified as Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). There are also a number of environmental constraints towards the east of the Borough.

Outline of the Local Plan and its objectives

1.5 Schedule 2 of the SEA Regulations requires the environmental report (i.e. the IIA) to provide/describe:

(a) *"an outline of the contents and main objectives of the Plan and its relationship with other relevant plans or programmes"*

1.6 The new Enfield Local Plan will cover the period to 2041 and alongside the new Traveller Local Plan (anticipated for adoption in 2026) will replace the Council's current suite of Development Plan Documents. The Council's current suite of Development Plan Documents comprises the London Plan (2021), Core Strategy (2010), Development Management Document (2014), and Area Action Plans for the North Circular Road (2014), North East Enfield (2016) and Edmonton Leaside (2020). The new Local Plan will address local housing need, the economy, environmental considerations including the climate emergency, community infrastructure as well as strategic infrastructure needs and will assist the Council in its move towards carbon neutrality. The Plan will make site-specific allocations to meet identified needs of the future. Once the Council has fully engaged with the local community and the Plan has been through all of its formal statutory stages, it will be adopted as the development plan for the Borough and used to assess planning applications, alongside the Traveller Local Plan.

1.7 Enfield Council undertook a preliminary consultation with local communities on the emerging Local Plan between December 2015 and February 2016. Then, between December 2018 and February 2019, the Council consulted upon the Issues and Options version of the Local Plan as part of the Regulation 18 stage of plan preparation. This initial Regulation 18 document focused on exploring broad issues and options but did not indicate the Council's preferred approach in terms of the scale of growth to be planned for nor the proposed spatial strategy. The Council then prepared the 'Enfield Local Plan: Main Issues and Preferred Approaches' document, which was subject to consultation between June and September 2021, also forming part of

the Regulation 18 stage. The purpose of this consultation was for the Council to test and refine its approaches, gain feedback on the scope of the new Local Plan, its strategic objectives, the main planning issues and opportunities in LBE, and the possible policy approaches to address these before making a decision on the Plan it wished to take to the next stage of the plan-making process. The Council also wanted to learn if there were any issues, opportunities or policy alternatives that had not yet been identified, but which should be considered.

1.8 The Council has now prepared the Publication Version of the Local Plan. Subject to Full Council approval at its meeting on 6 March 2024, the Local Plan will be subject to consultation between 7 March (or thereafter) and around 19 April 2024. The document comprises the following main components:

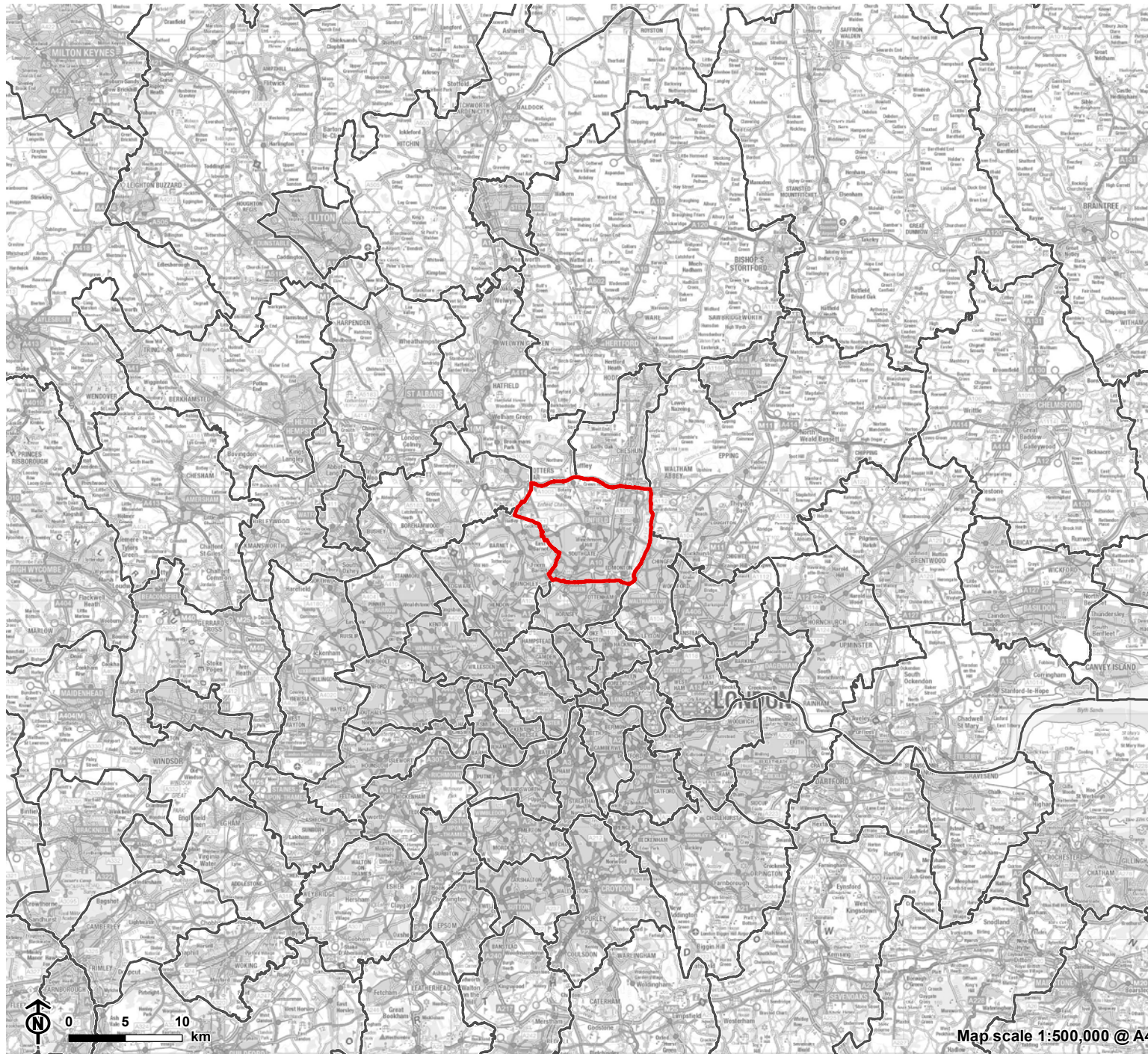
- Spatial vision setting out what Enfield will be by 2041¹ and underpinned by four guiding themes. Further detail is then provided by 20 strategic objectives.
- 40 strategic policies (including 11 place policies) and 58 development management policies across the following topics:
 - Good growth in Enfield;
 - Places;
 - Sustainable Enfield;
 - Addressing equality and improving health and wellbeing;
 - Blue and green Enfield;
 - Design and character;
 - Homes for all;
 - Economy;
 - Town centres and high streets;
 - Rural Enfield;
 - Culture, leisure and recreation;
 - Movement and connectivity;
 - Environmental protection; and
 - Delivering and monitoring.



1.9 Since consulting on the Issues and Options version of the Local Plan, the Council declared a climate emergency in July 2020. Enfield Council is committed to becoming a carbon neutral organisation by 2030 and a carbon neutral Borough by 2040. All services across the Council have an important part to play and the Local Plan has a key role in helping to reduce carbon emissions. In this respect, it must be recognised that the Local Plan is only one of the tools that will support a reduction in carbon emissions across the Borough. It cannot achieve this on its own as the Local Plan is primarily a land use document and any proposed policies need to comply with the Government requirements on for example, the number of houses that need to be built in the Borough. Nonetheless, the target of achieving carbon neutrality must be central to the Local Plan-making process and the IIA.

¹ The Plan period at Regulation 18 stage was up to 2039 but has since been revised to 2041 at Regulation 19 stage.



Figure 1.1: London Borough of Enfield



-  London Borough of Enfield boundary
-  Other local authority boundary

Sustainability Appraisal and Strategic Environmental Assessment

1.10 Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232). As set out in the explanatory Memorandum accompanying the Brexit amendments, they are necessary to ensure the law functions correctly following the UK's exit from the EU. No substantive changes are being made by this instrument to the way the SEA regime operates. Therefore, the SEA regulations remain in force and it is a legal requirement for Enfield's Local Plan to be subject to SA and SEA throughout its preparation.

1.11 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the Government's Planning Practice Guidance²), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA/SEA process – this is the process that is being undertaken for the Enfield Local Plan, and within this report the term 'SA' should be taken to mean 'SA incorporating the requirements of the SEA Regulations'. In addition to SA/SEA, further impact assessments are being carried out on the Enfield Local Plan as described below, therefore, instead of 'SA' and 'Sustainability Appraisal Report', the term 'Integrated Impact Assessment' and 'IIA' are being used in this report.

1.12 The SA process comprises a number of stages, as shown below.

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.

Stage B: Developing and refining options and assessing effects.

Stage C: Preparing the Sustainability Appraisal (or 'IIA') Report.

Stage D: Consulting on the Local Plan and the SA (IIA) Report.

Stage E: Monitoring the significant effects of implementing the Local Plan.

Health Impact Assessment

1.13 Although not a statutory requirement, Health Impact Assessment (HIA) aims to ensure that health-related issues are integrated into the plan-making process. Sustainability objectives that address health issues have been included as part of the IIA process and in this way the HIA of the Enfield Local Plan is being carried out as part of the IIA. Recommendations will be made in relation to how the health-related impacts of the Local Plan can be optimised as the options are developed into detailed policies and site allocations.

Equalities Impact Assessment

1.14 The requirement to undertake formal Equalities Impact Assessment (EqIA) of development plans was introduced in the Equality Act 2010 but was abolished in 2012. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.

1.15 In fulfilling this duty, many authorities still find it useful to produce a written record of equality issues having been specifically considered. Therefore, an EqIA is being carried out as part of the IIA, setting out how the Local Plan is likely to be compatible or incompatible with the requirements of the Equality Act 2010.

Community Safety Impact Assessment

1.16 The purpose of the Community Safety Impact Assessment (CSIA) will be to ensure that the Local Plan vision, objectives, policies and sites do not have a detrimental impact on community safety and, where possible, improve the existing situation.

² Department for Levelling Up, Housing and Communities (last updated 24 June 2021). Planning Practice Guidance. (see <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>)

1.17 The CSIA will be undertaken in accordance with the requirements of the Crime and Disorder Act 1998 and the Police and Justice Act 2006, as amended, and will fulfil the requirement to carry out a review of the levels and patterns of crime, disorder and community safety in the area when developing a strategy or plan.

Habitats Regulations Assessment

1.18 The requirement to undertake Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007³. The currently applicable version is 'The Conservation of Habitats and Species Regulations 2017 (SI 2017/1012), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579)⁴ (hereafter referred to as the 'Habitats Regulations'). When preparing the Local Plan, the Council is therefore required by law to carry out an HRA, and because it is a separate legal requirement to SA/SEA, it is being undertaken and reported on separately from the IIA.

1.19 The Council can commission consultants to undertake HRA work on its behalf (and LUC has been commissioned to do the HRA) and the work documented in separate HRA reports is then sent to and considered by the Council as the 'competent authority'. The Council will consider the HRA and may only progress the Local Plan if it considers that it will not adversely affect the integrity of any European site or have a significant effect on qualifying habitats or species for which the European sites are designated for, or if Imperative Reasons of Overriding Public Interest (IROPI) are identified. The requirement for authorities to comply with the Habitats Regulations when preparing a plan is also noted in the Government's online Planning Practice Guidance (PPG).⁵

1.20 The HRA findings have been considered in the IIA where relevant, for example to inform judgements about the likely effects of potential development locations on biodiversity.

Meeting the requirements of the SEA Regulations

1.21 Table 1.1 signposts the relevant sections of the IIA Report that are considered to meet the SEA Regulations requirements.

1.22 SEA guidance recognises that data gaps will exist but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. Where there are data gaps in the baseline and forthcoming reports, these are highlighted in the text. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis. Relevant baseline information will be updated during the IIA process as and when data are published.

Structure of the IIA Report

1.23 This chapter has described the background to the production of the Enfield Local Plan as well as its contents and the requirement to undertake SA and other assessment processes. The remainder of this IIA Report is structured into the following chapters:

- **Chapter 2** describes the approach that is being taken to the IIA of the Enfield Local Plan.
- **Chapter 3** describes the relationship between the Enfield Local Plan and any other relevant plans, policies and programmes; summarising the environmental, social and economic characteristics of the Borough and identifying the key sustainability issues.
- **Chapter 4** presents the IIA findings for the Enfield Local Plan vision, objectives and strategic policies SP SS1 and SP SS2 from Chapter 2 of the Enfield Local Plan.
- **Chapter 5** presents the IIA findings for the Place policies from Chapter 3 of the Enfield Local Plan.

³ The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) SI No. 2007/1843. TSO (The Stationery Office), London.

⁴ The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), TSO (The Stationery Office), London.

⁵ UK Government (2019). Guidance: Appropriate assessment (see <https://www.gov.uk/guidance/appropriate-assessment>).

- **Chapter 6** presents the IIA findings for the strategic and development management policies from Chapters 4 to 15 of the Enfield Local Plan.
- **Chapter 7** describes the potential cumulative effects of the Enfield Local Plan.
- **Chapter 8** suggests a potential monitoring framework and indicators that could be used.
- **Chapter 9** sets out the conclusions and next steps for the IIA process.

1.24 A separate volume of appendices has also been prepared as follows:

- **Appendix A** presents the consultation comments received in relation to the February 2020 IIA Scoping Report produced by AECOM and the June 2021 IIA Report produced by LUC that accompanied the 'Enfield Local Plan: Main Issues and Preferred Approaches' document, and provides a response to each them.
- **Appendix B** sets out the assumptions used in determining significant effects for the site options.
- **Appendix C** presents the updated review of relevant plans, policies and programmes.
- **Appendix D** presents the updated baseline information for the Borough.
- **Appendix E** presents the IIA findings for the spatial strategy options.
- **Appendix F** presents the IIA findings for the site options 2023.
- **Appendix G** presents the IIA findings for the site options 2021.
- **Appendix H** presents the IIA findings for the Enfield Local Plan Issues and Options 2018.
- **Appendix I** produced by the Council, presents their audit trail of the site selection process.

Table 1.1: Meeting the requirements of the SEA Regulations

SEA Regulations requirements	Where covered in this report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated (Reg. 12). The information to be given is (Schedule 2):	
a. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapters 1 and 3, and Appendix C
b. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Chapter 3 and Appendix D
c. The environmental characteristics of areas likely to be significantly affected.	Chapter 3 and Appendix D
d. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Chapters 1 and 3, and Appendix D
e. The environmental protection, objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Chapter 3 and Appendix C

SEA Regulations requirements	Where covered in this report
<p>f. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).</p>	<p>Chapters 4, 5, 6 and 7, and Appendices E, F, G and H</p>
<p>g. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</p>	<p>Chapters 4, 5, 6 and 7, and Appendix F</p>
<p>h. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p>	<p>Chapters 2, 4, 5 and 6, and Appendices B and E-I</p>
<p>i. A description of measures envisaged concerning monitoring in accordance with Reg. 17.</p>	<p>Chapter 8</p>
<p>j. A non-technical summary of the information provided under the above headings.</p>	<p>A separate non-technical summary has been prepared to accompany this IIA Report</p>
<p>The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3)).</p>	<p>Addressed throughout this IIA Report</p>
<p>Consultation requirements</p>	
<p>■ Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5)).</p>	<p>Consultation on the IIA Scoping Report was undertaken in early 2020</p>
<p>■ Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13).</p>	<p>Subject to approval at its Full Council meeting on 6-March 2024, consultation will be undertaken in relation to the Reg. 19 Publication Version Local Plan between 7 March (or shortly thereafter) and 19 April 2024</p>
<p>■ Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).</p>	<p>Unlikely to be relevant to the Local Plan, as there will be no effects beyond the UK</p>
<p>Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)</p>	

SEA Regulations requirements	Where covered in this report
<p>Provision of information on the decision:</p> <p>When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> ■ the plan or programme as adopted; ■ a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered into have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and ■ the measures decided concerning monitoring. 	<p>To be addressed after the Local Plan is adopted</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Reg. 17).</p>	<p>Requirement will be met after adoption of the Local Plan</p>
<p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.</p>	<p>This report has been produced in line with current guidance and good practice for SA/SEA and this table demonstrates where the requirements of the SEA Regulations have been met</p>

Chapter 2 Methodology

2.1 In addition to complying with legal requirements, the approach being taken to the IIA of the Enfield Local Plan is based on current good practice and the guidance on SA/SEA set out in the Government's Planning Practice Guidance. This calls for the IIA to be carried out as an integral part of the plan-making process and **Figure 2.1** sets out the main stages of the plan-making process and shows how these correspond to the SA/SEA (in this case IIA) process.

Figure 2.1: Corresponding stages in plan making and SA/SEA (in this case IIA)

Local Plan Step 1: Evidence Gathering and Engagement
SA/IIA Stages and Tasks
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope <ol style="list-style-type: none"> 1. Identifying other relevant policies, plans and programmes, and sustainability objectives 2. Collecting baseline information 3. Identifying sustainability issues and problems 4. Developing the SA/IIA Framework 5. Consulting on the scope of the SA/IIA
Local Plan Step 2: Production
SA/IIA Stages and Tasks
Stage B: Developing and refining options and assessing effects <ol style="list-style-type: none"> 1. Testing the Local Plan objectives against the SA/IIA Framework 2. Developing the Local Plan options 3. Evaluating the effects of the Local Plan 4. Considering ways of mitigating adverse effects and maximising beneficial effects 5. Proposing measures to monitor the significant effects of implementing the Local Plan
Stage C: Preparing the Sustainability Appraisal (or IIA) Report <ol style="list-style-type: none"> 1. Preparing the SA/IIA Report
Stage D: Seek representations on the Local Plan and the Sustainability Appraisal (or IIA) Report <ol style="list-style-type: none"> 1. Public participation on Local Plan and the SA/IIA Report 2. (i) Appraising significant changes
Local Plan Step 3: Examination
SA/IIA Stages and Tasks
Stage D (cont.) <ol style="list-style-type: none"> 2. (ii) Appraising significant changes resulting from representations
Local Plan Step 4 & 5: Adoption and Monitoring

SA/IIA Stages and Tasks
Stage D (cont.) 3. Making decisions and providing information
Stage E: Monitoring the significant effects of implementing the Local Plan 1. Finalising aims and methods for monitoring 2. Responding to adverse effects

Stage A: Scoping

2.2 The IIA process began with the production of an IIA Scoping Report for the Local Plan, prepared by AECOM (February 2020). The Scoping stage of the IIA involves understanding the environmental, social and economic baseline for the Plan area, as well as the sustainability policy context and key sustainability issues.

Review policies, plans and programmes to establish policy context

2.3 The Local Plan is not prepared in isolation; rather it is prepared within the context of other policies, plans and programmes. The SEA Regulations require the environmental report to describe the relationship of the plan with other relevant plans and programmes. It should also be consistent with environmental protection legislation and support attainment of sustainability objectives that have been established at the international, national and regional/sub-regional levels.

2.4 The February 2020 IIA Scoping Report (pre-consultation) contains a review of relevant policies, plans and programmes that were considered to be relevant to the scope of the Local Plan. This review was updated by AECOM and the IIA Scoping Report republished in May 2020 (post-consultation). The review of relevant policies, plans and programmes has since been updated by LUC and presented in **Appendix C** of this IIA Report. A summary of the relevant international, national and sub-national level policies, plans and programmes is provided in **Chapter 3**.

Collect baseline information to establish sustainability context

2.5 Information on existing environmental, social and economic conditions in the plan area provides the baseline against which the plan's effects can be assessed in the IIA and monitored during the plan's implementation. Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the local plan to understand the likely future sustainability conditions in the absence of the local plan.

2.6 The SEA Regulations require the environmental report (in this case the IIA Report) to describe relevant aspects of the current state of the environment and how they are likely to evolve without the plan. An understanding of this likely future, together with the assessed effects of the plan itself, additionally allows the IIA to report on cumulative effects, another requirement of the SEA Regulations.

2.7 The SEA Regulations require assessment of effects in relation to the following 'SEA topics': biodiversity, population, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape, and the inter-relationship between these. Baseline information was therefore collected in relation to the SEA topics and additional sustainability topics were also addressed, covering broader socio-economic issues such as housing, access to services, crime and safety, education and employment. This reflects the integrated approach that is being taken to the SA/SEA and other impact assessment processes. Baseline information for the Borough was presented in the IIA Scoping Report produced by AECOM. Any updates since the publication of the May 2020 IIA Scoping Report have been reflected in **Appendix D** of this IIA Report, with a summary provided in **Chapter 3**.

Identify sustainability issues

2.8 The baseline information also allows the identification of sustainability issues, including problems as required by the SEA Regulations. The sustainability issues and their likely evolution without the Local Plan were initially presented in the IIA Scoping Report but have since been updated and are presented in **Appendix D** of this IIA Report, under the headings 'Likely future changes without the Local Plan'.

Develop the IIA framework

2.9 The relevant sustainability objectives identified by the review of other policies, plans and programmes together with the key sustainability issues facing the Borough, identified by the collection and review of baseline information in the IIA Scoping Report, informed the development of a set of sustainability objectives (the 'IIA framework') against which the effects of the Plan would be assessed. These objectives also take into account the types of issues that are capable of being affected by the land use planning system. LUC reviewed these objectives and made some refinements to the original IIA framework, re-presenting it in the June 2021 IIA Report that accompanied the 'Enfield Local Plan: Main Issues and Preferred Approaches' document.

2.10 Development of an assessment framework is not a requirement of the SEA Regulations but is a recognised way in which the likely sustainability effects of a plan can be transparently and consistently described, analysed and compared. The IIA framework comprises a series of sustainability objectives and supporting criteria that are used to guide the appraisal of the policies and proposals within a plan. An explanation of the development of the IIA framework for the Enfield Local Plan is provided further ahead in this chapter and the IIA framework is presented in **Table 3.2**.

Consult on the scope and level of detail of the IIA

2.11 Public and stakeholder participation is an important part of the IIA and wider plan-making processes. It helps to ensure that the IIA report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development.

2.12 The SEA Regulations require the statutory consultation bodies (the Environment Agency, Historic England and Natural England) to be consulted "*when deciding on the scope and level of detail of the information that must be included*" in the IIA report. The scope and level of detail of the IIA is governed by the IIA framework and the statutory consultees have therefore been consulted on this when it was developed as part of the scoping process for the IIA. The Council undertook some pre-engagement with the statutory consultees before formal consultation on the IIA Scoping Report was undertaken in early 2020.

2.13 AECOM made some amendments to the review of policies, plans and programmes, the baseline information, key sustainability issues, the IIA framework and the IIA assumptions following consultation and reflected these updates in a revised IIA Scoping Report published in May 2020.

2.14 LUC reviewed the IIA framework before carrying out the assessment of the Regulation 18 Enfield Local Plan: Main Issues and Preferred Approaches document, and made some further minor revisions to the framework, as described later in this chapter.

Stage B: Developing and refining options and assessing effects

2.15 Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the IIA help to identify where there may be 'reasonable alternatives' to the options being considered for a plan.

2.16 In relation to the IIA Report that needs to be prepared for the Enfield Local Plan, Part 3 of the SEA Regulations 12 (2) requires that:

"The (environmental or SA/IIA) report must identify, describe and evaluate the likely significant effects on the environment of—

(a) implementing the plan or programme; and

(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme."

2.17 Schedule 2 (h) of the SEA Regulations requires that the Environmental (or SA/IIA) Report includes a description of:

"(h) an outline of the reasons for selecting the alternatives dealt with"

2.18 The SEA Regulations therefore require that when considering the policies and site allocations for inclusion in a plan, any alternative policy approaches or site options that are 'reasonable' must be subject to appraisal. Therefore, alternatives that are

not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or site allocation options that are unavailable or undeliverable.

2.19 The IIA findings are not the only factors taken into account when plan-makers are determining a preferred option to take forward in a plan. There will often be an equal number of positive and negative effects identified by the IIA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for the plan.

2.20 The consideration of reasonable alternatives has been a key focus of attention within the IIA process. This section provides an overview of how policy and site options have been identified by Enfield Council, which ones are reasonable alternatives and therefore have been subject to IIA, and how this appraisal work has fed into the development of Enfield's Local Plan.

2015-17 Early Issues and Options (Regulation 18)

2.21 An early Issues and Options consultation was undertaken by Enfield Council in 2015-16 which sought residents' views on the priorities for future growth in the Borough, including five options (do nothing, infill and intensify, optimise growth corridors, existing Green Belt settlements and industrial land release). This was an early opinion-seeking consultation only and the SA/IIA process had not yet commenced. The 2018 Issues and Options document notes that the 2015-16 consultation highlighted clear concerns about what would happen if growth were not properly managed and accommodated, including:

- Overcrowding and a lack of truly affordable housing.
- A lack of high quality healthcare facilities and other infrastructure provisions to cope with the increases in population.
- Increasing inequalities between different areas of the Borough and about development pressures on green spaces.

2.22 In 2017, the Council undertook another consultation exercise, the 'Enfield Conversation', which highlighted further local concerns and priorities. The Enfield Conversation engaged a wider mix of residents beyond those traditionally engaged in the plan-making process, through a series of residents' workshops. The discussions during the workshops found:

- Building homes in the Upper Lee Valley remained the most popular spatial choice followed by the town centres, the A10 corridor and on Council estates.
- There was some support for low density housing in the Green Belt but the general view was that high-density apartments would be the most efficient way of delivering more housing.
- There was concern that more housing would not be matched by the appropriate supporting infrastructure.

2018 Issues and Options (Regulation 18)

2.23 Enfield Council prepared and consulted on a Regulation 18 Issues and Options document from December 2018 to February 2019. This document focussed on exploring broad issues and options but did not indicate a preferred approach, in terms of the scale of growth to be planned for, or in terms of a spatial strategy. Drawing on the outcomes of the early 2015-17 consultation and taking into account strategic priorities at the time and the National Planning Policy Framework (NPPF), in the 2018 Issues and Options Local Plan Enfield Council identified seven broad strategic growth options (for distributing housing and employment development across the Borough – see below) and a series of high-level policy options. The policy options fell into the following broad themes: historic environment, design, housing, economy, town centres, social infrastructure, green infrastructure, transport and sustainable infrastructure.

2.24 The seven broad strategic growth options in the 2018 Issues and Option document were:

- Option 1: Main town centres and areas around all stations;
- Option 2: Transport corridors;
- Option 3: Existing estate renewal and regeneration programmes;
- Option 4: Eastern corridor and low density industrial areas;
- Option 5: Future Crossrail 2 Growth Corridor;

- Option 6: The New Southgate and Upper Lee Valley Opportunity Areas; and
- Option 7: Strategic plan-led approach to Green Belt.

2.25 All of the strategic growth options and high-level policy options constituted reasonable alternatives and were subject to IIA. The results of LUC's appraisal of the reasonable alternatives considered in the 2018 Issues and Options document are presented in **Appendix H**.

2021 Main Issues and Preferred Approaches (Regulation 18)

2.26 Enfield Council worked on a further Regulation 18 consultation document, which it considered necessary in order to:

- Explore issues identified through the earlier Regulation 18 consultation.
- Respond to changes in government planning policy, the climate and nature emergencies, COVID-19, and the recently adopted London Plan.
- Reflect the new and updated evidence base.
- Identify a preferred spatial growth strategy and preferred policy options.

2.27 The 2021 Enfield Local Plan: Main Issues and Preferred Approaches was an advancement on the 2018-19 Issues and Options consultation. Although the document still discussed issues and presented some spatial and policy options, it also identified preferred options. The previous iteration of the IIA Report, published in June 2021, provided an appraisal of this document.

2.28 The June 2021 IIA Report has since been updated to provide an appraisal of, and accompany, the Regulation 19 Publication Version Local Plan (see below). The Regulation 18 policy appraisals have not been re-presented in this IIA Report but can be found in the June 2021 IIA Report.

2023 Publication Version Local Plan (Regulation 19)

2.29 The Publication Version Local Plan is the document to which this IIA Report concerns. The Publication Version Local Plan will be the version of the Local Plan submitted to the Planning Inspectorate for Examination on behalf of the Secretary of State.

2.30 The Publication Version Local Plan contains the Council's preferred policies. It has been prepared to be consistent with the National Planning Policy Framework and takes into account the Planning Practice Guidance, in addition to being prepared in light of the New London Plan adopted in March 2021 and the North London Waste Plan adopted in July 2022. Once adopted, the Local Plan will replace in entirety the following development plan and supplementary planning documents:

- Core Strategy (2010);
- Development Management Document (2014);
- Edmonton Leaside Area Action Plan (2020);
- North East Enfield Area Action Plan (2016); and
- North Circular Area Action Plan (2014).

Spatial strategy and housing growth options

Spatial strategy and housing growth options considered at Regulation 18 stage

2.31 The housing requirement to 2029 for all London Boroughs including Enfield is set by the London Plan (2021). For housing targets beyond 2029, the London Plan advises that each London Borough considers:

- site availability evidence within the 2017 Strategic and Housing Land Availability Assessment for London (which covers the Plan period to 2041);
- any local evidence of identified capacity (in consultation with the GLA);
- any additional capacity that could be delivered as a result of any committed transport infrastructure improvements; and

- the housing capacity assumptions applied in the London Plan for small sites.

2.32 The adopted London Plan does not meet the Objectively Assessed Housing Need (OAHN) as calculated by the Mayor at the time of preparing the London Plan, or the increased need as calculated by the revised Standard Method.

2.33 For Enfield, the London Plan provides a target of 1,246 homes per annum in the ten year period 2018/19 to 2028/29. The Enfield Local Plan, therefore, has to make provision for housing required between 2029 and the end of the Plan period (2039 at the time of Regulation 18 consultation but subsequently extended to 2041). LBE proposed three broad options at Regulation 18 stage:

- To deliver around 17,000 homes over the Plan period - 1,246 homes per year to 2029 and then reverting to the existing level of supply which is around 500 homes per year.
- To deliver 25,000 homes over the Plan period - 1,246 homes per year to 2029 and then continued per year across the Plan period.
- To deliver 55,000 homes across the Plan period: 1,246 houses per year plus the additional amount required to meet the gap of provision in relation to the OAHN.

2.34 LBE identified the medium growth option of around 25,000 homes over the Plan period as the preferred option in the Regulation 18 Draft Local Plan (Main Issues and Preferred Approaches).

2.35 Discussions were held between Enfield Council and LUC's IIA team regarding the spatial strategy options for distributing the different levels of growth that may be required during the Plan period (under a baseline, medium and high growth scenario as described in the Draft Local Plan). Various options were considered by Enfield Council and the IIA team helped to determine which were reasonable alternatives and should be subject to IIA, as shown in **Table 2.1**. Note there are a few more options presented in this table than in Table 2.2 of the Draft Local Plan as some options were identified but discounted quickly by the Council as not being realistic. Nevertheless, they were still considered to represent 'reasonable alternatives' in IIA terms, hence their inclusion in the IIA Report. The IIA findings relating to these spatial strategy options are presented in **Appendix E**.

2.36 The Council's reasons for selecting the preferred option at the time (Medium growth in the urban area with some Green Belt release) are summarised in the third column in **Table 2.1**, along with the reasons for discounting the other options.

Table 2.1: Reasonable alternative spatial strategy options considered during preparation of the Regulation 18 Enfield Local Plan

Spatial strategy options considered	Appraised as reasonable alternative in IIA Report?	Enfield Council's reason for selecting or discounting the option
<p>Option 1A: Baseline growth</p> <p>This is based on accommodating 17,000 new homes with some other land uses, including limited nature recovery and green and blue infrastructure improvements. Growth is distributed in the urban area only.</p>	Yes	<p>Discounted because it would not meet the required housing need that must be planned for, and would not deliver the mix of housing types needed (as it would require mostly flats in tall buildings).</p> <p>Other land uses requirements will not be met.</p>
<p>Option 1B: Baseline growth</p> <p>Similar to Option 1A, growth is distributed in the urban area and employment areas.</p>	Yes	<p>Discounted because it would not meet the required housing need that must be planned for, would not deliver the mix of housing types needed, and would require limited use of Strategic Industrial Locations (SILs) so would not be in conformity with the London Plan.</p> <p>Other land use requirements not met.</p>
<p>Option 2A: Medium growth</p>	Yes	<p>Discounted because it would not deliver the mix of housing types needed and would require use of SILs so would not be in conformity with the London Plan.</p>

Spatial strategy options considered	Appraised as reasonable alternative in IIA Report?	Enfield Council's reason for selecting or discounting the option
This is based on accommodating approximately 25,000 new homes in the urban area and employment areas.		Other land use requirements not met.
<p>Option 2B: Medium growth</p> <p>This is based on accommodating approximately 25,000 new homes with a full range of land uses, including extensive nature recovery and green and blue infrastructure investment with growth distributed in the urban area, employment areas and some release of the Green Belt.</p>	Yes	<p>Discounted because it would not deliver the mix of housing types needed, would require use of SILs so would not be in conformity with the London Plan, and Green Belt release which may be contrary to the NPPF.</p> <p>Other land use requirements not met.</p>
<p>Option 2C: Medium growth</p> <p>Similar to Option 2B, this option looks to accommodate 25,000 new homes, largely focused in the urban area some release of Green Belt. Growth is largely focused in the seven urban placemaking areas and the two rural placemaking areas. A zoning approach is taken to most of the rural areas to facilitate development of multi-layered mosaic of sustainable rural land uses and creation of National Park city designation area. No release of SIL.</p>	Yes	<p>Selected as Preferred Option because it would meet the required housing need that must be planned for and mix of housing types. Although it involves some limited Green Belt release, it would not require use of SILs.</p> <p>Other land use requirements met in full or close to full.</p> <p>Positive enhancements to existing employment areas.</p>
<p>Option 2D: Medium growth</p> <p>Similar to Options 2B and C, this option looks to accommodate 25,000 new homes, but focused in the urban area only.</p>	Yes	<p>Discounted because it would not meet the required housing need that must be planned for and would not deliver the mix of housing types needed (as it would require mostly flats in tall buildings).</p> <p>Other land use requirements not met.</p>
<p>Option 3A: High growth</p> <p>This option is based on accommodating 55,000 homes, largely delivered in the urban area only.</p>	Yes	Discounted because it would result in very high density development and tall buildings in the urban area resulting in significant change to the Borough's character and not deliver the mix of housing types needed.
<p>Option 3B: High growth</p> <p>Similar to Option 3A, but the focus is in the urban area and employment areas.</p>	Yes	Discounted because it would result in very high density development and tall buildings in the urban area resulting in significant change to the Borough's character and not deliver the mix of housing types needed. It would also require significant use of SILs contrary to London Plan policy.
<p>Option 3C: High growth</p> <p>Similar to options 3B and C, this is widespread growth across the Borough including the urban area, employment areas and the Green Belt.</p>	Yes	Discounted because it would result in very high density development and tall buildings in the urban area resulting in significant change to the Borough's character and not deliver the mix of housing types needed. It would also

Spatial strategy options considered	Appraised as reasonable alternative in IIA Report?	Enfield Council's reason for selecting or discounting the option
		require significant use of SILs and Green Belt release contrary to London Plan policy and the NPPF.
Option 3D: High growth Similar to Option 3A, growth is focused in the urban area and Green Belt.	Yes	Discounted because it would result in very high density development and tall buildings in the urban area resulting in significant change to the Borough's character and not deliver the mix of housing types needed. It would also require significant Green Belt release contrary to the NPPF.
Option 4: seeking to accommodate most growth outside the Borough.	No – not a reasonable alternative as it is outside the geographical scope of the Local Plan	Discounted because none of the neighbouring authorities were willing to take Enfield's housing and other land use requirements and the Borough would be likely to suffer decline or stagnation and be unable to lever in investment and infrastructure improvements etc.
Option 5: seeking to accommodate most of the development in the urban area to the east of the A10.	Yes	Discounted because it would result in very high density development and tall buildings in the urban area east of the A10 and would not meet the housing need or deliver the mix of housing types needed. It would also require significant use of SILs contrary to London Plan policy. It would not be able to address inequality and east/west imbalances and there could be stagnation of western areas in the Borough.
Option 6: seeking to accommodate majority of development in the urban area to the west of the A10.	Yes	As for Option 5 but could result in stagnation of eastern areas rather than western.

Spatial strategy options considered at Regulation 19 stage

2.37 Subsequent to the spatial strategy options considered at Regulation 18 stage in 2021, the Council identified additional urban sites, which in simple terms meant that the baseline level of growth achievable within the Borough increased.

2.38 In 2021, approximately 17,000 new homes could be accommodated over the Plan period (which was until 2039), within the urban area. At Regulation 19 stage, the urban sites capacity had increased to c. 28,000 homes. The additional capacity arose from a range of factors including the identification of new sites, updated assumptions on phasing, reviewed capacity estimates on urban sites, as well as the extension to the Plan period (to 2041). The Council considered that most of the additional sites would be suited to flatted development rather than more traditional family housing and that some of them would be subject to viability issues that would impact on the amount of affordable housing they could deliver.

2.39 In terms of the two rural placemaking areas (Crews Hill and Chase Park) – the Council recognised at Regulation 19 stage that it would take longer than had been anticipated in 2021 to develop these sites. Allowing for the preparation of a Supplementary Planning Document for Crews Hill, and the preparation and approval of a comprehensive masterplan for Chase Park, followed by preparation of planning applications and so on, it was now considered likely that Chase Park would see first completions in approximately 2029. Due to the complex landownership arrangements, the first completions at Crews Hill were now anticipated until the early 2030s.

2.40 The reasonable alternative spatial strategy options considered by the Council at Regulation 19 stage in light of this changed context are set out in **Table 2.2**.

2.41 At the Regulation 18 stage, a wide range of spatial strategy options were considered. Different levels of housing growth were assessed, as well as different strategies for accommodating the different levels of growth. Option 1A looked at accommodating some 17,000 new homes, with some other land uses, within the urban areas of the Borough only. The scale of new housing proposed under this option was based upon work undertaken by the Council, which involved an assessment of each site considered suitable for development, to determine the potential development capacity (taking into account site constraints, the character and scale of surrounding development etc).

2.42 Option 1B assumed the same scale of housing development, but with some development in employment areas. Option 2A assumed the same spatial distribution of development as in Option 1B, but to accommodate a higher level of housing growth (medium level of growth), higher development densities were needed, with taller buildings and less scope to reflect and preserve existing local character.

2.43 Since the Regulation 18 IIA work, the Council undertook a further call for sites, which identified additional opportunities for accommodating development within the urban areas of the Borough. The capacity on these additional sites was assessed in a comparable way to the assessment of sites that underpinned Regulation 18 Option 1A. With the additional sites, an extended Plan period (to 2041) and more development now anticipated within the Plan period at Meridian Water, a new option has been prepared (Option 7) and appraised by LUC. This effectively updates the baseline position appraised at the Regulation 18 stage, with development only accommodated within the urban areas, and with the development density optimised on a site by site basis, taking into account site constraints, the character and scale of surrounding development etc.

2.44 At the Spatial Options scale of assessment, new Option 7 performs similarly to Option 1A (and 1B) against the IIA Objectives, albeit that new Option 7 will do more to meet the housing objective.

2.45 It was not felt necessary to create a new Option at the Regulation 19 stage to assess potential impacts of higher density development and taller buildings on the development sites within the urban areas that underpin new Option 7, as the likely types of impacts have already been reported in the assessment of Option 2A.

2.46 There are two further new Spatial Strategy Options that have been appraised at the Regulation 19 stage (Options 8 and 9). Option 8 is very similar to Option 2C, which was the preferred option at the Regulation 18 stage. New Option 8 takes the new baseline assessment of capacity within the urban areas (i.e. the scale of development envisaged under new Option 7), and adds to this the additional development that could be accommodated within the Plan period on two rural place-making areas. This is the Option taken forward in the Regulation 19 version of the Enfield Local Plan.

2.47 For completeness, the IIA also appraises the likely impacts of a spatial strategy option that promotes the new baseline level of development within the Borough's urban areas, and adds to this the additional development that could be accommodated within the Plan period on just one rural place-making area.

2.48 Options 8 and 9 have the further benefit of testing a level of growth (31,000/32,000-35,000) that sits between the medium level of growth (25,000 dwellings) and high level of growth (55,000 dwellings) appraised at the Regulation 18 stage

2.49 The Council's reasons for selecting the preferred option at Regulation 19 stage (Option 8: Medium to high growth with two rural placemaking areas) and for discounting the other options are outlined in the third column of **Table 2.2**. Option 8 broadly aligns with Option 2C, which was preferred at Regulation 18 stage, but delivers more homes as a result of the additional urban sites (and capacity) identified since 2021.

2.50 The IIA findings relating to these spatial options are presented in **Appendix F**.

Table 2.2: Reasonable alternative spatial strategy options considered during preparation of the Regulation 19 Enfield Local Plan

Spatial strategy options considered	Appraised as reasonable alternative in IIA Report?	Enfield Council's reason for selecting or discounting the option
<p>Option 7: Revised Baseline Growth - This is based on accommodating 30,000 new homes and some other land uses within urban areas only (and is in effect, an update to Option 1A). It reflects the additional sites identified since the Regulation 18 stage, and the further work undertaken to assess and optimise delivery on sites proposed for allocation in the urban areas. Alongside this development there is scope for some nature recovery and green and blue infrastructure improvements.</p>	Yes	<p>Discounted because it would not help address the housing shortfall across London as a whole, and it would not deliver the mix of housing types needed in Enfield (as it would mostly deliver flats many of which would be in tall buildings, the viability of which is worsening).</p> <p>Other land use requirements would not be met.</p>
<p>Option 8: Medium to High Growth with two Rural Placemaking Areas - This option looks to accommodate 34,500 new homes, largely focused in the urban area with some release of Green Belt. Growth is largely focused in the eight urban placemaking areas and the two rural placemaking areas. A zoning approach is taken to most of the rural areas to facilitate development of a multi-layered mosaic of sustainable rural land uses, ambitious nature recovery and rewilding. Intensification of existing industrial areas and new sites in urban and rural areas. No release of SIL.</p>	Yes	<p>Selected as Preferred Option because it would help address the housing shortfall across London as a whole, enable better place-making and provide a mix of housing types (including more family and more affordable homes).</p> <p>Although it involves some Green Belt release, it would not require release of SIL for housing.</p> <p>Other land use requirements met in full or close to full.</p> <p>Positive enhancements to existing employment areas to become more sensitively integrated with the wider neighbourhood.</p> <p>Significant opportunities to enhance remaining Green Belt areas and provide better sustainable access for food production, forestry, eco-tourism, recreation, education, leisure and sporting excellence and natural burial, for new and existing residents.</p>
<p>Option 9: Medium to High Growth with one Rural Placemaking Area - This option looks to accommodate 31-32,000 new homes, largely focused in the urban area with some release of Green Belt. Growth is largely focused in the eight urban placemaking areas and on one rural placemaking area (either Crews Hill or Chase Park). A zoning approach is taken to some of the rural areas to facilitate development of a multi-layered mosaic of sustainable rural land uses, nature recovery and rewilding. Intensification of existing industrial areas and new sites in urban and rural areas. No release of SIL.</p>	Yes	<p>Discounted because while it would do more to meet family and affordable housing needs than Option 7, it would not deliver the same level of benefits as Option 8.</p>

Site options

Site selection overview

2.51 As set out in the Council’s 2021 Site Selection Methodology⁶, the Council identified potentially available and suitable reasonable alternative site options as part of its Housing and Employment Land Availability Assessment (HELAA) from various sources, including:

- Recent planning applications;
- Enfield’s 2021 Call for Sites;
- Enfield’s 2019-2020 Call for Sites and Call for Small Sites;
- Existing Development Plan Allocations and Opportunity Sites not yet completed;
- Sites with development briefs and/or developer masterplans;
- London Strategic Housing Land Availability Assessment (SHLAA) 2017;
- Areas of search identified in the Enfield Industrial Intensification Study;
- The GLA’s London Development Database;
- Enfield Annual Monitoring Reports;
- Enfield Housing Trajectory; and
- Enfield Brownfield Land Register.

2.52 All sites were then subject to the six stage assessment process detailed in the Site Selection Methodology and summarised in **Table 2.3**. The outcome of this site selection process (Stage 6) was conclusions and recommendations about the suitability of sites for inclusion in the Local Plan, based on professional judgement and taking account of:

- suitability;
- whether the land is previously developed land, and/or in the urban area;
- accordance with the emerging spatial strategy;
- Integrated Impact Assessment;
- emerging Draft Local Plan Policy requirements;
- deliverability of Sites; and
- any other relevant factors.

Table 2.3: Enfield Council Site Selection Methodology Overview

Site Selection Stage	Tasks involved
Stage 1: Identification and initial sift of sites	<ul style="list-style-type: none"> ■ Stage 1a: Identification of sites (sites included in HELAA from sources described above). ■ Stage 1b: Assessment of absolute constraints. ■ Stage 1c: Size threshold (exclude sites for housing with a capacity of <50 homes or an area <0.5 and sites for employment with area <0.25ha or floor area <500sqm).
Stage 2: Promoting a Sustainable Pattern of Development	<ul style="list-style-type: none"> ■ Stage 2: Sites considered on a sequential approach directing growth to specific locations, based on the hierarchy set out in Table 2.4.

⁶ Enfield Council (2021). Site Selection Methodology. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0024/25728/site-selection-methodology-Planning.pdf)

Site Selection Stage	Tasks involved
Stage 3: Detailed Planning Assessment	<ul style="list-style-type: none"> Stage 3a: Consideration of technical constraints (e.g. highways). Stage 3b: Consideration of other non-absolute constraints (e.g. historic/ecological etc.).
Stage 4: Integrated Impact Assessment	<ul style="list-style-type: none"> Stage 4: Identify any significant negative effects that may require mitigation if site is put forward for allocation. <i>[The results of the IIA of site options are set out in Appendix F.]</i>
Stage 5: Deliverability	<ul style="list-style-type: none"> Stage 5: Does the evidence indicate that the site could be delivered within the Plan period?
Stage 6: Overall Conclusion	<ul style="list-style-type: none"> Stage 6: Identification of preferred site allocations.

2.53 After identification of sites at Stage 1a, Stages 1b and 1c filtered out those that were located in absolute constraint areas or that were below the size thresholds for housing and employment allocations. Stage 2 then assessed these remaining site options to prioritise the allocation of land within the urban area, with an emphasis on brownfield sites, as well as ensuring they conform with the emerging spatial strategy for the pattern and scale of development in the Borough. Sites were considered based on the sequential approach to direct growth to specific locations, based on the hierarchy set out in **Table 2.4**. The hierarchy gives sites on previously developed land in the urban area the highest priority, with isolated greenfield sites in the Green Belt given the lowest priority. A small number of sites were excluded from further consideration as they were assessed as priority 7 and 8 (i.e. isolated Green Belt locations). The remaining sites were subject to Stage 3: Detailed Planning Assessment by the Council, and Stage 4: IIA by LUC.

Table 2.4: Hierarchy used by Enfield Council in Stage 2 of the Site Selection Methodology

Priority	Broad Site location	Site typology	Approach to Allocation
1	Sites within the urban area	Brownfield sites in urban area	Allocation, subject to other stages
2		Greenfield sites in urban area	Allocation, subject to other stages
3	Accessible Green Belt sites	Brownfield sites in accessible ⁷ Green Belt location	Potential allocation possible, subject to alignment with emerging spatial strategy
4		Greenfield sites in accessible, lower performing Green Belt location	Potential allocation possible, subject to alignment with emerging spatial strategy
5		Greenfield in accessible, moderately performing Green Belt location	Potential allocation less likely, unless exceptional circumstances
6		Greenfield in accessible, high performing Green Belt location	Potential allocation less likely, unless exceptional circumstances
7	Isolated Green Belt Sites	Brownfield in isolated Green Belt location	No allocation unless exceptional circumstances
8		Greenfield in isolated low or moderately performing Green Belt location	No allocation unless exceptional circumstances

⁷ Accessibility will be determined by the Public Transport Accessibility Level (PTAL) of sites

IIA of reasonable alternative sites at Main Issues and Preferred Approaches (Regulation 18 consultation) stage (June 2021)

2.54 Stage 1a identified a large number of sites (around 600). Stages 1b and 1c reduced the list of sites to be assessed from around 600 to just over 100 sites that were above the size thresholds for housing and employment and not in absolute constraint areas. After applying the hierarchical approach in Stage 2, only sites assessed as priority 7 and 8 (i.e. isolated Green Belt locations) were ruled out as not being reasonable alternatives. The remaining sites were subject to Stage 3: Detailed Planning Assessment by the Council, and Stage 4: IIA by LUC. Overall, there were 41 residential sites, 27 mixed-use sites, 10 industrial sites, 2 leisure/sports and recreation sites, 4 burial/crematorium sites and a nature recovery site. All of these reasonable alternative site options were subject to IIA using a consistent methodology, as described along with the IIA findings in the June 2021 IIA Report that accompanied Regulation 18 consultation on the Main Issues and Preferred Approaches document. Those findings are reproduced in **Appendix G** of this report.

2.55 In parallel with this IIA of site options at Main Issues and Preferred Approaches stage, the spatial strategy options described above were also subject to IIA and the findings of both were provided to the Council in advance of final decisions being made on preferred site allocations. The Council then carried out Stages 5 and 6 of the Site Selection Methodology to identify its preferred site allocations in the 2021 Enfield Local Plan: Main Issues and Preferred Approaches document. The Council's reasons for identifying their preferred sites and discounting the other reasonable alternative site options at that stage were provided in Appendix F of the June 2021 IIA, which accompanied the Regulation 18 Enfield Local Plan: Main Issues and Preferred Approaches document.

IIA of reasonable alternative sites at Publication (Regulation 19 consultation) stage

2.56 Following the Main Issues and Preferred Approaches (Regulation 18) consultation in 2021, the Council undertook a third Call for Sites in June to July 2022. The information gained from this Call for Sites was used to produce a new version of the HELAA. The HELAA also contained previously submitted sites and the site selection process as described above was followed again by the Council. For the purposes of identifying the site options to be subject to IIA, a more precautionary approach was followed than at the Main Issues and Preferred Approaches stage (i.e. if in doubt assume that a site option is 'reasonable') to ensure that IIA findings were available to the Council for any site option that might conceivably be considered reasonable. The filtering process applied to identify the site options to be subject to IIA was based on the Council's HELAA methodology, the purpose of which is to identify a future supply of land which is suitable, available and achievable for development. The process for excluding sites from the IIA as not reasonable considered relevant results from these three tests, as well as whether sites had previously permitted or allocated development capacity that had not yet been built out. The filtering process was as follows:

Availability test

2.57 In the HELAA, a site was considered available when, on the best information available, there was confidence that there were no legal or ownership impediments to its development. Enfield Council assigned the sites to one of four categories: (1) available; (2) potentially available; (3) availability unknown; or (4) not available. Only sites that fell into category 4 (not available) were excluded from the IIA as not reasonable.

Suitability test

2.58 In the HELAA, a site was considered suitable if it provided an appropriate location for development when considered against relevant constraints and their potential to be mitigated. Enfield Council assigned the sites to one of two categories according to their level of planning constraints: Level 1 – sites not considered to have any reasonable development potential, having regard to national and local policies and designations; or Level 2 – Sites with constraints that could not be considered absolute, taking into account the hierarchy of environmental protection provided by national policy, or because they represent planning policy designations rather than environmental designations (e.g. Green Belt). Only sites that were wholly subject to Level 1 constraints were excluded from the IIA as not reasonable.

Achievability test

2.59 In the HELAA, a site was considered achievable where there was a reasonable prospect that the particular type of development proposed would be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.

Enfield Council assigned sites to one of four categories: (1) achievable; (2) potentially achievable; (3) achievability unknown; or (4) unachievable. Only sites that fell into category 4 (not achievable) were excluded from the IIA as not reasonable.

Previously permitted or allocated sites

2.60 The Council confirmed that it would consider allocating sites that already had planning consent in the new Local Plan, particularly if they were multi-phase developments, unless they had been fully built out. Previously allocated sites that were not fully built out were also treated as reasonable. Only permitted sites with no remaining permitted development left to build out were excluded from the IIA as not reasonable.

2.61 Together with the fact that additional sites had been suggested to the Council in the latest Call for Sites, this filtering process resulted in more site options being subject to IIA than at the Main Issues and Preferred Approaches (Regulation 18) stage. Overall, there were 146 residential sites, 104 mixed-use sites, 59 industrial/employment sites, 4 leisure/sports and recreation sites, 4 burial/crematorium sites, 2 green infrastructure sites, 2 nature recovery sites, 1 education site and 1 leisure/sports and recreation site that also incorporated nature recovery. All site options subject to IIA were appraised using a consistent methodology, which was refined to take account of the latest available evidence and the need for a proportionate approach, as described under 'Site assessment criteria and assumptions'. The IIA findings for these reasonable alternative site options are provided in **Appendix F**.

2.62 The Council's reasons for selecting the allocated sites and discounting the other reasonable alternative site options are provided in **Appendix I**.

Policy options

2.63 Drawing on the policy approaches included in the 2018 Issues and Options document, the June 2021 Enfield Local Plan: Main Issues and Preferred Approaches document, the consultation responses received and the current national and London level planning context, the Council has drafted an updated vision and strategic objectives along with 40 strategic policies (including 11 Place policies) and 58 development management policies across the following topics:

- Good growth in Enfield;
- Places;
- Sustainable Enfield;
- Addressing equality and improving health and wellbeing;
- Blue and green Enfield;
- Design and character;
- Homes for all;
- Economy;
- Town centres and high streets;
- Rural Enfield;
- Culture, leisure and recreation;
- Movement and connectivity;
- Environmental protection; and
- Delivering and monitoring.

2.64 The IIA team appraised early drafts of these policies at both Regulation 18 and 19 stages during May 2021 and September-November 2023, respectively, and provided recommendations to the Council to help improve the sustainability of the policy requirements. The IIA recommendations and how they were addressed by the Council throughout the plan-making process are set out in **Table 2.5** overleaf. Policy names and numbers from Regulation 18 stage have been updated to the versions used at Regulation 19 stage where relevant.

Table 2.5: IIA recommendations and how these have been addressed throughout the plan-making process

Policy name	IIA recommendations	How IIA recommendations have been addressed by the Council in the Local Plan
Regulation 18 stage		
Vision	The vision could make reference to sustainable transport, minimising air pollution, community safety, mitigating flood risk and improving water quality.	Revised vision now includes references to delivering sustainable buildings and transport options. Makes reference to a Borough that will be carbon neutral, better air quality and water quality. Policy SE1 making specific reference to reducing air pollution and managing flood risk. Theme 4) of the vision makes reference to a place of safe growing.
SP SS1: Spatial strategy	Policy SP1: Delivering good growth in Enfield could provide a sentence on mitigating flood risk.	Not covered in SS1 but mitigating flood risk is covered in Policy SE8: Managing flood risk.
Housing policies in general	Prioritising the development of brownfield land over greenfield land could be promoted across all housing policies.	Covered in overarching Policy SS1: Spatial strategy. Part 3 of the policy – prioritises the redevelopment of brownfield land, vacant and underused buildings for new housing and employment uses.
SP TC1: Promoting town centres	Policy SP10: Promoting town centres as places and as part of our community could be strengthened in terms of safety, particularly in the evening and at night.	Evening economy is not just focused in the town centres – but also in new placemaking areas, such as Meridian Water. Policy E9 deals with evening and night time economy and deals with safety in part 1b of the policy.
SP SC2: Protecting and enhancing social and community infrastructure	Policies SP20: Delivering social and cultural infrastructure facilities in the right location and DM42: Community facilities could have additional wording on minimising the impact of development on climate change (e.g. sustainable construction practices and/or renewable energy technologies).	Not specifically covered in the 2 policies mentioned. However, chapter 4 deals with sustainability and supports the transition to net zero carbon development. Policy SE1 responds to the impact of climate change and SE2 deals sustainable design and construction practices, whilst SE6 supports development involving renewable and low carbon energy.
Incorporated into SP SC2: Protecting and enhancing social and community infrastructure		
DM E10: Fostering a successful evening economy	Policy DM22: Fostering a successful evening and night-time economy could also be strengthened in terms of safety through additional wording (lighting, active frontages, etc.).	Covered in Policy TC2 – where proposals must provide active frontages to the public realm.

Policy name	IIA recommendations	How IIA recommendations have been addressed by the Council in the Local Plan
SP SE1: Responding to the climate emergency	Policy SP19: Responding to the climate emergency could have more specific policy wording that outlines the various measures that would help with climate change adaptation, e.g. orientation of buildings and trees for shading.	SE1, part 6 of the policy ensures development is designed for resilience in a changing climate.... through considering the orientation of buildings and using trees for shading. SE7: Climate change adaptation and managing heat risk. Part 2b of the policy requires developments to: optimise the layout, orientation, materials, technology and design of buildings and spaces to minimise any adverse impacts on internal and external temperature, reflection, overshadowing, micro-climate and wind movement.
DM DE7: Creating liveable, inclusive and quality public realm	The wording in Policy DM3: Creating liveable, inclusive and quality public realm could be amended to include reference to the historic environment and the protection and enhancement of heritage assets and their settings.	Policy DE10 deals with the conservation and enhancement of the Borough's heritage assets. Development proposals are required to conserve and enhance.
SP DE1: Delivering a well-designed, high quality and resilient environment	Policy DM1: Character and design of new development currently states that development must complement heritage assets. This wording could be strengthened to include specific reference to heritage assets.	Covered in Policy DE10: Conserving and enhancing heritage assets.
SP H1: Housing development sites	Policy SP4: Delivering homes that meet peoples' needs could make reference to energy efficient design.	Covered in Sustainable Enfield chapter.
DM TC2: Encouraging vibrant and resilient town centres	Policy SP11: Encouraging vibrant and resilient town centres could be amended to include reference to the historic environment and the protection and enhancement of heritage assets and their settings.	Covered in Policy DE10: Conserving and enhancing heritage assets.
DM CL3: Visitor accommodation	Policy SP12: Visitor accommodation could require all visitor accommodation to be sympathetic to the character of the area.	CL3, part 2h of the policy amended to include: proposals involving.... will be supported where they are: <i><u>sympathetic to the character of the area, but also able to create new places which reflect current times and needs, and which are fit for the future.</u></i>
SP SC1: Improving health and wellbeing of Enfield's diverse communities	Policy DM40: Improving health and wellbeing of Enfield's diverse communities could be made more specific by identifying how people's health and wellbeing will be improved (e.g. the provision of primary healthcare facilities and open space).	Provision includes:

Policy name	IIA recommendations	How IIA recommendations have been addressed by the Council in the Local Plan
		<ul style="list-style-type: none"> ■ access to sustainable modes of travel, including safe cycling routes, attractive walking route and easy access to public transport to reduce car dependency; ■ access to green infrastructure, including to blue corridors, open spaces and leisure, recreation and play facilities to encourage physical activity; ■ access to local community facilities, services and shops, which encourage opportunities for social interaction and active living; ■ access to local healthy food opportunities, allotments and food growing spaces; ■ an inclusive development layout and public realm that considers the needs of all, including the older population and disabled people; and ■ active design principles which support wellbeing and greater physical movement as part of everyday routines.
SP D1: Securing contributions to mitigate the impact of development	Policy SP22: Securing contributions to manage and mitigate the impact of development in Enfield could be more specific when referring to 'Other site-specific mitigation'.	No changes made.
Regulation 19 stage		
Vision	The vision and/or strategic objectives could make more explicit reference to measures to improve community and road safety, improving the Borough's resilience to climate change through adaptation measures and also the overall aim to use land and materials efficiently.	Changes made to include: improve community and road safety Climate change resilience already addressed in the Vision: A deeply green place – A place where enhanced green open spaces and waterways permeate shall traverse the urban fabric, seamlessly connecting the wild places in the rural stretches with accessible pockets of nature and localised food production. Improved biodiversity, greener urban environments, local food

Policy name	IIA recommendations	How IIA recommendations have been addressed by the Council in the Local Plan
		<p>production opportunities and better air and water quality shall deliver places where residents lives are enriched with nature. <i>We are committed to successfully addressing the climate crisis through an effective blend of mitigation and adaptation, delivering sustainable buildings and transport solutions, and effectively managing flood risk. We will be a Borough that is carbon neutral with the aim to use land and materials efficiently.</i></p> <p>Last point on use of land and materials, included in the Vision.</p>
<p>SP SS1: Spatial strategy</p>	<p>Policy SP SS1 could:</p> <ul style="list-style-type: none"> - Support targeted interventions to reduce crime and increase community safety, guided by LBE's Crime and Community Safety team, and ensure high quality new developments that are future proofed. - Encourage access to, and the provision of, community and youth facilities in more deprived neighbourhoods. - Make more explicit reference to measures to improve community and road safety and improving the Borough's resilience to climate change through adaptation measures. 	<p>Will be picked up as part of the formal Reg-19 stage</p>
<p>SP SS2: Making good places</p>	<p>Policy SP SS2 could:</p> <ul style="list-style-type: none"> - Seek to reduce levels of crime, anti-social behaviour and the fear of crime through high quality design and intervention, i.e. street layout, public space provision, passive surveillance, lighting, etc. - Make more explicit reference to measures to improve community and road safety and improving the Borough's resilience to climate change through adaptation measures. 	<p>Will be picked up as part of the formal Reg-19 stage</p>
<p>SP PL1: Enfield Town</p>	<p>Policy wording could be added on mitigating surface water flooding. Although Policy DM SE8: Managing flood risk provides mitigation, no</p>	<p>Will be picked up as part of the formal Reg-19 stage</p>

Policy name	IIA recommendations	How IIA recommendations have been addressed by the Council in the Local Plan
	specific mitigation is identified in Policy SP PL1: Enfield Town for the allocated sites.	
SP PL2: Southbury	<ul style="list-style-type: none"> ■ The policy could contain wording on the incorporation of sustainable drainage features, which can help protect water quality by preventing contamination from sediment runoff during construction and or increased pressure on wastewater treatment. ■ The policy could contain wording on mitigating flood risk and the incorporation of sustainable drainage features, which can help protect water quality by preventing contamination from sediment runoff during construction and or increased pressure on wastewater treatment. ■ The policy could contain wording on protecting and enhancing the historic environment. 	<p>Covered in policies in Chapter 6: Blue and Green Enfield</p> <p>Covered in Policy DE10: Conserving and enhancing heritage assets.</p>
SP PL4: Angel Edmonton	<ul style="list-style-type: none"> ■ The policy could contain wording on protecting and enhancing the historic environment. 	<p>Covered in Policy DE10: Conserving and enhancing heritage assets.</p>
SP PL5: Meridian Water	<ul style="list-style-type: none"> ■ If viable, provision could be made for a new secondary school to support growth. ■ Enhance measures for safeguarding heritage and conservation, perhaps by including a section on this within the Policy. 	<p>Will be picked up as part of the formal Reg-19 stage</p> <p>Covered in Policy DE10: Conserving and enhancing heritage assets.</p>
SP PL6: Southgate	Reference could be added to active frontages and passive surveillance.	<p>Covered by policy DE7: Design of business premises which refers to: <i>increase activity and natural surveillance at ground floor while meeting the minimum defensible space standards;</i></p> <p>And Policy DE9: Shopfronts and advertisements, which refers to: <i>new and redeveloped shopfronts established on corner sites will be expected to address both elevations to help activate the public realm and contribute to natural surveillance.</i></p>

Policy name	IIA recommendations	How IIA recommendations have been addressed by the Council in the Local Plan
		Policy DE13: Housing Standards and Design.
SP PL7: New Southgate	<ul style="list-style-type: none"> ■ Make reference to heritage conservation. ■ Reference is made broadly to housing typologies, but would be nice to see reference to inclusive design. ■ Policy should seek to protect and enhance biodiversity. 	<p>Covered in Policy DE10: Conserving and enhancing heritage assets.</p> <p>Covered in Policy DE3: Inclusive Design and Policy BG2: Protecting nature conservation sites – policy refers to: <i>Development will be expected to protect, maintain and enhance the biodiversity and geodiversity value of the Borough’s international, national and local wildlife and geological sites...</i></p>
SP PL8: Palmers Green	<ul style="list-style-type: none"> ■ Policy could seek to provide and/or improve cycling routes within the placemaking area. ■ Reference to surface water flood mitigation could be added. 	Will be picked up as part of the formal Reg-19 stage
SP PL9: Rural Enfield	<ul style="list-style-type: none"> ■ Implementation of climate resilience measures into development proposals, including strategies and consideration of the potential impact of climate change on rural Enfield. Update: The policy could be more specific by what it means by ‘climate resilience measures’. ■ Establish quantifiable targets related to rewilding, biodiversity gain, and nature recovery within the Enfield Chase Landscape Recovery Area. 	<p>Climate resilience will be picked up as part of the formal Reg-19 stage</p> <p>Covered in Policy BG4: Biodiversity net gain, landscape restoration and offsetting.</p>
SP PL10: Chase Park	<ul style="list-style-type: none"> ■ Amend Policy to address the break in provision regarding the National Cycle Route 12. ■ Revise point g) in the policy wording to "surrounding designated heritage and biodiversity assets" as it is currently unclear whether the policy is referring to heritage assets or also to biodiversity assets. 	Will be picked up as part of the formal Reg-19 stage
SP DE4: Putting heritage at the centre of place making	Policy could be more specific by what is meant by “affected communities” in the sentence “utilise the Borough’s cultural, built and landscape heritage to	Will be picked up as part of the formal Reg-19 stage

Policy name	IIA recommendations	How IIA recommendations have been addressed by the Council in the Local Plan
	realise wider social, cultural economic and environmental benefits for affected communities”	
Housing policies in general	Where appropriate, some of these policies could include reference to active frontages and passive surveillance so as to reduce crime levels and increase feelings of safety.	Covered in Policy DE13: Housing standards and design.
Economy policies in general	<ul style="list-style-type: none"> ■ Identify measures for safeguarding heritage and conservation, perhaps by including a section on this within the Policy. ■ Instead of outlining the need to deliver green infrastructure in the supporting text to the Policy, the policy could contain wording on this and require green infrastructure delivery. 	<p>Covered in Policy DE10: Conserving and enhancing heritage assets.</p> <p>Covered in Chapter 6: Blue and Green Policies</p>

Stage C: Preparing the IIA report

2.65 This IIA Report describes the process that has been undertaken to date in carrying out the IIA of the Enfield Local Plan. It contains an appraisal of alternative spatial strategy options as well as the potential sites for residential development, mixed-use development, industrial/employment development and other uses considered for inclusion in the Local Plan, as well as the policies in the Local Plan itself. The focus of the appraisal has been the identification of significant effects, whether positive or negative, in accordance with the SEA Regulations.

Stage D: Consultation on the Local Plan and this IIA Report

2.66 The Local Plan has been consulted upon at each stage of its development, alongside the IIA. **Appendix A** of this document presents the consultation comments received in relation to the February 2020 IIA Scoping Report produced by AECOM and the June 2021 IIA Report produced by LUC that accompanied the Enfield Local Plan: Main Issues and Preferred Approaches document, and provides a response to each of them.

2.67 Enfield Council is inviting comments on the Regulation 19 Publication Version Local Plan and this accompanying IIA Report. These documents are being published on the Council's website for consultation in March 2024.

Stage E: Monitoring and implementation of the Local Plan

2.68 Chapter 8 sets out suggested measures for monitoring potentially significant sustainability effects that could arise as a result of implementing the Enfield Local Plan.

Appraisal methodology

2.69 The SEA Regulations, Schedule 2(8) require the environmental report to include:

“...a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.”

IIA framework

2.70 The development of a set of IIA objectives (known as the IIA framework) is a recognised way in which the likely environmental and sustainability effects of a plan and reasonable alternatives can be described, analysed and compared. The IIA framework comprises a series of sustainability, health, equalities and community safety objectives against which the performance of the Local Plan and reasonable alternatives is assessed. Each IIA objective is supported by a set of appraisal questions, which help to guide judgements on whether a particular element of the Plan is likely to help the achievement of the objective in question. The appraisal questions are included for guidance only and are not intended to be definitive or exhaustive.

2.71 The IIA framework for the Local Plan is presented in **Table 3.2** and was based on an earlier version developed by AECOM from analysis of relevant policy objectives, baseline information, and key sustainability issues affecting the Plan area. LUC reviewed the original IIA framework developed by AECOM and made some refinements to it. LUC restructured the framework to clearly state the headline objective for each topic, in addition to moving some of the detail contained within AECOM's list of objectives to the appraisal questions column, whilst ensuring that all SEA topics were covered. The framework also addressed any relevant concerns expressed by the statutory consultees in relation to the IIA Scoping Report.

2.72 Table 3.1 outlines the key sustainability issues facing the Plan area, the potential for the Local Plan to address them, and how this is reflected in the IIA objectives. The relationship between the 'SEA topics' that SEA is required to cover, as per Schedule 2 of the SEA Regulations, is shown in the final column of **Table 3.2**. It can be seen that a number of the IIA objectives cut across SEA topics, showing how inter-related many of these are.

Key to IIA effects symbols

2.73 The findings of the IIA are presented as colour coded symbols showing the significance of the likely effect of each policy or site allocation in relation to each IIA objective, along with a concise justification for the effect identified, where appropriate. The colour coding is shown in **Figure 2.2** below.

Figure 2.2: Key to IIA effects symbols

++	Significant positive effect
++/-	Mixed significant positive and minor negative effect
+	Minor positive effect
0	Negligible effect
-	Minor negative effect
--/+	Mixed significant negative and minor positive effect
--	Significant negative effect
++/--	Mixed significant positive and significant negative effect
+/-	Mixed minor positive and minor negative effect
?	Uncertain effect
N/A	Not applicable

2.74 Where a potential positive or negative effect is uncertain, a question mark was added to the relevant symbol (e.g. +? or -?) and the symbol colour coded as per the potential positive, negligible or negative effect (e.g. green, white, orange/red, etc.). Negligible effects were recorded where a policy or site allocation was considered to have no effect in contributing to achievement of the IIA objective. This is usually the case when an objective or policy is focused on a very narrow topic and would only affect achievement of two or three IIA objectives, as may be the case with development management policies. For site options, negligible effects are usually identified when the location of a site would not affect achievement of an IIA objective (e.g. IIA2: Climate change adaptation), as this would depend on the design measures required in policies.

2.75 The likely effects of options and policies need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or policy in relation to the IIA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, effects are relative to the scale of proposals under consideration.

2.76 Mixed effects have only been presented where directly opposing effects (i.e. positive and negative) have been identified through the appraisal (e.g. +/-, ++/-, --/+ and ++/--). For some IIA objectives, it is possible that a policy or site might have a minor positive effect in relation to one aspect of the policy and a significant positive effect in relation to another aspect (giving a score of +/++). However, in these instances, only the significant effect is shown in the appraisal tables to aid clarity and reflect the fact that the focus of IIA is on identifying significant effects. Similarly, if a policy or site could have a minor and significant negative effect (-/--) for the same IIA objective, only the significant negative effect is shown in the appraisal tables. The justification text relating to the appraisal describes where the various elements of the policy or site being appraised might have potential to result in effects of differing magnitude.

2.77 The likely sustainability effects of the Regulation 19 Enfield Local Plan are summarised in **Chapters 4 to 6**. An assessment of the potential cumulative impacts of the Regulation 19 Enfield Local Plan are presented in **Chapter 7**.

Approach to appraisal of site allocation options

2.78 At the option identification stage of plan-making, assessment was of the principle of a specified type of development (residential, employment etc.) within a defined site boundary. Each site option was appraised on its own merits on a 'policy-off' basis, i.e. based on existing conditions and without taking into account opportunities to mitigate potential negative effects by, for example, providing new social infrastructure, by development design that seeks to minimise effects, or by site layouts that avoid sensitive environmental receptors within the site boundary. This served to highlight potential effects on the environment and potential gaps in existing services, facilities and sustainable transport links. It also provided a more consistent basis for assessment than reliance on indicative site masterplans or offers of infrastructure provision that some site promoters may have made because this information was not available for all site options. Consideration by the SA of any proposed site layouts would also be inappropriately detailed in light of the relatively high-level nature of a Local Plan. The findings of this policy-off appraisal are set out in **Appendix F**.

2.79 Once the Local Plan site allocation policies were drafted, the site assessment scores were revised to reflect the Local Plan's site-specific policy requirements. The IIA findings for the site allocation policies are set out in **Chapters 5** and **6**. For the 'Place' policies in **Chapter 5**, the 'policy-off' effects for the individual sites are presented in the columns with the blue headers. The final column synthesises these effects for the individual sites but also takes into account the mitigation provided by the policy, therefore presenting the 'policy-on' effects. In addition, once a complete draft of the Local Plan had been produced, discussion of the performance of the Plan as a whole (see **Chapter 7**), referred to as the cumulative effects, also took account of the mitigation offered by development management policies and regulatory mechanisms external to the Plan.

Criteria used to assess site options

2.80 IIA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, for each of the IIA objectives in the IIA framework, a clear set of decision-making criteria and assumptions for determining significance of the effects was developed. These assumptions set out clear parameters within which certain IIA effects would be identified, based on factors such as the distance of site options from sensitive environmental receptors (e.g. designated biodiversity sites or areas of high landscape sensitivity) or key services and facilities (e.g. public transport links). The criteria and assumptions, many of which were applied through the analysis of spatial data using a Geographical Information System (GIS), are presented in **Table B.1** of **Appendix B**.

2.81 Appraisal scores relying on intersection with areas of environmental sensitivity such as flood zones or areas of ecological value were not based on the proportion of the site intersecting with the sensitive area. As such the assessment scores were designed to highlight potential adverse effects and flag these for closer examination of the potential for avoidance or mitigation of negative effects by the Council before allocation. For example, the potential for a significant negative effect may be identified for SA objective 13: Biodiversity as a result of a small part of a site option falling within a designated wildlife site or containing valued habitat. This is potentially significant in the context of national policy protection for designated sites and requirements for biodiversity net gain and also served to highlight that the Council should consider whether habitat loss could be avoided by a minor amendment to the site allocation boundary or by a site-specific policy requirement to avoid development in or enhance the area of a valued habitat.

2.82 The site options appraisals were subject to a number of difficulties and limitations, as set out in the 'Difficulties encountered' section below.

Significance scoring

2.83 In many cases, a number of different criteria were used to inform the significance of the likely effect of site options on an IIA objective. The rules used to consolidate scores against multiple criteria into a single significance effect are set out in the final column of **Table B.1** of **Appendix B**.

2.84 For each IIA objective, one of two approaches were adopted. The first approach was to assign numerical scores for each criterion as follows:

- A major positive effect was given +3
- A minor positive effect was given +1
- A negligible effect was given 0

- A minor negative effect was given -1
- A major negative effect was given -3

2.85 The scores for the individual criteria were then totalled and averaged. A significance score was then assigned based on this average as follows:

- If the average score was $\geq +2$ a significant positive score was identified (++)
- If the average score was >0 to <2 a minor positive score was identified (+)
- If the average score was 0 a negligible score was identified (0)
- If the average score was <0 to >-2 a minor negative score was identified (-)
- If the average score was ≤ -2 a significant negative score was identified (--)

2.86 The second approach for some IIA objectives, primarily ones relating to the environment, was to take a more precautionary approach and identify a significant negative score in relation to the IIA objective if the effect against any single criterion was major negative rather than averaging scores.

Assumptions regarding distances

2.87 In assessing the likely accessibility of site options to key services and facilities, reference is made to various distances in the site assessment assumptions. The most sustainable and easily achievable mode of transport is walking and the distances therefore refer to walking distances to these services and facilities. These were based on the suggested acceptable walking distances presented in relevant guidance⁸. However, some distance thresholds were refined using professional judgment to reflect the fact that people are likely to be willing to walk longer distances to access higher order services (for example a secondary school rather than a primary school). It cannot be known which walking route future residents of a site will take and this is likely to vary depending on the exact starting point of each individual's journey within a site, especially where sites are large. Therefore, for consistency and to avoid spurious accuracy, these distance thresholds were applied using straight-line measurements from the boundary of a site option to the services and facilities in question.

Refinements to the site assessment criteria and assumptions

2.88 Due to the large increase in the number of reasonable alternative site options to be subject to IIA between Regulation 18 and 19 stages, the decision was taken to develop a GIS-based approach to the site appraisals, as it would provide a more consistent, transparent and proportionate approach than the manual assessment approach used at Regulation 18 stage. In order to facilitate a GIS-based approach, revisions were made to the site assessment assumptions, as outlined in **Table B.2 of Appendix B**.

2.89 It is common practice for the method to evolve as the evidence evolves throughout the IIA process and although changes were made to the methodology between stages, the methodology at each stage was applied consistently to all reasonable alternative site options under consideration at that stage.

Historic environment assessment work

2.90 Enfield Council undertook their own assessment on the potential impact of development on the historic environment. This assessment was undertaken for the sites proposed for allocation, in addition to a small number of other sites that were shortlisted for allocation but not ultimately allocated. The assessment was not undertaken for the majority of reasonable alternative site options. Therefore, this work could not be used to inform the appraisal of all reasonable alternative site options in the IIA, against the historic environment objective (IIA14), which instead used a proximity basis (see 'Difficulties encountered' below). The work did, however, inform the appraisal of the 'Place' policies in the IIA (see **Chapter 5**).

2.91 The sites assessed by the Council were each given a 'RAG' rating against: (1) heritage considerations; and (2) archaeological priority area impacts. The heritage considerations generally related to above ground constraints whereas the archaeological priority area impacts related to below ground constraints. The four potential ratings are shown in **Figure 2.3**.

⁸ The Institution of Highways and Transportation (2000) Guidelines for Providing for Journeys on Foot

Figure 2.3: Historic environment RAG ratings

Red	Significant heritage constraints; heritage impact assessment required; no/little opportunity to develop.
Amber	Heritage constraints; potential to develop; usual methodology for assigning indicative density will not apply; heritage impact assessment required; mitigation required.
Green	Heritage constraints; potential to develop; usual methodology for assigning indicative density may not apply; heritage impact assessment required; mitigation required.
None	No heritage constraints.

2.92 LUC converted the RAG ratings for each site into a 'policy-off' significance rating in relation to IIA objective 14 using the rules set out in **Figure 2.4**. All effects are recorded as uncertain, as actual effects are dependent on the final design, scale and layout of development.

Figure 2.4: Converting historic environment RAG ratings to (policy-off) IIA significance ratings

		Heritage considerations			
		Red	Amber	Green	None
Archaeological considerations	Red	--?	--?	--?	-?
	Amber	--?	--?	--?	-?
	Green	--?	--?	-?	-?
	None	--?	-?	-?	0?

Key to IIA significance ratings: -- potential for significant negative effect; - potential for minor negative effect; 0 negligible effect likely

2.93 Following this, we used our professional judgement to adjust the significance of these effects in our appraisal of the Place policies if we considered that site-specific policy requirements adequately addressed the historic environment constraints as described above.

Difficulties encountered

2.94 It is a requirement of the SEA Regulations that when describing how the assessment was undertaken, this includes any difficulties (such as technical deficiencies or lack of knowhow) encountered in compiling the required information. Such difficulties are described here.

- The number of strategies, plans, programmes, policy documents, advice and guidance produced by a range of statutory and non-statutory bodies means that it would not be proportionate or practicable for the IIA to consider every potentially relevant document when establishing the policy context and baseline conditions (see **Chapter 3** and **Appendices C** and **D**). Instead, the IIA sought to identify the key information relevant to the preparation of the Enfield Local Plan and IIA.
- Because many effects of development will be dependent on the exact location, layout and design of development, it may be possible to mitigate some of the effects highlighted in this IIA. However, given the inherent uncertainties about these details at the plan-making stage of the planning process, the IIA focuses on identifying potential significant effects of the options considered, without making assumptions about detailed design or mitigation measures that might be implemented.
- The spatial strategy options considered at each stage represent strategic principles for the scale and distribution of growth to be delivered over the Plan period. Consequently, the IIA focusses on the likely strategic implications of their implementation. This approach ensured that all options could be appraised consistently.

- There was a need to appraise a large number of site options consistently, transparently and proportionately. In order to achieve this, detailed assumptions relating to each of the IIA objectives were developed and applied during the appraisal of site options (as described above and set out in **Appendix B**).
- The GIS-based approach to site appraisals meant that where a site received a negative effect, this may have been as a result of only a small part of the site falling within the environmentally sensitive area. The reasons for and implications of this are described in the 'Criteria used to assess site options' section above.
- Distance thresholds applied in considering accessibility of sites to key services and facilities used straight-line measurements rather than actual walking routes for the reasons set out in the site assessment criteria and assumptions section above.
- Site options appraisals identified positive effects where residential development sites were within walking distance of key services and facilities. It was not considered proportionate for appraisal at the plan-making stage of the planning process to consider whether capacity exists at individual social infrastructure facilities (e.g. schools; GP surgeries) to accommodate demand from those developments. It was assumed that the need for additional capacity would be considered via the Council's infrastructure development plan process and developer contributions to additional capacity gathered as appropriate.
- The GIS data used to assess the site options according to the site appraisal criteria was subject to a number of limitations:
 - GIS data used to inform the assessment was generally only available for the extent of LBE, which could affect the IIA findings for sites on the edge of the Borough.
 - When considering accessibility of sites to social infrastructure such as GP surgeries or schools, it was not known whether individual facilities have the capacity to accept new residents. Rather, it was assumed that the required capacity would be identified and made available, including through the Council's Infrastructure Development Plan, liaison with service providers, and collection of developer contributions.
 - When considering the proximity of site options to healthcare facilities, only NHS GP surgeries were considered. This is because these are the facilities most likely to be used by local residents.
 - When considering the proximity of site options to existing schools, only state schools were considered. This is because these schools are open to all and it is expected the majority of school age residents will attend state schools. In addition, local catchments may not apply to independent schools, for which pupils will often travel further.
 - Qualitative heritage impact assessments were not undertaken by the Council for all reasonable site options therefore in order to appraise all site options on a consistent basis, the IIA used the proximity-based criteria set out in **Appendix B** as a proxy. Once allocated sites had been selected, the IIA of the Publication Version Plan drew on the Council's qualitative historic environment assessments to inform appraisal of site allocation policies. In parallel to the IIA findings, the Council agreed an approach with Historic England to ensure that the historic environment was taken into account in decisions regarding site allocations and this is described in detail in the Tall Buildings Method, incorporated into the Character of Growth Study.
 - The acceptable level of development and change in landscape terms identified for different areas of the Borough by the Council's 'Character of Growth' study formed the basis of appraisal of most site options in relation to IIA objective 15: Landscape. However, this study did not cover the entire Borough (most of the Green Belt and open space was excluded from the study scope) therefore where site options fell into these areas, the IIA fell back on the more simplistic assessment method used at Regulation 18 stage (see **Table B.2** of **Appendix B** for further detail).
 - When considering potential loss of best and most versatile agricultural land, data from the Agricultural Land Classification did not distinguish between Grade 3a (considered to be high quality) and 3b (not considered to be high quality).
 - When considering the likely effect of site options in relation to biodiversity, it was considered disproportionate to consider the designated features of individual, locally designated biodiversity sites that may be affected. Instead, professional judgement was used to define precautionary distance thresholds within which development may have an adverse effect. Potential effects on SSSIs and European sites were able to draw on the IRZs defined by Natural England for this purpose.

Chapter 3

Sustainability context

3.1 Schedule 2 of the SEA Regulations requires the environmental report to provide/ describe:

(e) *“the environmental protection objectives established at International, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”*

Relationship with other relevant plans or programmes

3.2 The Enfield Local Plan is not prepared in isolation and must be in conformity with a range of international and national plans and programmes, as show in **Figure 3.1** below. In addition, the Local Plan comprises any ‘made’ Neighbourhood Plans within the Borough and is supported by other documents such as the Statement of Community Involvement, Local Development Scheme, Authority Monitoring Report and Supplementary Planning Documents.

Policy context

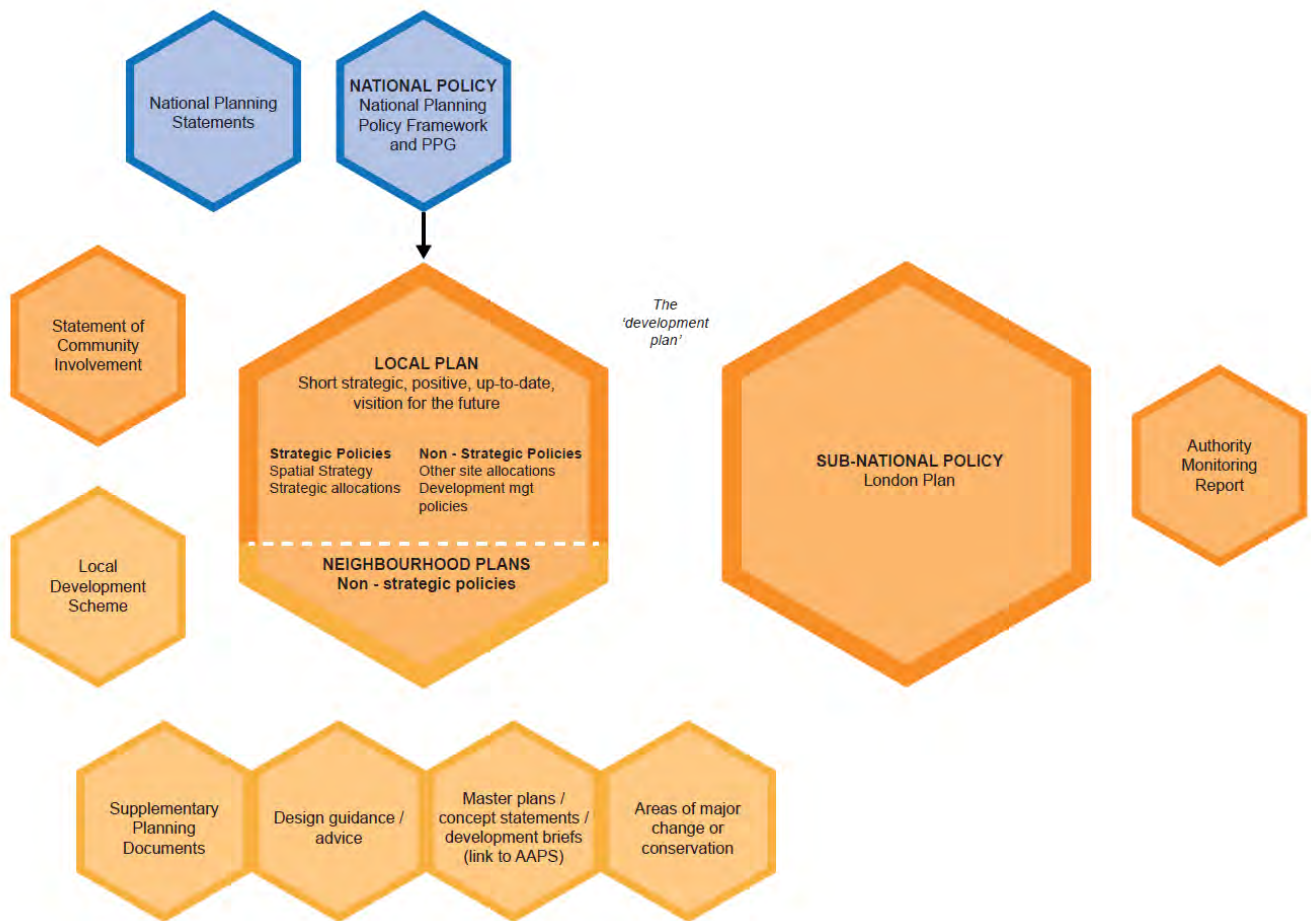
3.3 This section sets out the policy context within which the Local Plan must operate in relation to the various sustainability themes covered by the IIA. This context informed consideration of what constitutes reasonable alternative policy options for the Plan, as well as design of the framework of sustainability objectives against which the Plan was appraised. A more detailed review of the relevant documents is set out in **Appendix C**.

3.4 It should be noted that the policy context is inherently uncertain as the current framework outlined here is likely to change in response to a number of key factors:

- **Brexit:** Following the UK's departure from the European Union (EU) on 31 January 2020, it entered a transition period which ended on 31 December 2020. From 1 January 2021, directly applicable EU law no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law. Relevant EU legislation has still been referred to in this report but will be removed as and when UK legislation is amended.
- **COVID-19:** The COVID-19 pandemic has led to far-reaching changes to society in the UK and around the world. Which of these changes will continue in the long term is unknown and will depend on a variety of factors. Potential implications for planning and development include the Government's continued measures to restart the economy via support for housebuilding and infrastructure development, changes to permitted development rights, increased remote working and reduced commuting and related congestion and air pollution, increased prioritisation of walking and cycling over public transport, and increasing pressure to ensure satisfactory living standards are set and enforced.
- **Levelling Up and Regeneration Act:** The Act sets out various planning reforms including the replacement of SA/SEA with ‘Environmental Outcomes Reports’; replacement of the CIL process and much of the section 106 payments system with a new National Infrastructure Levy; a shared framework of National Development Management Policies, removing much of this detail from Local Plans; replacement of Supplementary Planning Documents (SPD) with Supplementary Plans that carry more weight but would be subject to examination; repeal of the Duty to Cooperate; a duty on public bodies and infrastructure providers to assist the local plan-making process; a speeded up plan-making process (plans to be prepared and adopted within 30 months); a strengthened role for the ‘National Model Design Code’; replacement of Neighbourhood Plans with Neighbourhood Priorities Statements; removal of the current NPPF requirement to demonstrate a rolling five-year supply of housing land, provided that the local plan is up-to-date; and removal of the ‘soundness test’ for local plans to be ‘justified’.

3.5 It is also possible that UK and sub-national climate change policy may change as public awareness and prioritisation of the threat of climate change grows, as illustrated by the increasing number of local authorities, including Enfield Council, that have declared a climate emergency.

Figure 3.1: Local Plan relationship with other relevant plans or programmes



International policy context

3.6 At the international level, there is a wide range of plans and programmes which act to inform and shape national level legislation. Planning policy in England at a national and local level (i.e. the NPPF and Local Plans) should be aware of and in conformity with the relevant legislation.

National policy context

3.7 There is an extensive range of national policies, plans and programmes that are of relevance to the Local Plan preparation and IIA process. A pragmatic and proportionate approach has been taken with regards to the identification of key national policies, plans and programmes, focusing on those that are of most relevance. A summary of the main objectives of the NPPF and PPG of relevance to the Local Plan and IIA is provided below. In addition, the main sustainability objectives of other international and national plans and programmes which are of most relevance for the Local Plan and IIA have been reviewed and a summary of the implications for the Local Plan and IIA is provided below the section on the NPPF and PPG.

The National Planning Policy Framework and Planning Practice Guidance

3.8 The NPPF⁹ is the overarching planning framework which provides national planning policy and principles for the planning system in England. The Local Plan must be consistent with the requirements of the NPPF, which states:

“Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

3.9 The national PPG¹⁰ sets out the Government’s planning policies for England and how these are expected to be applied. Sitting alongside the NPPF, it provides an online resource that is updated on a regular basis for the benefit of planning practitioners.

3.10 The overarching nature of the NPPF means that its implications for the IIA relate to multiple topics which this report seeks to address. Considering the importance of the NPPF to the English planning system, the relevance of the Framework and its implications for the plan-making process and the IIA is provided in more detail below. **Climate change adaption and mitigation, energy efficiency and waste minimisation** measures for new development including through the promotion of renewable energy schemes are also supported through the NPPF. One of the core planning principles is to *“support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”*. Furthermore, local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.¹¹

3.11 Although Local Plans can no longer require levels of the Code for Sustainable Homes, they can promote the Home Quality Mark to support residents in understanding the quality and performance of new build homes and can also set targets for developers to provide for a given percentage of energy used by a new development to come from on-site renewable or low carbon technologies. Local Plan policies can further support the development of renewable energy technologies where appropriate, in line with climate change mitigation strategies and targets.

3.12 The Local Plan can also identify areas where development would have lesser impacts in terms of its contribution to climate change (by limiting the need for site residents and users to travel, for example) or vulnerability to climate change. The IIA can consider the contribution the alternatives make in terms of contribution to climate change mitigation as well as climate change adaptation.

3.13 In relation to **health and wellbeing**, healthy, inclusive and safe places which promote social integration, are safe and accessible, and enable and support healthy lifestyles are supported through the Framework.

3.14 One of the core planning principles is to *“take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community”*. It is identified in the document that *“a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities”*. Furthermore, the retention and enhancement of local services and community facilities in villages, such as local shops, meeting places, sports, cultural venues and places of worship is supported. Importantly, Local plans should also *“contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible”*.

3.15 The delivery of new housing is considered to support local communities by meeting housing needs and addressing shortages. The Local Plan can have a significant influence on addressing inequalities including those relating to health and will need to consider the appropriate siting of new development, particularly large development sites that are likely to include new service and facility provisions. The Local Plan can ensure that new development is located in areas which can improve accessibility for existing as well as new residents and ensure that future development does not exacerbate existing inequalities.

⁹ Ministry of Housing, Communities and Local Government (2023). National Planning Policy Framework.

¹⁰ Ministry of Housing, Communities and Local Government (2021). Planning Practice Guidance.

¹¹ In line with the objectives and provisions of the Climate Change Act 2008.

The IIA process can support the identification and refinement of options that can contribute to reducing inequalities and support the development of policy options that cumulatively improve the wellbeing of local communities.

3.16 The NPPF sets out the approach Local Plans should take in relation to **biodiversity** and states that Plans should “*identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation*”. Plans should also promote conservation, restoration and enhancement of priority habitats and species, ecological networks and support measurable for multi-functional areas and net gains for biodiversity. A strategic approach to maintaining and enhancing networks of habitats and green infrastructure is to be supported through planning policies.

3.17 The Local Plan should seek to maximise any opportunities arising for local economies, communities and health as well as biodiversity. This should be inclusive of options which are supportive of enhancing the connectivity of green infrastructure and promoting the achievement of biodiversity net gain. The IIA process should support the identification and maximisation of potential benefits through the consideration of alternatives and assessment of both negative and positive significant effects.

3.18 In relation to **landscape**, the NPPF includes the planning principles of recognising the intrinsic beauty and character of the countryside as well as protecting and enhancing valued landscapes. Reference is included with regards this purpose at National Parks, The Broads and Areas of Outstanding Natural Beauty.

3.19 The Local Plan should be supportive of an option to development which would protect the landscape character of the Borough. Where appropriate it should seek to protect the individual identities of the areas within the Borough.

3.20 The NPPF states that in relation to the **historic environment** plans should “*set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats*”. Where appropriate, plans should seek to sustain and enhance the significance of heritage assets and local character and distinctiveness, while viable uses of assets should be considered. Plans should take into account the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring. They should also consider the contribution the historic environment can make to the character of a place.

3.21 The NPPF states that new and existing development should be prevented from contributing to, being put at an unacceptable risk from, or being adversely affected by, pollutions including **water pollution and air quality**. Inappropriate development in areas at risk of **flooding** should be avoided. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account implications for water supply. Furthermore, strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision infrastructure for water supply and wastewater.

3.22 The Local Plan presents an opportunity to consider incorporating targets for water efficiency and the level of water consumption and grey water recycling in any new development. The Local Plan also can ensure that development is sited away from areas of high flood probability and that appropriate water drainage is in place in line with flood risk strategies. The IIA process should seek to identify and address potential negative effects on the water environment, including implications relating to wastewater.

3.23 The NPPF states that planning system should protect and enhance **soils** in a manner commensurate with their statutory status or quality, while also encouraging the reuse of **previously developed land**.

3.24 The Local Plan can seek to ensure the appropriate protection of soil quality, including best and most versatile agricultural land. Further to this the Local Plan should ensure that new development does not conflict with current mineral operations as well as long-term mineral resource plans. The IIA process should inform the development of the Local Plan by helping to identify alternatives which would avoid the areas of highest soil quality and best and most versatile agricultural land, as well as those which would promote the use of brownfield land.

3.25 The Local Plan can offer enhanced protection for designated and non-designated heritage assets and their settings, including any potential archaeological finds in line with heritage protection and enhancement plans. The IIA has a role to play by identifying which alternatives could offer opportunities to secure the protection and enhancement of assets as well as those which might have significant impacts in terms of their appropriate use and setting.

3.26 The Framework sets out that in terms of **economic growth** the role of the planning system is to contribute towards building a “*strong, responsive and competitive economy*” by ensuring that sufficient land of the right type is available in the right places

and at the right time to support growth and innovation. There is also a requirement for the planning system to identify and coordinate the provision of infrastructure. Furthermore, planning policies should address the specific locational requirements of different sectors.

3.27 Local planning authorities should incorporate planning policies which “*support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation*”. Local Plans are required to “*set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration*”.

3.28 The Local Plan should seek to maximise the potential benefits of nearby strategic growth, whilst at the same time ensuring the vitality and viability of smaller localised economies. Ensuring that local town centres and settlement services and facilities are maintained and enhanced is also important and will also provide support for local communities. The IIA process can support the development of the Local Plan to ensure that its policies are considerate of impacts on the economy in Enfield. The process can also be used to demonstrate that impacts on the viability of town centres in the area and surrounding areas have been considered.

3.29 The NPPF encourages local planning authorities to consider **transport** issues from the earliest stages of plan making so that: opportunities to promote sustainable transport are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified and assessed; and opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised. The Framework also states that the planning system should actively manage growth patterns in support of these objectives.

3.30 Growth will inevitably increase traffic on the roads which also has implications for air quality, and the Local Plan and IIA process can seek to minimise effects of this nature through appropriately siting new development, identifying where mitigation may be needed and requiring the necessary transport provisions and contributions from new development. The Local Plan as supported by the IIA should seek to identify opportunities to maximise the potential for alternative modes of transport to the car and reduce the need to travel, therefore reducing emissions, through the consideration of alternatives and assessment of significant effects. This includes potential opportunities that may arise as a result of the delivery of new infrastructure.

Other international and national policies, plans and programmes

3.31 Numerous other policies, plans and programmes at a national level are of relevance to the preparation of the Local Plan and the IIA. Unlike the NPPF, most of the documents are focussed on a specific topic area which the IIA will consider. There will be some overlap between IIA topics covered by these plans and programmes where those documents contain more overarching objectives. However, the plans and programmes considered of most relevance for the IIA have been grouped by the topics they most directly seek to address, and green boxes below each topic heading summarise the implications of the plans, policies and programmes (including the NPPF) for the Local Plan and IIA.

Air and water quality

3.32 The relevant international and national PPPs under this topic are:

- Defra, Establishing the Best Available Techniques for the UK (UK BAT) (2022).
- HM Government, The Environment Act 2021.
- Defra, Clean Air Strategy 2019.
- HM Government, The Road to Zero (2018).
- HM Government, 25 Year Environment Plan (2018).
- HM Government, The Water Environment Regulations (2017).
- HM Government, The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017).
- Environment Agency, Managing Water Abstraction (2016).
- HM Government, The Water Supply (Water Quality) Regulations (2016).
- HM Government, The Environmental Permitting Regulations (2016).

- HM Government, The Air Quality Standards Regulations (2016).
- The 2030 Agenda for Sustainable Development (2015).
- HM Government, National Policy Statement for Waste Water (2012).
- Defra, Water White Paper (2012).
- HM Government, Future Water: The Government's Water Strategy for England (2008).
- Defra, The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007).
- HM Government, Environmental Protection Act 1990.

Implications for the Local Plan and IIA: The Local Plan should consider setting out policies to promote the efficient use of water and limit all types of pollution including water and air pollution. It should also seek to limit pressure on the wastewater treatment (WwT) infrastructure and water supply. The allocation of sites for development should take account of areas which have highest sensitivity in relation to these issues, including Source Protection Zones (SPZ) and Air Quality Management Areas (AQMA). To limit the potential for air quality issues to be intensified as development is delivered over the period the Local Plan should also factor in the contribution specific site options can make to achieving modal shift and limiting the need for residents to travel.

The contribution policy options can make to achieving these aims can be tested through the IIA. Individual site options can be considered in relation to particular sensitivities of the WwT infrastructure and other identified areas (such as SPZs and AQMAs).

Biodiversity

3.33 The relevant international and national PPPs under this topic are:

- The Environment Act (2021).
- The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations (2019).
- The Conservation of Habitats and Species Regulations 2017 (SI 2017/1012), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579).
- Defra, A Green Future: Our 25 Year Plan to Improve the Environment (2018).
- The 2030 Agenda for Sustainable Development (2015).
- United Nations Declaration on Forests (New York Declaration) (2014).
- Defra, Biodiversity offsetting in England Green Paper (2013).
- Defra, Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011).
- Defra, Safeguarding our Soils – A Strategy for England (2009).
- England Biodiversity Strategy Climate Change Adaptation Principles (2008).
- The Natural Environment and Rural Communities Act (2006).
- European Landscape Convention (2002).
- International Convention on Wetlands (Ramsar Convention) (1976).
- International Convention on Biological Diversity (1992).
- European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979).
- European Convention on the Conservation of European Wildlife and Natural Habitats (1979).
- International Convention on Wetlands (Ramsar Convention) (1976).

Implications for the Local Plan and IIA: The Local Plan should be prepared to limit the potential for adverse impacts on biodiversity and geodiversity as well as important landscapes (including those that are designated) and higher value soils. The Plan should also take into account non-designated landscapes identified to be particularly sensitive to development and non-designated habitats which form part of the wider ecological network. The plan also presents opportunities to promote the achievement of net gains in biodiversity. It can also be used to encourage the re-use of brownfield land and protect more valuable agricultural soils from development. Benefits may be achieved by directing development to less sensitive locations. The allocation of new sites for development and updated planning policy can also be used to achieve habitat connectivity through the provision of new green infrastructure.

It will be role of the IIA to test the policy options in terms of the effect they will have on biodiversity sites and habitats as well as valuable landscapes. The effects of these options in relation to promoting the development of brownfield land and limiting the loss of valuable agricultural soils should also be appraised. Site options should be considered in these terms also, making use of the findings of the HRA and landscape character assessment work where appropriate.

Climate change adaption and mitigation

3.34 The relevant international and national plans, policies and programmes (PPPs) under this topic are:

- Department for Energy Security and Net Zero, The Carbon Budget Delivery Plan (2023).
- Department for Energy Security and Net Zero, Powering up Britain (2023).
- Department for Energy Security and Net Zero, The Energy Security Plan (2023).
- Department for Energy Security and Net Zero, The Net Zero Growth Plan (2023).
- Ministry of Housing, Communities and Local Government, The British Energy Security Strategy (2022).
- HM Government, The Environment Act (2021).
- Department for Business, Energy and Industrial Strategy, The Net Zero Strategy: Build Back Greener (2021).
- Department for Business, Energy & Industrial Strategy, The UK Hydrogen Strategy (2021).
- Department for Business, Energy & Industrial Strategy, The Industrial Decarbonisation Strategy (2021).
- Department for Business, Energy & Industrial Strategy, The Heat and Buildings Strategy (2021).
- HM Government, The Energy Performance of Buildings Regulations (2021).
- Department for Transport, Decarbonising Transport: Setting the Challenge (2020).
- Department for Business, Energy & Industrial Strategy, The Energy White Paper: Powering our Net Zero Future (2020).
- HM Government, Flood and Coastal Erosion Risk Management: Policy Statement (2020).
- HM Government, The 25 Year Environment Plan (2018).
- Defra, The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (2018).
- HM Government, UK Climate Change Risk Assessment 2017 (2017).
- HM Government, The Clean Growth Strategy (2017).
- United Nations Paris Climate Change Agreement (2015).
- The 2030 Agenda for Sustainable Development (2015).
- Ministry of Housing, Communities and Local Government, National Planning Policy for Waste (NPPW) (2014).
- Defra, Waste Management Plan for England (2013).
- Department of Energy & Climate Change, The Energy Efficiency Strategy (2012).

- Defra and the Environment Agency, Understanding the risks, empowering communities, building resilience: The National Flood and Coastal Erosion Risk Management Strategy for England (2011).
- HM Government, The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009).
- HM Government, The UK Renewable Energy Strategy (2009).
- HM Government, The Climate Change Act (2008).
- HM Government, Planning and Energy Act (2008).

Implications for the Local Plan and IIA: The Local Plan should consider setting out policies to achieve climate change adaptation while also encouraging development which would help to minimise carbon emissions. This can be done through siting development allocations in areas where sustainable transport patterns can be best achieved and encouraging development to make use of more sustainable construction methods and sources of energy. The Local Plan should also contain policies to encourage appropriate use of SuDS.

The IIA can test policy options in relation to the contributions they make towards these aims. It should also appraise the contribution individual site options can make to limiting carbon emissions (including through the uptake of more sustainable sources of energy). Sites should also be considered in terms of the impact they will have in terms of promoting climate change adaptation as well as reducing flood risk and the amount of waste that goes to landfill.

Population, communities, health and well-being

3.35 The relevant international and national PPPs under this topic are:

- Levelling-up and Regeneration Act 2023.
- Department for Levelling Up, Housing and Communities, A fairer private rented sector White Paper (2022).
- Department for Levelling Up, Housing and Communities, The Levelling Up the United Kingdom White Paper (2022).
- Department of Health and Social Care, Build Back Better: Our Plan for Health and Social Care (2021).
- Department for Health and Social Care and Cabinet Office, COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021).
- Public Health England, Using the planning system to promote healthy weight environments (addendum) (2021).
- Ministry of Housing, Community and Local Government, The Charter for Social Housing Residents: Social Housing White Paper (2020).
- Public Health England, PHE Strategy 2020-25.
- The 2030 Agenda for Sustainable Development (2015).
- Ministry of Housing, Communities and Local Government, Planning Policy for Traveller Sites (2015).
- HM Government, Laying the foundations: housing strategy for England (2011).
- The United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002).
- United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') (1998).

Implications for the Local Plan and IIA: The Local Plan, in conjunction with the Infrastructure Delivery Plan, needs to consider the need for infrastructure as this has a significant impact on the environment and it should be prepared to ensure that the population has access to sustainable low carbon infrastructure and services and facilities, and that there is sufficient capacity within them to serve the increased population. This should include healthcare, education and open space. Development allocations should be located in areas where facilities are most accessible, issues of overcapacity would be less likely to result, and active modes of travel might be promoted. Policies in the Local Plan can also help to facilitate the supply of healthy local food. The provision of an appropriate level of housing over the Plan period will help

address issues of disparity in terms of access to decent housing in the Plan area. The provision of new housing should be considerate of local needs with regards to housing size, tenure and type, including the needs of Travellers.

Policy options considered for the Local Plan can be tested through the IIA in relation to the contributions they make towards these aims. The IIA should also appraise the contribution individual site options can make to health and wellbeing. This should be considered through the site's ability to support the delivery of new infrastructure and facilities which might benefit public health, as well as accessibility to existing infrastructure and facilities of this nature. It may be necessary to consider the capacity of existing facilities when considering individual site options. Consideration should also be given to the capacity of sites to deliver new homes, including affordable homes.

Economy and employment

3.36 The relevant international and national PPPs under this topic are:

- Levelling-up and Regeneration Act 2023
- Department for Levelling Up, Housing and Communities, The Levelling Up the United Kingdom White Paper (2022).
- HM Treasury, Build Back Better: Our Plan for Growth (2021).
- Defra, Agricultural Transition Plan 2021 to 2024.
- UK Parliament, Agriculture Act 2020.
- HM Government, Industrial Strategy: building a Britain fit for the future (2018).
- LEP Network, LEP Network response to the Industrial Strategy Green Paper Consultation (2017).
- Infrastructure and Projects Authority, National Infrastructure Delivery Plan 2016-2021.
- The 2030 Agenda for Sustainable Development (2015).

Implications for the Local Plan and IIA: The Local Plan should allocate land to support the projected level of economic growth required over the Plan period. Local Plan policies should be included to help promote sustainable economic and employment growth to benefit all members of the community as to reduce disparity in the Plan area. This should include support for the infrastructure required for the economy to function successfully. Local economic growth should be considered in the light of wider economic growth of the local LEPs. Employment sites should be located to enable local people to be able to access the new employment opportunities. Local Plan policies may also seek to promote the viability of Enfield Town Centre.

The IIA can test individual site and policy options in relation to the contribution they can make to achieving these aims. Employment site options should be appraised in terms of the contribution they can make to meeting the employment land requirements of the Borough as well as the access residents would have to the employment opportunities delivered.

Historic environment

3.37 The relevant international and national PPPs under this topic are:

- HM Government, The Environment Act (2021).
- The Heritage Alliance, Heritage 2020.
- Historic England, Corporate Plan 2018-2021.
- Department for Digital, Culture Media and Sport, The Heritage Statement (2017).
- Historic England, Sustainability Appraisal and Strategy Environmental Assessment: Historic England Advice Note 8 (2016).
- HM Government, The Government's Statement on the Historic Environment for England (2010)
- Valletta Treaty, formerly the European Convention on the Protection of Archaeological Heritage (1992)

- HM Government, Planning (Listed Buildings & Conservation Areas) Act 1990
- European Convention for the Protection of the Architectural Heritage of Europe (1985)
- HM Government, Ancient Monuments & Archaeological Areas Act 1979
- The United Nations (UNESCO) World Heritage Convention (1972)
- United Nations (UNESCO) World Heritage Convention (1972).
- HM Government, Historic Buildings and Ancient Monuments Act 1953

Implications for the Local Plan and IIA: The potential impact of new development on the historic environment, including local character as well as designated and non-designated heritage assets and their respective settings should also inform the preparation of the Local Plan. Particular regard may be given to protecting heritage assets which have been identified as being 'at risk' (both at the national and local level). Policies should be included to address these issues and site options should be considered with regard to the potential for related issues. The IIA should appraise both policy and site options in terms of the potential for effects on the historic environment. It should identify those locations at which development would have the greatest potential to adversely impact the historic environment, as informed by heritage impact assessment work for the Local Plan.

Landscape

3.38 The relevant international and national PPPs under this topic are:

- The Environment Act (2021).
- The European Landscape Convention (2000).
- Defra, A Green Future: Our 25 Year Plan to Improve the Environment (2018).
- The Countryside and Rights of Way Act 2010.
- National Parks and Access to the Countryside Act 1949.

Implication for the Local Plan and the IIA: The Local Plan should help to ensure that designated and valued landscapes are protected and enhanced, and that development should be sympathetic to local character and history including the surrounding built environment and landscape setting. The IIA is able to respond to this through the inclusion of IIA objectives relating to the character of landscapes and townscapes and green infrastructure.

Transport and accessibility

3.39 The relevant international and national PPPs under this topic are:

- Department for Levelling Up, Housing and Communities, The Levelling Up the United Kingdom White Paper (2022).
- Secretary for Transport, The Cycling and Walking Investment Strategy Report to Parliament (2022)
- HM Government, The Environment Act 2021.
- Department for Transport, Decarbonising Transport: A Better, Greener Britain (2021).
- Department for Transport, Decarbonising Transport: Setting the Challenge (2020).
- Department for Transport, Transport Investment Strategy (2017).
- Highways England, Sustainable Development Strategy and Action Plan (2017).
- HM Government, The Road to Zero.
- The 2030 Agenda for Sustainable Development (2015).

- Department for Transport, Door to Door: A strategy for improving sustainable transport integration.

Implication for the Local Plan and the IIA: The IIA should be used to test policy and site options in terms of the contribution they can make to making transport choices more sustainable in the Borough. As well as testing site options in terms of limiting the need to travel in Enfield, policy options should be tested with regard the contribution they make to the uptake of more sustainable transport options, such as walking and cycling and public transport.

Sub-national policy context

3.40 Below the national level there are further plans and programmes which are of relevance for the Local Plan and IIA process. These plans and programmes sit mostly at the sub-regional, county and borough level. Details of those plans and programmes which are relevant at this level are provided in the IIA Scoping Report, but given its importance to Enfield's Local Plan, a summary of the implications of the London Plan is provided below.

The London Plan

3.41 The London Plan 2021 is the statutory Spatial Development Strategy for Greater London. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The London Plan is prepared by the Mayor of London in accordance with the Greater London Authority Act 1999 (as amended) and associated regulations. The London Plan is legally part of each of London's local planning authorities' Development Plans. As a result, planning applications, Development Plan Documents and Neighbourhood Plans must be in 'general conformity' with the London Plan.

3.42 The London Plan identifies space for over 52,000 new homes per year in London and has a target that 50% of all new homes should be 'genuinely affordable'. In the London Plan, Enfield Borough has a 10 year housing target of 12,460 new homes and 3,530 new homes on smaller sites. The Borough must also achieve 195 units per year for older persons.

3.43 With regard to employment and industry, the London Plan highlights four Strategic Industrial Locations (SILs) in the Borough: (1) Brimsdown; (2) Central Leaside Business Area; (3) Freezywater/Innova Park; and (4) Great Cambridge Road (all in the Lee Valley Industrial Property Market Area). SILs are London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy. According to Policy E5: Strategic Industrial Locations in the London Plan, SILs should be protected and intensified.

3.44 Policy SI7: Reducing waste and supporting the circular economy in the London Plan seeks to promote a more circular economy that improves resource efficiency, as well as encouraging waste minimisation and waste prevention. By 2026, there should be zero biodegradable or recyclable waste to landfill and all London authorities must meet or exceed the municipal waste recycling target of 65% by 2030. With regard to construction and demolition waste, 95% must be reused, recycled or recovered. Enfield's household, commercial and industrial waste forecast for 2021 is 305,000 tonnes and is projected to increase to 327,000 tonnes by 2041.

3.45 Policy SI2: Minimising greenhouse gas emissions states that there must be a minimum on-site reduction of emissions by at least 35% beyond Building Regulations. Residential development should achieve 10%, and non-residential should achieve 15% through efficiency measures.

3.46 Policy SI8: Waste capacity and net waste self-sufficiency aims for full waste self-sufficiency in London by 2026, safeguarding and optimising existing sites, creating new facilities if necessary, and emphasising environmental and social advantages. The policy also states that Development Plans should align with Circular Economy principles, allocate suitable sites, and encourage collaboration amongst Boroughs. Proposals for waste sites should emphasise integration, renewable energy, and low emissions, whilst also considering carbon outcomes and local impacts.

3.47 Policy G5: Urban greening outlines that Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial developments (excluding B2 and B8 uses). Existing green space designations will remain strong to protect the environment, and improvements to green infrastructure, biodiversity and other environmental factors, delivering more than 50% green cover across London, will be important to help London become a National Park City.

3.48 Policy G6: Biodiversity and access to nature states that Sites of Importance for Nature Conservation (SINCs) should be protected. When developing Development Plans, boroughs should use up-to-date information about the natural environment and the relevant procedures to identify SINCs, ecological corridors and coherent ecological networks.

Baseline information

3.49 Baseline information provides the context for assessing the sustainability of proposals in the Local Plan and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. To inform an IIA, baseline data must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records that are sufficient to identify trends.

3.50 Schedule 2 of the SEA Regulations requires that the environmental report includes descriptions of:

“(2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.”

“(3) The environmental characteristics of areas likely to be significantly affected.”

3.51 Schedule 2(6) of the SEA Regulations requires the likely significant effects of the plan on the environment to be assessed in relation to: biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage including architectural and archaeological heritage; landscape; and the inter-relationship between these. As an integrated SA/SEA with HIA, EqlA and CSIA is being carried out, baseline information relating to other ‘sustainability’ topics has also been included, for example, information about housing, social inclusiveness, crime, transport, energy, waste and economic growth.

3.52 Information on existing environmental, social and economic conditions in the Plan area provides the baseline against which the Plan’s effects can be assessed in the IIA and monitored during the Plan’s implementation. Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the Local Plan to understand the likely future sustainability conditions in the absence of the Local Plan.

3.53 Appendix D includes baseline information. This information is presented for a number of topic areas.

Key sustainability issues

3.54 Schedule 2 of the SEA Regulations requires the IIA to report on:

“Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.”

3.55 Analysis of the baseline information has enabled a number of key sustainability issues facing the London Borough of Enfield to be identified. Key sustainability issues for Enfield Borough were previously identified through the Scoping process for the IIA of the emerging Local Plan in 2020, undertaken by AECOM. These issues were reviewed, revised, and supplemented in light of updates to the baseline information, as set out in the June 2021 IIA of the Enfield Local Plan: Main Issues and Preferred Approaches.

3.56 By identifying these problems, the IIA can, as a minimum, help the Local Plan to avoid exacerbating these, and ideally highlight opportunities for the Local Plan to help to solve them. Such opportunities are also presented within this chapter.

Table 3.1: Key sustainability issues for Enfield Borough and opportunities presented by the Local Plan

Key sustainability issues for Enfield	Opportunities presented by the Local Plan	Relevant IIA objectives
Air quality		
<p>The London Borough of Enfield experiences problems with air quality, particularly between the east and west of the Borough, and to the south. This is largely related to carbon emissions produced by transport within the Borough. The entire Borough has been declared an AQMA and there are concerns the Ultra-Low Emission Zone in the south of the Borough could potentially result in traffic re-routing in the Borough, which could contribute towards air pollution issues elsewhere. Unenclosed waste facilities in less industrialised areas of the Borough are also expected to contribute towards poor air quality. Of particular concern is the effect future development in LBE could have on the Epping Forest SAC.</p>	<p>The adopted Core Strategy already includes a policy seeking to minimise air pollution and reduce public exposure to pollution, specifically Core Policy 32: Pollution, which requires development to improve air quality by reducing pollutant emissions, particularly in areas identified as having poor air quality. The Development Management Document contains a policy that only permits development if pollution and the risk of pollution is prevented, or reduced and mitigated during all phases of development, namely DMD 64: Pollution Control and Assessment. Similarly, Policy DMD 65: Air Quality stipulates that planning permission will be refused for developments which would have an adverse effect on air quality unless mitigation of these effects has been proposed by the developer. Major developments should be accompanied by an air quality assessment and developments involving sensitive uses should only be permitted if sited away from major sources of pollution. According to the London Plan, development proposals must not lead to further deterioration of existing poor air quality or create an unacceptable risk of high levels of exposure to poor air quality, as set out in Policy SI 1: Improving Air Quality. To achieve this, development proposals should use design solutions that prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures.</p> <p>With regard to the Ultra-Low Emission Zone and traffic re-routing, the adopted Core Strategy includes policies encouraging the use of sustainable modes of transport. Core Policy 24: The Road Network encourages sustainable travel choices and reduces growing congestion levels through the promotion of Travel Demand Management Programmes. The Development Management Document already includes a policy, DMD 48: Assessing the Transport Implications of New Development, which seeks to reduce congestion through the production of a Travel Plan. The London Plan contains a number of policies that encourage uptake of sustainable travel modes by delivering patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. According to the London Plan, development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity, as set out in Policy T4: Assessing and Mitigating Transport Impacts. The policy states that where appropriate, mitigation will be required to address adverse transport impacts.</p> <p>With respect to the Epping Forest SAC, pressures on the natural environment are likely to continue regardless of the adoption of the Local Plan, although the Core Strategy, Development</p>	<p>IIA objective 11: Air pollution</p>

Key sustainability issues for Enfield	Opportunities presented by the Local Plan	Relevant IIA objectives
	<p>Management Document and London Plan already include policies seeking to address these pressures. Core Policy 36: Biodiversity seeks to protect, enhance, restore or add to biodiversity interests within the Borough with specific reference to European sites. Similarly, Policy DMD 78: Nature Conservation in the Development Management Document stipulates that development that has a direct or indirect negative impact upon important ecological assets will only be permitted where the harm cannot reasonably be avoided and it has been demonstrated that appropriate mitigation can address the harm caused.</p> <p>The Local Plan presents an opportunity to tailor policies to directly address air quality issues in the Borough, for example by encouraging walking, cycling and public transport rather than the private car. The Local Plan also offers the opportunity to build on these overarching policies through more specific policy wording that references the Epping Forest SAC.</p>	
Biodiversity		
<p>The Borough contains a number of designated and non-designated biodiversity assets which are experiencing recreational use pressures, as well as poor air quality, particularly the Epping Forest SAC, Walthamstow Reservoirs SSSI and Lee Valley SPA and Ramsar. Ecological connectivity across the Borough could be improved, in addition to the ecological status of watercourses.</p>	<p>Pressures on the natural environment are likely to continue regardless of the adoption of the Local Plan, although the Core Strategy, Development Management Document and London Plan already include policies seeking to address these pressures. Core Policy 36: Biodiversity seeks to protect, enhance, restore or add to biodiversity interests within the Borough, which includes European sites, SSSIs, SINC and Priority Habitats, whilst Core Policy 32: Pollution seeks to improve air quality by reducing pollutant emissions, particularly in areas identified as having poor air quality. Policy DMD 78: Nature Conservation in the Development Management Document stipulates that development that has a direct or indirect negative impact upon important ecological assets will only be permitted where the harm cannot reasonably be avoided and it has been demonstrated that appropriate mitigation can address the harm caused. Policy DMD 64: Pollution Control and Assessment only permits development if pollution and the risk of pollution is prevented or reduced and mitigated during all phases of development. According to Policy G6: Biodiversity and access to nature in the London Plan, SINC should be protected and where harm to a SINC is unavoidable, the mitigation hierarchy should be applied to minimise development impacts: (1) avoid damaging the significant ecological features of the site; (2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site; and (3) deliver off-site compensation of better biodiversity value. With regard to air quality, Policy SI 1: Improving air quality stipulates that development proposals should not lead to further deterioration of existing poor air quality.</p> <p>With respect to the Lee Valley Regional Park, the adopted Core Strategy already includes policies seeking to provide effective links to the Park. Core Policy 35: Lee Valley Regional Park and Waterways seeks to improve access to the Park, particularly from residential communities to</p>	<p>IIA objective 13: Biodiversity</p>

Key sustainability issues for Enfield	Opportunities presented by the Local Plan	Relevant IIA objectives
	<p>its west, focusing on two key areas: Ponders End and Central Leaside. The policy states that the Council will support the work of Lee Valley Regional Park Authority to realise the potential of the Park, whilst also making best use of the waterway network, seeking to fully restore the waterways and improve their pathways. The Core Strategy also contains a policy seeking to protect and enhance water quality, namely Core Policy 32: Pollution, which seeks to ensure that water quality is not compromised by new development and secures, where appropriate, improvements to water quality. As set out in the policy, the Council will work with partners, particularly the Environment Agency, to seek improvements to the water environment in adherence with the Water Framework Directive and as per the programme of measures set within the Thames River Basin Management Plan. Policy DMD 70: Water Quality in the Development Management Document does not permit development that would adversely affect water quality.</p> <p>The Local Plan presents an opportunity for new development to come forward at the most appropriate locations in order to avoid detrimental impacts on biodiversity assets and the water environment, as well as up to date planning policy in relation to future policy direction with specific reference to the Epping Forest SAC. It also provides the opportunity to further promote Lee Valley through new access points, in addition to improving existing ones, whilst also working on improving the ecological status of watercourses. The Local Plan can also promote sustainable drainage and green/blue infrastructure that enables natural cleaning processes to take place (e.g. reed beds) while also serving as a habitat for wildlife.</p>	
Climate change adaptation		
<p>Climate change is likely to increase temperatures and the subsequent risk of flooding and summer droughts. This is particularly the case in the Borough, where the urban heat island effect results in summer temperatures up to 10°C warmer than more rural areas around Greater London. Fluvial flood risk provides the greatest flood risk concern and is concentrated in the east of the Borough along the River Lee.</p>	<p>Climate change is likely to have ongoing effects regardless of the adoption of the Local Plan, although the Core Strategy, Development Management Document and London Plan already include policies seeking to respond to this issue, and these could continue to apply in the absence of the Local Plan. Core Policy 20: Sustainable Energy Use and Energy Infrastructure in the Core Strategy requires all new developments and, where possible via a retrofitting process in existing developments, to address the impacts of climate change by minimising energy use, supplying energy efficiently, and using energy generated from renewable sources. According to the policy, the Council will support appropriate measures to adapt to the impacts of climate change and will reduce emissions of carbon dioxide as part of development proposals. The Development Management Document contains a number of climate change policies, which require all new development to achieve the highest sustainable design and construction standards and to include measures capable of adapting to climate change. All development proposals are required to demonstrate how they minimise energy related CO₂ emissions. Where major developments have secured all possible savings through energy efficiency and</p>	<p>IIA objectives 2: Climate change adaptation and 17: Flooding</p>

Key sustainability issues for Enfield	Opportunities presented by the Local Plan	Relevant IIA objectives
	<p>decentralised energy networks and still fail to achieve the specified carbon dioxide reductions targets, they will be required to provide on-site renewable energy generation through the use of low and zero carbon technologies. The London Plan also contains a number of policies that seek to minimise greenhouse gas emissions, including Policy 21 4: Managing Heat Risk which relates to the urban heat island effect and minimising this effect through design, layout, orientation, materials and the incorporation of green infrastructure.</p> <p>With respect to fluvial flood risk, Core Policy 28: Managing Flood Risk Through Development diverts development to areas of low flood risk, whilst Core Policy 29: Flood Management Infrastructure seeks to maintain and enhance the Borough's existing flood defence infrastructure. Policy DMD 59: Avoiding and Reducing Flood Risk in the Development Management Document requires development to avoid and reduce the risk of flooding, at the same time as not increasing flood risk elsewhere. The London Plan contains Policy SI 12: Flood Risk Management which requires development proposals to make space for water and for development to be set back from the banks of watercourses. Development proposals adjacent to flood defences are required to protect the integrity of flood defences and allow access for future maintenance and upgrading.</p> <p>The Local Plan presents an opportunity to build on these overarching policies through more specific policies and site allocations that are selected following consideration of their risk of flooding, particularly in areas of the Borough that are most vulnerable to flooding. The Local Plan may also offer opportunities to encourage flood management through the green/blue infrastructure network and sustainable drainage systems.</p>	
Climate change mitigation		
<p>While CO₂ emissions have fallen in LBE, the Council has declared a climate emergency and will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040. To meet this, the Borough will need to minimise the need to travel and reduce emissions associated with the built environment.</p>	<p>The Core Strategy, Development Management Document and London Plan all contain policies that seek to reduce CO₂ emissions, particularly those associated with the private car. Core Policy 24: The Road Network states that the Council will encourage sustainable travel choices and support the use of low carbon vehicles, including electric vehicles. Core Policy 25: Pedestrians and Cyclists makes provision for safe, convenient and accessible routes for pedestrians, cyclists and other non-motorised modes, whilst Core Policy 26: Public Transport seeks to secure a comprehensive, safe, accessible, welcoming and efficient public transport network. In the Development Management Document, Policy DMD 48: Transport Assessments requires all major development proposals to be accompanied by a transport assessment and where relevant, a Travel Plan, which identifies the need to improve modal choice, pedestrian accessibility, minimise congestion or reduce pollution. The London Plan requires development proposals to reduce the dominance of vehicles on London's streets and to be permeable by foot</p>	<p>IIA objectives 1: Climate change mitigation and 12: Sustainable transport</p>

Key sustainability issues for Enfield	Opportunities presented by the Local Plan	Relevant IIA objectives
	<p>and cycle, whilst also connecting to local walking and cycling networks, as well as public transport.</p> <p>Core Policy 20: Sustainable Energy Use and Energy Infrastructure addresses the causes of climate change, as well as the impacts mentioned above under 'Climate change adaptation'. According to this policy, development proposals must reduce carbon dioxide emissions. Similarly, Policy DMD 49: Sustainable Design and Construction Statements requires all development to mitigate and adapt against climate change.</p> <p>The Local Plan provides an opportunity to strengthen policies which act positively with respect to climate change, especially those that limit the need to travel through the appropriate siting and design of new development, or which encourage electric vehicle uptake in place of petrol and diesel fuelled vehicles, and which make provision for renewable energy generation.</p>	
Communities		
<p>The Borough's age structure is changing in line with national trends, with a decreasing proportion of young people and an increasingly ageing population. Enfield has a growing ethnic and religious diversity.</p>	<p>Core Policy 9: Supporting Community Cohesion states that the Council will work with partners to promote community cohesion by supporting area based policy interventions relating to the place shaping agenda, both of which seek to tackle social disadvantage. Further to this, the policy requires the provision of necessary community facilities (Core Policies 37-45) to support local need, whilst also actively encouraging participation by all members of the community in planning and decision making processes. With respect to education, Core Policy 8: Education supports and encourages the provision of appropriate public and private sector pre-school, school and community learning facilities to meet projected demand across the Borough. Core Policy 7: Health and Social Care Facilities and the wider determinants of health also seeks to provide the health and social care facilities required by residents, so as to improve overall health and reduce inequalities. Policies DMD 16: Provision of New Community Facilities and DMD 17: Protection of Community Facilities support the retainment or provision of community facilities in areas where there is a demonstrated need. The London Plan also contains a number of policies on social infrastructure, which help to reduce inequalities between different areas across Greater London.</p> <p>Enfield is one of the 20% most deprived local authorities in England. Life expectancy is 8.8 years lower for men and 5.7 years lower for women in the most deprived areas of LBE than in the least deprivates areas. Additionally, around 22.2% (16,6670) children live in low income families. 10 LSOAs within the Borough fall within the top 10% most deprived LSOAs nationally. It is recognised that the Local Plan is only part of the solution to tackling deprivation and that there are a range of factors that may need to be addressed outside the scope of the Local Plan.</p>	<p>IIA objectives 6: Social inclusion and 4: Health and wellbeing</p>

Key sustainability issues for Enfield	Opportunities presented by the Local Plan	Relevant IIA objectives
Crime and community safety		
<p>Crime is a problem experienced across the Borough. The three most common types of recorded crime in Enfield are 'violence against the person', 'theft' and 'vehicle offences'. Concerning vehicle offences, people walking, cycling and motorcycling made up 81% of all people killed or seriously injured. The number of children seriously injured as pedal cyclists has increased. There is a demand for improved road safety for pedestrians and cyclists, to improve community safety.</p>	<p>Core Policy 9: Supporting Community Cohesion states that the Council will work with its partners to promote community cohesion by contributing towards reducing crime, fear of crime and anti-social behaviour by using design principles that create environments which promote community safety and discourage offending. Core Policy 30: Maintaining and Improving the Quality of the Built and Open Environment requires all developments and interventions in the public realm to be high quality and design-led, with reference to safe, accessible, inclusive and sustainable neighbourhoods. Policy DMD 34: Evening Economy in the Development Management Document supports an evening economy, provided there is an active ground floor street frontage and measures are in place to address issues such as community safety, policing and litter. Policy DMD 37: Achieving High-Quality and Design-Led Development also looks at the quality of the public realm and ensuring it is safe, attractive, uncluttered and effective. The policy specifically states that all development should create safe and secure places and comply with the principles of Secured by Design.</p> <p>With respect to road safety, a number of policies seek to foster road safety, including Core Policy 25: Pedestrians and Cyclists, by implementing 'Streets for People' initiatives. Similarly in the Development Management Document, Policy DMD 39: The Design of Business Premises, makes reference to creating a pleasant and safe environment for pedestrians, cyclists and vehicles at all times of the day. So too does Policy DMD 45: Parking Standards and Layout.</p> <p>The Local Plan can affect levels of crime indirectly by providing for development opportunities that generate jobs, affordable housing, and community facilities within more deprived communities. Through doing so, some of the causes of crime can be addressed. In addition, it is possible through good design of developments to further reduce the opportunities for crime, for example through appropriate lighting, natural surveillance via 'eyes on the street', security measures, etc.</p>	<p>IIA objectives 7: Crime and community safety and 8: Road safety</p>
Economy and employment		
<p>Education and skills provision could further meet the needs of Enfield's existing and future labour market, improving life chances for all, including by enabling older people and people with physical and</p>	<p>The Core Strategy already includes policies seeking to protect and improve LBE's employment offer, with a particular focus on the Strategic Industrial Locations (SILs) and the Locally Significant Industrial Sites (LSIS). With regard to education and skills development, Core Policy 16: Taking Part in Economic Success and Improving Skills encourages the Borough's colleges and work-based learning providers to deliver vocational lines of learning, whilst also exploring the possibility of establishing a new higher education/further education campus within the Upper Lee Valley. According to the policy, the Council will also work with partners to develop local</p>	<p>IIA objectives 9: Economy, 10: Town and local centres and 5: Services and facilities</p>

Key sustainability issues for Enfield	Opportunities presented by the Local Plan	Relevant IIA objectives
<p>mental health conditions to stay in employment.</p>	<p>employment partnerships and concentrate available resources in priority areas, so as to reach hard-to-serve populations and target the most disadvantaged areas. Core Policy 8: Education relates to the latter policy in seeking to support and encourage provision of appropriate public and private sector pre-school, school and community learning facilities to meet projected demand across the Borough. Facilities will also be provided for further and adult education to develop and improve the skills of the existing and future workforce. In the Development Management Document, Policy DMD 23: New Employment Development encourages new industrial development, particularly within SILs and LSIS, whilst DMD 24: Small Businesses supports the provision of small business units suitable for start-ups.</p> <p>The Local Plan will present the opportunity to facilitate the delivery of educational establishments and issues of capacity to meet anticipated growth in demand for places, as well as ensuring that the educational establishments are of a high standard of design and easy and safe to access. Opportunities may exist to build on the overarching policies discussed above by helping to address the specific education and skills gaps in LBE by facilitating proposals for appropriate educational facilities.</p>	
Health		
<p>LBE experiences flagship health issues revolving around air quality, obesity and food deprivation, in addition to access to green spaces. There are also deficiencies in the Borough's health infrastructure with inadequate GP facilities, cross boundary pressure on health services and issues around primary health services.</p>	<p>The adopted Core Strategy includes a number of policies that already seek to address the most prominent identified health issues within LBE, including encouraging healthy lifestyles such as walking and cycling, and improving accessibility to green and open spaces. This includes Core Policy 25: Pedestrians and Cyclists, which seeks to provide safe, convenient and accessible footpaths and cycleways in order to encourage more active modes of travel, Core Policy 32: Pollution, which seeks to improve air quality by reducing pollutant emissions and exposure to pollution in the Borough, and Core Policy 34: Parks, Playing Fields and other open spaces, which sets out to protect and enhance existing open spaces, as well as to improve the provision of accessible open space in the Borough. The Development Management Document also includes policies that would address health issues within the Borough. Policy DMD 16: Provision of New Community Facilities would encourage more active modes of transport such as walking and cycling over the use of private vehicles, which would address issues relating to obesity, while Policy DMD 65: Air Quality seeks to prevent adverse impacts on air quality in the Borough. In addition, Policy DMD 85: Land for Food and Other Agricultural Uses supports the use of land for growing food, which would directly address the issue of food deprivation in the Borough.</p> <p>In the London Plan, Policy S2: Health and Social Care Facilities seeks to ensure that Boroughs identify and address local health care needs. The London Plan also contains a number of policies that address the provision of open space and green infrastructure, including Policy GG2:</p>	<p>IIA objectives 4: Health and wellbeing and 6: Social inclusion</p>

Key sustainability issues for Enfield	Opportunities presented by the Local Plan	Relevant IIA objectives
	<p>Making the Best Use of Land, which seeks to protect and enhance London's open spaces, Policy GG3: Creating a Healthy City, which seeks to improve access to green spaces and the provision of green infrastructure, Policy G1: Green Infrastructure, and Policies G3: Metropolitan Open Land and G4: Open Space. Policy S5: Sports and Recreation Facilities would also help address issues with obesity. Policy SI 1: Improving Air Quality directly addresses air pollution issues in the Borough, while policy T2: Healthy Streets promotes more active travel modes to improve emissions and reduce health inequalities.</p> <p>The Core Strategy contains a policy that seeks to retain existing health and social care provision in the Borough, as well as deliver new facilities in order to address deficiencies in the Borough's health infrastructure. Core Policy 7: Health and Social Care Facilities and the wider determinants of health seeks to prioritise this delivery in the east of the Borough and sets out the infrastructure requirements of the Borough over the Plan period. Policy GG3: Creating a Healthy City in the London Plan seeks to ensure that development helps to reduce health inequalities by planning for appropriate health infrastructure. In addition, Policy D2: Infrastructure Requirements for Sustainable Densities seeks to ensure that infrastructure in the London Boroughs has sufficient capacity to support proposed densities.</p> <p>The Local Plan presents an opportunity to build on these overarching policies discussed above through more specific policies, and by seeking to deliver development that meets the needs of the more deprived communities in the Borough. There is also an opportunity to address the disparity between the east and west of the Borough more directly by addressing the identified flagship health issues.</p>	
Heritage and townscape		
<p>LBE has a rich variety of designated heritage assets, all of which are continuously facing pressures for change, often indirectly, and from inappropriate development and activity affecting their setting and context.</p>	<p>The adopted Core Strategy already includes policies seeking to protect and enhance the historic environment, including Core Policy 31: Built and Landscape Heritage, which seeks to pro-actively preserve and enhance heritage assets within the Borough. Several policies within the Development Management Document already require development to have particular consideration for local distinctiveness and historic character in the Borough, such as Policy DMD 44: Conserving and Enhancing Heritage Assets. The document also includes Policies DMD 37: Achieving High Quality and Design-Led Development and DM 43: Tall Buildings, which seek to prevent inappropriate development that may result in adverse impacts on heritage assets. The London Plan contains a number of policies within Chapter 7: Heritage and culture, which aim to ensure that development is particularly considerate of heritage and cultural assets, including Policy HC1: Heritage Conservation and Growth, HC2: World Heritage Sites, HC3: Strategic and Local Views, and HC4: London View Management Framework which seeks to protect and</p>	<p>IIA objective 14: Historic environment</p>

Key sustainability issues for Enfield	Opportunities presented by the Local Plan	Relevant IIA objectives
	<p>enhance the characteristics and composition of strategic views and their landmark elements. Policy GG5: Growing a Good Economy within the London Plan also promotes the consideration of heritage assets in Greater London.</p> <p>The Local Plan presents opportunities to address the historic environment through specific policies and site allocations are likely to exist taking into account their impacts on the historic environment. Furthermore, the Local Plan will be able to be tailored to LBE's historic townscape and landscape setting.</p>	
Housing		
<p>The London Plan significantly raises Enfield's housing targets to a ten year target of 12,460, which equates to 1,246 dwellings per annum. LBE has the potential to be a continued focus for housing delivery at scale; however, it will be important to balance this with the delivery of a range of types and tenures in the area to meet localised needs, specifically the needs of families that require affordable family sized homes. The 2015 SHMA identifies the need for 50% affordable (rented and market) housing in the Borough; however, recent affordable housing delivery is below policy target, achieving 40% instead of the 50% target. LBE has also not delivered its annual housing target in the last three reporting years, leaving a gap in the supply of much needed housing (including affordable housing). Whilst there is a need to provide more housing simply to match the</p>	<p>The Core Strategy already includes a number of policies which seek to address the supply of housing in the Borough to meet the housing target set out in the London Plan. Core Policy 2: Housing Supply and Locations for New Homes makes provision for 11,000 new homes within broad locations in the Borough, over the fifteen year period of the Core Strategy time frame, from 2010/11 to 2024/25. Core Policy 3: Affordable Housing seeks to achieve a Borough-wide target of 40% affordable housing units in new developments. Core Policy 5: Housing Types seeks to ensure the delivery of a range of housing sizes to meet the needs of the Borough, with particular consideration for affordable homes for families. The Development Management Document already contains a number of policies within Chapter 2: Housing, which address the provision of affordable housing in the Borough with a mix of housing sizes that can accommodate families, and also includes an affordable housing target of 40%.</p> <p>A number of policies within Chapter 4: Housing of the London Plan already address the provision of housing in the Borough, including H1: Increasing Housing Supply, H2: Small Sites, H3: Meanwhile Use As Housing and H9: Ensuring the Best Use of Stock, which seek to promote the efficient use of existing housing stock to reduce the number of vacant and under-occupied dwellings. Furthermore, Policy H10: Housing Size Mix already seeks to provide an appropriate mix of housing sizes and a range of tenures to meet the needs of the Borough. Several policies within the London Plan seek to ensure the sufficient delivery of homes and the provision of affordable housing in the Borough, including Policy GG4: Delivering the Homes Londoners Need, Policy GG5: Growing a Good Economy, Policy H4: Delivering Affordable Housing, which aims to deliver 50% of all new homes in London as affordable housing, as well as H5: Threshold Approach to Applications, H6: Affordable Housing Tenure, H7: Monitoring of Affordable Housing and H8: Loss of Existing Housing and Estate Redevelopment.</p> <p>The Local Plan would provide an opportunity to ensure a sufficient supply of housing in the Borough to meet the growing demand over the Plan period. The Local Plan provides an</p>	<p>IIA objectives 3: Housing and 6: Social inclusion</p>

Key sustainability issues for Enfield	Opportunities presented by the Local Plan	Relevant IIA objectives
growing population, it is imperative that this housing be affordable.	opportunity to facilitate the delivery of affordable housing to meet the growing need identified in the SHMA, whilst also supporting the provision of a more appropriate range of housing to meet the mixed needs of the population, with particular provision for family sized homes.	
Landscape and green infrastructure		
There are a number of valued landscapes within LBE that fall within the Green Belt, including designed landscapes and extensive semi-rural landscape character areas, all of which need to be protected.	<p>The adopted Core Strategy contains a policy which ensures that Enfield's Green Belt is protected and enhanced, namely Core Policy 33: Green Belt and Countryside. Policies DMD 82: Protecting the Green Belt and DMD 83: Development Adjacent to the Green Belt in the Development Management Document also address the need to conserve the Green Belt within LBE. The document also contains policies that directly address the protection of specific, distinct and valued landscapes in the Borough, including DMD 84: Areas of Special Character, DMD 90: Appropriate Uses in the Crews Hill Defined Area and DMD 91: Improving the General Appearance of the Crews Hill Defined Area, which recognise Enfield's horticultural traditions and give particular consideration to the Crews Hill area. Policy G2: London's Green Belt in the London Plan already includes protection for the Green Belt from development and supports the enhancement of the Green Belt for multi-functional uses.</p> <p>The Local Plan provides an opportunity to build on these policies as well as tailor policies to directly address the protection of designed landscapes and landscape character areas in the north of the Borough, where most are located.</p>	IIA objective 15: Landscape and townscape and IIA objective 16: Efficient use of land and materials
There is an identified need for enhanced green space in the Borough, which could be addressed through increased accessibility and availability to open space, particularly the Lee Valley Regional Park in the east of the Borough	<p>The adopted Core Strategy includes Core Policy 34: Parks, Playing Fields and other Open Spaces, which seeks to protect and enhance existing open spaces, as well as improve the provision of accessible open space in the Borough. It also contains Core Policy 35: Lee Valley Regional Park and Waterways which gives particular consideration to the Lee Valley Regional Park and aims to improve access to the Park and restore and improve the waterways and footpaths in the area. The Development Management Document contains a number of policies that already provide protection, enhancement and provision of public open space and access to Green Infrastructure, including DMD 71: Protection and Enhancement of Open Space, DMD 72: Open Space Provision, DMD 73: Children's Play Space, DMD 74: Playing Pitches, and DMD 77: Green Chains.</p> <p>The London Plan contains several policies that address the provision of open spaces and green infrastructure in the Borough, including Policy GG2: Making the Best Use of Land, which seeks to protect and enhance London's open spaces, Policy GG3: Creating a Healthy City, which seeks to improve access to green spaces and the provision of green infrastructure, Policy G1: Green Infrastructure, which addresses the protection and enhancement of open spaces and</p>	IIA objective 4: Health and wellbeing

Key sustainability issues for Enfield	Opportunities presented by the Local Plan	Relevant IIA objectives
	<p>green infrastructure in the Borough and states how these assets should be planned, designed and managed. Policies G3: Metropolitan Open Land and G4: Open Space also provide opportunities for the provision and protection of open spaces, as well as access to open spaces by assigning Metropolitan Open Land, which is afforded the same level of protection as Green Belt and ensuring that development addresses open space deficiencies in LBE, respectively.</p> <p>The Local Plan provides an opportunity to tailor policies to directly address this east-west imbalance that has been further highlighted by the COVID-19 pandemic. The COVID-19 pandemic has brought to light the importance of healthy living environments, access to nature and outdoor space, and the ability to exercise.</p>	
Transport		
<p>There are a number of issues relating to transport within LBE. Census data indicates that the majority of residents use a private car to get to work instead of public transport, implying that accessibility and availability to active and public transport is a potential issue in the Borough.</p>	<p>The Core Strategy already includes a number of core policies that aim to address existing deficiencies in sustainable transport infrastructure in the Borough and ensure that planned growth is supported by adequate transport infrastructure. This includes Core Policy 25: Pedestrians and Cyclists, which encourages the use of sustainable modes of transport and seeks to provide safe, convenient and accessible routes for pedestrians and cyclists. Core Policy 26: Public Transport seeks to ensure a comprehensive, accessible and efficient transport network within the Borough that encourages the use of bus and rail transport systems, while Core Policy 27: Freight promotes the potential for freight movement by rail and water over the use of roads. The Development Management Document contains several policies relating to transport provision in LBE, such as Policy DMD45: Parking Standards and Layout, which ensures particular consideration for car parking proposals in the Borough against the public transport accessibility of the site in order to encourage the use of public transport over private vehicles and supports residential development in close proximity to a designated town centre in order to reduce the need to travel. Policy DMD47: Access, New Roads and Servicing ensures that developments include provision for pedestrian and cyclist access, while both Policy DMD47 and Policy DMD48: Transport Assessments seek to ensure that public transport use as a result of development is sustainable. Chapter 10 of the London Plan, 'Transport', includes a number of policies which seek to address issues relating to transport capacity, connectivity and the use of sustainable transport modes in the Borough. These policies aim to encourage walking, cycling and public transport use through the provision and improvement of new and existing transport infrastructure.</p>	<p>IIA objectives 12: Sustainable transport, 11: Air pollution and 1: Climate change mitigation</p>

Key sustainability issues for Enfield	Opportunities presented by the Local Plan	Relevant IIA objectives
	<p>The Local Plan provides an opportunity to directly address the east and west divide in the Borough through policy which can improve public transport connections and directly address inefficiencies in sustainable transport infrastructure.</p>	
Water		
<p>LBE is located within an area of water stress where demand is high and supply is subject to constraints. The Borough is serviced by the Deephams Sewage Treatment Works, which will need significant upgrade in order to continue to service a growing population.</p>	<p>The adopted Core Strategy contains a policy that seeks to ensure that Enfield's future water resource needs are managed effectively, and that water supply is considered with development to accommodate the growth anticipated in the Borough. Core Policy 21: Delivering Sustainable Water Supply, Drainage and Sewerage Infrastructure promotes sustainable design and construction for water conservation and efficiency measures in new and existing developments. The policy specifically states that in order to improve water quality in the Borough, Thames Water Utilities Ltd plan to improve/redevelop Deephams Sewage Treatment Water Works. The Development Management Document contains Policy DM58: Water Efficiency which requires all new development to adhere to limits on water usage and maximise water efficiency to conserve water. The Policy also encourages new development to undertake a rainwater and greywater use feasibility study in order to promote the collection of rainwater and reuse of greywater in new development. The London Plan contains two policies regarding water supply, namely Policy SI 5: Water Infrastructure and Policy SI 13: Sustainable Drainage, which similarly seek to maximise water use efficiency and promote improvements to water supply infrastructure to contribute to the security of water supply, as well as ensure efficient surface water management.</p> <p>The Local Plans provides an opportunity to build on these overarching policies through more specific policy wording that addresses the insufficient supply of water in the Borough and the provision of water infrastructure and upgrades to water resource services, specifically Deephams Sewage Treatment Works.</p>	<p>IIA objective 18: Water</p>
<p>There are a number of water quality issues that impact the Borough, with none of the main watercourses currently meeting the Water Framework Directive (WFD) required ecological status of 'Good'. The Borough is also covered by a number of Source Protection Zones (SPZs) that may be at risk of potential contamination.</p>	<p>In order to improve water quality within the Borough, Policy 21: Delivering Sustainable Water Supply, Drainage and Sewerage Infrastructure in the Core Strategy ensures that Enfield's wastewater treatment and drainage infrastructure requirements are implemented in tandem with planned growth within the Borough. The Policy also encourages the incorporation of sustainable drainage measures within new development as a means to manage surface water run-off. The adopted Core Strategy also includes Core Policy 32: Pollution, which seeks to minimise water pollution and secure improvements to water quality, with particular regard for adherence to the Water Framework Directive as set out within the Thames River Basin Management Plan. The Development Management Document contains a number of policies that address the protection and enhancement of water quality in the Borough. Policy DM61: Managing Surface Water requires all developments to implement a Drainage Strategy to demonstrate the use of</p>	<p>IIA objective 18: Water</p>

Key sustainability issues for Enfield	Opportunities presented by the Local Plan	Relevant IIA objectives
	<p>Sustainable Drainage Systems to prevent water pollution and protect, and where possible, enhance water quality. The Document also contains Policy DM63: Protection and Improvement of Watercourses and Flood Defences, which requires development to not result in the deterioration of a watercourse, and Policy DM70: Water Quality, which seeks to prevent development that will adversely impact water quality in the Borough, including waterways, SPZs and Aquifers. The London Plan contains Policies SI 5: Water Infrastructure and SI 13: Sustainable Drainage, which both seek to promote the protection and improvement of water quality in the Borough through the support of wastewater treatment infrastructure investment and sustainable surface water management, respectively.</p> <p>The Local Plan provides an opportunity to directly address the water quality of the main watercourses in the Borough that have been identified as not having met the water quality standards set by the WFD. The Local Plan also provides the opportunity to address the implications of the UK's departure from the EU on water quality in LBE and provide more specific policy wording to promote the protection and enhancement of water quality with particular regard to the SPZs within the Borough.</p>	

The IIA framework

3.57 As described in the Methodology chapter, the relevant objectives established via the review of plans, policies and programmes, and the key sustainability issues identified by a baseline review, informed development of a set of IIA objectives, the IIA framework, against which the Plan has been assessed. The IIA framework is presented below in **Table 3.2**.

Table 3.2: IIA framework

IIA Objective	Appraisal questions- Will the Local Plan...?	Relevant SEA topics covered (<i>and coverage of HIA, EqIA and CSIA</i>)
<p>IIA objective 1: Ensure the Local Plan serves to minimise LBE's per capita CO₂ emissions such that the Council will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040.</p>	<p>Minimise greenhouse gas emissions from industrial and commercial activities?</p> <p>Improve strategic public transport infrastructure?</p> <p>Ensure a complementary mix of land uses within compact communities that minimises the length of journeys to services and facilities, in addition to employment opportunities?</p> <p>Increase the proportion of journeys made on foot or by cycle, and developments are of a sufficient density to support and enhance local services and public transport provision?</p> <p>Provide roadside green infrastructure, particularly trees, which could help absorb carbon dioxide?</p> <p>Sustainable transport is addressed separately under IIA objective 12.</p>	<p>Climatic factors</p> <p>Air</p>
<p>IIA objective 2: Ensure resilience to climate change particularly mindful of the likelihood of climate change leading to problematic high temperatures, worsened flood risk and increased risk of drought.</p>	<p>Require the incorporation of sustainable design and construction techniques in development?</p> <p>Ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping?</p> <p>Reduce the risk of damage to people, property and infrastructure from extreme weather events?</p> <p>Flood risk is addressed separately under IIA objective 17.</p>	<p>Climatic factors</p> <p>Human health</p> <p>Biodiversity, flora and fauna</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p>
<p>IIA objective 3: Deliver housing to meet agreed targets and support an appropriate mix of housing types and tenures, including affordable and specialist housing, including</p>	<p>Provide for a range of housing types and tenures to meet identified housing needs?</p> <p>Provide affordable housing to meet identified needs?</p> <p>Address the housing needs of older people, i.e. extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?</p> <p>Provide specialist accommodation for those with disabilities?</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p> <p><i>Equalities Impact Assessment</i></p>

IIA Objective	Appraisal questions- Will the Local Plan...?	Relevant SEA topics covered (<i>and coverage of HIA, EqIA and CSIA</i>)
housing for the elderly and disabled people.	Make provision for homes that can be adapted to support independent living for older and disabled people?	
IIA objective 4: Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the Borough.	<p>Improve access to healthcare and provide new or enhanced local health services to support new and growing communities?</p> <p>Contribute to narrowing health inequalities?</p> <p>Improve access to outdoor and indoor sport and leisure facilities, in addition to recreation facilities?</p> <p>Improve access to open space and the countryside, including Lee Valley Regional Park, recognising its sensitivity to human disturbance?</p> <p>Provide, steward and maintain green infrastructure assets and networks, ensuring that these are linked into new and existing developments, to improve the connectivity of green space and green networks?</p> <p>Limit the risk of air, noise and light pollution on local people?</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p> <p><i>Equalities Impact Assessment</i></p>
IIA objective 5: Support good access to services, facilities and wider community infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.	<p>Maintain and improve access to key services and facilities for all sectors of the population? / Ensure proposals retain or re-provide existing social infrastructure?</p> <p>Improve access to community facilities?</p> <p>Make provision for religious places of worship?</p> <p>Provide new and improved education facilities, which will support raising attainment and the development of skills, leading to a work ready population of school and college leavers?</p> <p>Improve educational attainment, qualification levels and participation in education and training?</p> <p>Access to more general services and facilities is addressed separately under IIA objective 10.</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p> <p><i>Equalities Impact Assessment</i></p>
IIA objective 6: Encourage social inclusion, promotion of	Reduce poverty and social exclusion in those areas most affected?	<p>Population</p> <p>Human health</p>

IIA Objective	Appraisal questions- Will the Local Plan...?	Relevant SEA topics covered (and coverage of HIA, EqIA and CSIA)
equality and a respect through diversity.	<p>Develop social cohesion through good urban design, using the healthy streets indicators and community spaces that act as a catalyst for community cohesion?</p> <p>Make provision for open space within town centres and new developments, encouraging interaction amongst residents?</p> <p>Make the public realm safe and attractive to use by pedestrians?</p>	<p><i>Health Impact Assessment</i></p> <p><i>Equalities Impact Assessment</i></p>
IIA objective 7: Reduce crime and increase community safety.	<p>Support targeted interventions to reduce crime and increase community safety, guided by LBE's Crime and Community Safety team, and ensure high quality new developments that are future proofed?</p> <p>Reduce levels of crime, anti-social behaviour and the fear of crime through high quality design and intervention, i.e. street layout, public space provision, passive surveillance, lighting, etc.?</p> <p>Encourage access to, and the provision of, community and youth facilities in more deprived neighbourhoods?</p> <p>Increase the perception of safety from crime?</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p> <p><i>Community Safety Impact Assessment</i></p>
IIA objective 8: Focus on delivering the 'Vision Zero' target for road safety.	<p>Apply healthy streets principles to ensure pedestrians and cyclists can travel safely?</p> <p>Ensure safe street design so as to encourage walking and cycling?</p>	<p>Population</p> <p>Human health</p> <p><i>Health Impact Assessment</i></p>
IIA objective 9: Support a strong, diverse and resilient economy that provides opportunities for all.	<p>Support the growth of Strategic Industrial Locations and Locally Significant Industrial Sites?</p> <p>Ensure a sufficient supply of land to meet local employment needs?</p> <p>Provide opportunities for start-up companies and expansion of local companies, particularly in high-performance technologies, business and professional services?</p> <p>Help diversify employment opportunities locally, including employment within the social enterprise, voluntary and community sectors and a growing higher wage economy?</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p>

IIA Objective	Appraisal questions- Will the Local Plan...?	Relevant SEA topics covered (<i>and coverage of HIA, EqIA and CSIA</i>)
	Improve access to jobs for local people from all sectors of the community that will reduce inequality between standards of living?	
IIA objective 10: Support the vitality of the Borough's town and local centres.	<p>Enhance the vitality and vibrancy of town and local centres?</p> <p>Encourage the retention of and expansion of town and local centre commercial and retail uses?</p> <p>Provide for a range of homes within the town and local centres?</p> <p>Promote regeneration in the Borough?</p> <p>Provide, protect or enhance locations for cultural activities, including the arts?</p>	<p>Population</p> <p>Material assets</p>
IIA objective 11: Minimise air pollution.	<p>Protect and improve air quality in the Borough which is entirely designated as an Air Quality Management Area (AQMA)?</p> <p>Support reduced air pollution in existing hotspots and avoid the creation of new air pollution hotspots, contributing to the achievement of the national and London-wide targets.</p> <p>Minimise air pollution caused by traffic and commercial uses?</p> <p>Address traffic congestion within the Borough and along key routes through neighbouring areas, with a focus on emission reduction, health impacts and the delivery of pedestrian friendly urban design?</p> <p>Mitigate the impacts of unenclosed waste facilities on dust and particulate pollution in less industrialised areas?</p>	<p>Air</p> <p>Human health</p> <p><i>Health Impact Assessment</i></p>
IIA objective 12: Minimise the need to travel and support a modal shift away from the private car.	<p>Make provision for safe and easy access to public transport services?</p> <p>Promote and facilitate the use of electric cars and sustainable modes of transport?</p> <p>Promote compact, mixed-use development, which encourages walking and cycling for short journeys?</p>	<p>Population</p> <p>Air</p> <p>Human health</p> <p>Climatic factors</p> <p>Material assets</p>

IIA Objective	Appraisal questions- Will the Local Plan...?	Relevant SEA topics covered (and coverage of HIA, EqIA and CSIA)
		<i>Health Impact Assessment</i>
<p>IIA objective 13: Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks.</p>	<p>Maintain the integrity of the Epping Forest SAC?</p> <p>Protect locally designated and non-designated biodiversity sites from both the direct and indirect adverse effects of development?</p> <p>Avoid impacts of development and human disturbance on Lee Valley Regional Park?</p> <p>Safeguard and strengthen local ecological/green infrastructure networks that contribute to ecological connectivity both within Enfield Borough and their links with ecological networks in neighbouring boroughs?</p> <p>Deliver targeted enhancements that improve the functioning of networks and are supportive of established conservation objectives?</p> <p>Ensure that known biodiversity of brownfield sites is given due weight reflecting its ecological interest and value?</p> <p>Deliver biodiversity net gain through individual development contributions?</p> <p>Take into account opportunities to enhance biodiversity in the layout and design of development, including allowing species to adapt to climate change?</p>	<p>Biodiversity, flora and fauna</p>
<p>IIA objective 14: Sustain and enhance the significance of heritage assets.</p>	<p>Support the integrity, special interest, character, appearance and historic setting of historic settlements and heritage assets, both designated and non-designated?</p> <p>Facilitate enhancements to the fabric and setting of the historic environment?</p> <p>Support access to, interpretation and understanding of the historic environment (including through investigations and studies which better reveal the significance of archaeological assets)?</p> <p>Protect, maintain and enhance scheduled monuments and archaeological sites, and their settings?</p> <p>Protect, maintain and enhance registered parks and gardens, and their settings?</p>	<p>Cultural heritage, including architectural and archaeological heritage</p>

IIA Objective	Appraisal questions- Will the Local Plan...?	Relevant SEA topics covered (<i>and coverage of HIA, EqIA and CSIA</i>)
	<p>Improve participation in cultural activities?</p> <p>Promote greater understanding and enhancement of the Borough's historic environment, such as parks and open spaces, and areas with a particular heritage significance?</p> <p>Help foster heritage-led regeneration?</p>	
<p>IIA objective 15: Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes.</p>	<p>Protect and enhance the landscape and townscape through the appropriate location, layout and design of new development, including the preservation of important open gaps and key views?</p> <p>Protect and enhance the local distinctiveness and contribution to a sense of place?</p> <p>Contribute to London-wide Green Infrastructure objectives, including in respect of the Lee Valley Regional Park?</p>	<p>Landscape</p> <p>Cultural heritage including architectural and archaeological heritage</p>
<p>IIA objective 16: To achieve efficient use of land and materials.</p>	<p>Avoid development of high quality agricultural land?</p> <p>Ensure the re-use and redevelopment of brownfield sites?</p> <p>Make efficient use of recycled and secondary materials?</p> <p>Encourage minimisation, reuse and recycling of waste?</p> <p>Protect mineral resources and ensure development avoids sterilisation of local mineral reserves?</p>	<p>Soil</p> <p>Material assets</p>
<p>IIA objective 17: To manage and reduce the risk of flooding</p>	<p>Minimise the risk of flooding to people, property and infrastructure from rivers?</p> <p>Avoid development in locations at risk from flooding or which could increase the risk of flooding elsewhere, taking into account the impacts of climate change?</p> <p>Create development that incorporates Sustainable Urban Drainage Systems (SUDS) (including their long-term maintenance) to reduce the rate of run-off and the risk of surface water flooding and combined sewer overflows?</p>	<p>Human health</p> <p>Water</p> <p>Climatic factors</p> <p><i>Health Impact Assessment</i></p>

IIA Objective	Appraisal questions- Will the Local Plan...?	Relevant SEA topics covered (<i>and coverage of HIA, EqIA and CSIA</i>)
<p>IIA objective 18: Minimise water use and protect water quality.</p>	<p>Ensure that development does not lead to the deterioration of groundwater, surface water or river water quality?</p> <p>Locate development where adequate foul drainage, sewage treatment facilities, adequate potable water supply and surface water drainage can be made available?</p> <p>Require the incorporation of SUDS?</p> <p>Increase water efficiency, particularly in new developments through innovative design measures?</p>	<p>Water</p>

Chapter 4

IIA findings for Chapter 2 of the Enfield Local Plan

2. Good growth in Enfield

4.1 This chapter presents the IIA findings for the vision, strategic objectives and strategic policies (SP SS1 and SP SS2) included in Chapter 2 (Good growth in Enfield) of the Enfield Local Plan.

Enfield's vision and strategic objectives

4.2 The vision is as follows:

By 2041, Enfield will be a place of growing opportunity for future generations: a green lung of London and a place where new homes, particularly family housing and the availability of new employment opportunities are catalysts for the thriving of all our communities.

Inclusive housing growth will be accommodated across the Borough, including in two new communities at Crews Hill and Chase Park, ensuring delivery of a mix of housing types and tenures, each thoughtfully curated to meet the varied needs of both existing and new residents.

Our commitment to the generation of new employment floorspace will be delivered within town centres, existing employment areas and new locations in the northern and eastern fringes of the Borough. This will amplify the existing strengths of our local economy and supporting the growth of new economic sectors. Our main town centres at Enfield Town, Angel Edmonton, Edmonton Green, Palmers Green, New Southgate and Southgate will be diverse, vibrant and inclusive.

Disparities between the eastern and western parts of the Borough will be reduced through high quality infrastructure, an uplift in employment floorspace and an array of environmental enhancements. Borough-wide we will embrace biophilic design principles, weaving together new development into a tapestry of enhanced blue-green networks seamlessly connecting our residents through the promotion of walking and cycling.

We shall be recognised as:

A nurturing place – A place that provides everyone, including children and young people with the ingredients for a good life. By accommodating growth throughout the Borough, we will ensure the delivery of high quality and affordable homes, complemented by a tapestry of employment opportunities, community facilities and excellent educational, leisure and cultural experiences. This progressive approach to growth will be used to address spatial disparities, generating prospects for improved outcomes for all.

A deeply green place – A place where enhanced green open spaces and waterways permeate shall traverse the urban fabric, seamlessly connecting the wild places in the rural stretches with accessible pockets of nature and localised food production. Improved biodiversity, greener urban environments, local food production opportunities and better air and water quality shall deliver places where residents lives are enriched with nature. We are committed to successfully addressing the climate crisis through an effective blend of mitigation and adaptation, delivering sustainable buildings and transport solutions, and effectively managing flood risk. We will be a Borough that is carbon neutral.

The workshop of London – A place where new spaces for logistics and manufacturing shall give impetus to job creation, leveraging Enfield's strategic position within the UK Innovation Corridor. The expansion of employment floorspace will be delivered in town centres and established and new industrial locations, where enhanced links with the Borough's green networks, thereby nurturing vibrant places for business growth. We will establish a range of workspaces to cater to the varied needs of a diverse economy, including spaces for homeworking, start-ups, small and medium enterprises, and the vibrant creative and maker economy. Enfield's hot house of creativity will be harnessed to enrich our industrial heartlands and diversify our town centres.

A distinct and leading part of London – A place of safe growing neighbourhoods whose unique character, heritage and natural settings are celebrated, with new development thoughtfully aligned to sustain beautiful places. By underpinning

growth with essential infrastructure and enhanced blue and green networks, emerging developments will serve to elevate both town and country landscapes. Enfield will be a place that is at the forefront of London, offering unparalleled access to nature, intergenerational communities and an unmatched quality of life.

4.3 The vision is supported by twenty strategic objectives under the four themes in the vision:

A nurturing place

1. To alleviate disparities in employment accessibility and opportunities by bolstering local skills enhancement and employment strategies, protecting employment floorspace and promoting the development of new workspace initiatives and by supporting local skills. Concurrently, to tackle spatial disparities by building more high quality homes, delivering an uplift in infrastructure to support growth being planned for – including social infrastructure and enhancing the quality of the eastern environments of the Borough.
2. To reduce health inequalities by requiring Health Impact Assessments as part of significant development proposals. To use good design to create walkable and cohesive neighbourhoods, supporting active and socially connected lifestyles, helping to deliver on the priorities of the Enfield Joint Health and Wellbeing Strategy.
3. To increase the supply of housing to ensure that more people can access good quality homes¹². To protect family-oriented housing while facilitating the delivery of new family and affordable homes, giving long-term residents the chance to remain in the Borough.
4. To diversify the housing options available to cater to the needs of all financial backgrounds, ages and abilities. To maximise the supply of affordable housing, by resisting the loss of affordable homes and securing at least 50% of newly constructed homes as genuinely affordable. To facilitate the construction of wheelchair accessible and supported housing, while endorsing developments that seek to meet the needs of specific communities, including older people, individuals with disabilities, vulnerable population, students, and Gypsies and Travellers.
5. To enhance the cohesiveness, liveability and inclusivity of the public realm network by requiring development to enhance their connectivity both physically and digitally, legibility, permeability, accessibility and visual appearance. To foster a pedestrian and cyclist friendly environment as the natural choice by integrating the healthy streets approach into new developments.
6. To establish accessible and sustainable active travel routes to make it easy to get around safely and sustainably, while bolstering enhancements to make the best use of existing public transport infrastructure including safeguarding land for Crossrail 2. To strengthen connectivity along the east-west links by implementing new routes and access enhancements.

Deeply green place

7. To maximise opportunities to experience greenery and the natural world by incorporating tree lined streets, promoting biodiversity and exceeding urban greening factor targets outlined in the London Plan. To employ biophilic design principles to connect urban areas within Enfield such as including Edmonton, Ponders End, Southbury, Brimsdown and Southgate with the broader natural networks across the Borough.
8. To tackle the climate emergency head-on by through a wide range of measures, including by reducing the need to travel through the implementation of sustainable transportation choices in all major developments, achieving zero carbon status, evidenced through detailed energy assessments. To promote the use of renewable and low-carbon energy generation, including through connection to decentralised energy networks.
9. To support the objectives of the North London Waste Plan by managing waste further up the waste hierarchy. To safeguard air and water quality and manage sources of noise and pollution in line with the 'agent of change' principle.
10. To mitigate the impacts of global warming and a changing climate by requiring developments to efficiently address heat-related risks, integrate sustainable drainage systems, and support measures for sustainable flood risk management, which includes optimising the blue-green network.

¹² As a minimum, this plan will support the delivery of the London Plan's ten-year net housing target.

11. To protect and enhance the River Lee and its tributaries including Turkey Brook, Salmons Brook and Pymmes Brook, by de-culverting, naturalisation, restoration and the creation of new wetland areas. To protect the Green Belt, Metropolitan Open Land and local open spaces, while promoting enhancements for the growing population's benefit. To contribute to the protection of Epping Forest Special Area of Conservation (EFSAC) habitats.
12. To deliver significant green infrastructure enhancements, ensuring improved public access to newly established woodlands, restored river corridors and new parks and open spaces for both existing and new residents. To facilitate the creation of a major green infrastructure corridor in the northern part of the Borough, supporting Enfield's position as a leading 'Green' destination.

The workshop of London

13. To deliver an uplift in employment floorspace to cater to business requirements, capitalising on rising demand for logistics and manufacturing. To achieve this by focusing growth in Strategic Industrial Locations and Locally Significant Industrial Sites and the provision of new sites in appropriate locations.
14. To celebrate and make the most of our industrial heartlands by protecting employment floorspace capacity and encouraging industrial intensification. New development should maximise enhancing the blue-green connectivity of employment areas, contributing to positive placemaking to attract businesses and investment.
15. To support new office development in Enfield Town, the district centres and Meridian Water. To encourage the creation of workspaces offering diverse sizes, setups and configurations catering to the needs of small and medium-sized enterprises, which include flexible, cost-effective and affordable workspaces, and co-working alternatives close to where people live.
16. To foster diverse, vibrant town centres with quality public spaces to facilitate civic activities, shopping, leisure, culture and social interactions. To support this by enhancing local centres and parades, offering convenient amenities and services within easy reach of where people live.

A distinct and leading part of London

17. To strengthen the rural parts of Enfield as a leading Green destination offering a place for people to come and experience nature, with opportunities to walk and cycle through connected habitats of rewilded corridors and experience the highlights of historic and leisure attractions, while promoting sustainable travel options. To support the varied qualities of the rural parts of Enfield, including food growing, nature conservation, thriving economic contributor and landscape preservation to enrich the rural parts of Enfield.
18. To protect existing community facilities and ensure that new homes are supported by high quality infrastructure, including education, healthcare, sports, cultural facilities and digital connectivity in order to create safe, green and attractive places with a good quality of life. To work with partners to ensure essential facilities are conveniently accessible to residents and secure funding for these amenities, which can be sourced through planning contributions and other infrastructure funding channels.
19. To create a vital and viable future for the major and district centres of the Borough including Enfield Town, Angel Edmonton, Edmonton Green, Palmers Green, Southgate. These centres will play a pivotal role in providing new homes, job opportunities, as well as leisure and cultural facilities. To work with partners to deliver a cultural renaissance in Enfield.
20. To draw on the valuable character and heritage of Enfield's communities as a cornerstone in managing growth. To implement place-based policies that prioritises local distinctiveness at the heart of placemaking and manage proposals for tall buildings to ensure that new development can be sensitively accommodated. To ensure that designated heritage assets and views both strategic and local are protected and enhanced.

4.4 Table 4.1 below summarises the sustainability effects for the above vision and strategic objectives in relation to the IIA objectives, and the findings are described below the table.

Figure 4.1: IIA findings for vision and strategic objectives

IIA objective	Vision	Strategic objective 1	Strategic objective 2	Strategic objective 3	Strategic objective 4	Strategic objective 5	Strategic objective 6	Strategic objective 7	Strategic objective 8	Strategic objective 9	Strategic objective 10	Strategic objective 11	Strategic objective 12	Strategic objective 13	Strategic objective 14	Strategic objective 15	Strategic objective 16	Strategic objective 17	Strategic objective 18	Strategic objective 19	Strategic objective 20
IIA1: Climate change mitigation	+?	0	0	0	0	+	+	+	++	0	+	0	+	0	-?	+	0	0	0	0	0
IIA2: Climate change adaptation	0	0	0	0	0	0	0	+	0	0	++	0	+	0	0	0	0	0	0	0	0
IIA3: Housing	+?	++	0	++	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0
IIA4: Health and wellbeing	+?	0	++	0	0	+	0	++	0	+	0	++	++	0	+	0	0	+	+	0	0
IIA5: Services and facilities	+?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+	+	0
IIA6: Social inclusion	+?	+	+	0	0	++	0	0	0	0	0	0	0	0	0	0	+	0	0	+	0
IIA7: Crime and community safety	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IIA8: Road safety	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IIA9: Economy	+?	+	0	0	0	0	0	0	0	0	0	0	0	++	++	++	+	+	0	+	0
IIA10: Town and local centres	+?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	++	0	0	++	0
IIA11: Air pollution	+?	0	0	0	0	+	+	0	0	+	0	0	0	0	-?	+	0	0	0	0	0
IIA12: Sustainable transport	+?	0	0	0	0	+	++	0	0	0	0	0	0	0	0	+	0	0	0	0	0

IIA objective	Vision	Strategic objective 1	Strategic objective 2	Strategic objective 3	Strategic objective 4	Strategic objective 5	Strategic objective 6	Strategic objective 7	Strategic objective 8	Strategic objective 9	Strategic objective 10	Strategic objective 11	Strategic objective 12	Strategic objective 13	Strategic objective 14	Strategic objective 15	Strategic objective 16	Strategic objective 17	Strategic objective 18	Strategic objective 19	Strategic objective 20
IIA13: Biodiversity	+?	0	0	0	0	0	0	++	0	0	+	++	++	0	0	0	0	+	0	0	0
IIA14: Historic environment	+?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+
IIA15: Landscape and townscape	+?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+
IIA16: Efficient use of land and materials	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IIA17: Flooding	+?	0	0	0	0	0	0	0	0	0	++	+	0	0	0	0	0	0	0	0	0
IIA18: Water	+?	0	0	0	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0

IIA of the vision

4.5 The vision for Enfield sets out a general ambition for development to take place in a sustainable way, embracing a mix of social, environmental and economic aspirations. This will enable the Borough to be an attractive place to live, work and invest. The vision also reflects the Climate Emergency declared by Enfield Council in July 2020, with reference to their ambition to become carbon neutral.

4.6 If the vision is achieved, it can be expected to lead to minor positive effects in relation to the following IIA objectives:

- **IIA1: Climate change mitigation**, because Enfield Council seeks to become a carbon neutral Borough and successfully respond to the climate crisis through effective mitigation and adaptation and delivering sustainable buildings and transport solutions. The vision also promotes the provision of enhanced green open space and improved blue-green networks, which would aid carbon absorption processes and reduce overall emissions within the Borough.
- **IIA3: Housing**, because the vision seeks to accommodate housing growth across the Borough and ensure the delivery of a mix of housing types and tenures, including affordable homes, to meet the needs of existing and new residents.
- **IIA4: Health and wellbeing**, because if other aspects of the vision are achieved, such as the delivery of affordable homes and services, which is likely to include primary healthcare facilities, job opportunities and access to nature, this will provide the foundations for people's health and wellbeing to improve. The vision also seeks to reduce east-west disparities in the Borough through the provision of high quality infrastructure.
- **IIA5: Services and facilities**, because the provision of education, community facilities, leisure and cultural opportunities and other services is specifically referenced in the vision. The vision also seeks to address east-west disparities in the Borough through the provision of new infrastructure, which may include transport services.
- **IIA6: Social inclusion**, because the vision seeks to make Enfield a more equal place where growth delivers better outcomes for all.
- **IIA9: Economy**, because the vision embraces growth which provides for a diverse range of economic opportunity, including the delivery of new employment floorspace in town centres and existing and new industrial locations. The vision makes reference to the potential for the Borough to support job growth in coordination and manufacturing, as well as capitalising on Enfield's strategic position in the UK Innovation Corridor.
- **IIA10: Town and local centres**, because the vision seeks to deliver new employment in the Borough's town centres and industrial locations, which are often located in proximity to urban centres.
- **IIA11: Air pollution**, because the vision seeks to improve air quality in the Borough in order to deliver places where residents and lives are enriched.
- **IIA12: Sustainable transport**, because the vision seeks to successfully respond to the climate crisis through the delivery of sustainable transport solutions.
- **IIA13: Biodiversity**, because the vision seeks to make Enfield a deeply green place and improve biodiversity and blue-green networks, describing the Borough as a green lung of London. The vision also seeks to address east-west disparities in the Borough through environmental enhancements.
- **IIA14: Historic environment**, because the vision encourages growth but seeks to enhance and celebrate the Borough's heritage.
- **IIA15: Landscape and townscape**, because the vision encourages growth but seeks to enhance and celebrate the Borough's character and will ensure that new developments enhance both town and country.
- **IIA17: Flooding**, because the vision aims to successfully respond to the climate crisis through the effective management of flood risk in the Borough.
- **IIA18: Water**, because the vision seeks to improve water quality in the Borough to deliver places where residents lives are enriched with nature.

4.7 The vision is unlikely to have any adverse effects in relation to the IIA objectives. Due to the fact they are not specifically mentioned or indirectly affected, the vision's contribution to the achievement of the following objectives is likely to be negligible:

IIA2: Climate change adaptation, IIA7: Crime and community safety, IIA8: Road safety and IIA16: Efficient use of land and materials.

4.8 All of the effects of the vision are subject to some uncertainty since their achievement will depend on the details of the Local Plan policies and site allocations which are designed to implement it (and have been appraised separately in **Chapters 5 and 6** in this IIA Report).

IIA of the strategic objectives

A nurturing place

4.9 Strategic objective 5 is to foster a pedestrian and cyclist friendly environment by integrating the healthy streets approach into new developments. As such, minor positive effects are expected against **IIA1: Climate change mitigation**, **IIA11: Air pollution** and **IIA12: Sustainable transport**. As this will encourage more active and healthy lifestyles, a minor positive effect is also expected against **IIA4: Health and wellbeing**.

4.10 Strategic objective 6 seeks to establish accessible and sustainable active travel routes that will enable safe and sustainable travel, as well as make the best use of existing public transport infrastructure to strengthen connectivity along the east-west links by implementing new routes and access enhancements. As such, minor positive effects are expected against **IIA1: Climate change mitigation** and **IIA11: Air pollution**, while a significant positive effect is expected against **IIA12: Sustainable transport**.

4.11 Strategic objectives 1, 3 and 4 seek to increase the supply of a variety of housing, including family housing and to maximise the supply of affordable housing, improve access to good quality homes and address east-west spatial disparities. As such, significant positive effects are expected in relation to **IIA3: Housing**.

4.12 Strategic objective 2 seeks to reduce health inequalities in the Borough and create walkable and cohesive neighbourhoods to encourage active and social lifestyles, helping to deliver on the priorities of the Enfield Joint Health and Wellbeing Strategy. Therefore, a significant positive effect is expected against **IIA4: Health and wellbeing** and a minor positive effect is expected against **IIA6: Social inclusion**.

4.13 Strategic objective 5 is to enhance the cohesiveness, liveability and inclusivity of the public realm network that is connected, legible, permeable, accessible and visually attractive. Therefore, a significant positive effect is expected in against **IIA6: Social inclusion**.

4.14 In addition, Strategic objective 1 seeks to alleviate east-west spatial disparities by delivering an uplift in infrastructure, including social infrastructure and enhancing the quality of the eastern environments of the Borough. Strategic objective 4 aims to diversify the housing options available to cater to the needs of specific communities in the Borough, including older people, individuals with disabilities, the vulnerable population, students and Gypsies and Travellers. As such, minor positive effects are expected in relation to **IIA6: Social inclusion**.

4.15 Strategic objective 1 seeks to alleviate disparities in employment accessibility and opportunities by bolstering local skills enhancement and employment strategies, resulting in a minor positive effect in relation to **IIA9: Economy**.

Deeply green place

4.16 Strategic objective 8 sets out the Council's approach to addressing the climate emergency through the delivery of zero carbon status development and renewable and low-carbon energy generation, while Strategic objective 10 aims to mitigate the impacts of climate change through several measures including the effective management of heat-related risk, sustainable drainage systems and optimising the blue-green network. Therefore, a significant positive effect is expected against **IIA1: Climate change mitigation** in relation to Strategic objective 8, while a minor positive effect is expected in relation to Strategic objective 10.

4.17 Strategic objectives 7 and 12 both seek to increase greenery and vegetation, which could aid carbon absorption, helping to minimise emission levels. Therefore, both objectives are expected to have minor positive effects in relation to **IIA1: Climate change mitigation**. Further to this, green infrastructure can reduce the speed and volume of water runoff during intense rainfall events, reducing the risk of flash flooding, and helps reduce day time temperatures in urban areas through shading and

evapotranspiration. Therefore, both objectives are also expected to have minor positive effects in relation to **IIA2: Climate change adaptation**.

4.18 Strategic objective 7 aims to maximise opportunities for urban greening and exceed urban greening factor targets outlined in the London Plan. It seeks to employ biophilic design principles to connect urban areas within Enfield with the broader natural networks across the Borough, improving biodiversity and access to nature, while Strategic objective 12 is to deliver significant green infrastructure enhancements and facilitate the creation of a major green infrastructure corridor in the northern part of the Borough to support Enfield's position as a leading Green destination. Therefore, these objectives are likely to have significant positive effects in relation to **IIA4: Health and wellbeing** and **IIA13: Biodiversity**. In addition, Strategic objective 11 seeks to protect and enhance quality and access to the Green Belt, Metropolitan Open Land and local open spaces, and will also aim to protect and enhance the River Lee and its tributaries including Turkey Brook, Salmons Brook and Pymmes Brook by de-culverting, naturalisation, restoration and the creation of new wetland areas. Additionally, the objective seeks to contribute to the protection of Epping Forest Special Area of Conservation (EFSAC) habitats. As such, significant positive effects are expected in relation to **IIA4: Health and wellbeing** and **IIA13: Biodiversity**.

4.19 Strategic objective 9 seeks to support the objectives of the North London Waste Plan and manage waste in order to safeguard air and water quality, as well as manage sources of noise and pollution. It is therefore likely to protect environmental health and the amenity of the Borough's residents, resulting in minor positive effects against **IIA4: Health and wellbeing**, **IIA11: Air pollution** and **IIA18: Water**.

4.20 Strategic objective 10 seeks to mitigate the impacts of global warming and a changing climate by requiring developments to efficiently address heat-related risks. Therefore, a significant positive effect is expected in relation to **IIA2: Climate change adaptation**. Strategic objective 10 also aims to mitigate the effects of climate change through optimising the blue-green network, which is likely to benefit biodiversity in the Borough. Therefore, a minor positive effect is expected against **IIA13: Biodiversity**. Strategic objective 10 will also encourage the incorporation of sustainable drainage systems in development as well as measures for sustainable flood risk management including through optimising the blue-green network. As such, a significant positive effect is expected against **IIA17: Flooding** while a minor positive effect is expected against **IIA18: Water**.

4.21 Strategic objective 11 seeks to protect and enhance waterways in the Borough including through the creation of new wetland areas, which has potential to contribute to sustainably managed flood risk. Therefore, a minor positive effect is expected against **IIA17: Flooding**.

The workshop of London

4.22 Strategic objective 15 will support the delivery of a variety of workspaces including co-working alternatives close to where people live. This will limit the need to travel and is likely to contribute to a reduction in the use of private vehicles and therefore carbon emissions, resulting in a minor positive effect against **IIA1: Climate change mitigation**, **IIA11: Air pollution** and **IIA12: Sustainable transport**. Strategic objective 14 seeks to ensure that new development maximises blue-green connectivity of employment areas, which is likely to result in physical and mental health benefits. Therefore, a minor positive effect is expected against **IIA4: Health and wellbeing**.

4.23 Strategic objective 16 seeks to foster diverse, vibrant town centres in the Borough with quality public spaces to facilitate civic activities, retail, leisure, culture and social interaction. It also seeks to ensure that local centres offer convenient amenities and services within easy reach of where people live, resulting in minor positive effects against **IIA5: Services and facilities**, **IIA6: Social inclusion**, and **IIA9: Economy** and a significant positive effect against **IIA10: Town and local centres**.

4.24 Strategic objective 13 is to deliver an uplift in employment floorspace and focus economic growth in Strategic Industrial Locations and Locally Significant Industrial Sites, as well as the provision of new sites, while Strategic objective 14 seeks to protect employment floorspace capacity and encourage industrial intensification, as well as contribute to positive placemaking in order to attract businesses and investment. Therefore, significant positive effects are expected against **IIA9: Economy** in relation to these Strategic objectives. However, industrial intensification may lead to an increase in carbon emissions due to industrial activity and an influx of workers from outside of the Borough that use private vehicles to commute. As such, an uncertain minor negative effect is expected against **IIA1: Climate change mitigation** and **IIA11: Air pollution** in relation to Strategic objective 14.

4.25 In addition, Strategic objective 15 will support new office development in Enfield Town, the district centres and Meridian Water, as well as the creation of workspaces offering diverse sizes, setups and configurations, which include flexible, cost-

effective and affordable workspaces. Therefore, a significant positive effect is expected for **IIA9: Economy** in relation to this objective, while a minor positive effect is expected for **IIA10: Town and local centres**.

A distinct and leading part of London

4.26 Strategic objective 18 will ensure that new homes are supported by high quality infrastructure, including education, healthcare, sports, cultural facilities and digital connectivity and that essential facilities are within easy reach of where people live. As such, minor positive effects are expected against **IIA4: Health and wellbeing** and **IIA5: Services and facilities** in relation to Strategic objective 18.

4.27 Strategic objective 19 is to create a vital and viable future for the major and district centres of the Borough. The objective states that these centres will play a pivotal role in providing new homes, job opportunities, and leisure and cultural facilities, resulting in minor positive effects against **IIA3: Housing**, **IIA5: Services and facilities**, **IIA6: Social inclusion**, and **IIA9: Economy**, and a significant positive effect against **IIA10: Town and local centres**.

4.28 Strategic objective 17 seeks to encourage opportunities to walk and cycle through connected habitats of rewilded corridors, historic and leisure attractions resulting in minor positive effects against **IIA4: Health and wellbeing** and **IIA14: Historic environment**. Strategic objective 17 also seeks to strengthen the rural parts of Enfield and support its varied qualities, including food growing, nature conservation, landscape preservation and its economic contribution, in order to support the Borough as a leading Green destination. Therefore, minor positive effects are expected against **IIA9: Economy**, **IIA13: Biodiversity** and **IIA15: Landscape and townscape**.

4.29 Strategic objective 20 seeks to encourage local distinctiveness in placemaking and ensure that new development is sensitively accommodated, as well as protect and enhance designated heritage assets and views. Therefore, minor positive effects are expected against **IIA14: Historic environment** and **IIA15: Landscape and townscape**.

4.30 Due to the fact they are not specifically mentioned or indirectly affected, the Strategic objectives have no effect on the following IIA objectives: IIA7: Crime and community safety, IIA8: Road safety and IIA16: Efficient use of land and materials.

Recommendations

- The vision and/or strategic objectives could make more explicit reference to measures to improve community and road safety and also the overall aim to use land and materials efficiently. However, it is recognised that more detailed policies within the Enfield Local Plan do directly or indirectly address these IIA objectives, such as Policies DM DE6: Tall buildings and DM DE7: Creating liveable, inclusive and quality public realm for IIA7; SP T1: a Promoting sustainable transport and decarbonised transport system, DM T3: Constructing a vibrant and safe Enfield for everyone for IIA8; and Policies SS1: Spatial strategy, DM H4: Small sites and small housing development, DM SE3: Whole-life carbon and circular economy and a number of the policies in the Town centres and high streets section for IIA16.

Strategic Policies SS1 and SS2

4.31 The likely sustainability effects of the good growth in Enfield policies (Strategic Policies SP SS1: Spatial Strategy and SP SS2: Making good places) are set out in **Table 4.2** and described below the table.

Table 4.1: IIA findings for the good growth in Enfield policies

IIA objective	SP SS1: Spatial strategy	SP SS2: Making good places
IIA1: Climate change mitigation	+	+
IIA2: Climate change adaptation	0	0

IIA objective	SP SS1: Spatial strategy	SP SS2: Making good places
IIA3: Housing	++	0
IIA4: Health and wellbeing	+	+
IIA5: Services and facilities	+	+
IIA6: Social inclusion	+	+
IIA7: Crime and community safety	0	0
IIA8: Road safety	0	0
IIA9: Economy	++	+
IIA10: Town and local centres	++	+
IIA11: Air pollution	+	+
IIA12: Sustainable transport	+	+
IIA13: Biodiversity	+	+
IIA14: Historic environment	-?	+
IIA15: Landscape and townscape	-?	+
IIA16: Efficient use of land and materials	+	+
IIA17: Flooding	-?	0
IIA18: Water	-	0

4.32 Policy SP SS1: Spatial strategy supports development across the Borough, particularly in urban areas around railway stations and tube stations, and where frequent bus services are also present. Numerous services and facilities are available in these areas, alongside employment opportunities – all of which are within easy walking distance of one another. This has the potential to reduce reliance on the private car and associated air pollution, in addition to CO₂ emissions. However, the actual use of more active and sustainable modes of travel will depend on people’s behaviour. The spatial strategy supports large-scale development at four main placemaking areas. One of these, Chase Park, is within an area of the Green Belt where there are less public transport options available and facilities are not necessarily within easy walking distance of one another. According to the policy, however, the placemaking areas will be accessible by high frequency sustainable modes of transport with integrated active travel initiatives to facilitate movement and link existing communities and places of work. Further to this, there is potential for the scale of growth to deliver new social infrastructure alongside housing development to minimise the need for travel and vehicle use. However, the amount of development proposed by the policy is likely to result in an increase in cars on the road as a result of population increase. An increase in cars on the road is likely to result in an increase in CO₂ emissions and air pollution, although diesel and petrol usage is decreasing and electric vehicle usage increasing. Electric vehicles do, however, contribute to non-exhaust emissions (e.g. particulates from tyres). Road transport emissions may also increase because the policy supports development of two new logistics hubs (close to Junction 24 of the M25, and close to the M25 North of Innova Park), which facilitate road transport of goods and may not be as easily accessible for employees via more

sustainable and active modes of transport (i.e. walking and cycling). This is despite the severe problems with air quality the Borough experiences, with the entire Borough declared an Air Quality Management Area. Taking all of the above into account, Policy SP SS1 is expected to have a minor positive effect in relation to **IIA1: Climate change mitigation**, **IIA11: Air pollution** and **IIA12: Sustainable transport**. Policy SP SS2: Making good places requires development proposals to contribute towards the provision of transport infrastructure, which may include walking and cycling, but may also include the road network and therefore increase reliance on the private car. However, the policy does support development proposals which contribute towards the blue and green infrastructure network which is likely to comprise walking and cycling routes. Overall, Policy SP SS2 is also expected to have a minor positive effect in relation to IIA, IIA11 and IIA12.

4.33 Policy SP SS1: Spatial strategy is expected to have a significant positive effect in relation to **IIA3: Housing** because it will broadly meet the London Plan requirement for LBE for the period to 2029, in addition to making a contribution towards the wider shortfall within London. More specifically, it will support the development of at least 34,710 new homes by 2041 across a range of different areas, which will contribute significantly to the Borough's housing need and should help to provide a mix of different housing types, with at least 35% being genuinely affordable¹³. The spatial strategy focuses development in urban areas close to public transport and so residents would be likely to have easy access to healthcare facilities, and encouraged to walk and cycle due to everyday amenities being within close proximity of residences. There are, however, very few GP surgeries on the estates within Enfield and where they are present, tend to be outdated. Conversely, development could provide new GP surgeries and improve existing ones. Policy SP SS1 supports the protection of open-air facilities, especially for leisure, recreation and sport, and will contribute to narrowing health inequalities through housing provision, including social and affordable housing provision. It will also support improvements to local infrastructure and services, which is likely to include healthcare, in addition to improvements to green and blue spaces and access to them. Further to this, the spatial strategy is based on a brownfield first approach and as most brownfield sites are already within close proximity of existing services and facilities, are likely to be within close proximity of healthcare facilities and open spaces. The volume of development proposed in the Local Plan could, however, place pressure on existing services, including GP surgeries. It is also possible that infrastructure in large-scale strategic developments may not be provided until nearer the end of the Plan period. Overall, Policy SP SS1 is expected to have a minor positive effect in relation to **IIA4: Health and wellbeing**. Under the spatial strategy, two of the main placemaking areas are located in the Green Belt, and so not within close proximity of certain amenities, including education. However, the scale of development has the potential to provide new services and facilities together with significant improvements to infrastructure more generally. Indeed, Policy SP SS1 sets out that Enfield Town, Meridian Water, Edmonton, Southbury, Southgate, New Southgate and Angel Edmonton will be major urban foci of high quality growth, accommodating a range of uses. Therefore, Policy SP SS1 is also expected to have a minor positive effect in relation to **IIA5: Services and facilities**. Policy SP SS2 is expected to have minor positive effects in relation to IIA4 and IIA5, as it promotes active and healthy lifestyles through things like active travel, as well as the provision of blue and green infrastructure. The policy also supports a mix of development uses, which is likely to include healthcare.

4.34 Policies SP SS1: Spatial strategy and SP SS2: Making good places are expected to have minor positive effects in relation to **IIA6: Social inclusion**. This is because Policy SP SS1 supports the development of a significant number of new homes of different types, and include a proportion of affordable homes, whilst Policy SP SS2 seeks to make all development within LBE inclusive and accessible, with beneficial effects on social cohesion. Both policies also support sustainable travel choices and will therefore help ensure that residents who may not have access to a car, can still travel around the Borough easily.

4.35 Policy SP SS1: Spatial strategy is expected to have a significant positive effect in relation to **IIA9: Economy** and **IIA10: Town and local centres** because it supports the development of a mix of employment, retail, leisure, housing, community and cultural uses at Enfield Town, Meridian Water, Edmonton Green, Palmers Green, Southbury, Southgate, New Southgate and Angel Edmonton, which will contribute significantly towards the local economy at the same time as enhancing the vitality of the centres. According to the policy, employment needs will be met through the intensification of existing industrial areas in the east of the Borough, and new sites in urban and rural locations. New logistics hubs will be delivered close to Junctions 24 and 25 of the M25 and provide a significant amount of the Borough's employment needs in the Plan period. Rural areas will also be managed for a number of sustainable countryside uses, including food production, forestry, eco-tourism, recreation, education, leisure and sporting excellence, with beneficial effects on the rural economy. The Policy states that a minimum of 304,000 sqm of net additional industrial and logistics floorspace and 40,000 sqm of net additional office floorspace will be provided to meet the identified economic need. Policy SP SS2: Making good places is expected to have a minor positive effect in relation to these

¹³ All major housing developments must achieve a minimum of 35% affordable housing. This percentage increases to 50% for developments on industrial land that would result in a net loss of industrial floorspace, former Green Belt sites and on publicly owned land

two objectives because it supports a mix of uses to create vibrant and lively places. It also supports sustainable development that enhances the Borough's character and requires development proposals to promote and support the Borough's rich heritage and cultural assets, contributing to the creation and maintenance of local distinctiveness, all of which will help to draw investment into the Borough and contribute positively to town and local centres.

4.36 Policy SP SS1: Spatial strategy supports development across the Borough, the eastern edge of which is located within close proximity to the Lee Valley Special Protection Area (SPA) and Ramsar site, in addition to the Epping Forest Special Area of Conservation (SAC). The Chingford Reservoir Site of Special Scientific Interest (SSSI) is located within the eastern edge of the Borough. There are some local biodiversity assets, namely the Covert Way Local Nature Reserve (LNR) and some Sites of Importance in Nature Conservation (SINCs) within the Borough. Development proposed under the spatial strategy is not located within close proximity to the internationally designated biodiversity assets, or the SSSI and NNR. Development is, however, proposed in some of the SINCs, although these already contain some built development. Policy SP SS1 seeks to facilitate nature recovery and improvements to green and blue spaces, in addition to urban greening and landscape recreation. The policy states that all development should contribute to the provision of green and blue infrastructure to support communities, as well as enhance local wildlife and biodiversity, including opportunities for nature recovery. According to the policy, Chase Park will provide a deeply green extension to the urban area. However, the large-scale housing and employment growth proposed through the spatial strategy could have adverse effects on biodiversity, including in the placemaking areas at Chase Park, Crews Hill, New Southgate and Enfield Town. Overall, a minor positive effect is expected in relation to **IIA13: Biodiversity**. Policy SP SS2: Making good places is expected to have a minor positive effect in relation to this objective because it requires development proposals to contribute towards the provision of blue and green infrastructure, in addition to enhancing local wildlife and biodiversity. The policy also requires development proposals to actively seek out opportunities for nature recovery.

4.37 Policy SP SS2: Making good places is expected to have a minor positive effect in relation to **IIA14: Historic environment** because it requires all development to promote and support the Borough's rich heritage and cultural assets and contribute towards the creation and maintenance of local distinctiveness. Policy SP SS1: Spatial strategy is likely to have a minor negative but uncertain effect in relation to IIA14: Historic environment, due to the large-scale housing and employment proposed through the spatial strategy, which could adversely affect heritage assets and their settings, particularly where development is proposed within conservation areas and/or close to heritage assets such as listed buildings, including in the placemaking areas at Enfield Town, Angel Edmonton, New Southgate, Crews Hill and Chase Park. However, it is recognised that many of the Place policies include requirements to design development sensitively and by responding appropriately to the historic environment. The policy also supports the protection of the Borough's historic assets by seeking to designate areas with historic interest or value as Metropolitan Open Land.

4.38 The scale of growth promoted under Policy SP SS1: Spatial strategy would result in an increase in the density of development, particularly around transport nodes and in town centres. There would need to be an increase in the height of existing tall buildings, in addition to new high-rise buildings, both of which would alter the character of the urban area, potentially in a negative way. Lower density development is likely on the two placemaking areas in the Green Belt although development in these locations would be more likely to have adverse effects on the surrounding rural landscape. Policy SP SS1: Spatial strategy states that to compensate for the loss of Green Belt there will be major landscape restoration and a new country park to improve public access at Enfield Chase, and with improvements in access and quality to the Lee Valley Regional Park. The policy states that employment areas will become more sensitively integrated within the wider neighbourhood in which they sit. However, the large-scale housing and employment development proposed through the spatial strategy could still have an adverse effect on the landscape, particularly where development is proposed on the edge of existing settlements and on greenfield land in the rural areas, such as in the placemaking areas at New Southgate, Chase Park and Crews Hill. Overall, Policy SP SS1 is expected to have a minor negative effect in relation to **IIA15: Landscape and townscape**. The effect is recorded as uncertain, as it is dependent on the final design, scale and layout of development. Policy SP SS2: Making good places requires all development to enhance the Borough's character and contribute to the places in which they are located. According to the policy, all development should be of high quality design and make a positive contribution to creating a high-quality environment that is sympathetic to the local character and respects and enhances its landscape and townscape. This includes both buildings and the public realm and green spaces between them. To encourage cohesive development and opportunities for placemaking, the Policy also provides guidance for effective masterplanning. This includes the use of a design code and emphasises creating healthy, vibrant and lively places. Like Policy SP SS1, it also supports consolidation of the blue and green infrastructure network. Overall, Policy SP SS2 is expected to have a minor positive effect in relation to IIA15.

4.39 Policy SP SS1 focuses on the Lee Valley Opportunity Area, with support for the regeneration of previously developed sites and the intensification of already existing industrial and strategic areas, including the largest previously developed site at Meridian Water, to meet employment and future development needs. This aspect of the policy is also expected to enhance the townscape through the redevelopment of vacant and underused buildings that currently have poor aesthetic quality. However, due to the large-scale housing and employment development proposed through the spatial strategy, particularly where it is proposed on the edge of existing settlements and on greenfield land in the rural areas, Policy SP SS1 could also have an adverse effects in relation to IIA16. Overall, Policy SP SS1 is expected to have a minor positive effect in relation to **IIA16: Efficient use of land and materials**. Policy SP SS2 supports urban intensification, which involves the re-use of previously developed land, in addition to optimising the use of brownfield land in sustainable locations. Therefore, Policy SP SS2 is also expected to have a minor positive effect in relation to IIA16.

4.40 The River Lee Navigation is a canalised river incorporating the River Lee, which runs north to south in the east of Enfield. Due to the presence of the River Lee and its tributaries, in addition to some reservoirs, the eastern edge of the Borough falls within Flood Zones 2 and 3. The tributaries of the River Lee stretch towards the west of the Borough and so there are some areas elsewhere that also fall within Flood Zones 2 and 3, including Chase Park, which is identified as one of the key placemaking areas in the emerging Local Plan. The placemaking areas of Edmonton Green, Angel Edmonton, Meridian Water, New Southgate and Palmers Green also fall within Flood Zones 2 and 3 and so are also at risk of fluvial flooding. There is a fairly even distribution of areas within the Borough at risk of surface water flooding, some notable areas being to the north of Clay Hill in close proximity to Whitewebbs Golf Course & Tottenham Hotspur Football Club, in addition to Enfield Golf Club to the south east of Chase Park. Some areas proposed for development are therefore subject to both types of flood risk. Policy SP SS1: Spatial strategy is therefore expected to have a minor negative effect in relation to **IIA17: Flooding**. The effect is recorded as uncertain, as it is dependent on the boundaries of development sites (separately assessed for each allocated site) and the layout and design of development within those boundaries. Finally, Policy SP SS1 is also likely to have a minor negative effect in relation to **IIA18: Water** because the scale of development proposed would place more pressure on water resources and water treatment capacity.

4.41 Negligible effects are expected from both Policies SP SS1 and SS2 in relation to IIA2: Climate change adaptation, IIA7: Crime and community safety and IIA8: Road safety. In addition, Policy SP SS2 is expected to have negligible effects in relation to IIA3: Housing, IIA17: Flooding and IIA18: Water.

Recommendations

- Policy SP SS1: Spatial strategy and Policy SP SS2: Making good places could make more explicit reference to measures to improve community and road safety and improving the Borough's resilience to climate change through adaptation measures.
- With respect to IIA7 and IIA8, Policy SP SS1 could:
 - Support targeted interventions to reduce crime and increase community safety, guided by LBE's Crime and Community Safety team, and ensure high quality new developments that are future proofed.
 - Encourage access to, and the provision of, community and youth facilities in more deprived neighbourhoods.
- Policy SP SS2 could:
 - Seek to reduce levels of crime, anti-social behaviour and the fear of crime through high quality design and intervention, i.e. street layout, public space provision, passive surveillance, lighting, etc.
- However, it is recognised that more detailed policies within the Enfield Local Plan do directly or indirectly address these IIA objectives, such as Policies DM SE6: Climate change adaption and managing heat risk, DM SE7: Managing flood risk, DM DE6: Tall buildings, DM DE7: Creating liveable, inclusive and quality public realm for IIA7, DM DE8: Design of business premises, DM DE9: Shopfronts and advertisements, DM DE13: Housing standards and design, SP T1: Promoting a sustainable and decarbonised transport system and DM T2: Forming a healthy and connected Enfield.

Chapter 5

IIA findings for the Place policies in Chapter 3 of the Enfield Local Plan

5.1 This chapter presents the IIA findings for the ten Place policies in Chapter 3 of the 2021 Enfield Local Plan:

- Policy SP PL1: Enfield Town
- Policy SP PL2: Southbury
- Policy SP PL3: Edmonton Green
- Policy SP PL4: Angel Edmonton
- Policy SP PL5: Meridian Water
- Policy SP PL6: Southgate
- Policy SP PL7: New Southgate
- Policy SP PL8: Palmers Green
- Policy SP PL9: Rural Enfield
- Policy SP PL10: Chase Park
- Policy SP PL11: Crews Hill

3. Place

5.2 The IIA findings for each of the eleven Place policies are set out below. A summary table illustrating the likely sustainability effects of each policy is provided, using the symbols and colour coding described in **Figure 2.2**. As each Place policy allocates a number of sites, we have presented the 'policy-off' (i.e. mitigation is not taken into account) effects for the individual sites in the columns with the blue headers and the 'policy-on' (i.e. mitigation is taken into account) effects for the overall policy in the final column. The final column synthesises the effects for the individual sites in addition to taking into account the mitigation provided by the policy.

5.3 The effects of all eleven Place policies alongside each other can be seen in **Table 7.1** at the start of the cumulative effects chapter, **Chapter 7**. As noted in **Chapter 2**, negligible effects are recorded where a policy or site allocation is considered to have no effect in contributing to achievement of the IIA objective. For the Place policies, this is usually the case when the policy makes no explicit reference to what the IIA objective is seeking to achieve (e.g. IIA2: Climate change adaptation). However, it is usually the case that another policy or policies within the Local Plan directly seek to address that IIA objective (e.g. in this case Policy DM SE6: Climate change adaptation and managing heat risk).

Enfield Town

Table 5.1: IIA findings for Policy SP PL1: Enfield Town

IIA objective	Policy-off							Policy-on
	SA1.1: Palace Gardens shopping centre	SA1.2: Enfield Town station and the former Enfield Arms, Genotih Road	SA1.3: Tesco Southbury Road superstore	SA1.4: Enfield Civic Centre	SA1.5: St Anne's Catholic High School for girls	SA1.6: 100 Church Street	SA1.7: Oak House, 43 Baker Street	SP PL1: Enfield Town
IIA1: Climate change mitigation	N/A	N/A	N/A	N/A	N/A	N/A	N/A	+
IIA2: Climate change adaptation	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0
IIA3: Housing	++	++	++	++	++	+	+	++
IIA4: Health and wellbeing	+	+	++	++	+	+	++	++
IIA5: Services and facilities	++	++	++	++	++	++	++	++?
IIA6: Social inclusion	0	0	0	0	0	0	0	+
IIA7: Crime and community safety	N/A	N/A	N/A	N/A	N/A	N/A	N/A	+
IIA8: Road safety	N/A	N/A	N/A	N/A	N/A	N/A	N/A	+
IIA9: Economy	0	-	0	0	-	-	-	++
IIA10: Town and local centres	+	+	+	+	+	+	+	++
IIA11: Air pollution	-	-	-	-	-	-	-	0
IIA12: Sustainable transport	++	++	++	++	++	++	++	++
IIA13: Biodiversity	--	--	--	--	--	--	-	-
IIA14: Historic environment	--?	--?	--?	--?	--?	--?	--?	-?
IIA15: Landscape and townscape	--	--	-	-	--	--	-	-?
IIA16: Efficient use of land and materials	++	+	+	+	+	+	+	++
IIA17: Flooding	--	-	-	--	-	0	--	0
IIA18: Water	--	--	--	--	--	--	--	-

5.4 Policy SP PL1: Enfield Town supports a range of uses to be developed within Enfield Town and seeks to respond to the area's historic environment, in addition to enhancing the public realm and blue and green infrastructure network. It includes four residential allocations and three mixed-use allocations. The range of development types supported at Enfield Town is expected to draw more residents and visitors into the area and could therefore increase the number of cars coming into the town and associated CO₂ emissions. However, the placemaking area contains two railway stations (Enfield Town and Enfield Chase) and a number of bus stops and is therefore likely to encourage the use of public transport, which will also help minimise CO₂

emissions associated with the private car. The policy seeks to make walking and cycling considerably more accessible within, through and around the placemaking area, and having a mix of uses all in one place means that different services and facilities will be within walking distance of one another. Overall, Policy SP PL1 is expected to have a minor positive effect in relation to **IIA1: Climate change mitigation**. In the long-term, expansion of the Ultra-Low Emission Zone may help mitigate emissions, in addition to the fact the sale of petrol and diesel cars will be banned in 2035¹⁴. Use of electric vehicles is increasing, but they can contribute to non-exhaust emissions through particulates from tyres.

5.5 A significant positive effect is expected against **IIA3: Housing** in relation to this policy because a large number of new homes will be delivered within the placemaking area, with five of the seven allocations expected to deliver more than 100 housing units each. Significant positive effects are also expected in relation to **IIA4: Health and wellbeing** and **IIA5: Services and facilities** because the policy supports the delivery of a mix of uses, which may include healthcare and education facilities. A number of GP surgeries and open spaces are already located within Enfield Town and the policy seeks to enhance open spaces to create a more attractive environment. The placemaking vision for Enfield Town specifically states that access to nearby green spaces and watercourses including Enfield Town Park will continue to be excellent, with new street improvements and public realm projects drawing these qualities into the heart of the area and improving the attractiveness of active travel to, from and through the area. A number of primary and secondary schools are also located within and around the town. The significant positive effect on IIA5 is recorded as uncertain because it is unknown whether the schools have capacity for new pupils or not.

5.6 The placemaking area is not located within one of the 10% or 20% most deprived areas within England but the policy supports an inclusive environment that is welcoming to all, including groups with relevant protected characteristics such as the older population and disabled people. Additionally, affordable housing will be provided as part of development. Therefore, Policy SP PL1 is expected to have a minor positive effect in relation to **IIA6: Social inclusion**. A minor positive effect is also expected in relation to **IIA7: Crime and community safety** because the policy supports active frontages which is a form of passive surveillance, whilst also requiring developers to demonstrate how safety and lighting of walking and cycling routes has been designed so as to create an inclusive environment that supports the evening and night time economy. Policy SP PL1 is also expected to have a minor positive effect in relation to **IIA8: Road safety** because it seeks to enhance the public realm and make cycling and walking more accessible and safer.

5.7 Four of the seven site allocations within the Enfield Town placemaking area received minor negative significance scores in relation to IIA9: Economy. This is due to the fact they are not within close proximity of Strategic Industrial Locations or Locally Significant Industrial Sites, and so do not provide easy access to job opportunities. However, SA1.1, SA1.3 and SA1.4 will provide new employment floorspace. Policy SP PL1 supports the regeneration of Enfield Town, which will reinforce its role as the Borough's major centre and principal civic and cultural hub. The placemaking vision for Enfield Town specifically states that Enfield Town will continue to be the focus of the Borough's civic, entertainment, leisure, commercial and retail activity, and that the centre will have evolved to also include a wider mix of uses, including new homes. Although the placemaking area is not located adjacent or close to Locally Significant Industrial Sites or Strategic Industrial Locations, it supports a mix of uses which will diversify the centre and improve resilience, helping secure its long-term vitality and viability. As set out in the policy, development in Enfield Town must retain or re-provide existing workspace and deliver net increases wherever possible. A broad range of workspace typologies will be supported, with priority given to office floorspace and flexible workspace. Provision of workspace suitable for small businesses will also be strongly encouraged. Policy SP PL1 is therefore expected to have a significant positive effect against **IIA9: Economy** and **IIA10: Town and local centres**.

5.8 All of the sites allocated within the Enfield Town placemaking area received minor negative significance scores against **IIA11: Air pollution**. This is because they are located in an area where the current baseline annual mean concentration of nitrogen dioxide, PM₁₀ and PM_{2.5} exceed WHO guidelines and in most cases also exceed the higher nitrogen dioxide pollution levels allowed under the UK's national air quality objectives. The regeneration of Enfield Town is likely to attract more people to the area, which could increase the number of cars on the road with adverse effects on air quality. However, Enfield Town contains and is within close proximity to a number of railway stations and bus stops, which could reduce use of the private car and help minimise associated air pollution. Policy SP PL1 seeks to make walking and cycling more accessible and by having a mix of uses in one area, means that different services and facilities are within walking distance of one another. Overall, Policy SP PL1 is expected to have a negligible effect in relation to **IIA11: Air pollution**. Mitigation provided under Policies SP T1:

¹⁴ Prime Minister Rishi Sunak confirmed in a speech on 20 September 2023 that the planned ban on the sale of petrol and diesel cars would be pushed back five years from 2030 to 2035

Promoting a sustainable and decarbonised transport system and DM T2: Forming a healthy and connected Enfield in the new Local Plan¹⁵ would also help encourage more active and sustainable travel choices.

5.9 Despite the potential for increased car use associated with new development, Policy SP PL1 is expected to have a significant positive effect in relation to **IIA12: Sustainable transport** because Enfield Town contains two railway stations and a number of bus stops. Therefore, focusing growth within the centre is likely encourage the use of public transport. Further to this, the policy seeks to make walking and cycling significantly more accessible and safer, in addition to supporting a mix of uses that will ensure there are a range of services within walking distance of one another.

5.10 Enfield Town contains three SINC's and its development could therefore have potential adverse effects on these designations: (1) New River; (2) Enfield Loop of the New River; and (3) Crews Hill to Bowes Park RAILSIDES. Some areas of deciduous woodland, which is a Priority Habitat, are also located within the placemaking area. Six of the seven allocations receive significant negative scores in relation to **IIA13: Biodiversity**, as most of them fall within a relevant Site of Special Scientific Interest (SSSI) Impact Risk Zone (IRZ) and are within 250m of a locally designated site, Priority Habitat and/or Ancient Woodland. One of the sites, SA1.4, contains part of the Enfield Loop of the New River Site of Importance for Nature Conservation (SINC). However, the policy states that development in Enfield Town must facilitate and/or contribute to clear and coordinated green and blue enhancements. Therefore, overall, Policy SP PL1 is expected to have a minor negative effect in relation to **IIA13: Biodiversity**. Mitigation will also be achieved through other policies in the new Local Plan (e.g. SP BG2: Protecting nature conservation sites).¹⁶

5.11 The whole of Enfield Town is a conservation area that contains a large number of listed buildings. Archaeological priority areas are also located within the placemaking area (APA6: Enfield Town Centre and APA7: Ermine Street). Therefore, development could have an adverse effect on the historic environment. Indeed, one of the sites, SA1.1 scored 'Red' in Enfield Council's historic environment assessment against heritage constraints and 'Amber' against archaeological considerations, reflecting the fact it is within a highly sensitive context. The remaining site allocations within the placemaking area scored 'Amber' against heritage constraints and archaeological constraints, with the exceptions of SA1.2, SA1.3 and SA1.7 which scored 'Green' against archaeological constraints. All site allocations therefore receive uncertain significant negative effects against **IIA14: Historic environment**. However, Policy SP PL1 states that development in Enfield Town must enhance the significance of heritage assets and facilitate enhancements to the fabric and setting of the historic environment by demonstrating how it has responded appropriately to Enfield Town's historic environment, which includes the market square, area around Gentleman's Row and the Parish Church. Therefore, overall, a minor negative effect is expected against IIA14. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development.

5.12 Most of the sites allocated through this policy fall within an area where 'Limited Change' or 'Medium Change' is recommended, as outlined in Enfield's Character of Growth Study. Therefore, most of the site allocations receive significant negative scores. However, the policy states that enhancements to the townscape will be achieved through improvements to the public realm, nearby open spaces and watercourses, and the creation of active frontages. Further to this, the policy supports development of previously developed land and is therefore expected to enhance the townscape and avoid impacts on landscape elsewhere in the Borough. Therefore, overall, Policy SP PL1 is expected to have a minor negative effect in relation to **IIA15: Landscape and townscape**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. Support for use of previously developed land will have a significant positive effect in relation to **IIA16: Efficient use of land and materials**.

5.13 Although none of the allocated sites within this placemaking area fall within Flood Zones 2 or 3, most of them are at risk of surface water flooding. However, Enfield Town is largely developed already Policy SP PL1 requires particular attention to reducing surface water flood risk. Therefore, Policy SP PL1 is expected to have negligible effect in relation to **IIA17: Flooding**. Enfield Town falls within Source Protection Zones 1 and 2 and the Enfield Loop of New River runs through the area. Therefore, development under this policy could potentially cause a deterioration in water quality (e.g. through sediment runoff during construction and/or increased pressure on wastewater treatment), particularly in the short-term, but due to the fact the area is

¹⁵ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanism.

¹⁶ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

already developed, the potential for contamination is reduced. Policy SP PL1 states that all development must contribute towards enhancing watercourses. Therefore, overall, a minor negative effect is expected in relation to **IIA18: Water**.

5.14 Negligible effects are expected in relation to IIA2: Climate change adaptation.

Recommendations

- No recommendations.

Southbury

Table 5.2: IIA findings for Policy SP PL2: Southbury

IIA objective	Policy-off								Policy-on
	SA2.1: Colosseum Retail Park	SA2.2: Heritage House	SA2.3: Morrisons, Southbury Road	SA2.4: Southbury Leisure Park	SA2.5: Tesco Superstore, Ponders End	SA2.6: Sainsburys Crown Road	SA2.7: Crown Road Lorry Park	SA2.8: Land and buildings north of Lincoln Road	SP PL2: Southbury
IIA1: Climate change mitigation	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	++
IIA2: Climate change adaptation	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0
IIA3: Housing	++	N/A	++	++	++	++	N/A	N/A	++
IIA4: Health and wellbeing	+	N/A	++	+	++	+	N/A	N/A	++
IIA5: Services and facilities	++	N/A	++	++	++	++	N/A	N/A	++?
IIA6: Social inclusion	+	0	0	+	+	+	+	0	+
IIA7: Crime and community safety	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	+
IIA8: Road safety	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	+
IIA9: Economy	+	+	+	0	+	+	+	+	++
IIA10: Town and local centres	0	+	0	0	+	0	0	0	++
IIA11: Air pollution	--	-	-	-	-	-	-	-	+
IIA12: Sustainable transport	+	+	+	+	++	-	+	0	++
IIA13: Biodiversity	-	-	-	--	-	-	-	-	+
IIA14: Historic environment	-?	-?	-?	-?	-?	-?	--?	-?	-?
IIA15: Landscape and townscape	0	0	0	0	-	0	0	-	++?
IIA16: Efficient use of land and materials	++	++	+	+	+	++	+	++	++
IIA17: Flooding	--	--	--	--	--	--	-	--	-

IIA objective	Policy-off								Policy-on
	SA2.1: Colosseum Retail Park	SA2.2: Heritage House	SA2.3: Morrisons, Southbury Road	SA2.4: Southbury Leisure Park	SA2.5: Tesco Superstore, Ponders End	SA2.6: Sainsburys Crown Road	SA2.7: Crown Road Lorry Park	SA2.8: Land and buildings north of Lincoln Road	SP PL2: Southbury
IIA18: Water	0	0	0	0	-	0	0	0	-

5.15 Policy SP PL2: Southbury supports new residential-led mixed-use development within Southbury and the potential creation of a new local centre, in addition to improvements to the public realm and townscape. It includes five residential-led mixed-use allocations and three industrial allocations. The residential-led mixed-use development is expected to attract more residents and workers into the area and could therefore increase the number of car journeys into Southbury and associated CO₂ emissions, particularly due to the proximity of the A10. However, the placemaking area includes one railway station (Southbury) and a number of bus stops, in addition to falling within 1km of other railway stations, and may therefore encourage the use of public transport, which will also help minimise CO₂ emissions associated with the private car. Policy SP PL2 seeks to promote active travel and improve the pedestrian environment by facilitating and/or contributing towards the delivery of a new east-west cycle lane along Southbury Road and delivering both a green buffer and a new cycle lane in both directions along the A10 Great Cambridge Road, which would help reduce dependence on the private car and associated emissions. The policy also lists specific priorities, which includes enhancing the visual presence of the railway station within the wider area. Overall, Policy SP PL2 is expected to have a significant positive effect in relation to **IIA1: Climate change mitigation**.

5.16 The policy is expected to have a significant positive effect in relation to **IIA3: Housing** because a large number of new homes will be delivered within the placemaking area, with all five of the mixed-use allocations expected to deliver more than 100 housing units each. Significant positive effects are also expected in relation to **IIA4: Health and wellbeing** because the policy supports the delivery of a mix of uses, which may include healthcare facilities. Although this placemaking area does not contain any GP surgeries, there are a number within 400m. Areas of open space are also present within the placemaking area and the policy seeks to deliver or contribute towards new pocket parks and improved accessibility and enhancements to existing open spaces nearby, including Enfield Playing Fields, Durants Park and St George's Playing Fields. There is also a requirement for development proposals within Southbury to demonstrate how they will improve the pedestrian environment along the A10, in addition to the delivery of a new cycle lane in both directions along the A10 and Southbury Road – both of which will help promote walking and cycling and increase overall levels of physical exercise. With respect to amenity, the policy states that blocks must be oriented to minimise the negative noise and air quality impacts of the A10, with single aspect homes or balconies facing the A10 being resisted. Policy SP PL2 is also expected to have a significant positive effect in relation to **IIA5: Services and facilities** because the placemaking area contains a secondary school and is also located within 800m of a number of primary schools and one other secondary school. Further to this, the policy supports a mix of uses, which includes community facilities and potentially education. According to the policy, health or early years' facilities should be delivered where suitable. The significant positive effect is recorded as uncertain because it is unknown whether the existing schools have capacity for new pupils or not.

5.17 The placemaking area is partially located within one of the 20% most deprived areas within England and is therefore expected to help regenerate the area through a range of development types, with beneficial effects on social inclusion. Provision will also be made for affordable housing, in addition to improvements to the pedestrian environment and new cycle lanes along the A10, making the area more accessible to those who may not have a car. As such, a minor positive effect is expected in relation to **IIA6: Social inclusion**. A minor positive effect is also expected in relation to **IIA7: Crime and community safety** because the policy seeks to ensure that active frontages are located along key routes through and around proposed development sites, which is a form of passive surveillance. The policy lists specific priorities, which includes improving the safety and security of the station environment. A minor positive effect is also expected in relation to **IIA8: Road safety** because the

policy supports the installation of a new crossing point along the A10 and Southbury Road, which will make crossing roads safer for pedestrians, alongside improving safety at the key junction between the A10 and A110.

5.18 A significant positive effect is expected in relation to **IIA9: Economy** because the policy includes two industrial allocations that together will provide approximately 5.3ha of employment land. The placemaking area is also located within Strategic Industrial Locations (SIL) and adjacent to a Locally Significant Industrial Site, and therefore new residents will be within close proximity to job opportunities. The policy also seeks to protect the existing operation and future intensification capacity of designated SIL, as well as support its ongoing productivity by increasing employment floorspace and job density within designated SIL areas and ensuring that proposals for residential uses adjacent to SIL do not compromise the continued integrity and effectiveness of the operation of industrial uses. With regard to **IIA10: Town and local centres**, Policy SP PL2 will lead to an appropriate phased release of a retail park, which may have been drawing business away from town centres. The placemaking vision for Southbury states that Southbury will act as a key gateway into the Lee Valley, Ponders End and Enfield Town and according to the policy, a new local centre may potentially be created. Therefore, a significant positive effect is expected in relation to IIA10.

5.19 The allocations within the Southbury placemaking area receive negative significance scores in relation to **IIA11: Air pollution**, with one of them receiving a significant negative score. This is because they are located in an area where the current baseline annual mean concentration of nitrogen dioxide, PM₁₀ and PM_{2.5} exceed WHO guidelines and in most cases also exceed the higher nitrogen dioxide pollution levels allowed under the UK's national air quality objectives. Site SA2.1 specifically exceeds the higher nitrogen dioxide, PM₁₀ and PM_{2.5} levels under the UK's national air quality objectives. The residential-led mixed-use development scheme may attract more people to the area, which could increase the number of cars on the road with adverse effects on air quality. However, Southbury contains and is within close proximity to railway stations and bus stops, which would facilitate higher levels of sustainable transport use and help minimise associated air pollution. The policy seeks to promote active travel and improve the pedestrian environment along the A10 through the provision of a green buffer, in addition to facilitating the delivery of a new cycle lane in both directions along the A10. Providing a mix of uses within one area is also likely to encourage more active travel choices as different services will be within walking distance of one another. Mitigation provided under Policy SP T1: Promoting a sustainable and decarbonised transport system and DM T2: Forming a healthy and connected Enfield¹⁷ would also help encourage more active and sustainable travel choices which are likely to benefit groups in the Borough that are particularly vulnerable to air pollution such as children, older people, people with cardiovascular or respiratory illnesses and pregnant women. Overall, Policy SP PL2 is expected to have a minor positive effect in relation to **IIA11: Air pollution**.

5.20 All but two of the allocations within the Southbury placemaking area receive positive significance scores in relation to the sustainable transport objective. SA2.6 receives a minor negative significance score as although it has a medium PTAL rating, it is not located within close proximity of a Major, District or Local Centre. SA2.8 receives a negligible significance score, as although it has a relatively poor PTAL rating, is within 800m of a Major, District or Local Centre. New development has the potential to increase car use. However, Policy SP PL2 is expected to have a significant positive effect in relation to **IIA12: Sustainable transport** because Southbury contains a railway station and a number of bus stops, in addition to being within close proximity to other railway stations. Therefore, focusing growth within the area is likely to encourage and facilitate the use of public transport. Indeed, the policy seeks to enhance the visual presence of the station within the wider area. The policy also seeks to promote walking and cycling through enhancements to the pedestrian environment and new cycle routes along the A10.

5.21 The Southbury placemaking area does not contain designated biodiversity assets but is within 250m of a Priority Habitat (deciduous woodland). One of the allocations, SA2.4, receives a significant negative score in relation to **IIA13: Biodiversity**, as it falls within a relevant SSSI IRZ and is also within 250m of the Priority Habitat. The Southbury placemaking policy requires the provision of a green buffer along the A10, in addition to delivering or contributing towards pocket parks and enhancing nearby open spaces including Enfield Playing Fields, Durants Park and St George's Playing Fields, each of which could potentially contribute towards biodiversity. Therefore, overall, Policy SP PL2 is expected to have a minor positive effect in relation to **IIA13:**

¹⁷ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

Biodiversity. Mitigation will also be provided in the form of Policy SP BG2: Protecting nature conservation sites in the Local Plan¹⁸.

5.22 The Southbury placemaking area contains one grade II listed building (Ripaults Factory) and is within 250m of another grade II listed building (Enfield Technical College). There is also one local heritage asset within the placemaking area (Southbury Railway Station), and multiple within 250m. Archaeological priority areas are also located within the placemaking area (APA7: Ermine Street and APA10: Southbury Road). One of the sites, SA2.7, scored 'Green' in Enfield Council's historic environment assessment against heritage constraints and 'Amber' against archaeological constraints. The remaining site allocations within the placemaking area scored 'Blue' (i.e. no heritage constraints) against heritage and 'Amber' against archaeology, with the exception of SA2.2 and SA2.8 which received 'Amber' against archaeology. All but one of the site allocations therefore receive uncertain minor negative effects in relation to **IIA14: Historic environment**. Site SA2.7 receives an uncertain significant negative effect against IIA14. However, development is unlikely to have an adverse effect on the setting of the historic environment because the placemaking area already contains built development. Therefore, a minor negative effect is likely in relation to **IIA14: Historic environment**. The effect is recorded as uncertain because development in the area could still have some potential for impacts on non-designated heritage features and the actual effect will depend on the final design, scale and layout of development which is not yet known. Mitigation is also provided by Policy SP DE4: Putting heritage at the centre of placemaking.¹⁹

5.23 Most of the sites allocated through this policy fall within an area where 'Transformative Change' is recommended, whilst the remainder fall within an area where 'Medium Change' is recommended. Therefore, most of the site allocations receive negligible significance scores and the remainder receive minor negative significance scores. Policy SP PL2 supports a coherently planned and appropriate distribution of scale and massing of built form, the creation of urban blocks that integrate well with the surrounding residential areas and tall buildings that aid legibility and also relate appropriately to surrounding development. A masterplan approach to the area's development is supported, which will allow development to be brought forward in a holistic and comprehensive manner. As set out in the vision for Southbury, the area will have transformed into a cohesive, exemplary, high-density, mixed-use quarter with pocket parks and high quality public realm with new street trees and planting that offer a highly attractive environment to live and work in. Therefore, a significant positive effect is expected in relation to **IIA15: Landscape and townscape**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. The policy also supports the development of previously developed land, which would also help enhance the townscape. As such, a significant positive effect is expected in relation to **IIA16: Efficient use of land and materials**.

5.24 Although none of the allocated sites within the placemaking area fall within Flood Zones 2 or 3, all of them are at risk of surface water flooding. However, the policy requires the incorporation of Sustainable Drainage Systems and tree planting, which will help mitigate flood risk. Mitigation will also be provided through Policy DM SE7: Managing flood risk within the new Local Plan²⁰. Policy SP PL2 alone is expected to have a minor negative effect in relation to **IIA17: Flooding**. A very small proportion of the Southbury placemaking area to the north and east falls within Source Protection Zone 2. Therefore, development under this policy could potentially cause a deterioration in water quality but due to the fact the area is already developed, the potential for contamination is reduced. Therefore, a minor negative effect is expected against **IIA18: Water**.

5.25 Negligible effects are expected in relation to IIA2: Climate change adaptation.

Recommendations

- The policy could contain wording on protecting and enhancing the historic environment, although it is acknowledged that Policy DM DE10: Conserving and enhancing heritage assets already provides mitigation (see 'Cumulative effects' section).

¹⁸ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

¹⁹ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

²⁰ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

Edmonton Green

Table 5.3: IIA findings for Policy SP PL3: Edmonton Green

IIA objective	Policy-off		Policy-on
	SA3.1: Edmonton Green Shopping Centre	SA3.2: Chiswick Road Estate (Oswald and Newdales)	SP PL3: Edmonton Green
IIA1: Climate change mitigation	N/A	N/A	++
IIA2: Climate change adaptation	N/A	N/A	+
IIA3: Housing	++	++	++
IIA4: Health and wellbeing	+	+	++
IIA5: Services and facilities	+	+	++?
IIA6: Social inclusion	++	++	++
IIA7: Crime and community safety	N/A	N/A	+
IIA8: Road safety	N/A	N/A	+
IIA9: Economy	0	0-	++
IIA10: Town and local centres	+	+	++
IIA11: Air pollution	-	-	0
IIA12: Sustainable transport	++	++	++
IIA13: Biodiversity	--	-	+
IIA14: Historic environment	--?	--?	+?
IIA15: Landscape and townscape	--	--	+?
IIA16: Efficient use of land and materials	++	+	++
IIA17: Flooding	--	--	+?
IIA18: Water	--	0	+

5.26 Policy SP PL3: Edmonton Green seeks to revitalise Edmonton Green District Centre through the delivery of housing, workspace, town centre and community uses, in addition to supporting infrastructure. It includes two mixed-use allocations. The range of development types supported in Edmonton Green is expected to draw more residents and visitors into the area and could therefore increase the number of cars coming into the centre and associated CO₂ emissions. However, the placemaking area is within close proximity of a railway station (Edmonton Green) and contains a bus station, which is likely to encourage and facilitate the use of public transport. Provision is made for new walking and cycling routes within the area and having a mix of uses all in one place will reduce the need for people to travel elsewhere by private car, helping minimise CO₂ emissions and air pollution. According to the policy, improvements will be made to bus services and connections to ensure good public transport access, and the Council will work with TfL and others to upgrade access and capacity at Edmonton Green railway station. The policy also requires major development to provide connections to and if possible extend the existing or planned future heat

network and for minor developments to optimise opportunities to connect to existing heat networks – both of which would help minimise CO₂ emissions. Policy SP PL3 supports the integration of SuDS and urban greening to reduce flood risk and ensure a significant net gain in biodiversity and reduce the heat island effect. Therefore, overall, a significant positive effect is expected in relation to **IIA2: Climate change adaptation**.

5.27 A significant positive effect is expected in relation to **IIA3: Housing** because a large number of new homes will be delivered within the placemaking area. Edmonton Green contains GP surgeries and is within 800m of a number of areas of open space, including Edmonton Green Linear Open Space and Plevna Road Local Park. According to the policy, distinctive features such as nearby greenspaces (including the Green) should be retained and enhanced, and the policy seeks to provide wider links to Angel Edmonton, Meridian Water and the Lee Valley Regional Park. The District Centre is also located within close proximity to walking and cycle routes, which the policy seeks to retain and extend. Therefore, a significant positive effect is expected in relation to **IIA4: Health and wellbeing**. A significant positive effect is also expected in relation to **IIA5: Services and facilities** because the policy supports a mix of uses and the District Centre is located within 800m of a number of primary schools. The effect is recorded as uncertain because it is unknown whether these schools have capacity for new pupils or not.

5.28 The placemaking area is located within the 10% most deprived areas within England and new development is therefore expected to help regenerate the area through a range of high quality new development types, with beneficial effects on social inclusion. Provision will also be made for affordable housing, in addition to Provision will also be made for walking and cycling routes, making the area more accessible to those who may not have a car. A significant positive effect is therefore expected against **IIA6: Social inclusion**. The policy states that proposals will be expected to contribute to enhancing the public realm to make walking and cycling safer and more accessible and attractive, as well as to the introduction of urban greening between buildings, the shopping centre and railway line, to help create a lively street culture and safe environment. The policy also supports the potential removal of the current roundabout to connect the war memorial island to the station or concourse, which will provide safer more direct connections and more useable open space. All of these measures will improve safety within Edmonton Green, with minor positive effects expected in relation to **IIA7: Crime and community safety** and **IIA8: Road safety**.

5.29 Policy SP PL3 supports the development of a mix of uses and activities, including commercial, community, cultural, leisure and workspace uses, which would create new jobs and contribute to the local economy. Uses that support an evening economy are also encouraged. According to the policy, proposals for new employment generating development should be concentrated within the District Centre. This may include introducing a wider range of job opportunities, and leisure and food and beverage opportunities to diversify the centre and improve resilience. Although Edmonton Green is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites, the policy states that opportunities should be taken to deliver new and improved workspaces through the intensification of sites and along with improving the quality of existing employment spaces. As set out in the placemaking vision for Edmonton Green, it will become a renewed District Centre, with the policy specifically stating that development must ensure that a covered market continues to act as the focal point of a revitalised high street based shopping area. For these reasons, significant positive effects are expected against both **IIA9: Economy** and **IIA10: Town and local centres**.

5.30 The allocations within the Edmonton Green placemaking area receive minor negative significance scores in relation to **IIA1: Air pollution**. This is due to the fact they are located in an area where the current baseline annual mean concentration of nitrogen dioxide, PM₁₀ and PM_{2.5} exceed WHO guidelines and the higher nitrogen dioxide pollution level allowed under the UK's national air quality objectives. Revitalising Edmonton Green may attract more car trips to the area. However, Edmonton Green is located within close proximity of a railway station and contains a bus station, which is likely to encourage and facilitate the use of public transport and minimise air pollution associated with car use. The prioritisation of public transport is highlighted in the policy through determining that any changes to traffic circulation must safeguard the continued operation of the bus station with no loss of efficiency or overall capacity. The policy also supports the retention and extension of walking and cycling routes and seeks to make walking and cycling more accessible through public realm enhancements. Providing a mix of uses in one area is also expected to reduce the need to travel elsewhere, as everyday amenities would all be within one place and therefore within walking distance of one another. Therefore, overall, a negligible effect is expected in relation to **IIA11: Air pollution**. Mitigation with respect to air quality is also provided under Policies SP T1: Promoting a sustainable and decarbonised transport system and DM T2: Forming a healthy and connected Enfield²¹.

²¹ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

5.31 Despite the potential for increased car use associated with new development, Policy SP PL3 supports car-free development and the retention and extension of walking and cycling routes within the area. The area is located adjacent to Edmonton Green Railway Station and contains a bus station, with the policy seeking to upgrade access and capacity at the railway station and to improve bus services and connections to ensure good public transport access. Therefore, a significant positive effect is expected in relation to **IIA12: Sustainable transport**.

5.32 Edmonton Green does not contain designated biodiversity assets but is adjacent to Salmons Brook and Montague Road Recreation Ground SINC and within 250-750m of Pymme's Park SINC. Site SA3.1 receives a significant negative score in relation to **IIA13: Biodiversity**, as it falls within a relevant SSSI IRZ and is within 250m of the Salmons Brook and Montague Road Recreation Ground SINC. Site SA3.2 receives a minor negative significance score, as it intersects a relevant SSSI IRZ. SP PL3 supports the retention and enhancement of greenspaces and the introduction of urban greening, with specific reference made to biodiversity net gain. Therefore, a minor positive effect is expected in relation to **IIA13: Biodiversity**. Mitigation is also provided by Policy SP BG2: Protecting nature conservation sites in the Local Plan²². With regard to the historic environment, the placemaking area is within close proximity to four conservation areas, a number of grade II* and grade II listed buildings, four local heritage assets and an archaeological priority area (APA15: Lower Edmonton). Indeed, both site allocations scored 'Amber' in Enfield Council's historic environment assessment against heritage constraints and 'Amber' against archaeological constraints. They both therefore receive uncertain significant negative scores in relation to IIA14. However, the policy states that development within Edmonton Green must demonstrate how it has responded appropriately to the components of historic and cultural heritage that form Edmonton Green's identity. Proposals are expected to contribute to removing the Fore Street and Church Street Conservation Areas from the Historic England register of Heritage at Risk and enhance those at The Crescent and Montagu Road cemeteries, which would have positive effects on this objective. Further to this, the area is already largely developed. Overall, Policy SP PL3 is expected to have a minor positive effect in relation to **IIA14: Historic environment**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. Policy SP DE4: Putting heritage at the centre of placemaking in the Local Plan will also provide mitigation²³.

5.33 With regard to the landscape and townscape, although site SA3.1 is located within an area where 'Transformative Change' is recommended, it contains a green link that could be lost as a result of development. Site SA3.2 is located within an area where 'Medium Change' is recommended. Policy SP PL3 requires development within Edmonton Green to 'stitch back' into the surrounding context and provide more coherent and outward looking high streets creating new street-based routes which increase the prominence of entrances and reduce the prominence of servicing and inactive frontages. Enhancements to the public realm and urban greening are also proposed, in addition to the revitalisation of open spaces. Additionally, the policy states that the Council will use planning tools, such as the preparation of detailed design codes. Regarding tall buildings, these will only be permitted in locations identified as being appropriate for tall buildings. Therefore, a minor positive effect is expected in relation to **IIA15: Landscape and townscape**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. The policy also supports the intensification of existing uses within Edmonton Green; therefore a significant positive effect is expected against **IIA16: Efficient use of land and materials**.

5.34 Edmonton Green contains a small area of land within Flood Zone 2 and 3 and both of the allocated sites within this placemaking area are at risk of surface water flooding. The placemaking area also falls within Source Protection Zone 2. However, Policy SP PL3 supports the integration of SuDS and the introduction of rain gardens, swales and other sustainable drainage features, as well as opportunities to de-culvert Salmons Brook. Therefore, Policy SP PL3 is expected to have a minor positive effect in relation to **IIA17: Flooding**. The effect is recorded as uncertain, as the actual effect depends on where development is located within the site, as it may not intersect Flood Zones 2 and/or 3. Flood risk mitigation will also be provided under Policy DM SE7: Managing flood risk²⁴. A minor positive effect is also expected in relation to **IIA18: Water** because although the placemaking area partially falls within Source Protection Zone 2, sustainable drainage features can help protect

²² In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

²³ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

²⁴ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

water quality by preventing contamination from sediment runoff during construction and or increased pressure on wastewater treatment.

Recommendations

- No recommendations.

Angel Edmonton

Table 5.4: IIA findings for Policy SP PL4: Angel Edmonton

IIA objective	Policy-off					Policy-on
	SA4.1: Joyce Avenue & Snells Park Estate	SA4.2: Upton Road and Raynham Road (b)	SA4.3: Langhedge Lane Industrial Estate	SA4.4: South-east corner of the North Middlesex University Hospital Trust	SA4.5: Public House 50-56 Fore Street London	SP PL4: Angel Edmonton
IIA1: Climate change mitigation	N/A	N/A	N/A	N/A	N/A	++
IIA2: Climate change adaptation	N/A	N/A	N/A	N/A	N/A	0
IIA3: Housing	++	++	++	++	+	++
IIA4: Health and wellbeing	+	+	++	++	++	++/--?
IIA5: Services and facilities	+	+	+	++	+	++?
IIA6: Social inclusion	++	+	++	0	+	++
IIA7: Crime and community safety	N/A	N/A	N/A	N/A	N/A	+
IIA8: Road safety	N/A	N/A	N/A	N/A	N/A	++
IIA9: Economy	+	-	+	+	0	++
IIA10: Town and local centres	+	0	0	0	+	++
IIA11: Air pollution	-	--	-	-	-	+
IIA12: Sustainable transport	+	++	+	++	++	++
IIA13: Biodiversity	--	--	-	--	-	+
IIA14: Historic environment	--?	--?	-?	-?	--?	--?
IIA15: Landscape and townscape	--	--	0	-	-	+?
IIA16: Efficient use of land and materials	++	+	+	+	+	++
IIA17: Flooding	--	--	0	0	0	0
IIA18: Water	--	--	0	0	--	0

5.35 Policy SP PL4: Angel Edmonton seeks to regenerate the area through residential-led mixed-use development and to contribute to improvements to blue and green infrastructure, in addition to SuDS enhancements and improved transport connections between Silver Street Railway Station and Fore Street. The policy includes four mixed-use allocations and one

residential allocation. Regeneration of Angel Edmonton and the provision of employment uses may attract more residents to the area, increasing the number of cars on the road and associated CO₂ emissions. However, the placemaking area contains one railway station (Silver Street) and a number of bus stops, which is expected to help reduce CO₂ emissions through a reduced reliance on the private car. The policy seeks to work towards car-free development in line with public transport improvements, in addition to improving the walking and cycling environment, all of which would discourage use of the private car and help minimise associated CO₂ emissions. As set out in the placemaking vision for Angel Edmonton, active travel will be the primary means of movement and new rapid transport and green active travel corridors will link the new neighbourhood at Meridian Water to Edmonton Green via Angel Edmonton. Overall, Policy SP PL4 is expected to have a significant positive effect in relation to **IIA1: Climate change mitigation**.

5.36 Policy SP PL4 is expected to have a significant positive effect in relation to **IIA3: Housing** because four of the five site allocations are expected to deliver more than 100 housing units each. Furthermore, the policy states that development in Angel Edmonton must offer a range of housing typologies. As set out in Policy SP PL4, the health and wellbeing of residents will be protected through tree planting, the provision of wild meadows and other public realm works along the North Circular Road, so as to help minimise the effects of poor air quality. The placemaking area contains one GP surgery and the policy further seeks to contribute towards funding a study to explore opportunities to provide a new integrated health and wellbeing centre. There are a number of areas of open space in the placemaking area, and it is also located adjacent to others including Pymmes District Park. According to the policy, access to Pymmes Park should be improved and play space provided, in addition to enhanced connections to Bull Lane playing fields. However, some of the areas of open space within Angel Edmonton could be lost as a result of the development of SA15: Joyce Avenue and Snells Park Estate, although this is uncertain. Therefore, a mixed significant positive and significant negative effect is expected in relation to **IIA4: Health and wellbeing**, with uncertainty recorded against the potential negative effect. The vision for Angel Edmonton states that the High Street will be revitalised through community-led initiatives and anchored by a range of new community, cultural and recreational facilities. Angel Edmonton contains a primary school and is located within 800m of further primary schools and a secondary school. Therefore, a significant positive effect is expected in relation to **IIA5: Services and facilities**. However, the effect is recorded as uncertain because it is unknown whether the schools have capacity for new pupils or not.

5.37 This placemaking area partially falls within the 10% most deprived areas within England and new high quality development is therefore expected to help regenerate the area, with beneficial effects on social inclusion. The policy supports housing delivery, which will include affordable housing. Provision is also made for new spaces for culture and community uses, which may help contribute towards social cohesion. It is also likely that delivering improvements to the walking and cycling environment through the implementation of cycleways and enhancing the pedestrian environment could encourage uptake of active travel, making the area more accessible to those who may not have a car. Therefore, overall, a significant positive effect is expected in relation to **IIA6: Social inclusion**. With regard to **IIA7: Crime and community safety**, the policy states that access to Pymmes Park should be improved with better security and contributions will be sought towards this. Therefore, a minor positive effect is expected in relation to this objective. Policy SP PL4 is also expected to have a minor positive effect in relation to **IIA8: Road safety** because it seeks to contribute towards and/or facilitate improving connections between Silver Street Railway Station and Fore Street including markers for intuitive wayfinding and a variety of public realm spaces that are pedestrian and cycle friendly. Contributions will also be made towards improving the crossing facilities at North Circular Road, and prioritising active travel to better connect both sides of the road.

5.38 One of five allocations within the Angel Edmonton placemaking area received a minor negative significance score in relation to IIA9: Economy. This is due to the fact it is not within close proximity of Strategic Industrial Locations or Locally Significant Industrial Sites, and so does not provide easy access to job opportunities. However, Policy SP PL4 is expected to have significant positive effects in relation to **IIA9: Economy** and **IIA10: Town and local centres** because Angel Edmonton is a District Centre and its regeneration is likely to increase footfall and therefore enhance its overall vitality and vibrancy. The policy seeks to provide new spaces for small business and employment uses that contribute towards the creation of a wide range of new jobs, including the provision of affordable workspace and creative studios that support entrepreneurship. The placemaking area is adjacent to a Locally Significant Industrial Site and residents would therefore have easy access to employment opportunities. According to the policy, provision of affordable workspace and creative studios in the area will also be supported.

5.39 The allocations within the Angel Edmonton placemaking area receive negative significance scores in relation to IIA11: Air pollution, with one of them receiving a significant negative score. This is because they are located in an area where the current baseline annual mean concentration of nitrogen dioxide, PM₁₀ and PM_{2.5} exceed WHO guidelines and in most cases also exceed the higher nitrogen dioxide pollution level allowed under the UK's national air quality objectives. Site SA4.2 specifically

exceeds the higher nitrogen dioxide and PM₁₀ levels under the UK's national air quality objectives. The revitalisation of the District Centre could increase car trips into the area and associated air pollution. However, Angel Edmonton contains one railway station (Silver Street) and a number of bus stops, which could encourage public transport use and reduce use of the private car and associated air pollution. The policy supports a move towards car-free development and seeks to encourage active travel choices through the implementation of cycleways and enhancements to the pedestrian environment. Walking is encouraged along North Circular Road through tree planting and wild meadows, which will help mitigate the effects of poor air quality. Therefore, overall, a minor positive effect is expected in relation to **IIA11: Air pollution**. Mitigation is also provided by Policy SP TE1: Promoting a sustainable and decarbonised transport system and DM T2: Forming a healthy and connected Enfield²⁵.

5.40 Despite the potential for increases in car use associated with new development, Policy SP PL4 is expected to have a significant positive effect in relation to **IIA12: Sustainable transport** because Angel Edmonton contains a railway station and a number of bus stops, and the policy seeks to move towards car-free development by promoting active travel choices through the implementation of cycleways and enhancements to the pedestrian environment.

5.41 Angel Edmonton does not contain any designated biodiversity assets but is within 250m of Pymmes Park SINC and Priority Habitats. Three of the five allocations receive significant negative scores in relation to IIA13: Biodiversity, as most of them fall within a relevant SSSI IRZ and are within 250m of a locally designated site, Priority Habitat and/or Ancient Woodland. Policy SP PL4 supports the provision of play space at Pymmes Park which could potentially result in adverse effects on the SINC through increased recreational use. However, Policy SP PL4 also supports improvements to the blue and green infrastructure network, in addition to tree planting and the provision of wild meadows along North Circular Road. Therefore, overall, a minor positive effect is expected in relation to **IIA13: Biodiversity**. Mitigation is also provided through Policy SP BG2: Protecting nature conservation sites in the Local Plan.²⁶

5.42 Angel Edmonton contains Fore Street South Conservation Area and partially overlaps Fore Street Angel Conservation Area, the latter of which contains a number of grade II listed buildings and local heritage assets. The placemaking area is also located within 500m of Fore Street North Conservation Area. The area contains an archaeological priority area (APA20: Upper Edmonton). Due to the placemaking area's proximity to these conservation areas and listed buildings, development could affect the setting of these heritage assets, in addition to the archaeological priority area. Indeed, three of the sites (SA4.1, SA4.2 and SA4.5) receive 'Amber' in Enfield Council's historic environment assessment against heritage constraints and archaeological constraints. Site SA4.4 scored 'Amber' against heritage constraints and 'Blue' (i.e. no heritage constraints) against archaeology. The remaining site, SA4.3 scored 'Green' against both heritage and archaeology. All site allocations with the exception of SA4.3 and SA4.4 therefore receive uncertain significant negative effects in relation to IIA14. SA4.3 and SA4.4 receive uncertain minor negative effects. Therefore, overall, Policy SP PL4 is expected to have a significant negative effect in relation to **IIA14: Historic environment**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. It is important to note that mitigation is provided in the form of Policy DM D4: Putting heritage at the centre of place making.²⁷

5.43 Most of the sites allocated through this policy fall within an area where 'Limited Change' or 'Medium Change' is recommended, as outlined in Enfield's Character of Growth Study. Further to this, two of the sites, SA4.1 and SA4.2, contain open space and a green loop, respectively, which could be lost as a result of development. Therefore, most of the site allocations receive negative significance scores in relation to **IIA15: Landscape and townscape**. However, Policy SP PL4 requires regeneration of Angel Edmonton to respond positively to the unique context and characteristics of the area, and for proposals elsewhere to respect the predominantly lower-rise character of the area. The policy states that tall buildings will only be accepted in appropriate locations. Therefore, overall, Policy SP PL4 is expected to have a minor positive effect in relation to **IIA15: Landscape and townscape**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. Policy SP PL4 is expected to have a significant positive effect in relation to **IIA16:**

²⁵ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the Cumulative Effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

²⁶ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the Cumulative Effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

²⁷ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the Cumulative Effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

Efficient use of land and materials because the placemaking area contains previously developed land that has been allocated for housing.

5.44 Only two of the five site allocations are at risk of surface water flooding and just a small proportion of the Angel Edmonton placemaking area falls within Flood Zone 3. Policy SP PL4 states that contributions should be made towards SuDS enhancements and that opportunities to de-culvert Pymmes Brook should be explored. Therefore, a negligible effect is expected in relation to **IIA17: Flooding**. Mitigation is also provided in the form of Policy DM SE7: Managing flood risk²⁸. Although the placemaking area partially falls within Source Protection Zone 2, SuDS can help protect water quality by preventing contamination from sediment runoff during construction and or increased pressure on wastewater treatment. Therefore, a negligible effect is also expected in relation to **IIA18: Water**.

5.45 Negligible effects are expected in relation to IIA2: Climate change adaptation.

Recommendations

- The policy could contain wording on protecting and enhancing the historic environment, although it is acknowledged that Policy DM DE10: Conserving and enhancing heritage assets already provides mitigation (see 'Cumulative effects' section).

Meridian Water

Table 5.5: IIA findings for Policy SP PL5: Meridian Water

IIA objective	Policy-off								Policy-on
	SA5.1: Meridian Water Phase 1	SA5.2: Meridian Water Phase 2	SA5.3: Former IKEA, Meridian Water	SA5.4: Tesco Extra, Meridian Water	SA5.5: Meridian 13	SA5.6: Meridian East	SA5.7: Ravenside Retail Park	SA5.8: Kenninghall Metals and Waste	SP PL5: Meridian Water
IIA1: Climate change mitigation	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	++/-
IIA2: Climate change adaptation	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	+
IIA3: Housing	++	++	++	++	++	++	N/A	N/A	++
IIA4: Health and wellbeing	+	-	-	+	-	-	N/A	N/A	++
IIA5: Services and facilities	+	+	+	+	+	+	N/A	N/A	++
IIA6: Social inclusion	++	+	++	+	+	++	+	+	++
IIA7: Crime and community safety	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0
IIA8: Road safety	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	+
IIA9: Economy	+	0	+	+	0	0	+	+	++
IIA10: Town and local centres	+	0	0	0	0	0	0	0	++
IIA11: Air pollution	-	-	-	-	-	-	-	-	+
IIA12: Sustainable transport	+	0	0	0	0	--	--	0	++/-

²⁸ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the Cumulative Effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

IIA objective	Policy-off								Policy-on
	SA5.1: Meridian Water Phase 1	SA5.2: Meridian Water Phase 2	SA5.3: Former IKEA, Meridian Water	SA5.4: Tesco Extra, Meridian Water	SA5.5: Meridian 13	SA5.6: Meridian East	SA5.7: Ravenside Retail Park	SA5.8: Kenninghall Metals and Waste	SP PL5: Meridian Water
IIA13: Biodiversity	--	--	--	--	--	--	--	--	+
IIA14: Historic environment	-?	-?	-?	-?	-?	--?	0?	-?	0?
IIA15: Landscape and townscape	--	--	--	0	--	--	--	--	+?
IIA16: Efficient use of land and materials	++	+	++	++	+	++	++	++	++
IIA17: Flooding	--	-	--	--	-	--	-	--	-?
IIA18: Water	--	--	--	--	--	--	--	--	-

5.46 Policy SP PL5: Meridian Water seeks to deliver a residential-led mixed-use development scheme containing a large new Local Centre, in addition to open space and ecological enhancements. It includes six mixed-use allocations and two industrial/employment allocations. The policy states that development will be supported where it contributes towards the enhancement of the existing network of routes, namely Leaside Road, Glover Drive and Angel Edmonton Road. This could promote use of the private car and contribute towards CO₂ emissions, with adverse effects on this objective. However, improvements to highways infrastructure should also decrease congestion and associated concentrations of emissions. Further to this, the placemaking area contains a railway station (Meridian Water) and a number of bus stops, which is also likely to encourage and facilitate the use of public transport, which will help minimise CO₂ emissions associated with car use. A mixed-use development with a new large local centre will also mean that everyday facilities are located in one place and therefore people do not have to travel far to reach most amenities. The policy states that development should deliver new strategic connections from Meridian Water to key destinations such as Edmonton Green, North Middlesex Hospital, Angel Edmonton, Picketts Local to the north and Tottenham Marshes to the south, in addition to neighbouring boroughs (via the Lee Valley Regional Park) to overcome physical severance and provide attractive and safe walking and cycling links. The policy supports improvements to rail and bus provision, active travel and new routes across the placemaking area to improve accessibility and connectivity. It also makes provision for a network of green corridors, which are also likely to provide walking and cycling routes for residents. The policy requires primary routes through the area to form a key route for essential infrastructure, including decentralised energy, gas and electricity networks, which would also help minimise CO₂ emissions. Therefore, overall, a mixed significant positive and minor negative effect is expected in relation to **IIA1: Climate change mitigation**. A minor positive effect is expected in relation to **IIA2: Climate change adaptation** because the policy requires development within the placemaking area to contain flood mitigation infrastructure, in addition to off-site flood attenuation basins/conveyance channels to divert surface water run-off where this cannot be delivered on site.

5.47 Policy SP PL5 is expected to have a significant positive effect in relation to **IIA3: Housing** because collectively the six mixed-use allocations make provision for over 6,000 new housing units. The policy seeks to deliver a range of alternative housing products to increase the quantum and pace of delivery, and support is given for high quality 'build to rent' schemes as an element of the provision of private housing. According to the policy, the need for co-living, older person's accommodation and student accommodation should also be explored. Significant positive effects are also expected in relation to **IIA4: Health and wellbeing** and **IIA5: Services and facilities** because the policy states that development should make a significant, positive contribution to both physical and social infrastructure, which will include the delivery of a new primary school and a new health centre as a minimum (the placemaking area does not currently contain a GP surgery, with the nearest one located within 400-800m). The placemaking area does, however, contain one primary school, and is within 800m of other existing primary schools. The policy also requires development proposals to explore opportunities for the delivery of water sports facilities along the Lee Valley Navigation canal and at Banbury Reservoir, which could encourage increased levels of physical exercise. Improved access to the Lea Valley is also noted in the policy, with new developments encouraged to contribute to delivering sustainable

transport connections to the Lea Valley given its importance as a north-south corridor and green space. Provision will also be made for open space and there is a requirement within the policy for each phase of development to meet the 30% public open space target as a minimum and to seek to deliver the maximum open space possible. Related to this point is the requirement to deliver high quality, varied play through a combination of designated and informal playable space supported by suitable infrastructure including supportive seating. Doorstep play must also be provided within individual plots. The delivery of a residential-led mixed-use scheme will also ensure that there is a wide range of services and facilities available within one area.

5.48 Meridian Water is located within one of the 10% and 20% most deprived areas within England and the proposed new development is therefore expected to help regenerate the area through the residential-led mixed-use development scheme, with beneficial effects on social inclusion. A significant number of new housing units will be provided, including affordable housing units to address the needs of families in the Borough. According to the placemaking vision for Meridian Water, it will be a highly sustainable, mixed-use community, providing new homes and jobs well served by community infrastructure. The policy makes provision for a new large Local Centre and states that development within the new local centre must create new spaces for small business, indoor leisure, culture and community uses, aiding social inclusion. Open space provision will help to address inequalities in access to open space, whilst active travel and new walking and cycling routes, in addition to improvements to rail and bus provision, will make the area more accessible to those who may not have access to a car. The policy also makes reference to the need for co-living, older person's accommodation and student accommodation. Therefore, overall, a significant positive effect is expected in relation to **IIA6: Social inclusion**. A minor positive effect is expected in relation to **IIA8: Road safety** because the policy seeks to facilitate and contribute towards the enhancement of the existing network of routes and strategic connections from Meridian Water to key destinations and neighbouring boroughs, to overcome any physical severance. The policy also supports roadside improvements, such as underpass treatment and bridges, all of which have the potential to increase road safety.

5.49 According to the vision for Meridian Water, it will continue to be a place of innovation and industry that has adapted and evolved to modern needs, delivering new jobs and opportunities on a scale which will transform the Borough's employment base (the aspiration is for the area to deliver 6,000 permanent jobs over 25 years, in addition to significant temporary jobs from construction and meanwhile uses). The policy states that development within Meridian Water should contribute to generating a mix of high-quality permanent jobs, as well as jobs through meanwhile uses and construction jobs, with no less than 25% from local labour. To deliver the permanent jobs, development should provide a mix of employment spaces in appropriate locations. High speed broadband will also help contribute towards economic growth. Employment-led regeneration is also focussed at Meridian Hinterlands, in which a net increase in employment floorspace through intensification and mixed-use redevelopment is sought to be delivered. The placemaking area also contains a Strategic Industrial Location and is located close to two further Strategic Industrial Locations, as well as a Locally Significant Industrial Site. Therefore, new residents would be located within close proximity of employment opportunities. According to the policy, the Strategic Industrial Location will be safeguarded as a SIL for this Plan period, but that may change in future plan periods to ensure that future aspirations are not undermined through planning consent on this land in the Plan period. Therefore, overall, Policy SP PL5 is expected to have a significant positive effect in relation to **IIA9: Economy**. A significant positive effect is also expected in relation to **IIA10: Town and local centres** because the policy makes provision for a new large Local Centre, which will be supported by a wide range of complementary uses. Development within the new local centre must create new spaces for small businesses.

5.50 The allocations within the Meridian Water placemaking area receive minor negative significance scores in relation to the air quality objective. This is because they are located in an area where the current baseline annual mean concentration of nitrogen dioxide, PM₁₀ and PM_{2.5} exceed WHO guidelines and in most cases also exceed the higher nitrogen dioxide pollution levels allowed under the UK's national air quality objectives. The residential-led mixed-use development scheme may attract more residents and workers to the area, which could increase the number of cars on the road with adverse effects on air quality. However, Meridian Water contains a railway station and a number of bus stops, which should encourage modal shift and help to minimise air pollution from car use. The policy supports improvements to rail and bus provision, active travel and new routes across proposed development sites to improve accessibility and connectivity. It also makes provision for a network of green corridors, which are likely to provide walking and cycling routes for residents. Providing a mix of uses within one area is also likely to encourage more active travel choices as different services will be within walking distance of one another. Therefore, Policy SP PL5 is expected to have a minor positive effect in relation to **IIA11: Air pollution**. Mitigation provided under Policy SP

T1: Promoting a sustainable and decarbonised transport system and DM T2: Forming a healthy and connected Enfield²⁹ would also help encourage more active and sustainable travel choices.

5.51 Two of the allocations within the placemaking area receive significant negative scores in relation to sustainable transport, as they have poor PTAL ratings and are not within close proximity of Major, District or Local Centres. Further to this, although Meridian Water contains a railway station and a number of bus stops, which is likely to encourage and facilitate the use of public transport, Policy SP PL5 seeks to facilitate and contribute towards the enhancement of the existing network of routes, in particular Leaside Road, Glover Drive, Angel Edmonton Road, Picketts Lock to the north and Tottenham Marshes to the south, which could encourage more road transport. However, the policy also requires development to deliver new strategic connections from Meridian Water to key destinations and neighbouring boroughs via the Lee Valley Regional Park to overcome physical severance and provide attractive and safe walking and cycling links. The policy supports improvements to rail and bus provision, active travel and new routes across the placemaking area to improve accessibility and connectivity, and makes provision for a network of green corridors, which are likely to provide walking and cycling routes for residents. Therefore, Policy SP PL5 is expected to have a mixed significant positive and minor negative effect in relation to **IIA12: Sustainable transport**.

5.52 Meridian Water contains Priority Habitats (deciduous woodland) and is located within the Lea Valley SINC, with the safeguarded land on the "east bank" located within 250-750m of Chingford Reservoirs SSSI. Sites SA5.5, 5.6 and 5.7 overlap the SINC, whilst site SA5.8 overlaps the area of deciduous woodland recorded on the Priority Habitat Inventory. However, according to the supporting figure to Policy SP PL5, improvements will be made to the Kenninghall Amenity Green Space which comprises Priority Habitat. The placemaking policy makes provision for a network of green corridors and seeks to maximise the experience, activation and ecological potential of the existing waterways in the area through naturalisation and ecological enhancements where possible. This includes the potential delivery of water sports facilities along the Lee Valley Navigation canal where they will not have an unacceptable level of harm to ecology or wildlife. The policy also seeks to deliver a net gain in biodiversity and states that planting must be consistent with the habitats and character of the Lee Valley Regional Park and must be composed of a diverse range of native species in accordance with the Lee Valley Biodiversity Action Plan. Therefore, overall, Policy SP PL5 is expected to have a mixed minor positive and minor negative effect in relation to **IIA13: Biodiversity**. Mitigation for potential effects on other biodiversity assets will be provided through Policy SP BG2: Protecting nature conservation sites³⁰.

5.53 Meridian Water is located within 250m of three grade II listed buildings (Water Turbine House, Chingford Mill Pumping Station, and Chingford Mill Pumping Station's associated metal railing) and a local heritage asset (St John the Evangelist), in addition to containing an archaeological priority area (APA4: Lea Valley West Bank). All of the site allocations in the placemaking area receive 'None' (i.e. no heritage constraints) against the heritage aspect of Enfield Council's historic environment assessment, with the exception of SA6.5 which receives 'Amber'. All of the site allocations receive 'Amber' against the archaeological aspect of the assessment, with the exception of SA5.7, which receives 'None'. All sites with the exception of SA5.6 and SA5.7 therefore receive an uncertain minor negative effect in relation to **IIA14: Historic environment**. SA5.6 receives an uncertain significant negative effect, whilst SA5.7 receives an uncertain negligible effect. However, new development is unlikely to have an adverse effect on the setting of the listed buildings and local heritage asset, in addition to the archaeological priority area, as the placemaking area already contains built development and mitigation is provided through the policy. New development may be high density, but the policy specifically requires development to be seamlessly woven into the surrounding context, employing an appropriate massing strategy that complements the predominantly suburban low-rise character of the area. Therefore, a negligible effect is likely in relation to **IIA14: Historic environment** although this is recorded as uncertain because the placemaking area could still have some potential for impacts on non-designated heritage features.

5.54 All but one of the site allocations fall within an area where 'Transformative Change' is recommended, as outlined in Enfield's Character of Growth Study. This means that the area has a low sensitivity to development. However, all of the sites with the exception of SA5.4 contains a green loop and/or open space that could be lost as a result of development. Subsequently, all but one of the sites receive significant negative scores in relation to **IIA15: Landscape and townscape**. Meridian Water is located directly adjacent to the North Circular Road, which provides good strategic road connectivity to other

²⁹ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

³⁰ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

parts of London and further afield. However, this road also divides the area, reducing connectivity and making navigation difficult. Further to this, large areas of land, including two former gasholder sites, are inaccessible and help to further divide the area. Electricity pylons and the North Circular Road flyover are dominant visual elements within the area, and the area also contains retail in the form of large box retail outlets. In light of the context and characteristics of Meridian Water, Policy SP PL5 builds upon this low baseline by making provision for open space throughout the policy and highlighting the potential of comprehensive, masterplanned redevelopment to improve the area. The Policy requires development to be seamlessly woven into the surrounding context, stipulating that development should provide a clearly delineated centre in the form of a central east-west spine that is connected to a variety of public realm spaces including pocket gardens and squares. According to the policy, planning permission for individual phases must conform with a masterplan for the whole placemaking area, which is likely to give consideration to the existing landscape. Further to this, the vision for Meridian Water states that development will offer views across the Lee Valley Regional Park. Policy SP PL5 is therefore expected to have a minor positive effect in relation to **IIA15: Landscape and townscape**, which is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. The policy supports development within the Meridian Water placemaking area, which almost entirely comprises brownfield land. Additionally, the vision states that Meridian Water will be a zero waste development. As such, a significant positive effect is expected in relation to **IIA16: Efficient use of land and materials**.

5.55 The Meridian Water placemaking area contains some allocations that partially fall within Flood Zone 3 and all of the allocations are at risk of surface water flooding. However, Policy SP PL5 requires development within Meridian Water to contribute towards river restoration works, including naturalisation of the riverbanks and off-site flood attenuation basins/conveyance channels to divert surface water run-off where this cannot be delivered on site. Overall, therefore, Policy SP PL5 is expected to have a minor negative effect in relation to **IIA17: Flooding**. The effect is recorded as uncertain as it is unknown whether development within the site boundaries that overlap Flood Zone 3 will in fact intersect these areas of flood risk. Mitigation is also provided under Policy DM SE7: Managing flood risk³¹. With regard to water quality, although the placemaking area partially falls within Source Protection Zones 1 and 2, naturalisation of the riverbanks and off-site flood attenuation basins/conveyance channels will help prevent contamination from sediment runoff. Policy SP PL5 also seeks to maximise the ecological potential of the existing waterways through naturalisation and ecological enhancements where possible, which is expected to enhance water quality. Policy SP PL5 is therefore expected to have a minor negative effect in relation to **IIA18: Water**.

5.56 Negligible effects are expected in relation to IIA7: Crime and community safety.

Recommendations

- If viable, provision could be made for a new secondary school to support growth.
- Although Policy DM DE10: Conserving and enhancing heritage assets already provides mitigation (see 'Cumulative effects' section), the measures for safeguarding heritage and conservation within Policy SP PL5: Meridian Water could be enhanced, perhaps by including a section on this within the Policy.

³¹ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

Southgate

Table 5.6: IIA findings for Policy SP PL6: Southgate

IIA objective	Policy-off			Policy-on
	SA6.1: Southgate Office Village	SA6.2: Barnet and Southgate College	SA6.3: Minchenden Car Park and Alan Pullinger Centre	SP PL6: Southgate
IIA1: Climate change mitigation	N/A	N/A	N/A	++
IIA2: Climate change adaptation	N/A	N/A	N/A	0
IIA3: Housing	++	+	+	++
IIA4: Health and wellbeing	+	+	+	++
IIA5: Services and facilities	+	++	+	++
IIA6: Social inclusion	0	0	0	+
IIA7: Crime and community safety	N/A	N/A	N/A	0
IIA8: Road safety	N/A	N/A	N/A	+
IIA9: Economy	0	0	0	++
IIA10: Town and local centres	+	+	+	++
IIA11: Air pollution	-	-	-	0
IIA12: Sustainable transport	++	++	++	++
IIA13: Biodiversity	--	--	--	-
IIA14: Historic environment	--?	--?	--?	-?
IIA15: Landscape and townscape	--	+	--	+?
IIA16: Efficient use of land and materials	+	+	+	++
IIA17: Flooding	-	--	-	-
IIA18: Water	0	0	0	0

5.57 Policy SP PL6: Southgate supports the renewal of Southgate District Centre through the delivery of new homes, employment floorspace including through a new college campus, in addition to town centre uses, whilst protecting the distinctive character and heritage of the area. It includes two mixed-use allocations and one education allocation. Providing a range of uses within Southgate may draw more residents and visitors into the area and increase the number of cars on the road and associated CO₂ emissions. However, the placemaking area contains a tube station (Southgate) and a number of bus stops which may reduce reliance on the private car. The policy requires development to work towards car free development and a reduced reliance on surface car parks, in addition to requiring development to contribute towards enhancing the pedestrian environment. The supporting figure to the policy shows that new walking and cycling opportunities will be introduced to the area and improvements will be made to existing walking routes. Therefore, it is likely this policy will reduce reliance on the private car

and help minimise associated CO₂ emissions. Providing a mix of uses in one area will also reduce reliance on the private car because more services and facilities will be located within walking distance of one another. Overall, Policy SP PL6 is expected to have a significant positive effect in relation to **IIA2: Climate change mitigation**.

5.58 Policy SP PL6 is expected to have a significant positive effect in relation to **IIA3: Housing** because a large number of homes will be delivered within the placemaking area, with one of the three allocations expected to deliver more than 100 housing units. A significant positive effect is also expected in relation to **IIA4: Health and wellbeing** because the placemaking area contains areas of open space and is also located within 800m of a number of other areas of open space, in addition to walking and cycling routes. The policy seeks to enhance and improve access to parks and open spaces within the vicinity of the area, including but not limited to Grovelands Park, Minchenden Oak Garden, Oakwood and Ivy Road Recreation Ground. A significant positive effect is identified in relation to **IIA5: Services and facilities** because the policy supports the development of a mix of uses, including education facilities. Specifically, the policy requires developers to explore opportunities to enhance community and cultural facilities, including colleges, schools and mosques. The placemaking area contains a primary school and is located within 800m of further primary schools but is not within 800m of a secondary school..

5.59 A minor positive effect is expected in relation to **IIA6: Social inclusion** because, while the placemaking area is not located within one of the 20% most deprived areas within England, affordable housing would be provided as part of development. Additionally, the policy makes provision for small creative businesses and business start-ups. The policy also explores the opportunity to integrate public art into proposals or to contribute towards these, collaborating with schools on cultural projects. A minor positive effect is also expected in relation to **IIA8: Road safety** because the policy supports the development of a strategy of improvements to cycling infrastructure, as well as requiring development to contribute towards enhancing the pedestrian environment, which is likely to improve both pedestrian and cyclist safety.

5.60 Policy SP PL6 seeks to provide an expanded or intensified District Centre by supporting proposals for small creative businesses and business start-ups, encouraging meanwhile and temporary use of vacant shop units and small office spaces around the High Street. According to the vision for the placemaking area, existing and newly developed clusters of small to medium office spaces will take advantage of good links to central London. The policy also seeks to support a growing evening economy, with changes to non-town centre uses not permitted unless appropriate evidence can be provided to demonstrate why this is acceptable. Therefore, Policy SP PL6 is expected to have significant positive effects in relation to **IIA9: Economy** and **IIA10: Town and local centres**.

5.61 The allocations within the Southgate placemaking area receive minor negative significance scores in relation to the air quality objective. This is because they are located in an area where the baseline annual mean concentration of nitrogen dioxide, PM₁₀ and PM_{2.5} exceed WHO guidelines. Renewal of Southgate District Centre may draw more residents and visitors into the area, which could increase the number of cars on the road with adverse effects on air quality. However, Southgate contains a tube station and a number of bus stops, which could encourage modal shift and help minimise air pollution from car use. Policy SP PL6 requires development proposals to work towards car-free development, in addition to requiring development to contribute towards enhancing the pedestrian environment. Renewal of the District Centre could also support more sustainable transport initiatives. Therefore, Policy SP PL6 is expected to help minimise air pollution associated with car use. Locating a mix of uses all in one area is also expected to reduce car use as a wide range of services and facilities will be within walking distance of one another. Policy SP PL6 is therefore expected to have a negligible effect in relation to **IIA11: Air pollution**. Mitigation is also provided through Policies SP T1: Promoting a sustainable and decarbonised transport system and DM T2: Forming a healthy and connected Enfield³², both of which promote more active and sustainable travel choices.

5.62 Despite the potential for increased car use associated with new development, Policy SP PL6 is expected to have a significant positive effect in relation to **IIA12: Sustainable transport** because Southgate contains a tube station and a number of bus stops. Therefore, focusing growth within the centre is likely to encourage the use of public transport. The policy also states that development proposals and changes to traffic circulation must safeguard the continued operation of the bus station with no loss of efficiency or overall capacity. Further to this, the policy requires development proposals to work towards car free development and a reduced reliance on surface car parks, in addition to requiring development to contribute towards enhancing

³² In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

the pedestrian environment. The supporting figure to the policy shows that new walking and cycling opportunities will be introduced to the area and improvements will be made to existing walking routes.

5.63 The Southgate placemaking area is located within 250m of Grovelands Park and Priory Hospital SINC and Piccadilly Line from Cockfosters Station to Southgate, which contain Priority Habitats. Two of the three site allocations receive significant negative scores in relation to IIA13, as they fall within a relevant SSSI IRZ and are within 250m of the Piccadilly Line from Cockfosters Station to Southgate SINC. However, the policy states that development should enhance and improve Grovelands Park. Therefore, a minor negative effect is expected in relation to **IIA13: Biodiversity**. Further mitigation is provided through Policy SP BG2: Protecting nature conservation sites.³³

5.64 Southbury placemaking area contains Southgate Circus Conservation Area and a number of grade II* and grade II listed buildings and locally designated assets. Southgate is also located within 250m of Grovelands Registered Park and Garden and Medway Conservation Area and Southgate Green Conservation Area. The placemaking area contains an archaeological priority area (APA25: Grovelands Park and Southgate Green). Therefore, development could have an adverse effect on the conservation areas and on the settings of the listed and locally designated buildings, in addition to the archaeological priority area. Indeed, all three site allocations scored 'Amber' in Enfield Council's historic environment assessment against heritage constraints and 'Green' (with the exception of SA6.2 which scored 'Green') against archaeological constraints. All site allocations therefore receive uncertain significant negative effects in relation to **IIA14: Historic environment**. However, the policy states that development in Southgate must be shaped by the distinctive character and heritage in the area, with particular regard to the grade II* listed tube station of outstanding national significance and its surroundings, in addition to the interwar shopping parades, historic high streets and distinctive suburban housing. According to the vision for the area, Southgate will be a thriving District Centre characterised by its unique identity derived from the listed tube station and other heritage assets. Therefore, overall, Policy SP PL6 is expected to have a minor negative effect against **IIA14: Historic environment**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. Mitigation is also provided through Policy SP DE4: Putting heritage at the centre of place making within the Local Plan.³⁴

5.65 Two of the three allocations in the placemaking area fall within an area where 'Limited Change' is recommended, as outlined in Enfield's Character of Growth Study. Therefore, both site allocations receive significant negative scores in relation to **IIA15: Landscape and townscape**. Site SA6.2 receives a minor positive effect in relation to this objective, as alongside college campus facilities, it will provide enhanced landscaping and public realm. Policy SP PL6 requires development within Southgate to respond positively to the unique context and characteristics of the area. New homes should be delivered through high density development that also preserves key views of the stations, with tall buildings only acceptable in locations identified as being suitable. According to the policy, development should create an improved sense of place by the station and the Council will work in partnership with key stakeholders and landowners to devise a cohesive public realm strategy. The strategy will be focused around the station to improve the sense of arrival and around the shopping parades to create a more pedestrian friendly environment. Overall, Policy SP PL6 is expected to have a minor positive effect in relation to **IIA15: Landscape and townscape**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. The policy also supports development on previously developed land, with the deliverance of small-scale housing proposed through the intensification of underutilised brownfield sites such as garages and car parking forecourts, in addition to the meanwhile and temporary use of vacant shop units; therefore a significant positive effect is expected in relation to **IIA16: Efficient use of land and materials**.

5.66 Although none of the allocated sites within this placemaking area fall within Flood Zones 2 or 3, most of them are at risk of surface water flooding, with two of the sites susceptible to a 1 in 30 year risk of surface flooding. As the area already contains built development, Policy SP PL6 is expected to have a minor negative effect in relation to **IIA17: Flooding**. Flood risk mitigation will be provided through Local Plan Policy DM SE7: Managing flood risk³⁵.

³³ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

³⁴ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

³⁵ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

5.67 Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA7: Crime and community safety and IIA18: Water.

Recommendations

- No recommendations.

New Southgate

Table 5.7: IIA findings for Policy SP PL7: New Southgate

IIA objective	Policy-off					Policy-on
	SA7.1: Former Gasholder, New Southgate	SA7.2: Aldi, New Southgate (Formerly Homebase	SA7.3: Ladderswood Estate	SA7.4: Arnos Grove Station Car Park	SA7.5: Coppice Wood Lodge	SP PL7: New Southgate
IIA1: Climate change mitigation	N/A	N/A	N/A	N/A	N/A	+
IIA2: Climate change adaptation	N/A	N/A	N/A	N/A	N/A	0
IIA3: Housing	++	++	++	++	+	++
IIA4: Health and wellbeing	+	+	+	+	+	++
IIA5: Services and facilities	+	+	++	++	+	++?
IIA6: Social inclusion	+	+	+	0	0	++
IIA7: Crime and community safety	N/A	N/A	N/A	N/A	N/A	+
IIA8: Road safety	N/A	N/A	N/A	N/A	N/A	+
IIA9: Economy	+	+	+	0	-	+
IIA10: Town and local centres	0	0	0	+	+	+
IIA11: Air pollution	--	-	-	-	-	0
IIA12: Sustainable transport	-	0	++	++	++	++
IIA13: Biodiversity	--	-	--	--	0	--
IIA14: Historic environment	-?	0?	0?	-?	0	-?
IIA15: Landscape and townscape	-	0	--	--	0	+?
IIA16: Efficient use of land and materials	+	+	++	+	+	++
IIA17: Flooding	-	--	--	--	0	-
IIA18: Water	0	0	0	0	0	+

5.68 Policy SP PL7: New Southgate seeks to deliver a mix of uses within New Southgate and an enhanced public realm, in addition to an appropriate distribution of green open spaces across the area and river restoration projects within Arnos Park. It

includes three mixed-use site allocations and two residential allocations. The development of a mix of uses within the area may draw more residents into the area and could therefore increase the number of cars coming into the area and associated CO₂ emissions. However, Policy SP PL7 seeks to make walking and cycling significantly more accessible and safer through the delivery of an attractive public realm and active frontages, particularly along Bowes Road, the A406 and Station Road. Use of public transport may also be encouraged as the area contains a tube station (Arnos Grove) and a railway station (New Southgate), in addition to a number of bus stops. Therefore, Policy SP PL7 is expected to have a minor positive effect in relation to **IIA1: Climate change mitigation**.

5.69 Policy SP PL7 is expected to have a significant positive effect in relation to **IIA3: Housing** because a large number of new housing units will be delivered within the placemaking area, with all four of the five allocations expected to deliver in excess of 100 housing units each. According to the policy, a range of housing typologies will be provided. The policy is also expected to have a significant positive effect in relation to **IIA4: Health and wellbeing** because the policy supports the delivery of a mix of uses, which may include healthcare facilities. The placemaking area contains a GP surgery and a number of open spaces which, according to the supporting figure to the policy, will be improved. The policy specifically states that contributions will be made towards enhancing existing local open spaces and that improvements will be made to provide play opportunities for all ages within existing parks. A new play park for young children is also proposed suggested in the High Road open space. Further to this, pollution from the North Circular Road will be partially managed through the careful positioning of living and sleeping spaces away from the most polluted side of the development, with natural ventilation drawn into the building from the less polluted side. A significant positive effect is also expected in relation to **IIA5: Services and facilities** because the placemaking area contains primary schools and is also located within 800m of a further primary school and a secondary school. As noted above, the policy supports a mix of uses including community facilities, as well as improvements to Bowes Road Library, and Arnos Pool subject to funding. The policy also supports the development of new hub facilities around Grove Road open space. The significant positive effect is recorded as uncertain because it is unknown whether the schools have capacity for new students or not.

5.70 The New Southgate placemaking area is partially located within the 20% most deprived areas within England and new development is therefore expected to help regenerate the area through a range of development types, with beneficial effects on social inclusion. Provision will also be made for affordable housing and walking and cycling will be made more accessible through public realm improvements. Therefore, a significant positive effect is expected in relation to **IIA6: Social inclusion**. Policy SP PL7 is expected to have a minor positive effect in relation to **IIA7: Crime and community safety** because according to the supporting figure to the policy, active frontages will be promoted along a couple of roads, which is a form of passive surveillance. Additionally, the policy supports improvements to parks such as enhanced lighting, which will help ensure people are safe at night. A minor positive effect is also expected in relation to **IIA8: Road safety** because the policy seeks to contribute towards improving links along key routes to the tube and railway station through public realm improvements, in addition to making cycle and walking routes safer.

5.71 One of the five allocations within the New Southgate placemaking area received a minor negative significance score in relation to **IIA9: Economy**. This is due to the fact the site is not within close proximity of Strategic Industrial Locations or Locally Significant Industrial Sites, and so does not provide easy access to job opportunities. However, three of the allocations received minor positive significance scores because they are within close proximity of Strategic Industrial Locations or Locally Significant Industrial Sites and will make provision for employment uses. Policy SP PL7 seeks to create a thriving mixed-use place and according to the vision for New Southgate, supports the revitalisation of the shopping areas at both Arnos Grove tube station and New Southgate railway station. Therefore, a minor positive effect is expected in relation to **IIA9: Economy**. New Southgate contains a number of local centres and its redevelopment is expected to increase footfall within these centres, contributing to their vitality. Therefore, a minor positive effect is also expected in relation to **IIA10: Towns and local centres**.

5.72 The allocations within the New Southgate placemaking area receive negative significance scores in relation to **IIA11: Air pollution**, with one of them receiving a significant negative score. This is because they are located in an area where the current baseline annual mean concentration of nitrogen dioxide, PM₁₀ and PM_{2.5} exceed WHO guidelines, and in most cases also exceed higher nitrogen dioxide pollution levels allowed under the UK's national air quality objectives. Site SA7.1 specifically exceeds the higher nitrogen dioxide and PM₁₀ levels under the UK's national air quality objectives. Development within New Southgate may attract more people to the area and subsequent car trips into the area, which would contribute towards poor air quality. However, New Southgate contains a tube station and a railway station, in addition to a number of bus stops, which could discourage use of the private car and help minimise associated air pollution. Policy SP PL7 seeks to make walking and cycling safer and more accessible. Providing a mix of uses within one area is also expected to encourage more active travel choices as

different services will be within walking distance of one another. Mitigation provided through Policy SP T1: Promoting a sustainable and decarbonised transport system and DM T2: Forming a healthy and connected Enfield³⁶ would also help encourage more active and sustainable travel choices. Policy SP PL7 alone seeks to positively address the main North Circular Road, and stipulates that the internal planning of new development should consider positioning living and sleeping accommodation away from the most polluted side of development. This would help mitigate against poor air quality and noise pollution associated with this heavily trafficked. Therefore, Policy SP PL7 is expected to have a negligible effect in relation to **IIA11: Air pollution**.

5.73 Site SA7.1 scores a minor negative significance score in relation to IIA12: Sustainable transport, as it is not within close proximity of a Major, District or Local Centre. However, the other allocations score more strongly in relation to this objective. Policy SP PL7 is expected to have a significant positive effect in relation to **IIA12: Sustainable transport** because New Southgate contains a tube station and a railway station, in addition to a number of bus stops. The policy also supports enhancements to walking and cycling routes. Therefore, focusing growth within the area is expected to encourage public transport use.

5.74 The placemaking area contains a Priority Habitat (deciduous woodland) and is within 250m of Arnos Park SINC, which also contains some Priority Habitats. Three of the five site allocations receive significant negative scores in relation to **IIA13: Biodiversity**, as they fall within a relevant SSSI IRZ and are within 250m of a locally designated site, Priority Habitat and/or Ancient Woodland. As there is no site-specific mitigation outlined in the policy, it receives a significant negative effect in relation to **IIA13: Biodiversity**. It is noted, however, that Policy SP BG2: Protecting nature conservation sites³⁷ will help mitigate against any effects development might have on biodiversity.

5.75 The New Southgate placemaking area contains one grade II* listed building (Arnos Grove Underground Station) and two grade II listed buildings (Bowes Road Library and Arnos Pool and Bowes Road Clinic). The New Southgate placemaking area also contains a number of local heritage assets. Therefore, development could have an adverse effect on the setting of these listed buildings and locally designated buildings assets. In Enfield Council's historic environment assessment, all of the site allocations receive 'None' (i.e. no heritage constraints) against archaeology and 'None' against heritage, with the exception of SA7.1 and SA7.4, which receive 'Amber' against heritage. Sites SA7.1 and SA7.4 therefore receive uncertain minor negative effects in relation to **IIA14: Historic environment**, whilst the remaining sites receive uncertain negligible effects. As Policy SP PL7 does not contain any mitigation in relation to the historic environment, it is expected to have a minor negative effect overall, in relation to **IIA14: Historic environment**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. Mitigation will also be provided through Local Plan Policy SP DE4: Putting heritage at the centre of place making³⁸.

5.76 With regard to the landscape, three of the five site allocations fall within an area where 'Medium Change' is recommended. Two of these sites, SA7.3 and SA7.4, contain open space which could be lost as a result of development, although this is uncertain. However, Policy SP PL7 requires development in New Southgate to be delivered via a masterplan, particularly around the western gateway sites. The masterplan is likely to give consideration to the landscape of the area, with Policy SP PL7 also stating that contributions will be sought towards improvements to the public realm and townscape along the large roads bounding the area (i.e. Bowes Road, A406 and Station Road). Contributions will also be sought towards enhancing existing local open spaces. According to the vision for the place, New Southgate will become a new enhanced gateway to the Borough and offer exemplary quality development on its western edge with housing alongside modern commercial space. Therefore, Policy SP PL7 is expected to have a minor positive effect in relation to **IIA15: Landscape and townscape**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. Policy SP P7 is expected to have a significant positive effect in relation to **IIA16: Efficient use of land and materials** because the placemaking area contains previously developed land that has been allocated for housing.

³⁶ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

³⁷ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

³⁸ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

5.77 A very small proportion of New Southgate contains land that falls within Flood Zone 3 and all four of the five allocated sites within this placemaking area are at risk of surface water flooding. Specifically, three of them have a 1 in 30 year risk of surface flooding and the other has a 1 in 100 year risk of surface water flooding. Despite this, a lot of the area is already developed. Therefore, overall, a minor negative effect is expected in relation to **IIA17: Flooding**. Flood risk mitigation will also be provided through Local Plan Policy DM SE7: Managing flood risk³⁹. A minor positive effect is expected overall in relation to **IIA18: Water** as the policy requires development proposals to contribute to river restoration projects, which are likely to help improve water quality.

5.78 Negligible effects are expected in relation to IIA2: Climate change adaptation.

Recommendations

- Make reference to heritage conservation, although it is acknowledged that Policy DM DE10: Conserving and enhancing heritage assets already provides mitigation (please see 'Cumulative effects' section).
- Reference is made broadly to housing typologies but it would be helpful to see reference to inclusive design, although it is acknowledged that the 'Design and character' policies already provide mitigation (please see 'Cumulative effects' section).
- Policy should seek to protect and enhance biodiversity.

Palmers Green

Table 5.8: IIA findings for Policy SP PL8: Palmers Green

IIA objective	Policy-off				Policy-on
	SA8.1: Morrisons, 19 Alderman's Hill, Palmers Green.	SA8.2: Lodge Drive Car Park Palmers Green including depot	SA8.3: Corner of Green Lanes and the North Circular	SA8.4: Travis Perkins Palmers Green, Bridge Drive, Broomfield Lane	SP PL8: Palmers Green
IIA1: Climate change mitigation	N/A	N/A	N/A	N/A	+
IIA2: Climate change adaptation	N/A	N/A	N/A	N/A	0
IIA3: Housing	++	++	++	+	++
IIA4: Health and wellbeing	++	++	+	++	++
IIA5: Services and facilities	++	++	++	++	++?
IIA6: Social inclusion	0	0	0	0	+
IIA7: Crime and community safety	N/A	N/A	N/A	N/A	+
IIA8: Road safety	N/A	N/A	N/A	N/A	0
IIA9: Economy	0	0	+	0	++
IIA10: Town and local centres	+	+	+	+	++
IIA11: Air pollution	-	-	-	-	0

³⁹ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

IIA objective	Policy-off				Policy-on
	SA8.1: Morrisons, 19 Alderman's Hill, Palmers Green.	SA8.2: Lodge Drive Car Park Palmers Green including depot	SA8.3: Corner of Green Lanes and the North Circular	SA8.4: Travis Perkins Palmers Green, Bridge Drive, Broomfield Lane	SP PL8: Palmers Green
IIA12: Sustainable transport	+	+	+	+	++
IIA13: Biodiversity	--	--	--	--	-
IIA14: Historic environment	-?	-?	0?	0?	0?
IIA15: Landscape and townscape	-	-	-	0	+?
IIA16: Efficient use of land and materials	+	+	+	+	++
IIA17: Flooding	--	-	--	--	-
IIA18: Water	--	--	--	--	-

5.79 Policy SP PL8: Palmers Green supports residential and mixed-use development around Palmers Green District Centre to ensure that Palmers Green continues to thrive, offering new housing, improvements to the public realm and diverse commercial development. It includes four mixed-use allocations. The range of development types supported in Palmers Green is expected to draw more residents and visitors into the area and could therefore increase the number of cars coming into the centre and associated CO₂ emissions. However, Palmers Green is particularly well connected, benefiting from a rail station with links to Finsbury Park and Moorgate stations. The policy makes some provision for walking, wheeling and cycling through denser forms of development within walking distance of the station and the town centre, working in partnership with Network Rail to support improvements to the railway station including the possibility to establish step-free access to the rail station, and greater improvements to the public realm, including pedestrian connections to the Pymmes Brook Trail. Improvements to walking routes within the area and having a mix of uses in close proximity to one another will reduce the need for people to travel elsewhere by private car, helping minimise CO₂ emissions and air pollution. The policy does not make direct provision for greater cycling opportunities however, and has limited provision for improving public transport connectivity. Green Lanes, which runs through the heart of the placemaking area, connects the area to Haringey to the south and Enfield Town to the north. There are also frequent bus services along this link, encouraging sustainable travel patterns. The C20 cycleway also runs along this road. Therefore, overall, Policy SP PL8 is expected to have a minor positive effect in relation to **IIA1: Climate change mitigation**.

5.80 A significant positive effect is expected in relation to **IIA3: Housing** because a large number of new homes will be delivered within the placemaking area, with three out of four site allocations expected to deliver more than 100 housing units each. Palmers Green is located within 400m of a number of GP surgeries, and is within 800m of a number of areas of open space, including Broomfield Park and the New River which runs through the area. Local open spaces can play an important role for local people in terms of providing for meeting spaces and allowing for informal interactions to occur and are expected to have positive health effects in relation to the protected characteristics of age, disability, and pregnancy and maternity. The policy further seeks to contribute towards the delivery of improvements to the public realm, including Broomfield Park, the New River and Pymmes Brook. This includes improving the public facilities at these locations, enhancing heritage assets and their settings as well as local greening projects. Respecting key views within Broomfield Park are also highlighted by the policy. The placemaking vision further states that connectivity to Broomfield Park will be improved, and the cultural significance of the New River and Pymmes Brook will be enhanced. This includes new trails to help improve east-west connectivity across the area. The District Centre is also located within close proximity to walking and cycle routes such as the C20 cycleway which runs along Green Lanes. Therefore, a significant positive effect is expected in relation to **IIA4: Health and wellbeing**. A significant positive effect is also expected in relation to **IIA5: Services and facilities** because the policy supports a mix of uses and the District

Centre contains one secondary school and is further located within 800m of a number of primary schools. The effect is recorded as uncertain because it is unknown whether these schools have capacity for new pupils or not.

5.81 The placemaking area is not located within one of the 10% or 20% most deprived areas within England but the policy supports development within close proximity to a range of valued community facilities and green spaces. Ensuring proximity to local facilities and uses may promote greater social inclusion for a range of services, which could include facilities that support meetings related to pregnancy or maternity and faith groups. Ensuring Local open spaces are also more accessible also provides for meeting spaces and allows for informal interactions to occur, with greater benefits for social inclusion, including groups with relevant protected characteristics. A minor positive effect is therefore expected against **IIA6: Social inclusion**. Policy SP PL8 is expected to have a minor positive effect in relation to **IIA7: Crime and community safety** because according to the policy open ground floor frontages are encouraged which may act as a form of passive surveillance. Denser forms of development within walking distance to public transport and town centre locations may also contribute to natural surveillance through maximising the visibility of residents and encouraging positive social interaction that may deter crime and enhance community safety.

5.82 One of four allocations within the Palmers Green placemaking area received a minor positive significance score in relation to IIA9: Economy. This is due to the fact it is within close proximity of Strategic Industrial Locations or Locally Significant Industrial Sites and makes provision for employment uses. Policy SP PL8 supports the development of a mix of uses and activities in the District Centre, especially along the high street, where greater diversification of uses is encouraged to contribute to its vitality. The policy seeks to deliver a mix of commercial, community, cultural and workspace uses, which would create new jobs and contribute to the local economy. According to the vision for Palmers Green, it aims to mix traditional retail with unique food and beverage outlets, in close proximity to a range of much valued community facilities and green spaces, as well as support a range of micro and small business, including those within the growing knowledge and creative industries, which will offer synergies with spaces for cultural activity. For these reasons, significant positive effects are expected against **both IIA9: Economy and IIA10: Town and local centres**.

5.83 The allocations within the Palmers Green placemaking area receive minor negative significance scores in relation to the air quality objective. This is due to the fact they are located in an area where the current baseline annual mean concentration of nitrogen dioxide, PM₁₀ and PM_{2.5} exceed WHO guidelines and in the case of site SA8.3 also exceed the higher nitrogen dioxide pollution level allowed under the UK's national air quality objectives. Revitalising Palmers Green may attract more car trips to the area, with adverse effects on air quality. However, Palmers Green is particularly well connected, benefiting from a rail station with links to inner London. There are also frequent bus services and the C20 cycleway, encouraging sustainable travel patterns. These provisions are likely to encourage and facilitate the use of public transport and minimise air pollution associated with car use. The policy also supports the retention and extension of walking and wheeling routes and seeks to make walking and wheeling more accessible through public realm enhancements and denser forms of development within walking and wheeling distance of the station and town centre. Providing a mix of uses in one area is also expected to reduce the need to travel elsewhere, as everyday amenities would all be within one place and therefore within walking and wheeling distance of one another. Therefore, Policy SP PL8 alone is expected to have a negligible effect in relation to **IIA11: Air pollution**. Mitigation with respect to air quality is also provided under Policies SP T1: Promoting a sustainable and decarbonised transport system and DM T2: Forming a healthy and connected Enfield.⁴⁰

5.84 Despite the potential for increased car use associated with new development, Policy SP PL8 supports walkable, denser forms of development within the placemaking area. The policy requires development to contribute towards improving and enhancing cycling and pedestrian accessibility to support sustainable travel patterns. The placemaking area also contains a railway station and has frequent bus services, with the policy seeking to support improvements to the railway station, including the possibility to establish step-free access. Therefore, a significant positive effect is expected in relation to **IIA12: Sustainable transport**.

5.85 Palmers Green contains Priority Habitats (deciduous woodland) and is located within the Crews Hill to Bowes Park Railsides SINC, New River SINC and Broomfield Park SINC. There are further SINC's located within close proximity to the placemaking area, including Pymme's Park and Pymme's Brook SINC. There is one Priority Habitat located within Broomfield Park (traditional orchard). All but one of the site allocations receive significant negative scores in relation to **IIA13: Biodiversity**,

⁴⁰ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

as they fall within a relevant SSSI IRZ and are within 250m of a locally designated site, Priority Habitat and/or Ancient Woodland. One of the sites, SA8.1, borders and subsequently intersects Crews Hill to Bowes Park Railsides SINC. The placemaking policy makes provision to contribute towards the delivery of improvements to the public realm, including Broomfield Park, the New River and Pymmes Brook. Therefore, overall, Policy SP PL8 is expected to have a minor negative effect in relation to **IIA13: Biodiversity**. Mitigation for potential effects on other biodiversity assets will be provided through Policy SP BG2: Protecting nature conservation sites.⁴¹

5.86 The placemaking area contains a number of listed buildings and local heritage assets, and partially contains the Lakes Estate Conservation Area and an archaeological priority areas (Broomfield House). There are further local heritage assets located within 250m of the placemaking area. In Enfield Council's historic environment assessment, all of the site allocations receive 'None' (i.e. no heritage constraints) against archaeology and 'None' against heritage, with the exception of SA8.1 and SA8.2, which receive 'Amber' against heritage. Sites SA8.1 and SA8.2 therefore receive uncertain minor negative effects in relation to **IIA14: Historic environment**, whilst the remaining sites receive uncertain negligible effects. Policy SP PL8 seeks to enhance the placemaking area's heritage assets and their settings, including those in the public realm such as the New River, Pymme's Brook and Broomfield Park. Broomfield Parks' twentieth century parades are also highlighted for their contribution to local character and distinctiveness, with the policy seeking to reinforce their heritage value. Therefore, Policy SP PL8 is expected to have a negligible effect in relation to **IIA14: Historic environment**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. Policy SP DE4: Putting heritage at the centre of place making in the Local Plan also provides mitigation.⁴²

5.87 Three of the four sites allocated under this policy receive minor negative significance scores in relation to **IIA15: Landscape and townscape**, as they are located within an area where 'Medium Change' is recommended, as outlined in Enfield's Character of Growth Study. However, Policy SP PL8 seeks to ensure that while the character of the centre will evolve, development should be designed to complement the valued characteristics of the place identified in the Character of Growth Study. The distinctive shopfronts and architecture are an essential component of this. As such, the policy proposes that where alternative uses are introduced to replace retail uses, they should maintain distinctive shopfronts and open ground floor frontages. Enhancements to the public realm are also proposed, in addition to the revitalisation of open spaces. Policy SP PL8 is therefore expected to have a minor positive effect overall, in relation to **IIA15: Landscape and townscape**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. The policy also supports the densification of existing uses within Palmers Green; therefore, a significant positive effect is expected against **IIA16: Efficient use of land and materials**.

5.88 Palmers Green contains areas of land within Flood Zone 2 and 3 and all four of the allocated sites within this placemaking area are at risk of surface water flooding. The placemaking area also falls into Source Protection Zones 1 and 2. However, a lot of the area is already built-up. Overall, Policy SP PL8 is expected to have minor negative effects in relation to **IIA17: Flooding** and **IIA18: Water**. It is important to note that flood risk mitigation will also be provided under Policy DM SE7: Managing flood risk⁴³.

5.89 Negligible effects are expected for IIA2: Climate change adaptation and IIA8: Road safety.

Recommendations

- Reference to surface water flood mitigation could be added.

⁴¹ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

⁴² In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

⁴³ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

Rural Enfield

Table 5.9: IIA findings for Policy SP PL9: Rural Enfield

IIA objective	Policy-off			Policy-on
	R.06: Land at Picketts Lock	R.07: Whitewebbs Golf Course & Land at and within the vicinity of Tottenham Hotspur Training Ground	R.08: Sloemans Farm	SP PL9: Rural Enfield
IIA1: Climate change mitigation	N/A	N/A	N/A	++
IIA2: Climate change adaptation	N/A	N/A	N/A	+
IIA3: Housing	N/A	N/A	N/A	0
IIA4: Health and wellbeing	++	++	--	++
IIA5: Services and facilities	N/A	N/A	N/A	+
IIA6: Social inclusion	++	0	N/A	0
IIA7: Crime and community safety	N/A	N/A	N/A	0
IIA8: Road safety	N/A	N/A	N/A	+
IIA9: Economy	--	0	0	++
IIA10: Town and local centres	0	0	N/A	0
IIA11: Air pollution	-	-	N/A	++/-
IIA12: Sustainable transport	--	--	--	-
IIA13: Biodiversity	--	++	--	++
IIA14: Historic environment	0?	--?	--?	+?
IIA15: Landscape and townscape	--	+	--?	++/-
IIA16: Efficient use of land and materials	-	--	--	-
IIA17: Flooding	--	+	--	+
IIA18: Water	--	--	--	+

5.90 Policy SP PL9 Rural Enfield sets out the different ways in which the northern area of the Borough will be transformed into a leading outdoor countryside destination in North London and surrounding areas and how it will serve as a unique and exemplar place for the rural north of Enfield. The policy supports tourism and recreational, sport and leisure activities, which may draw visitors into the area and subsequently increase traffic, contributing towards CO₂ emissions. In order to mitigate this potential effect, the policy requires the delivery of new or improved walking and cycling routes between key railway stations, town centres and cultural attractions within the area, as well as along watercourses. According to the policy, priority will be given to projects where public accessibility is improved. Policy SP PL9 also supports the Enfield Chase landscape restoration programme which

will see the development of 1,000ha of woodland, which will help aid carbon absorption. Overall, Policy SP PL9 is expected to have a significant positive effect in relation to **IIA1: Climate change mitigation**. A minor positive effect is expected in relation to **IIA2: Climate change adaptation** because the policy supports sustainable drainage systems and wetland creation so as to reduce the impacts of development downstream. In addition, the Enfield Chase landscape restoration programme, which includes 1,000ha of proposed woodland may contribute to reducing wider urban heat island effects within Enfield and other London boroughs. Furthermore, the Policy notes that proposals which could lead to losses of biodiversity within the policy area will be resisted, even where compensatory credits can be provided elsewhere.

5.91 Policy SP PL9 is expected to have a significant positive effect in relation to **IIA4: Health and wellbeing** because it supports improved hubs of sporting excellence at the Tottenham Hotspur training ground, Ponders End, and Pickett's Lock, and is therefore likely to encourage physical exercise, with beneficial effects on people's health. The policy also supports the development of a 1,000ha woodland and open space as part of a major nature recovery network, which will have beneficial effects on air quality through carbon absorption and may help prevent health conditions associated with poor air quality (e.g. asthma). The delivery of new or improved active travel initiatives including walking and cycling routes is also expected to increase levels of physical exercise amongst local people. A minor positive effect is expected against **IIA5: Services and facilities** because as mentioned, Policy SP PL9 supports improved hubs of sporting excellence and reference is made in the policy to the development of a visitor centre, which could be used for educational purposes. A minor positive effect is also expected in relation to **IIA8: Road safety** because the policy supports new or improved active travel initiatives including walking and cycling routes, which may increase their safety.

5.92 The sport, leisure and recreation site allocation (R.06) within the Rural Enfield placemaking area received a significant negative score in relation to IIA9: Economy, due to the fact it overlaps a Strategic Industrial Location, although this looks to be as a result of the way the GIS boundary for the site is drawn. Policy SP PL9 is expected to have a significant positive effect in relation to **IIA9: Economy** because it supports the transformation of Rural Enfield into a leading outdoor countryside destination and will therefore stimulate the tourism industry. The policy supports the creation of a new cultural gateway hub at Enfield Chase, including a new visitor centre, and will also support the rural economy through the conversion of publicly-owned farmland into sustainable agricultural/forestry and horticultural units. According to the vision for the area, community participation and sustainable green enterprises will invigorate the local rural economy.

5.93 Two of the three allocations within the Rural Enfield placemaking area receive minor negative significance scores in relation to the air quality objective. Specifically, sites R.06 and R.07 are located in an area where the current baseline annual mean concentration of nitrogen dioxide, PM₁₀ and PM_{2.5} exceeds the 2021 WHO guidelines and the higher nitrogen dioxide pollution level allowed under the UK's national air quality objectives. Policy SP PL9 seeks to transform Rural Enfield into a leading outdoor countryside destination, which may draw a large number of visitors into the area who may be travelling via car, which would exacerbate existing air quality issues. However, Policy SP PL9 supports the development of a 1,000ha woodland which will help absorb CO₂ emissions, with beneficial effects on air quality. Overall, Policy SP PL9 is expected to have a mixed significant positive and minor negative effect in relation to **IIA11: Air pollution**. Some mitigation will also be provided through Policies SP T1: Promoting a sustainable and decarbonised transport system and DM T2: Forming a healthy and connected Enfield in the new Local Plan⁴⁴ which discourage car use.

5.94 Rural Enfield is poorly connected in terms of public transport. Therefore, it is likely that people will have to travel via car to reach the destination. Indeed, all three site allocations received significant negative scores in relation to IIA12: Sustainable transport, as they have poor PTAL ratings and are not within close proximity of a Major, District or Local Centre. However, Policy SP PL9 supports new or improved active travel initiatives including walking and cycling routes between railway stations, town centres and cultural attractions, as well as along watercourses. Overall, Policy SPL PL9 is expected to have a minor negative effect in relation to **IIA12: Sustainable transport**.

5.95 Policy SP PL9 is expected to have a significant positive effect in relation to **IIA13: Biodiversity** because it supports the development of 1,000ha of woodland and open space as part of a major nature recovery network within Enfield Chase. The policy also supports proposals for biodiversity offsetting within Rural Enfield and, with regard to flood risk mitigation, supports wetland creation. Promoting food growing areas and gardens is also expected to increase biodiversity. Further to this, the Policy

⁴⁴ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

states that all proposals for biodiversity net gain in Enfield will be required to have regard to emerging Enfield Chase Rewilding strategies.

5.96 Rural Enfield contains a number of conservation areas, listed buildings, scheduled monuments and registered parks and gardens, in addition to archaeological priority areas. The development of these three sites could therefore have adverse effects on the historic environment. Indeed, site R.07 scored 'Red' in Enfield Council's historic environment assessment against heritage and 'Amber' against archaeology. Site R.08 scored 'Amber' against heritage and archaeology (site R.06 scored 'Blue' against heritage and archaeology). However, Policy SP PL9 seeks to prevent any non-essential development from taking place in the north of the Borough, and seeks to protect and enhance the historic character of the area in line with Green Belt and Metropolitan Open Land policies. Further to this, it is stated that priority will be given to projects where public accessibility is improved and heritage enhanced. According to Policy SP PL9, proposals for the sensitive restoration of historic parks and gardens at Trent Park, Forty Hall and Myddelton House are supported. Overall, therefore, a minor positive effect is expected in relation to **IIA14: Historic environment**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of any development that might take place within the area. Mitigation is also provided in the form of Policy SP DE4: Putting heritage at the centre of place making.⁴⁵

5.97 R.06 and R.08 receive significant negative scores in relation to **IIA15: Landscape and townscape**. This is because site R.06 falls within the Lee Valley Regional Park and contains open space. R.08 was not covered by Enfield's Character of Growth Study and was appraised using the site assessment criteria from Regulation 18 stage, where it is considered to have significant adverse effects on the landscape. However, Policy SP PL9 prevents development from taking place within Rural Enfield that may adversely affect the openness of the Green Belt and Metropolitan Open. According to the policy, new development should be designed to sensitively integrate physically and visually with Enfield Chase and Lee Valley Regional Park, particularly in relation to skylines, key entrance points, strategic views and valued landscapes. The policy also supports the delivery of a 1,000ha woodland and open space (R.07), and proposals which could lead to losses of biodiversity within the policy area will be resisted. These measures would have beneficial effects on the landscape. Therefore, Policy SP PL8 is expected to have a significant positive effect in relation to **IIA15: Landscape and townscape**. The significant positive effect is coupled with a minor negative effect, as two residential sites will be allocated under this policy, on greenfield land in a fairly sensitive area.

5.98 A minor negative effect is expected in relation to **IIA16: Efficient use of land and materials** because Rural Enfield comprises greenfield land, much of which is classed as Grade 3 agricultural land. Therefore, if development were to take place, it would not be an efficient use of previously developed land. However, it does not comprise Grade 1 and 2 best and most versatile agricultural land.

5.99 A minor positive effect is expected in relation to **IIA17: Flooding** because although Rural Enfield contains a small proportion of land that falls within Flood Zone 3, Policy SP PL8 supports flood risk mitigation that reduces the impact of development downstream, such as sustainable drainage systems and wetland creation. Mitigation is also provided through Policy DM SE7: Managing flood risk in the Local Plan⁴⁶. These flood mitigation measures are expected to enhance water quality, with a minor positive effect also expected in relation to **IIA18: Water**.

5.100 Negligible effects are expected in relation to IIA3: Housing, IIA6: Social inclusion, IIA7: Crime and community safety and IIA10: Town and local centres.

Recommendations

- The policy could be more specific by what it means by 'climate resilience measures'.

⁴⁵ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

⁴⁶ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

Chase Park

Table 5.10: IIA findings for Policy SP PL10: Chase Park

IIA objective	Policy-off				Policy-on
	SA10.1: Land South of Merryfields Brook	SA10.2: Arnold House & Land to the rear of 66 The Ridgeway (west)	SA10.3: Land East of Salmon' s Brook	SA10.4: Land East of Salmon' s Brook	SP PL10: Chase Park
IIA1: Climate change mitigation	N/A	N/A	N/A	N/A	++
IIA2: Climate change adaptation	N/A	N/A	N/A	N/A	+
IIA3: Housing	++	+	++	++	++
IIA4: Health and wellbeing	+	+	+	+	++
IIA5: Services and facilities	++	++	++	+	++
IIA6: Social inclusion	0	0	0	0	+
IIA7: Crime and community safety	N/A	N/A	N/A	N/A	0
IIA8: Road safety	N/A	N/A	N/A	N/A	+
IIA9: Economy	-	-	-	-	+
IIA10: Town and local centres	+	0	0	0	++
IIA11: Air pollution	-	-	-	-	0
IIA12: Sustainable transport	0	--	-	--	+
IIA13: Biodiversity	--	--	--	--	++
IIA14: Historic environment	0?	0?	0?	0?	+?
IIA15: Landscape and townscape	--	--	--	--	+?/-?
IIA16: Efficient use of land and materials	--	--	--	--	--?
IIA17: Flooding	--	--	--	--	-
IIA18: Water	--	0	--	--	-

5.101 Policy SP PL10: Chase Park supports the development of a high quality new neighbourhood, providing a mixture of homes and good links to employment opportunities. The policy includes three mixed-use allocations and one residential allocation, in addition to land that has not been allocated but which will deliver more development beyond 2041.

5.102 The development of a mix of uses within Chase Park is expected to draw more residents and visitors into the area, which is likely to result in an increase in cars on the road and associated CO₂ emissions. However, the strategic requirements of Policy SP PL10 include comprehensive development of the area in a way that supports sustainable, low carbon lifestyles and plays a key role in addressing the effects of climate change by creating mixed-use, resilient communities. More specifically, the policy requires development to maximise opportunities for sustainable and active travel. According to the policy, cycle and pedestrian priority streets should permeate all development areas, connecting the Chase Park urban extension to surrounding areas, including Enfield Town and Oakwood tube station. Although the placemaking area does not contain a railway station, it is within

1km of Oakwood tube station and adjacent to a number of bus stops with frequent services. The policy also seeks to create new public transport corridors through the placemaking area to ensure residents have good access to public transport. Development is also required to provide a new and improved network of green infrastructure, which will facilitate movement between the existing and new communities, and to Trent Park. The policy supports the extension of Trent Country Park into the northern part of the area, incorporating amenity green spaces and play areas. Improvements are expected to be made to the east-west corridor of the A110/Enfield Road to enable vehicular accesses to the area and although this will contribute towards CO₂ emissions, an improved bus corridor and upgraded cycleway and walking route is also supported. This will help encourage public transport use, in addition to creating an attractive environment for walking, cycling and other non-polluting wheeled transport. Providing a mix of uses in one area will also reduce the need for people to travel elsewhere for certain amenities. The policy seeks to ensure that development is flexible to accommodate likely changes over a 15-year or greater build-out period, and so supports the reuse of existing buildings, reducing embodied carbon. Further to this, the policy seeks to facilitate a shift to a net zero carbon future through new energy efficient homes and facilities that connect into local heat networks. Therefore, overall, a significant positive effect is expected in relation to **IIA1: Climate change mitigation**. Policy SP PL10 supports the integration of sustainable drainage systems into the public realm and is therefore expected to have a minor positive effect in relation to **IIA2: Climate change adaptation**.

5.103 Policy SP PL10 is expected to have a significant positive effect in relation to **IIA3: Housing** because the placemaking area has the capacity to accommodate over 3,700 residential units, of which approximately 3,200 are expected to be delivered within the Plan period. According to the policy, a variety of housing sizes, types and tenures will be supported, with affordable homes also provided, in addition to specialist accommodation. Significant positive effects are also expected in relation to **IIA4: Health and wellbeing** and **IIA5: Services and facilities** because provision is made for a Local Centre and Local Parades, which could include retail, community and health facilities and other related social infrastructure to support the community, in addition to employment generating uses and potentially co-working spaces. Provision is also made for a new three form entry primary school. Further to this, the Chase Park placemaking area is already within 800m of both a primary school and a secondary school and is also within 800m of a number of areas of open space, as well as 400m of a GP surgery. The policy makes provision for a new and improved network of green infrastructure, incorporating a variety of typologies of publicly accessible open space that incorporate play spaces and the extension of Trent Country Park. This will help address any deficiencies in access to open space within the area. There is also provision for growing spaces, including community orchards and allotments.

5.104 Although the Chase Park placemaking area is not located within one of the 20% most deprived areas in England, the policy supports the creation of an inclusive environment and the delivery of a mix of dwelling sizes, types and tenures (including affordable housing). For example, it supports specialist accommodation to meet identified needs and should include self and custom build plots, in addition to Gypsy and Traveller pitches. Support for more active and sustainable modes of transport is also expected to benefit any residents who may not have access to a car. Provision is also made for healthcare facilities and open space, which will help narrow any gaps in access to healthcare and open space within Chase Park, whilst also creating opportunities for people to interact with their neighbours, which will have beneficial effects on social cohesion. Therefore, overall, a minor positive effect is expected in relation to **IIA6: Social inclusion**. A minor positive effect is also expected in relation to **IIA8: Road safety** because there is a requirement to provide opportunities for convenient and safe active travel throughout the area, with priority given to cyclists and pedestrians. This is likely to improve safety for cyclists who may otherwise have had to divert their route and travel along busy roads. The policy also supports upgrades to the cycleway and walking route along the A110 with reference to dedicated lanes, and so is expected to increase safety for pedestrians.

5.105 All four allocations within the Chase Park placemaking area received minor negative significance scores in relation to IIA9: Economy. This is due to the fact that they are not within close proximity of Strategic Industrial Locations or Locally Significant Industrial Sites, and so do not provide easy access to job opportunities. However, three of them (SA10.1, SA10.3 and SA10.4) will provide a significant amount of new employment floorspace. Policy SP PL10 makes provision for sustainable modes of transport and improvements to connections which is anticipated to facilitate residents' access to employment opportunities. The provision of employment space and links to existing employers such as Chase Farm hospital to the north east will also provide employment opportunities for new and existing residents. The supporting text identifies Chase Farm Hospital as an important employment location within the area. Therefore, overall, a minor positive effect is expected in relation to **IIA9: Economy**. A significant positive effect is expected in relation to **IIA10: Town and local centres** because Policy SP PL10 supports the delivery of green links and biodiversity corridors through the placemaking area that connect to Enfield Chase, the major centre at Enfield Town and the major employer at Chase Farm Hospital. This is expected to increase footfall within these centres, with associated benefits on the economy.

5.106 The allocations within the Chase Park placemaking area receive minor negative significance scores in relation to the air quality objective. Specifically, sites SA10.1 and SA10.2 are located in an area where the current baseline annual mean concentration of nitrogen dioxide, PM₁₀ and PM_{2.5} exceeds the 2021 WHO guidelines, whilst sites SA10.3 and SA10.4 are located in an area where nitrogen dioxide and PM_{2.5} exceed WHO guidelines. The residential-led mixed-use development at Chase Park may draw more residents into the area, which could increase the number of cars on the road with adverse effects on air quality. Further to this, the Policy provides for enhancements of the road network, specifically improvements to the key east-west corridor of the A110/Enfield Road to enable vehicular access to the area. Whilst this is likely to have adverse effects on air quality, it may reduce traffic congestion by improving overall efficiency of the road network. Chase Park is located within close proximity to a railway station and a number of bus stops, which could reduce reliance on the private car and help minimise associated air pollution. Indeed, the policy seeks to make walking, cycling and the use of public transport the natural choice. Overall, Policy SP PL10 is expected to have a negligible effect in relation to **IIA11: Air pollution**. Policies SP T1: Promoting a sustainable and decarbonised transport system and DM T2: Forming a healthy and connected Enfield in the new Local Plan⁴⁷ also provide some mitigation, supporting more active and sustainable travel choices.

5.107 Site 10.2 receives a significant negative score in relation to **IIA12: Sustainable transport**, as it has a very poor PTAL rating and is not within close proximity of Major, District or Local Centres. Sites SA10.3 and SA10.4 receive minor negative significance scores because although they also have very poor PTAL ratings, are within 201-400m of a Major, District or Local Centre. Conversely, site 10.1 receives a negligible significance score as although it has a poor PTAL rating, is within 200m of a Major, District or Local Centre. Although the allocations in this policy are not in accessible locations, the policy requires development to maximise opportunities for sustainable and active travel. According to the policy, a walkable and permeable neighbourhood will be delivered to encourage links to amenities, services and sustainable travel. Development proposals are required to achieve 75% sustainable transport mode share. New neighbourhoods within the placemaking area must be located in areas with good access to enhanced public transport options. Accordingly, residential densities will reduce further away from the main public transport corridors. Further to this, the policy supports improvements to the environment and facilities for pedestrians and cyclists, alongside an expanded bus network. It also supports a network of cycle and walking routes which should connect all parts of the site. The policy provides limited residential parking. Although the placemaking area does not contain a railway station, it is within 1km of Oakwood tube station and adjacent to a number of bus stops. Development is also required to provide east-west and north-south publicly accessible green corridors. Providing a mix of uses within one area is also likely to minimise the need to travel elsewhere via car in order to reach certain amenities. Therefore, overall, Policy SP PL10 is expected to have a minor positive effect in relation to **IIA12: Sustainable transport**.

5.108 Chase Park placemaking area contains some Priority Habitats (deciduous woodland) and is located adjacent to Trent Park SINC, Trent Park Golf Course SINC, Lakeside SINC and Boxer's Lane & Lonsdale Drive Woods SINC. The area is also located within 250m of Crews Hill to Bowes Park Railsides SINC. All four sites allocated under this policy receive significant negative scores in relation to **IIA13: Biodiversity**, as they intersect locally designated sites, Priority Habitats and/or Ancient Woodland. However, the placemaking policy itself requires 20% Biodiversity Net Gain and a new and improved green infrastructure network incorporating a variety of typologies of open space, to support the extension of Trent Country Park, incorporating woodland, trees and hedgerows, wetland and grassland habitat. According to the policy, development must protect and enhance greenspace and valuable ecological areas within the site, including the SINC (Royal Enfield Rifles Site), high quality hedgerows and woodland corridors, and the existing watercourses of Salmon's Brook and Merryhill's Brook. Sustainable urban drainage systems should also be integrated into the public realm and designed to be multi-functional, people-focussed spaces and provide an approach to site wide water management. Lastly, areas for wetland habitats should also be created alongside surface water flood mitigation, and contributing to Salmon's Brook naturalisation proposals. Therefore, overall, Policy SP PL10 is expected to have a significant positive effect in relation to **IIA13: Biodiversity**. Mitigation of the potential negative effects of development on these is provided by Policy SP BG2: Protecting nature conservation sites in the new Local Plan⁴⁸.

5.109 Chase Park placemaking area partially falls within Trent Park Conservation Area, which contains a number of grade II listed buildings, the Trent Park Registered Park and Garden and some local heritage assets. The placemaking area also falls

⁴⁷ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

⁴⁸ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

within an archaeological priority area (APA2: Enfield Chase and Camlet Moat). However, all four site allocations receive 'None' (i.e. no heritage constraints) against heritage and archaeological considerations in Enfield's historic environment assessment. Therefore, all four sites receive uncertain negligible effects in relation to IIA14: Historic environment. Policy SP PL10 requires development to reflect the rural and historic agricultural character of the area to the north and west, and respect the significance and setting of Trent Park and surrounding designated assets, the Conservation Area, parkland and adjoining woodland. Therefore, a minor positive effect is expected in relation to **IIA14: Historic environment**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. Mitigation of the historic environment will also be provided through Policy SP DE4: Putting heritage at the centre of place making in the Local Plan.⁴⁹

5.110 With regard to the landscape, all four site allocations received significant negative scores in relation to **IIA15: Landscape and townscape**, as they contain green links and areas of open space that could be lost to development. Two of the sites, SA10.2 and SA10.3, also fall within an area where 'Limited Change' is recommended, as outlined in Enfield's Character of Growth Study. However, the vision for Chase Park is to create a distinctive new neighbourhood shaped by brooks, hedgerows and SINC's that define the area. A site-wide detailed masterplan will take forward the design concept for the area, provided in a Supplementary Planning Document. Planning applications must demonstrate how they will contribute to the ultimate delivery of comprehensive and joined up development. There will be a landscape-led approach to urban design and development must positively respond to the landscape, taking into account the site's natural assets, such as the watercourses which form the edges of the site, while development along the southern edge of the placemaking area which abuts existing residential areas will need to carefully mediate the change in density between the existing suburbs and the new higher density development within Chase Park itself. There is also a requirement for development to respond to the topography of the area, whilst also acknowledging the townscape of the local residential context. There should be higher density development along Enfield Road, the new Local Centre and within walking distance of Oakwood Station, and elsewhere with improved public transport accessibility. Enfield Council commissioned a landscape sensitivity assessment to consider whether the landscape has capacity to accommodate new development at Chase Park without causing adverse effects on the character of the area. According to this assessment, most of Chase Park is considered to have medium capacity with the area to the south likely to have medium/low capacity. For the reasons outlined above, a mixed minor positive and minor negative effect is expected in relation to **IIA15: Landscape and townscape**. The effects are recorded as uncertain because the actual effects will depend on the final design, scale and layout of development.

5.111 The policy is expected to have a significant negative effect in relation to **IIA16: Efficient use of land and materials** because the placemaking area mainly comprises greenfield land classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land (Grade 3a is classed as high quality, while Grade 3b is not).

5.112 Chase Park contains a small proportion of land that falls within Flood Zone 3 and three of the four allocations within this placemaking area are at risk of surface water flooding. However, Policy SP PL10 supports the integration of sustainable urban drainage systems into the public realm, whilst areas for wetland habitats should be created alongside surface water flood mitigation, and contribute to the Salmon's Brook naturalisation proposals. Therefore, a minor negative effect is expected in relation to **IIA17: Flooding**. The placemaking area contains a number of brooks, including Merryhills, but does not fall within a Source Protection Zone. The policy seeks to enhance the ecological potential of the watercourses in the area, which is likely to improve water quality. Therefore, a minor negative effect is also expected against **IIA18: Water**. Mitigation is also provided in the form of Local Plan Policy DM SE7: Managing flood risk⁵⁰.

5.113 Negligible effects are expected in relation to IIA7: Crime and community safety.

Recommendations

- Amend Policy to address the break in provision regarding the National Cycle Route 12.

⁴⁹ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

⁵⁰ In common with the IIA effects for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the cumulative effects section of the IIA, taking into account mitigation provided by other Plan policies, as well as any relevant external regulatory mechanisms.

- Revise point g) in the policy wording to "surrounding designated **heritage and biodiversity assets**" as it is currently unclear whether the policy is referring to heritage assets or also to biodiversity assets.

Crews Hill

Table 5.11: IIA findings for Policy SP PL11: Crews Hill

IIA objective	Policy-off						Policy-on
	SA11.1: Crews Hill North West	SA11.2: Crews Hill South West	SA11.3: Crews Hill North East	SA11.4: Crews Hill	SA11.5: Crews Hill South	SA11.6: Crews Hill East	SP PL11: Crews Hill
IIA1: Climate change mitigation	N/A	N/A	N/A	N/A	N/A	N/A	++
IIA2: Climate change adaptation	N/A	N/A	N/A	N/A	N/A	N/A	+
IIA3: Housing	++	++	++	++	++	++	++
IIA4: Health and wellbeing	-	-	-	-	-	-	++
IIA5: Services and facilities	-	++	-	+	++	+	++
IIA6: Social inclusion	0	0	0	0	0	0	+
IIA7: Crime and community safety	N/A	N/A	N/A	N/A	N/A	N/A	0
IIA8: Road safety	N/A	N/A	N/A	N/A	N/A	N/A	+
IIA9: Economy	-	-	-	-	-	-	++
IIA10: Town and local centres	0	0	0	0	0	0	+
IIA11: Air pollution	-	-	-	-	-	-	0
IIA12: Sustainable transport	--	--	--	--	--	--	+
IIA13: Biodiversity	--	--	--	--	--	--	+
IIA14: Historic environment	0?	0?	0?	0?	0?	0?	0
IIA15: Landscape and townscape	--?	--	--?	--	--	--	++?/-?
IIA16: Efficient use of land and materials	--	--	--	--	--	--	+/-?
IIA17: Flooding	--	--	--	--	--	--	-
IIA18: Water	--	--	--	--	--	--	-

5.114 Policy SP PL11: Crews Hill supports residential-led redevelopment of Crews Hill centred around the existing underutilised train station, which will be enhanced. The policy includes three mixed-use allocations and three residential allocations.

5.115 The strategic requirements of Policy SP PL11 include the comprehensive redevelopment and intensification of the area in a way that supports sustainable, low carbon lifestyles and plays a key role in addressing the effects of climate change by creating mixed-use, resilient communities. More specifically, the policy requires development to take a consolidated and

compact urban form in order to ensure a sustainable form of development where new residents are within easy reach of, and connected to, the railway station and existing and proposed green and blue infrastructure networks. The policy supports the delivery of a new and improved network of green infrastructure, incorporating a variety of typologies of open space. The policy seeks to improve green links both for active travel and biodiversity corridors east-west through the placemaking area, and in particular along existing water courses and to connect to Enfield Chase and the rural transformation area. A high quality public realm is also supported, in addition to green links to surrounding areas, for example Enfield Chase and the National Cycle Network route 12. The policy also seeks to provide opportunities for convenient and safe active travel throughout the area, linking across separate site allocations and creating strong north-south and east-west movement corridors. Further to this, it requires two new connections across the railway line. However, Policy SP PL11 states that development will need to address limitations in the capacity of the existing road network, particularly in accessing land to the west of the railway and including the road passing under the railway near Crews Hill station. Increasing the capacity of the road network could accommodate a higher number of car trips with associated CO₂ emissions. However, an increase in road capacity may reduce congestion and associated emissions, particularly generated by cars moving slowly and stopping and starting. Providing a mix of uses within the one area will also reduce the need for people to travel elsewhere, via private car, to reach certain amenities. All of these measures will help minimise CO₂ emissions associated with use of the private car. The policy also requires development proposals to facilitate a shift towards a net zero carbon future and requires new homes and facilities to be connected to the heat network, which would help to minimise CO₂ emissions. Therefore, overall, a significant positive effect is expected in relation to **IIA1: Climate change mitigation**. Policy SP PL11 is expected to have a minor positive effect in relation to **IIA2: Climate change adaptation** because in addition to requiring development and associated green infrastructure to contribute to the delivery of strategic flood mitigation, it supports the delivery of a climatically adapted public realm.

5.116 A significant positive effect is expected in relation to **IIA3: Housing** because the housing allocation within the Crews Hill placemaking area supports the development of 3,500 new housing units within the Plan period and 2,000 new housing units beyond the end of the Plan period, and will therefore contribute significantly to housing need. According to the policy, development should provide a mix of housing sizes, types and tenures. Policy SP PL11 seeks to provide the necessary infrastructure to support the new community, including health facilities. At present, the Crews Hill area does not contain a GP surgery and is located over 800m from the nearest GP surgery but the policy requires provision of health facilities. The Crews Hill placemaking area is located within close proximity of areas of open space and Policy SP PL11 requires development to incorporate a variety of typologies of open space. According to the vision for the placemaking area, access will be provided to restored landscapes, sustainable ecotourism, sport and recreation spaces, and Crews Hill will offer a healthy and inclusive environment supported by access to green space and nature. Residents are also encouraged to produce or buy food locally, which is expected to increase awareness of healthy eating. With respect to amenity, the policy requires noise mitigation from the M25 for development to the north of the Crews Hill area, and appropriate mitigation measures included such as bunding, tree planting and/or setbacks. This is particularly the case for sensitive uses, such as schools, nurseries, homes and publicly accessible open space. Additionally, the design of all residential properties is required to mitigate the blight of motorway noise in their layout, design and location of outside space. Overall, a significant positive effect is expected in relation to **IIA4: Health and wellbeing**.

5.117 Policy SP PL11 is expected to have a significant positive effect in relation to **IIA5: Services and facilities** because the policy supports mixed-use development and includes provision of social and community facilities. Specifically, the policy provides for green infrastructure (including parks and green community spaces), community orchards and allotments, community and health facilities, two new primary schools and a secondary school, and a visitors centre to serve the Borough's rural transformation. Further to this, development should deliver a new Local Centre and additional parades, and include retail, community and health facilities and other related social infrastructure required to support the community.

5.118 This placemaking area is not located within one of the 10% or 20% most deprived areas within England but Policy SP PL11 supports the development of a mixed and inclusive community by providing a diversity of employment opportunities, housing sizes, types and tenures, in addition to affordable housing. The policy also requires a sustainable form of development where new residents are within easy reach of, and connected to, the railway station and existing and proposed green and blue infrastructure networks. This will ensure that those who may not have access to a car still have access to the rest of the Borough through public transport, in addition to walking and cycling routes. According to Policy SP PL11, the east-west severance created by the railway line will be reduced with two new connections across the railway, and enhanced east-west green corridors across the north of the Borough in order to minimise the reliance of development on vehicular access. Therefore, a minor positive effect is expected in relation to **IIA6: Social inclusion**. A minor positive effect is also expected in relation to **IIA8: Road safety** because development is required to provide safe cycle and pedestrian priority routes.

5.119 The allocations within the Crews Hill placemaking area received minor negative significance scores in relation to IIA9: Economy. This is due to the fact they are not within close proximity of Strategic Industrial Locations or Locally Significant Industrial Sites, and so do not provide easy access to job opportunities. However, the mixed-use site allocations will provide a considerable amount of new employment floorspace. Policy SP PL11 is expected to have a significant positive effect in relation to **IIA9: Economy** because the placemaking area includes some mixed-use development and the policy supports the provision of a diversity of employment opportunities. The Policy supports the retention of rural uses such as equestrian and horticultural uses. Therefore, it would help support the rural economy. As set out in the vision, Crews Hill will become an important gateway to the Borough's rural transformation area and it is therefore also expected to support the tourism industry.

5.120 A minor positive effect is expected in relation to **IIA10: Town and Local Centres** as although Crews Hill is not located adjacent or close to a Strategic Industrial Locally or a Locally Significant Industrial Site, Policy SP PL11 stipulates that development proposals shall deliver main town centre uses in the form of a large Local Centre and parades in order to optimise the self-sufficiency of the settlement and meet day-to-day needs, thereby enhancing town centre vitality.

5.121 The allocations within the Crews Hill placemaking area receive minor negative significance scores in relation to the air quality objective. This is because they are located in an area where the current baseline annual mean concentration of nitrogen dioxide, PM₁₀ and PM_{2.5} exceed the WHO guidelines and in the case of sites SA11.1 and SA11.3, also exceed the higher nitrogen dioxide pollution levels allowed under the UK's national air quality objectives. However, Crews Hill contains a railway station and the policy mitigates air pollution by supporting the provision of walking and cycling routes, and providing new active travel connections. Despite this, the policy stipulates that that limitations in the capacity of the existing road network will be addressed, which is anticipated to increase private vehicle usage, thereby contributing towards air pollution. Policy SP PL11 is therefore expected to have a negligible effect overall, in relation to **IIA11: Air pollution**.

5.122 All of the allocations receive significant negative scores in relation to **IIA12: Sustainable transport**, as these sites have poor PTAL ratings and are not located within close proximity of a Major, District or Local Centre. However, Policy SP 11 supports development that provides opportunities for convenient and safe active travel, stating that cycle and pedestrian priority streets and routes should permeate all development areas. Higher density development should be located near the areas with highest public transport accessibility. A high quality public realm is also supported, in addition to green links to surrounding areas, which will include walking and cycling routes. The policy seeks to strengthen cycle routes, with specific reference given to National Cycle Network Route 12. Providing a mix of uses within one area is also likely to minimise the need to travel elsewhere via car in order to reach certain amenities. Further to this, improvements to public transport accessibility will be made through an expanded bus network. However, as stated above, the policy supports an increase in the capacity of the road network so will accommodate a higher number of car trips. Therefore, overall, Policy SP PL11 is expected to have a minor positive effect in relation to **IIA12: Sustainable transport**. Mitigation is also provided through Policies SP T1: Promoting a sustainable and decarbonised transport system and DM T2: Forming a healthy and connected Enfield within the Local Plan.⁵¹

5.123 The Crews Hill placemaking area partially overlaps Crews Hill to Bowes Park Railsides SINC, Crews Hill Golf Course SINC, Whitewebbs Wood SINC and Ancient Woodland, and Hilly Fields Country Park SINC, in addition to containing a large number of Priority Habitats. All six sites allocated under this policy receive significant negative scores in relation to **IIA13: Biodiversity**, as they intersect locally designated sites, Priority Habitats and/or Ancient Woodland. However, mitigation for potential adverse effects on biodiversity is provided through the requirement of Policy SP PL11 for proposals to protect and enhance ecological areas; generic mitigation will also be provided by Local Plan Policy SP BG2: Protecting nature conservation sites⁵². Policy SP PL11 requires 20% Biodiversity Net Gain and seeks to provide a multifunctional green and blue infrastructure network. It also seeks to improve the east-west green corridors through the placemaking area and to incorporate a high quality public realm, as well as green links to the surrounding designated landscapes, such as Enfield Chase, with beneficial effects on biodiversity. The policy also supports horticulture and the retention of existing rural uses, which is expected to increase biodiversity. Support is also given for the establishment of a functional floodplain, and diversity of habitats along the Salmon, Turkey and Cuffley Brooks, as well as along other smaller watercourses and in other green spaces in the area, which is

⁵¹ In common with the IIA effects scores for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the Cumulative Effects section of the IIA, taking into account mitigation provided by other plan policies, as well as any relevant external regulatory mechanisms.

⁵² In common with the IIA effects scores for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the Cumulative Effects section of the IIA, taking into account mitigation provided by other plan policies, as well as any relevant external regulatory mechanisms.

expected to increase the ecological potential of the area. Therefore, overall, Policy SP PL11 is expected to have a minor positive effect in relation to **IIA13: Biodiversity**.

5.124 Crews Hill placemaking area contains one grade II* listed building (The Paddocks), three grade II listed buildings (Owls Hall, Glasgow Stud Farmhouse and 2 Barns North West of Farmhouse at The Paddocks) and some local heritage assets, in addition to abutting Clay Hill Conservation Area. The area also contains an archaeological priority area (APA3: Whitewebbs Hill, Bulls Cross and Forty Hill). However, all of the site allocations receive 'None' against heritage and archaeological constraints, in Enfield Council's historic environment assessment. Therefore, all site allocations receive an uncertain negligible effect in relation to **IIA14: Historic environment**. Policy SP PL11 seeks to reflect the historic environment of the area and respond to the surrounding landscape character, including that of the Theobalds Estate South Area of Special Character (ASC), Whitewebbs & Forty Hall ASC and Clay to the east, Clay Hill ASC to the south and Turkey Brook Valley ASC to the west, with sensitive green buffers along the edges of the placemaking area. However, development proposed in this somewhat undeveloped area could result in adverse effects on the historic environment. The policy does, however, make provision for different open space typologies and enhancements to the public realm. Therefore, overall, a negligible effect is expected in relation to **IIA14: Historic environment**. Mitigation is also offered in the form of Policy SP DE4: Putting heritage at the centre of place making⁵³. With regard to the landscape, all the site allocations receive a significant negative score in relation to **IIA15: Landscape and townscape**. This is due to the fact all but two of these sites fall within an area where 'Limited Change' is recommended, as outlined in Enfield's Character of Growth Study. The other two sites were appraised against the criteria used at Regulation 18 stage, as they were not covered by the aforementioned Study, and received uncertain significant negative scores. The sites also contain green links, green loops and/or areas of open space that could be lost to development. Enfield Council commissioned a landscape sensitivity assessment to consider whether the landscape has capacity to accommodate new development at Crews Hill without causing adverse effects on the character of the area. According to this assessment, most of the Crews Hill area is considered to have medium sensitivity with the area to the south west likely to have high/medium sensitivity, and along the eastern boundary. The policy supports a landscape-led approach to design. Development will be supported that is centred on the core 'Hill' area, to create a new and unique place, and there will be clear separation between the new settlement and Clay Hill to the south. Overall, a mixed significant positive and minor negative effect is expected in relation to **IIA15: Landscape and townscape**. Both effects are recorded as uncertain because the actual effects will depend on the final design, scale and layout of development.

5.125 A mixed minor positive and minor negative effect is expected in relation to **IIA16: Efficient use of land and materials** because although parts of the placemaking area comprise brownfield land, others comprise greenfield land that is classed as Grade 3 agricultural land. The negative effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land (Grade 3a is classed as high quality, while Grade 3b is not).

5.126 Although the allocations within this placemaking area do not fall within Flood Zones 2 or 3, they are at risk of surface water flooding. None of the allocations within the placemaking area fall within a Source Protection Zone, although there are a number of brooks which run through the area. Policy SP PL11 requires development and associated green infrastructure to contribute towards the delivery of strategic flood mitigation, contributing to the performance of downstream locations across the Borough. New development should be designed to have the capacity and means of retaining storm runoff which would otherwise be dealt with at on-site locations downstream in more constrained urban infill locations. Therefore, overall, Policy SP PL11 is expected to have a minor negative effect in relation to **IIA17: Flooding**. Further to this, flood risk mitigation will be provided through Local Plan Policy DM SE7: Managing flood risk⁵⁴. A minor negative effect is also expected in relation to **IIA18: Water** because although there is a potential negative effect on water quality of the brooks flowing through the area, the policy seeks to avoid inappropriate uses in functional floodplains and protect the diversity of habitats along the Salmon, Turkey and Cuffley Brooks, as well as other smaller watercourses and in other green spaces, to increase the ecological potential of the area which would have the effect of improving overall water quality.

5.127 Negligible effects are expected in relation to IIA7: Crime and community safety.

⁵³ In common with the IIA effects scores for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the Cumulative Effects section of the IIA, taking into account mitigation provided by other plan policies, as well as any relevant external regulatory mechanisms.

⁵⁴ In common with the IIA effects scores for all other policies, those awarded to this policy relate to the likely effects of the policy alone. The likely effects of the Local Plan as a whole are considered in the Cumulative Effects section of the IIA, taking into account mitigation provided by other plan policies, as well as any relevant external regulatory mechanisms.

Chapter 5

I/A findings for the Place policies in Chapter 3 of the Enfield Local Plan

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Recommendations

- No recommendations.

Chapter 6

IIA findings for the policies in Chapters 4-15 of the Enfield Local Plan

6.1 This chapter presents the IIA findings for the strategic and development management policies in the Local Plan. Overall, there are 36 strategic policies (including 10 place policies) and 57 development management policies across the following topics:

- Good growth in Enfield (appraised in **Chapter 4** of this IIA Report);
- Places (appraised in **Chapter 5** of this IIA Report);
- Sustainable Enfield;
- Addressing equality and improving health and wellbeing;
- Blue and green Enfield;
- Design and character;
- Homes for all;
- Economy;
- Town centres and high streets;
- Rural Enfield;
- Culture, leisure and recreation;
- Movement and connectivity;
- Environmental protection; and
- Delivering and monitoring.

6.2 A summary table illustrating the likely sustainability effects of all policies within each Local Plan chapter (4 to 15) is provided, using the symbols and colour coding described in **Figure 2.2**. The effects of all the Local Plan policies alongside each other can be seen in **Table 7.1** at the start of the Cumulative Effects chapter in **Chapter 7**. As noted in **Chapter 2**, negligible effects are recorded where a policy or site allocation is considered to have no effect in contributing to achievement of the IIA objective. For the policies, this is usually the case when the policy makes no explicit reference to what the IIA objective is seeking to achieve and/or because of the narrow focus of what each policy covers (in particular the DM policies). However, it is usually the case that another policy or policies within the Local Plan directly seek to address that IIA objective and this is covered in Chapter 7 through the consideration of the effects of the whole plan together.

4. Sustainable Enfield

6.3 The likely sustainability effects of the Sustainable Enfield policies in Chapter 4 of the Enfield Local Plan are set out in **Table 6.1** and described below the table.

Table 6.1: IIA findings for the sustainable Enfield policies

IIA objective	SP SE1: Responding to the climate emergency	DM SE2: Sustainable design and construction	DM SE3: Whole-life carbon and circular economy	DM SE4: Reducing energy demand and increasing low carbon energy supply	DM SE5: Renewable energy development	DM SE6: Climate change adaptation and managing heat risk	DM SE7: Managing flood risk	DM SE8: Protection and improvement of watercourses	DM SE9: Sustainable drainage systems
IIA1: Climate change mitigation	++	++	+	++	++	0	0	0	0
IIA2: Climate change adaptation	++	+	0	+	0	++	+	+	+
IIA3: Housing	0	0	0	0	0	0	0	0	0
IIA4: Health and wellbeing	+	0	0	0	+	+	+	0	+
IIA5: Services and facilities	0	0	0	0	0	0	0	0	0
IIA6: Social inclusion	0	0	0	0	+	0	0	0	0
IIA7: Crime and community safety	0	0	0	0	0	0	+	0	0
IIA8: Road safety	0	0	0	0	0	0	0	0	0
IIA9: Economy	0	0	0	0	0	0	0	0	0
IIA10: Town and local centres	0	0	0	0	0	0	0	0	0
IIA11: Air pollution	+	0	0	+	0	0	0	0	0
IIA12: Sustainable transport	+	0	0	0	0	0	0	0	0
IIA13: Biodiversity	+	0	0	0	0	+	+	+	+
IIA14: Historic environment	+	+	0	+	+	0	0	+	0
IIA15: Landscape and townscape	0	0	0	0	+	+	0	0	0
IIA16: Efficient use of land and materials	+	0	++	0	+	+	+	0	0
IIA17: Flooding	+	0	0	0	0	0	++	+	++
IIA18: Water	+	0	0	0	0	0	+	++	+

6.4 Policy SP SE1: Responding to the climate emergency sets out the Council's approach to tackling climate change and meeting the 2040 net zero carbon target set out in the Climate Action Plan, as well as maximising the role of the natural environment in delivering measures to reduce the effects of climate change. Policies DM SE4: Reducing energy demand and increasing low carbon energy supply and DM SE5: Renewable energy development outline in detail measures that will be taken to minimise greenhouse gas emissions. Policy DM SE4 contains targets for heating and energy use with reference made to a Passivhaus equivalent certification, including the provision of an Energy Statement setting out how emissions savings have been maximised and carbon reduced, and a requirement for major developments to be net-zero carbon. The policy also supports the installation of low carbon heating and hot water, no onsite combustion of fossil fuels for heating and connecting developments to decentralised energy networks. Policy DM SE5 promotes renewable energy development, setting out

standards and considerations for new proposals, including the contribution of the proposals to cutting greenhouse gas emissions and decarbonising the energy system. Therefore, all three policies are expected to have significant positive effects in relation to **IIA1: Climate change mitigation**. Policy DM SE2 seeks to ensure that the design and construction of development is sustainable through the submission of a Sustainable Design and Construction Statement, in addition to working towards achieving the Home Quality Mark 4.5* with a minimum certification level of 4* for residential development and BREEAM 'Outstanding' with a minimum certification level of 'Excellent' for non-residential development. Therefore, Policy DM SE2 is expected to have a significant positive effect in relation to IIA1. Policy DM SE3 requires the submission of a Circular Economy Statement, which sets out how circular economy principles have been taken into consideration. Therefore, it is expected to have a minor positive effect in relation to this objective.

6.5 A number of these policies specifically aim to ensure that the Borough is resilient to the effects of climate change. Policy DM SE6: Climate change adaptation and managing heat risk will seek to ensure new development provides adequate mitigation measures to minimise overheating including landscaping, tree planting and the use of blue-green infrastructure. Similarly, Policy SP SE1: Responding to the climate emergency also seeks to maximise the role of the natural environment in delivering measures to reduce the effects of climate change, including reducing all sources of flood risk through Sustainable Drainage Systems (SuDS) and promoting sustainable infrastructure including green infrastructure and resilient ecological networks. It also acknowledges the importance of tree planting to moderate heat island effects, which has been identified as a key sustainability issue in the Borough and will require development to provide adequate mitigation measures to minimise the risk of overheating, taking into account future climate change. As such, these policies will encourage development proposals to incorporate sustainable design and construction techniques which are likely to ensure that development within Enfield is resilient to the effects of climate change and so are expected to have significant positive effects against **IIA2: Climate change adaptation**. Policies DM SE7: Managing flood risk, DM SE8: Protection and improvement of watercourses and DM SE9: Sustainable drainage systems will seek to reduce flood risk and alleviate the effects of flooding. In addition, Policy DM SE2: Sustainable design and construction states that it will require a Sustainable Design and Construction Statement with development proposals, which sets out how sustainable design principles have been integrated into the construction and operational phases of the development. Policy DM SE4: Reducing energy demand and increasing low carbon energy supply seeks to optimise roof space to deliver green roofs, which would also contribute towards regulated indoor temperatures and increased air quality. Therefore, these policies will also contribute towards building a Borough that is resilient to climate change. As such, minor positive effects are expected against IIA2 in relation to these policies.

6.6 Policy DM SE5: Renewable energy development supports development involving renewable and low carbon energy where it considers local amenity, including appropriate stand-off distances between technologies (e.g. wind turbines) and sensitive uses, whilst Policy DM SE9: Sustainable drainage systems states that measures should be incorporated to maximise opportunities to improve recreation value, and is therefore likely to provide opportunities for, and improve access to, recreation for the resident population. It also refers to improving local amenity and will therefore benefit communities within the Borough. Therefore, both policies are expected to have minor positive effects in relation to **IIA4: Health and wellbeing**. A minor positive effect is also expected for Policy DM SE6: Climate change adaptation and managing heat risk in relation to this objective because the policy seeks to minimise overheating through landscaping, tree planting and the use of blue and green infrastructure. Similarly, Policy SP SE1: Responding to the climate emergency seeks to moderate heat island effects which may help to reduce heat-related illnesses such as general discomfort, respiratory difficulties, heat cramps, heat exhaustion, and non-fatal heat strokes. The policy also seeks to encourage the use of active travel and minimise the usage of private cars thereby reducing the release of air pollutants and greenhouse gases associated with vehicular travel. They will also help to encourage physical recreation in the Borough, with benefits to public health for all sections of the community, and as such, is expected to have a minor positive effect in relation to IIA4. Policy DM SE7: Managing flood risk is also expected to have beneficial effects on people's mental wellbeing by avoiding and reducing the risk of flooding, therefore also receiving a minor positive effect. The policy states that all new developments at risk of flooding must demonstrate they will be safe throughout their lifetime, taking into account the vulnerability of their users, which includes the provision of flood warning arrangements and evacuation plans.

6.7 Policy DM SE5: Renewable energy development is expected to have a minor positive effect on **IIA6: Social Inclusion** as it considers the direct benefits of proposals for renewable and low carbon energy, and associated infrastructure to the area and local community. It further states that particular support for proposals will be given to renewable and low carbon energy generation developments that are led by or meet the needs of local communities.

6.8 Policy DM SE7: Managing flood risk is expected to have a minor positive effect in relation to **IIA7: Crime and community safety** because it requires all new development at risk of flooding to demonstrate that it will be safe throughout its lifetime,

taking into account the vulnerability of its users, which includes the provision of flood warning arrangements and evacuation plans.

6.9 Policy SP SE1: Responding to the climate emergency states that the Council will work with partners to use all planning tools available to meet the 2040 net zero carbon Borough commitments. Reducing carbon emissions is likely to have beneficial effects on air quality and therefore a minor positive effect is expected in relation to **IIA11: Air pollution**. Policy DM SE4: Reducing energy demand and increasing low carbon energy supply is expected to have a minor positive effect in relation to this objective because it states that no onsite combustion of fossil fuels should take place, which would help minimise air pollution. These policies are likely to benefit groups in the Borough that are particularly vulnerable to air pollution; this includes children, older people, people with cardiovascular or respiratory illnesses and pregnant women.

6.10 Policy SP SE1: Responding to the climate emergency seeks to prioritise development in connected locations, support active travel, and a modal shift away from the private motor car towards walking, cycling and sustainable transport. A minor positive effect is therefore expected in relation to **IIA12: Sustainable Transport**.

6.11 Policy DM SE6: Climate change adaptation and managing heat risk includes measures such as landscaping, tree planting and the use of blue-green infrastructure in order to mitigate the urban heat island effect. Correspondingly, Policy SP SE1: Responding to the climate emergency seeks to maximise the role of the natural environment in delivering measures to reduce the effects of climate change, including tree planting to moderate heat island effects. It also highlights Green Infrastructure and resilient ecological networks as playing an important role in aiding climate change adaptation, including the role of the natural environment as a biodiverse resource and as a carbon sink. Policy DM SE9: Sustainable drainage systems requires that developments include measures to maximise opportunities to improve biodiversity. Similarly, Policies DM SE7: Managing flood risk and DM SE8: Protection and improvement of watercourses require development in proximity to watercourses to have an adequate set back with a means to facilitate river naturalisation, ecological enhancements and de-culverting, which improves the ecological function of river corridors. These policies are therefore likely to contribute towards biodiversity enhancement and so will result in minor positive effects against **IIA13: Biodiversity**.

6.12 Policy DM SE5: Renewable energy development states that the Council will support development involving renewable and low carbon energy that has regard to sensitive receptors, including high quality landscapes such as river valleys, reservoirs and regional parks, parts of the urban fringe, areas of special character and areas of Metropolitan Open Land. The policy also notes designated and non-designated heritage assets as sensitive assets, therefore, as well as protecting the landscape, this policy will also help protect the historic environment. As such, minor positive effects are expected in relation to **IIA14: Historic environment** and **IIA15: Landscape and townscape** in relation to this policy. Policy SP SE1: Responding to the climate emergency seeks to ensure the character and significance of built and natural heritage is safeguarded, and DM SE2: Sustainable design and construction requires all development to submit a sustainable design and construction statement which considers heritage significance in sustainable design principles. Similarly, whilst Policy DM SE4: Reducing energy demand and increasing low carbon energy supply seeks to maximise the installation of on-site renewable energy on new developments, the policy restricts renewable energy development in places where this would not be practically viable, including near heritage assets or their setting. These policies are therefore expected to receive a minor positive effect in relation to **IIA14: Historic environment**. A minor positive effect is also expected in relation to Policy DM SE8: Protection and improvement of watercourses as it states that development on or adjacent to watercourses must not have an adverse impact upon its amenity value, including its character and heritage significance.

6.13 Policy DM SE6: Climate change adaptation and managing heat risk is expected to have a minor positive effect in relation to **IIA15: Landscape and townscape** because it supports landscaping and tree planting, which is expected to benefit the appearance and character of the area.

6.14 Policies SP SE1: Responding to the climate emergency and DM SE3: Whole-life carbon and circular economy seek to apply circular economy principles, including minimising the production of waste and promoting the use of sustainable materials. Policy DM SE3 specifically prioritises the reuse and retrofit of existing buildings wherever possible before considering the dismantling of old buildings, and minimising the environmental impact of materials by reusing materials on-site where possible. Policy DM SE6: Renewable energy development also seeks to enable the reuse and regeneration of land in the Borough. Overall, therefore, Policy DM SE3 is expected to have a significant positive effect in relation to **IIA16: Efficient use of land and materials**, whilst Policies SP SE1 and DM SE6 are expected to have minor positive effects. Policy DM SE7: Managing flood risk is also expected to have a minor positive effect in relation to this objective because it supports development on previously developed land.

6.15 Policy DM SE7: Managing flood risk seeks to ensure that new development includes measures to avoid and reduce the risk of flooding, as well as not increasing flood risk elsewhere, while Policy DM SE9: Sustainable drainage systems will contribute to reducing flood risk in the Borough through the use of Sustainable Drainage Systems (SuDS). Therefore, significant positive effects are expected against **IIA17: Flooding** in relation to these policies. Policy SP SE1: Responding to the climate emergency will also seek to ensure that development incorporates SuDS and is therefore expected to have a minor positive effect against IIA17. Policy SP SE1 also seeks to improve wastewater infrastructure in line with the Council's Infrastructure Delivery Plan. Policies DM SE7 and DM SE9 will help development to manage surface water and reduce runoff using SuDS and preventing the loss of permeable surfaces. These policies are therefore also likely to protect surface water quality, with minor positive effects expected against **IIA18: Water**. Policy DM SE8: Protection and improvement of watercourses seeks to ensure that development proposals enhance the flood risk and water quality aesthetic and amenity quality of nearby watercourses and prevent any deterioration in a watercourse, as well as prevent development on any land required for current and future flood management which would adversely affect the delivery of flood defence schemes. As such, this policy will contribute towards the prevention of water pollution and protect water quality in the Borough, and so is expected to have a significant positive effect against IIA18 and a minor positive effect against IIA17.

6.16 Negligible effects are expected in relation to IIA3: Housing, IIA5: Services and facilities, IIA8: Road safety, IIA9: Economy and IIA10: Town and local centres.

Recommendations

- No recommendations.

5. Addressing equality and improving health and wellbeing

6.17 The likely sustainability effects of the addressing equality and improving health and wellbeing policies in Chapter 5 of the Enfield Local Plan are set out in **Table 6.2** and described below the table.

Table 6.2: IIA findings for the addressing equality and improving health and wellbeing policies

IIA objective	SP SC1: Improving health and wellbeing of Enfield's diverse communities	SP SC2: Protecting and enhancing social and community infrastructure
IIA1: Climate change mitigation	+	+
IIA2: Climate change adaptation	0	0
IIA3: Housing	0	+
IIA4: Health and wellbeing	++	+
IIA5: Services and facilities	++	++
IIA6: Social inclusion	++	++
IIA7: Crime and community safety	0	+
IIA8: Road safety	+	0
IIA9: Economy	0	+

IIA objective	SP SC1: Improving health and wellbeing of Enfield's diverse communities	SP SC2: Protecting and enhancing social and community infrastructure
IIA10: Town and local centres	0	+
IIA11: Air pollution	+	+
IIA12: Sustainable transport	+	+
IIA13: Biodiversity	++	0
IIA14: Historic environment	0	0
IIA15: Landscape and townscape	0	0
IIA16: Efficient use of land and materials	0	+
IIA17: Flooding	0	0
IIA18: Water	0	0

6.18 Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities is expected to have a minor positive effect in relation to **IIA1: Climate change mitigation** because it states that development proposals will be expected to make provision for sustainable modes of travel, including safe cycling routes, attractive walking routes and easy access to public transport. This would reduce reliance on the private car and minimise CO₂ emissions. The policy also supports the provision of green infrastructure, which will help absorb CO₂ emissions. Policy SP SC2: Protecting and enhancing social and community infrastructure is also expected to have a minor positive effect in relation to this objective because it states that new or improved community facilities should be located within the Borough's designated town centres and neighbourhood shopping parades, where a number of services and facilities are within walking distance of one another. This policy is therefore expected to promote more active and sustainable travel choices.

6.19 SP SC2: Protecting and enhancing social and community infrastructure is expected to have a minor positive effect in relation to **IIA3: Housing** because it seeks to avoid the loss of housing floorspace. Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities is expected to have a significant positive effect in relation to **IIA4: Health and wellbeing** because it requires development proposals to demonstrate how they will improve the health and well-being of the Borough through the submission of a Health Impact Assessment. The policy states that development proposals must contribute towards healthy and active lifestyles, whilst also seeking to improve access to local healthy food opportunities, allotments and food growing spaces. Further to this, the policy promotes leisure, recreation and play facilities to encourage physical activity. The inclusion of active travel provision will also help to encourage physical recreation with benefits to public health for all sections of the community. Policy SP SC2 is also expected to have a significant positive effect in relation to this objective because it promotes the development of social and community facilities in town centres or walking distance of public transport, pedestrian and cycling routes. Therefore, it will encourage more walking and cycling, with beneficial effects on people's health. It also states that contributions will be sought towards additional health and social care facilities, taking account of the latest strategic health needs assessment, pharmaceutical assessment and relevant NHS estate strategies.

6.20 Policies SP SC1: Improving health and wellbeing of Enfield's diverse communities and SP SC2: Protecting and enhancing social and community infrastructure are expected to have significant positive effects in relation to **IIA5: Services and facilities**

because they make provision for social and community infrastructure, including the development of education, health, leisure and community facilities. Policy SP SC2 specifically states that contributions will be sought towards new school places to meet the needs arising from new housing development, taking account of available capacity within existing schools and the number of pupils it will generate.

6.21 Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities is also expected to have a significant positive effect in relation to **IIA6: Social Inclusion** because it requires developments to have an inclusive layout with a public realm that considers the needs of all, including groups with relevant protected characteristics such as the older population and disabled people. A significant positive effect is also expected for Policy SP SC2: Protecting and enhancing social and community infrastructure as it requires community infrastructure to be welcoming, safe, affordable and inclusive. With respect to education provision, the policy states that new or expanded schools will be expected to incorporate specialist provision where demand exists and make reasonable adjustments to support the needs of the disabled and mobility impaired.

6.22 Policy SP SC2: Protecting and enhancing social and community infrastructure is expected to have a minor positive effect in relation to **IIA7: Crime and community** because it promotes the increased provision of community infrastructure, which may help reduce crime levels, in addition to requiring a strong active frontage which will enable passive surveillance. Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities is expected to have a minor positive effect in relation to **IIA8: Road Safety** because it promotes safe cycle routes.

6.23 Policy SP SC2: Protecting and enhancing social and community infrastructure is expected to have a minor positive effect in relation to **IIA9: Economy** because it seeks to avoid the loss of employment floorspace. The policy is also expected to have a minor positive effect in relation to **IIA10: Town and local centres** because it requires new or improved community facilities to be located within or adjacent to the Borough's designated town centres, which will increase footfall within the town centres and enhance their vitality.

6.24 Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities is expected to have a minor positive effect in relation to **IIA12: Sustainable transport** because it promotes access to sustainable modes of travel, including safe cycling routes, attractive walking routes and easy access to public transport. A minor positive effect is also expected for Policy SP SC2: Protecting and enhancing social and community infrastructure as it states that community centres must be within walking distance of public transport, pedestrian and cycling routes. For this reason, a minor positive effect is also expected for both policies in relation to **IIA11: Air pollution** as they both promote sustainable transport options which will contribute to reducing air pollution associated with use of the private car. These policies are likely to benefit groups in the Borough that are particularly vulnerable to air pollution; this includes children, older people, people with cardiovascular or respiratory illnesses and pregnant women.

6.25 Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities is expected to have a minor positive effect in relation to **IIA13: Biodiversity** because it promotes access to green infrastructure, including blue corridors and open spaces within the Borough.

6.26 Policy SP SC2: Protecting and enhancing social and community infrastructure is expected to have a minor positive effect in relation to **IIA16: Efficient use of land and materials** as it establishes provisions for the release of community buildings to other uses, but also including the opportunity to share the use of existing community sites or the co-location of services for efficiency.

6.27 Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA14: Historic environment, IIA15: Landscape and townscape, IIA17: Flooding and IIA18: Water.

Recommendations

- No recommendations.

6. Blue and green Enfield

6.28 The likely sustainability effects of the blue and green Enfield policies in Chapter 6 of the Enfield Local Plan are set out in **Table 6.3** and described below the table.

Table 6.3: IIA findings for the blue and green Enfield policies

IIA objective	SP BG1: Enfield's blue and green infrastructure network	SP BG2: Protecting nature conservation sites	SP BG3: Protecting Epping Forest Special Area of Conservation	SP BG4: Biodiversity net gain, landscape restoration and offsetting	SP BG5: Green Belt and Metropolitan Open Land	SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land	SP BG7: Strategy for enhancing the beneficial uses of the Green Belt and Metropolitan Open Land	DM BG8: Protecting open space	DM BG9: Watercourses	DM BG10: Urban greening and biophilic principles	DM BG11: Allotments and community food production	DM BG12: Burial and crematorium spaces	DM BG13: Blue and green infrastructure plans
IIA1: Climate change mitigation	++	0	0	0	0	0	0	0	0	+	0	0	+
IIA2: Climate change adaptation	+	0	0	0	0	0	0	0	0	+	0	0	+
IIA3: Housing	0	0	-	0	-	-	-?	0	0	0	0	0	0
IIA4: Health and wellbeing	++	0	+	0	0	0	+	++	+	0	+	-	+
IIA5: Services and facilities	+	0	0	0	0	0	0	0	0	0	0	0	0
IIA6: Social inclusion	+	0	0	0	0	0	0	+	+	0	+	0	+
IIA7: Crime and community safety	0	0	0	0	0	0	0	0	0	0	0	0	+
IIA8: Road safety	+	0	0	0	0	0	0	0	0	0	0	0	0
IIA9: Economy	0	0	-	0	-	+	-?	0	0	0	0	0	0
IIA10: Town and local centres	+	0	0	0	0	0	0	0	0	0	0	0	0
IIA11: Air pollution	+	0	0	0	0	0	0	0	0	+	0	0	+
IIA12: Sustainable transport	++	0	0	0	0	+	0	0	+	0	0	-	+

IIA objective	SP BG1: Enfield's blue and green infrastructure network	SP BG2: Protecting nature conservation sites	SP BG3: Protecting Epping Forest Special Area of Conservation	SP BG4: Biodiversity net gain, landscape restoration and offsetting	SP BG5: Green Belt and Metropolitan Open Land	SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land	SP BG7: Strategy for enhancing the beneficial uses of the Green Belt and Metropolitan Open Land	DM BG8: Protecting open space	DM BG9: Watercourses	DM BG10: Urban greening and biophilic principles	DM BG11: Allotments and community food production	DM BG12: Burial and crematorium spaces	DM BG13: Blue and green infrastructure plans
IIA13: Biodiversity	++	++	++	++	+	+	++	+	+	+	+	--?	+
IIA14: Historic environment	+	0	0	0	+	+	0	+	0	0	0	-	+
IIA15: Landscape and townscape	++	0	0	0	++	++	+	+	+	+	+	--	+
IIA16: Efficient use of land and materials	0	0	0	0	+	+	0	0	0	0	+	--	0
IIA17: Flooding	+	0	0	0	0	0	0	+	0	+	0	0	+
IIA18: Water	++	+	0	0	0	0	+	+	-	+	0	-?	+

6.29 A number of policies are likely to contribute towards mitigating carbon emissions in the Borough either by reducing the need to travel or by promoting the use of more sustainable modes of transport such as walking and cycling. Significant positive effects are expected against **IIA1: Climate change mitigation** and **IIA12: Sustainable transport**, while a minor positive effect is expected against **IIA11: Air pollution** in relation to Policy SP BG1: Enfield's blue and green infrastructure network, as it seeks to enhance access to key destination points (e.g. town centres), community facilities and publicly accessible open spaces through walking, cycling and public transport. In addition, blue and green infrastructure will help to increase the Borough's capacity to sequester carbon emissions. Policy SP BG1: Enfield's blue and green infrastructure network is expected to have a minor positive effect in relation to these three objectives because it encourages walking through the provision of linear corridors and improved crossing/bridges, which may reduce reliance on the private car and associated CO₂ emissions, as well as minimising air pollution. Policy BG12: Blue and green infrastructure plans is also expected to have a minor positive effect against these three objectives because it supports the development of blue and green infrastructure, which is likely to include walking and cycle routes. The policy also states that the blue-green infrastructure plan, included as part of a Design and Access Statement submitted alongside major planning applications must demonstrate how the development will mitigate the impacts of air pollution. Policy SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land is expected to have a minor positive effect against **IIA12: Sustainable transport** only because the policy supports limited infilling within existing settlements if the development would not lead to any significant increase in motorised traffic generation, as evidenced through a suitable traffic modelling tool. Therefore, this policy would encourage proposals that incorporate sustainable transport measures. A minor positive effect is also expected for DM BG9: Watercourses as the policy promotes opportunities for sustainable and/or electric water-borne freight and passenger transport along the River Lea Navigation, where possible and where this would not conflict with the conservation of designated sites. Policy DM BG12: Burial and crematorium spaces is expected to have a minor negative effect against **IIA12: Sustainable transport** because the two burial/crematorium sites have relatively low PTAL ratings, particularly the natural burial site (R.08), and are not located within close proximity to a Major, District or Local Centre, where most people are located. Therefore, people would potentially need to travel longer distances to reach the sites.

6.30 Policy DM BG10: Urban greening and biophilic principles sets out the Council's approach to urban greening and supports development that promotes opportunities to restore, create and enhance Enfield's tree and woodland resource. As such, the policy is expected to have minor positive effects in relation to **IIA1: Climate change mitigation** and **IIA11: Air pollution** because it promotes tree and woodland cover, which would help to improve air quality and aid carbon absorption. Policy DM BG13: Blue and green infrastructure plans is expected to have a minor positive effect in relation to IIA11 because a blue-green infrastructure plan must be submitted alongside major planning applications to demonstrate how the development will help people and wildlife adapt to the impacts of climate change. Policy DM BG12: Burial and crematorium spaces is expected to have a negligible effect against IIA11 because although the policy states that development involving new burial and/or crematorium spaces or related facilities must demonstrate how it will appropriately respond to air pollution issues through the incorporation of mitigation measures, the two sites allocated under this policy scored poorly against the air quality objective. This is because they are likely to generate a number of trips via the private car, which would contribute towards air pollution. The negative effect is recorded as uncertain because the ban on the sale of petrol and diesel cars by 2030 is expected to reduce air pollution in the future.⁵⁵

6.31 Policy SP BG1: Enfield's blue and green infrastructure network makes reference to natural flood management through the naturalisation and catchment restoration of the river corridors along Salmons Brook, Turkey Brook and Pymmes Park. Therefore, a minor positive effect is expected in relation to **IIA2: Climate change adaptation**. Policy DM BG10: Urban greening and biophilic principles is also expected to have a minor positive effect in relation to this objective because it supports flood risk mitigation, prioritising areas at risk of flooding.

6.32 Policies SP BG5: Green Belt and Metropolitan Open Land and SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land set out the Council's approach to preventing inappropriate development in the Green Belt, which includes housing (as defined by the NPPF). As such, both policies have the potential to restrict the delivery of housing in the Borough, with a minor negative effect expected against **IIA3: Housing**. It is important to note that it is national policy to restrict development in the Green Belt but a minor negative effect from the Local Plan policies is recognised, as they will act in combination with the national policy requirement, helping to implement it in the context of Enfield Borough. Similarly, Policy SP BG3: Protecting Epping Forest Special Area of Conservation could have adverse effects on

⁵⁵ Prime Minister Rishi Sunak confirmed in a speech on 20 September 2023 that the planned ban on the sale of petrol and diesel cars would be pushed back five years from 2030 to 2035

residential growth as if development is located within the Zone of Influence, this has the potential to make the development unviable and dissuade housing delivery. As such, a minor negative effect is expected in relation to SP BG3. A minor negative effect is also expected in relation to SP BG7: Strategy for enhancing the beneficial uses of the Green Belt and Metropolitan Open Land as not granting permission unless enhancements to environmental quality and accessibility of remaining Green Belt/MOL has been secured through developer contributions (or other means) may slow housing delivery, however this is uncertain.

6.33 Policies SP BG1: Enfield's blue and green infrastructure network and DM BG13: Blue and green infrastructure plans seek to ensure that development proposals contribute to the creation of a continuous, multifunctional and integrated blue and green infrastructure network and will result in the provision of, and improved access to, open space in the Borough. In particular, Policy SP BG1 aims to create a continuous 'green-loop' extending from the open countryside into the main urban area and onto the Lee Valley Regional Park and Enfield Chase, as well as create a new publicly accessible restored landscape at Enfield Chase comprising new woodland, open space and extensive landscape restoration. Policy SP BG1 also includes the provision for professional and community sports, recreation, and leisure facilities, including ancillary and related uses. Reference is made to the revitalisation of open spaces and leisure/recreational activities at Picketts Lock and Ponders End. The policy would therefore improve access to open space and sports facilities, which would contribute to improving the physical and mental wellbeing of Enfield's residents. Therefore, Policy SP BG1 is expected to have a significant positive effect in relation to **IIA4: Health and wellbeing**, whilst Policy DM BG13 is expected to have a minor positive effect in relation to this objective. Policy DM BG8: Protecting open space is also expected to have a significant positive effect in relation to this objective because it seeks to prevent the loss of open space and only supports development on existing designated open space if it promotes the multifunctional and shared use of the open space. This also includes the provision of new outdoor uses with recreational and sporting benefits which would promote health and wellbeing directly across the Borough.

6.34 Policy DM BG9: Watercourses promotes development that facilitates sport and recreational uses, thereby providing the Borough's residents with more opportunities for healthier and more active lifestyles. The policy also supports permanent residential and commercial moorings where they do not have any adverse impacts on the amenity of surrounding residents and public enjoyment of the water space. Therefore, Policy DM BG9 is expected to have a minor positive effect in relation to **IIA4: Health and wellbeing**. Policy DM BG11: Allotments and community food production is also expected to have a minor positive effect in relation to IIA4 because it promotes access to healthy and affordable food through allotments and community food production. According to the policy, there will be in-principle support for new allotments and community gardens/orchards. A minor positive effect is also expected in relation to Policy SP BG3: Protecting Epping Forest Special Area of Conservation because mitigation to offset any potential effects arising from increased recreational pressure on the Epping Forest SAC will ensure people continue to have appropriate access to high quality outside space for recreation. Similarly, SP BG7: Strategy for enhancing the beneficial uses of the Green Belt and the Metropolitan Open Land references enhancements to areas of Green Belt, plans to create a new mountain biking trail centre, wild swimming lake, art trail, performance space and play features. These enhancements will also ensure people continue to have appropriate access to high quality space for recreation. Policy DM BG12: Burial and crematorium spaces is expected to have a minor negative effect in relation to **IIA4: Health and wellbeing** because although the burial/crematorium spaces allocated in the policy contain an area of open space and/or a cycle path that could be lost to development, the policy ensures there are appropriate local places for dignified burial and cremation.

6.35 Policy SP BG1: Enfield's blue and green infrastructure network seeks to enhance access to Enfield's town centres, community facilities and publicly accessible open spaces by maximising green grid links, which would encourage walking and cycling, and states that the Council will support the creation of a continuous 'green-loop' that extends into the main urban area. As such, this policy is likely to improve access to services and facilities, particularly to those located within town centres, and so a minor positive effect is expected against **IIA5: Services and facilities** in relation to this policy.

6.36 Several policies will contribute towards reducing inequalities in access to open space, which has been identified as a key sustainability issue within the Borough, particularly between the east and west. Policy SP BG1: Enfield's blue and green infrastructure network seeks to improve and enhance access to open space and outdoor sports (including playing pitches and ancillary sporting facilities) in locations which experience the highest level of deficiency within the Borough. Policy DM BG8: Protecting open space only supports development on existing designated open space if it will promote the multifunctional and shared use of existing open space, encouraging interaction between different groups of people and underrepresented groups which includes those with protected characteristics, whilst Policy DM BG13: Blue and green infrastructure plans seeks to maximise access to open spaces via the wider blue-green network in areas where there is poor or unequal access to open space and nature as identified in the Blue and Green Audit (2020). In addition, Policy DM BG9: Watercourses promotes the

development of continuous public access along the towpaths, so there are no breaks in the path and the space is accessible to all, while Policy DM BG11: Allotments and community food production will seek to ensure that new food growing spaces are accessible to everyone and that there is no net loss of allotment provision, encouraging interaction between residents. As such, minor positive effects are expected against **IIA6: Social inclusion** in relation to all of these policies.

6.37 Policy DM BG13: Blue and green infrastructure plans is expected to have minor positive effects in relation to **IIA7: Crime and community safety** because the blue-green infrastructure plans submitted alongside major planning applications must demonstrate how blue-green features will be managed in terms of safety and security arrangements. Policy SP BG1: Enfield's blue and green infrastructure network is expected to have a minor positive effect in relation to **IIA8: Road safety** because it makes provision for new crossings/bridges over the A10, A406 and Lee Valley line to overcome the east-west severance, which is expected to improve safety as residents would no longer need to cross these busy roads.

6.38 Policy SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land sets out criteria to avoid the unsuitable redevelopment of previously developed sites and may therefore restrict the provision of employment development in the Borough. However, the policy also sets out criteria to permit the development of dwellings in order to support rural businesses, such as if a dwelling is essential to sustain the viability of a farming enterprise, resulting in a minor positive effect against this objective. Policy SP BG5: Green Belt and Metropolitan Open Land sets out the Council's approach to preventing inappropriate development in the Green Belt, which includes employment development (as defined by the NPPF). Therefore, this policy could potentially restrict the delivery of employment land within the Borough, with a minor negative effect expected against **IIA9: Economy**. A minor negative effect is also expected in relation to SP BG7: Strategy for enhancing the beneficial uses of the Green Belt and Metropolitan Open Land as not granting permission until appropriate enhancements to environmental quality and accessibility of remaining Green Belt/MOL have been secured through developer contributions may slow the delivery of employment development, however this is uncertain. Similarly, Policy SP BG3: Protecting Epping Forest Special Area of Conservation could have adverse effects on economic development as if development is located within the Zone of Influence, it has the potential to make the development unviable and restrict economic growth. As such, a minor negative effect is expected in relation to SP BG3. Policy SP BG1: Enfield's blue and green infrastructure network aims to maximise links and public access to key destination points such as town centres and the main urban area. The policy is therefore likely to enhance the vitality and vibrancy of the Borough's town centres, resulting in a minor positive effect against **IIA10: Town and local centres**.

Policy SP BG1 states that development should protect and enhance significant ecological features, achieve biodiversity net gain and maximise opportunities for urban greening through the planting of street trees, in addition to requiring Sites of Importance for Nature Conservation and areas of biodiversity deficiency to be reviewed to ensure development contributes as appropriate to the Borough's nature recovery network. The policy also seeks to link green spaces with identified wildlife corridors, in addition to creating a new woodland and extensive landscape restoration. New habitats will also be introduced to the river corridor. For these reasons, Policy SP BG1 is expected to have a significant positive effect in relation to **IIA13: Biodiversity**. Significant positive effects are also expected in relation to Policies SP BG2: Protecting nature conservation sites, SP BG3: Protecting Epping Forest Special Area of Conservation and SP BG4: Biodiversity net gain, landscape restoration and offsetting as they will ensure that development protects, maintains and enhances habitat and wildlife resources in Enfield and seeks to achieve a minimum of 20% net gain in biodiversity, including through ecological enhancements to the Borough's watercourses. Policy SP BG3 will not permit development that could have an adverse impact on the integrity of the Epping Forest Special Area of Conservation (SAC) and sets out measures to prevent recreational impacts on the SAC. A significant positive effect is also expected for Policy DM BG13: Blue and green infrastructure plans against this objective because it requires a blue-green infrastructure plan to be submitted alongside major planning applications, demonstrating how development will prevent net loss, damage or deterioration to blue-green assets and contribute towards delivering identifies opportunities and priorities set out in the Blue and Green Strategy. A significant positive effect is expected for Policy SP BG7: Strategy for enhancing the beneficial uses of the Green Belt and the Metropolitan Open Land in relation to IIA13 as the policy prioritises enhancements to retained areas of Green Belt including the Proposed Enfield Chase Landscape Restoration scheme and the Lee Valley Regional Park. The policy also references enhancements for other projects in the Green Belt including reforestation at least 60 hectares of land with 135,000 trees and creating 50 ponds and wetland scrapers to provide valuable habitats and nature recovery. The policy also supports the beneficial use and management of the Green Belt and MOL where it is integrated with the wider blue-green infrastructure network. Policies SP BG5: Green Belt and Metropolitan Open Land and SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land are expected to have minor positive effects in relation to **IIA13: Biodiversity** because they prevent inappropriate development on Green Belt and Metropolitan Open Land, a proportion of which comprises greenfield land which may potentially have biodiversity value. However, it is noted that

many brownfield sites are also biodiverse and home to rare species. SP BG6 also further states that proposals will be permitted in the Green Belt where they are consistent with the exceptions listed in the NPPF and where feasible, enhance areas of ecological value. Policy DM BG10: Urban greening and biophilic principles sets out the Council's approach to urban greening and supports development that promotes opportunities to restore, create and enhance tree and woodland cover in Enfield, particularly areas that are deficient in terms of access to nature, whilst Policy DM BG8: Protecting open space requires proposals to avoid harm to the ecological value of open space. Policy DM BG11: Allotments and community food production supports the development of allotments and community gardens/orchards, which are likely to have biodiversity value. As such, Policies DM BG10, DM BG8 and DM BG11 are expected to have minor positive effects in relation to IIA13. In addition, Policy DM BG9: Watercourses states that development within or adjacent to the Borough's watercourses will be expected to provide ecological and biodiversity enhancements to the Borough's water spaces, having regard to the principles of the Biodiversity Action Plan. As such, a minor positive effect against IIA13 is also expected in relation to this policy. Policy DM BG12: Burial and crematorium spaces is expected to have a significant negative effect against this objective because the burial/crematorium sites allocated under this policy contain or are within close proximity of a Priority Habitat, with one of the sites also located within 250m of two SINCS. The effect is recorded as uncertain because appropriate mitigation may avoid adverse effects and may even result in beneficial effects.

6.39 Policy SP BG1: Enfield's blue and green infrastructure network includes measures to provide blue and green infrastructure within the restoration and enhancement of Registered Parks and Gardens (Forty Hall, Trent Park, Grovelands Park and Myddelton House Gardens and Broomfield Park) and associated visitor attractions. The Policy also seeks to maximise opportunities to preserve, enhance and better reveal the significance of Enfield's historic landscapes, including watercourses. As a result, the policy will facilitate the protection and enhancement of the Borough's historic environment and is expected to have a minor positive effect against **IIA14: Historic environment**. A minor positive effect is also expected for Policies DM BG4: Green Belt and Metropolitan Land, Policy SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land and DM BG8: Protecting open space against this objective because while DM BG7 requires proposals to avoid harm to the heritage and cultural value of existing open spaces, DM BG4 seeks to protect the openness of the Green Belt which may indirectly help protect the setting of nearby heritage assets and BG5 seeks to ensure that the visual impact on historic landscape/features is minimised and supports limited infilling within existing settlements if the development would not have an adverse impact upon the historic character. Policies DM BG10: Urban greening and biophilic principles and DM BG13: Blue and green infrastructure plans are also expected to have minor positive effects in relation to IIA14. Policy DM BG10 seeks to retain and protect trees and hedgerows of heritage value. Similarly, Policy DM BG13 requires a blue-green infrastructure plan to be submitted alongside major planning applications which will in part demonstrate how opportunities to preserve and enhance the historic environment have been maximised. Policy DM BG12: Burial and crematorium spaces is expected to have a minor negative effect in relation to this objective because although one of the sites could have adverse effects on heritage assets, the policy requires development of existing or new burial and/or cremation spaces to respond to the historic character and significance of the burial ground or landscape.

6.40 Policies SP BG1: Enfield's blue and green infrastructure network, SP BG5: Green Belt and Metropolitan Open Land and SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land are expected to have significant positive effects in relation to **IIA15: Landscape and townscape** because they seek to ensure that development within or adjacent to the Green Belt and Metropolitan Open Land has respect for the character of its surroundings and local landscape and sets out requirements for development within the Green Belt and Metropolitan Open Land to preserve the openness and minimise visual impacts. Policy DM BG8: Protecting open space is likely to protect the landscape of the Borough, as it includes the provision of, and provides +protection to, designated open space. Several policies make reference to landscaping schemes, including Policy DM BG9: Watercourses, Policy DM BG10: Urban greening and biophilic principles, Policy DM BG11: Allotments and community food production and DM BG13: Blue and green infrastructure plans. These policies are therefore expected to have minor positive effects in relation to IIA15. A minor positive effect is also expected for SP BG7: Strategy for enhancing the beneficial uses of the Green Belt and Metropolitan Open Land in relation to IIA15 as the policy seeks to better use and manage the Borough's Green Belt and MOL, which will encourage the preservation of the Borough's landscape and townscape. Policy DM BG12: Burial and crematorium spaces is expected to have a significant negative effect against this objective because the burial site and crematorium site would result in the loss of open space.

6.41 Policy DM BG11: Allotments and community food production seeks to promote food growing provision in areas including vacant or underused sites and seeks to integrate food growing spaces with other uses such as sport and play facilities, resulting in a minor positive effect against **IIA16: Efficient use of land and materials**. Policies DM BG4: Green Belt and Metropolitan Open Land and DM BG5: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan

Open Land prevent development within the Green Belt and on Metropolitan Open Land and are therefore likely to increase pressure for development elsewhere within the Borough, potentially in the more built up areas on previously developed land. As such, both policies are expected to have a minor positive effect in relation to this objective. Policy DM BG12: Burial and crematorium sites is expected to have a significant negative effect because both sites are on greenfield land and R.08 is classed as Grade 3 agricultural land.

6.42 Minor positive effects are expected against **IIA17: Flooding** in relation to several policies. Policy DM BG13: Blue and green infrastructure plans seeks to ensure that naturalised forms of flood storage are included as part of blue-green infrastructure proposals, which will help the Borough adapt to the expected impacts of climate change on flood risk. Policy DM BG8: Protecting open space seeks to ensure that development on existing designated open space avoids harm to the flood risk levels within and beyond the site. Policy DM BG10: Urban greening and biophilic principles sets out the Council's approach to urban greening and supports development that promotes opportunities to restore, create and enhance tree and woodland cover in Enfield, including areas of flood risk and as such. Policy SP BG1: Enfield's blue and green infrastructure network is also expected to have a minor positive effect in relation to this objective because it makes reference to natural flood management through the naturalisation and catchment restoration of the river corridors along Salmons Brook, Turkey Brook and Pymmes Park.

6.43 Policy SP BG1: Enfield's blue and green infrastructure network is expected to have a significant positive effect in relation to **IIA18: Water** because it seeks to improve the wider water environment by naturalising the riverbank and introducing new habitats to the river corridor. Similarly, Policy SP BG7: Strategy for enhancing the beneficial uses of the Green Belt and the Metropolitan Open Land references enhancements projects proposed by Enfield Council in areas of remaining Green Belt including creating 50 ponds and wetland scrapers to provide valuable habitats and nature recovery and the Salmons Brook River Restoration project. Policies that seek to address flood risk and prevent flooding are also likely to help inhibit water contamination. As such, Policies SP BG1, DM BG8, DM BG10 and DM BG13 are also expected to have minor positive effects against IIA18. Policy SP BG2: Protecting nature conservation sites states that development will not be permitted where it would adversely affect (directly or indirectly) Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSIs) or Ramsar sites (and any other sites protected under the Habitats Regulations). Therefore, it is expected to help protect water quality within these sites, with a minor positive effect against IIA18. Policy DM BG9: Watercourses aims to ensure that development within or adjacent to the Borough's watercourses provide ecological and biodiversity enhancement. However, the policy also promotes opportunities to facilitate water-borne freight and passenger transport along the River Lea Navigation, which could pollute the water. Overall, Policy DM BG9 is expected to have a minor negative effect in relation to IIA18. Policy DM BG12: Burial and crematorium spaces allocates a burial and crematorium site, one of which is at risk of surface water flooding (R.08). Site R.08 contains a number of brooks, whilst U.36 falls within a Source Protection Zone. However, the policy states that development proposals involving the provision of new burial and/or crematorium spaces or related facilities must respond to potential flood risk and water pollution issues through the incorporation of mitigation measures. Therefore, a negligible effect is expected in relation to **IIA17: Flooding** and a minor negative effect is expected against **IIA18: Water**. The effects for IIA18 are recorded as uncertain because the extent to which water quality is affected would depend on construction techniques and the use of SuDS within the design.

6.44 The IIA findings for the sites allocated under Policy DM BG12: Burial and crematorium spaces are summarised in **Table 6.4** overleaf. The way in which these sites were appraised is outlined in **Appendix F**. The effects are 'policy-off' (i.e. mitigation is not taken into account). However, mitigation has been considered in the overall appraisal of Policy DM BG12 above, which allocates these two sites.

Table 6.4: IIA findings for the sites allocated under Policy DM BG12: Burial and crematorium spaces

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a GP surgeries	4b Access to recreation	4c Loss of recreation	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a Access to employment	9b Safeguarding employment land	9c Employment provision	IIA9: Economy	IIA10: Town and local centres	11a NO ₂ pollution	11b PM10 pollution	11c PM2.5 pollution	IIA11: Air pollution	12a Sustainable transport	12b Services and facilities	IIA12: Sustainable transport	13a International and national biodiversity and geodiversity assets	13b Locally designated wildlife sites, Priority Habitats and Ancient Woodland	IIA13: Biodiversity	14a Proximity to historic assets: sites within existing settlements	14b Proximity to historic assets: sites outside of existing settlements	IIA14: Historic environment	15a Landscape and townscape	15b Open space	IIA15: Landscape and townscape	16a Brownfield/greenfield land	16b Agricultural Land Classification	IIA16: Efficient use of land and materials	17a Flood zones	17b Surface water flood risk	IIA17: Flooding	IIA18: Water	
Policy DM BG12: Burial and crematorium spaces																																								
R.08	N/A	N/A	N/A	N/A	N/A	--	--	N/A	N/A	N/A	N/A	N/A	0	N/A	0	N/A	N/A	N/A	N/A	N/A	--	N/A	--	-	--	--	N/A	--	--?	N/A	N/A	--?	--	-	--	0	--	--	--	
U.36	N/A	N/A	N/A	N/A	N/A	--	--	N/A	N/A	N/A	N/A	N/A	0	N/A	0	N/A	N/A	N/A	N/A	N/A	-	+	0	-	--	--	--	N/A	0?	-	--	--	--	--	0	-	0	0	0	--

Reasonable alternative options

6.45 At Regulation 18 stage, six alternative options to Policy DM BG12: Burial and crematorium spaces (formerly referred to as DM BG10) were presented, as follows:

- **A. Do nothing:** This is not considered a reasonable alternative because it would not meet the Borough's identified need for burial and crematorium spaces and forms the baseline against which Policy DM BG10 has been appraised.
- **B. Meet our objectively assessed needs ourselves in the urban area and extension of existing sites:** not considered a reasonable alternative because would not meet the identified need for burial and crematorium spaces.
- **C. Meet our needs through the re-use of graves:** reasonable alternative – see below appraisal.
- **D. Set a reduced target:** reasonable alternative – see below appraisal.
- **E. Meet our objectively assessed need with assistance from duty to cooperate partners:** reasonable alternative – see below appraisal.
- **F. Meet our objectively assessed need in the urban area first and new sites in the Green Belt:** reasonable alternative – see below appraisal.

6.46 Table 6.5 below summarises the IIA effects identified for the reasonable alternative options to Policy DM BG12, and the findings are described below the table.

Table 6.5: IIA findings for the reasonable alternative options to Policy DM BG12: Burial and crematorium space

IIA objective	C. Meet our needs through the re-use of graves	D. Set a reduced target	E. Meet objectively assessed needs with assistance from duty to cooperate partners	F. Meet out objectively assessed need in the urban area first and new sites in the Green Belt
IIA1: Climate change mitigation	0	0	0	0
IIA2: Climate change adaptation	0	0	0	0
IIA3: Housing	0	0	0	0
IIA4: Health and wellbeing	+/-	-	+/-	+/-
IIA5: Services and facilities	+/-	-	+/-	+
IIA6: Social inclusion	-?	-?	-?	+
IIA7: Crime and community safety	0	0	0	0
IIA8: Road safety	0	0	0	0
IIA9: Economy	0	0	0	0
IIA10: Town and local centres	0	0	0	0
IIA11: Air pollution	0	-?	-?	+/-?
IIA12: Sustainable transport	0	-	-	+/-
IIA13: Biodiversity	0	-?	-?	-?
IIA14: Historic environment	0	-?	-?	0?
IIA15: Landscape and townscape	0	-?	-?	-?

IIA objective	C. Meet our needs through the re-use of graves	D. Set a reduced target	E. Meet objectively assessed needs with assistance from duty to cooperate partners	F. Meet out objectively assessed need in the urban area first and new sites in the Green Belt
IIA16: Efficient use of land	++	+?/-?	+?/-?	-
IIA17: Flooding	0	-?	-?	+/-
IIA18: Water	0	-?	-?	+/-

6.47 Given the narrow focus of these options, they are unlikely to have any effect on seven of the IIA objectives relating to climate change, housing, crime and community safety, road safety, economy and town and local centres. It has also been assumed that all options would result in a policy with similarly worded requirements to DM BG12 regarding any new burial or crematorium proposals coming forward. In addition, Option C: Meet our needs through the re-use of graves would be carried out at existing burial sites, therefore it is also unlikely to affect a number of the other IIA objectives relating to sensitivity of potential receptors because it would not involve any new development sites.

6.48 In relation to the other IIA objectives, Options E: Meet our needs with assistance from duty to cooperate partners and F: Meet our needs in the urban area first and new sites in the Green Belt are likely to have minor positive effects in relation to **IIA4: Health and wellbeing** as they ensure there are appropriate local spaces available for dignified burial and cremation. However, both options are also expected to have a minor negative effect in relation to this objective. This is because Option E would see provision met outside of the Borough, which is not a popular approach as according to the Burial Needs Assessment 2020⁵⁶, people generally prefer to be buried within their local area. It is also not understood whether adjacent authorities have sufficient understanding of their own provision and future requirements to be able to support Enfield's need. One of the sites listed under Option F falls within Church Street Recreation Ground Metropolitan Open Land, which is likely to be lost as a result of development, with adverse effects on access to open space and health and wellbeing. Option C: Meet our needs through the re-use of graves is expected to have a mixed minor positive and minor negative effect in relation to IIA4 because although this approach is already occurring in the Borough and considered a sustainable way of ensuring enough burial space is available in the Borough, it is a controversial approach that some people find insensitive. There is also no scope to reuse graves at Edmonton Cemetery and as such, there may be difficulties in meeting all burial and crematorium space needs. Option D: Set a reduced target is expected to have a minor negative effect in relation to this objective because reducing the target may mean that there are not enough burial or crematorium spaces to meet residents' needs within the Borough.

6.49 Similar effects are expected for each option in relation to **IIA5: Services and facilities** because it relates to ensuring sufficient community and religious infrastructure is provided in the Borough. Option C: Meet our needs through the re-use of graves is expected to have a mixed minor positive and minor negative effect because although this approach is already occurring in the Borough and considered a sustainable way of ensuring enough burial space is available in the Borough, it is a controversial approach that some people find insensitive, and may not be sufficient to meet all needs. Option D: Set a reduced target is expected to have a minor negative effect in relation to this objective because reducing the target may mean that there are not enough burial or crematorium spaces to meet residents' needs within the Borough. Options E: Meet our needs with assistance from duty to cooperate partners and F: Meet our needs in the urban area first and new sites in the Green Belt are likely to have minor positive effects in relation to IIA5 as they ensure there are appropriate local spaces available for dignified burial and cremation. However, option E would also have a minor negative effect in relation to this objective because people generally prefer to be buried within their local area and it may also not provide sufficient space to meet the Borough's need.

6.50 Option C: Meet our needs through the re-use of graves may not be accepted by different faiths and therefore a minor negative but uncertain effect is expected in relation to **IIA6: Social inclusion**. Options D: Set a reduced target and E: Meet our needs with assistance from duty to cooperate partners may potentially increase inequalities in access to burial and crematorium sites because not providing enough burial or crematorium sites within the Borough and/or relying on neighbouring authorities or

⁵⁷ All major housing developments must achieve a minimum of 35% affordable housing. This percentage increases to 50% for development on industrial land that would result in a net loss of industrial floorspace, former Green Belt sites and on publicly owned land.

duty to cooperate partners for the provision of burial sites may extend distances between where people live and where their friends/relatives are buried and hence reduce their ability to visit the graves as frequently as they need to. There may also not be public transport available to take them to the sites in neighbouring authorities if they do not have access to a car. Therefore, Options D and E are expected to have minor negative but uncertain effects in relation to IIA6. Option F would have a mixed minor positive and minor negative effect. This is because some sites may be located within close proximity to where residents live and therefore residents would have less distance to travel and should be able to access burial or crematorium sites via public transport which would help with social inclusion, however, some sites may still require travel by private car excluding some residents from easily accessing these sites.

6.51 Option D: Set a reduced target would result in an increase in reliance on neighbouring authorities, whilst Option E: Meet our needs with assistance from duty to cooperate partners is expected to exhaust existing burial/crematorium capacity and rely on neighbouring boroughs or on their duty to cooperate partners for their future demand. This could lead to an increase in travel as people will have longer distances between where they live and where the burial sites are and at least a percentage of those trips will be made using private cars of which the majority is assumed to be fossil fuel powered. Therefore, these options are expected to have minor negative but uncertain effects in relation to **IIA11: Air pollution**. Option F: Meet our needs in the urban area first and new sites in the Green Belt seeks to unlock potential urban sites for the growing demand and then explore opportunities in the Green Belt. Therefore, this option is expected to have a mixed minor positive and minor negative effect against IIA11. This is because some sites may be located within close proximity to where residents live and therefore reduce the need to travel elsewhere via the private car, whilst others may not. One of the sites listed under this option scored 2 in the air quality appraisal, which is the poorest score possible. This is because it is likely to generate a number of trips via the private car, which could contribute towards air pollution, particularly in areas of the Green Belt that are rural and more isolated than elsewhere within the Borough. However, it is assumed that as required in Policy DM BG10, development involving new burial and/or crematorium spaces or related facilities must demonstrate how it will appropriately respond to air pollution issues through the incorporation of mitigation measures. All negative effects are recorded as uncertain because the ban on the sale of petrol and diesel cars by 2030 is expected to reduce air pollution in the future.

6.52 Options D: Set a reduced target and E: Meet our needs with assistance from duty to cooperate partners are likely to have minor negative effects in relation to **IIA12: Sustainable transport**, because sites outside of the Borough may require people to travel long distances to visit graves and at least a proportion of them will be made using fossil fuel powered private vehicles. Option F: Meet our objectively assessed needs in the urban area first and new sites in the Green Belt is likely to have a mixed minor positive and minor negative effect against IIA12 because although one of the sites listed under this option is located within 1km of a railway station and 350m of a bus stop, it is not located within close proximity to a Major, District or Local Centre where most people are located, and may therefore require people to travel longer distances to visit burial and crematorium sites, potentially via the private car.

6.53 Options D: Set a reduced target and E: Meet our needs with assistance from duty to cooperate partners are likely to have minor negative but uncertain effects in relation to **IIA13: Biodiversity** because once existing burial/crematorium sites within the Borough are exhausted, the local authority will rely on neighbouring authorities or duty to cooperate partners who may also need to deliver new sites, and therefore development may take place on sites where biodiversity may be lost to development. Option F: Meet our objectively assessed needs in the urban area first and new sites in the Green Belt is expected to have a minor negative effect against this objective because the burial and crematorium sites listed under this option both contain a Priority Habitat. The effect is recorded as uncertain because appropriate mitigation may avoid adverse effects and may even result in beneficial effects.

6.54 Taking a precautionary approach, Options D: Set a reduced target and E: Meet our needs with assistance from duty to cooperate partners are expected to have minor negative but uncertain effects in relation to **IIA14: Historic environment** because it is unknown where the burial/crematorium sites will be located and the construction of a crematorium could potentially affect the setting of heritage assets. Option F: Meet our objectively assessed needs in the urban area first and new sites in the Green Belt is likely to have a negligible but uncertain effect in relation to IIA14 because although the sites listed are more than 500m from the nearest designated heritage asset, both sites could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.

6.55 Options D: Set a reduced target and E: Meet our needs with assistance from duty to cooperate partners are likely to have minor negative but uncertain effects against **IIA15: Landscape and townscape** because it is unknown where the burial/crematorium sites will be located and the construction of a crematorium could potentially affect the landscape. Option F: Meet our needs in the urban area first and new sites in the Green Belt is expected to have a minor negative effect against this

objective because the two sites listed under this option would result in the loss of open space. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development.

6.56 Option C: Meet our needs through the re-use of graves seeks to reuse already existing burial/cremation sites and therefore is likely to have a significant positive effect in relation to **IIA16: Efficient use of land**. Options D: Set a reduced target and E: Meet our needs with assistance from duty to cooperate partners are expected to have mixed minor positive and minor negative but uncertain effects in relation to IIA16 as they seek to exhaust already existing sites first but rely on potential capacity of neighbouring authorities or duty to cooperate partners, which may include sites located on greenfield land. Option F: Meet our needs in the urban area first and new sites in the Green Belt is expected to have a minor negative effect against this objective because it would result in the loss of some greenfield land.

6.57 Options D: Set a reduced target and E: Meet our needs with assistance from duty to cooperate partners are expected to have minor negative but uncertain effects against **IIA17: Flooding** and **IIA18: Water** because although the Borough's burial/crematorium sites already exist, and exploitation of their capacity should have no effect on flooding, the Borough would need to rely on neighbouring authorities to ensure provision for the future demand and it is uncertain what sites would be made available and whether they would be at risk of flooding or not. If they are at risk of flooding, there is also potential for contamination of groundwater. Option F: Meet our needs in the urban area first and new sites in the Green Belt is expected to have a mixed minor positive and minor negative effect on IIA17 because although both sites listed are on greenfield land and partially fall within Flood Zone 3, the policy requires mitigation of flood risk, which could also help protect water quality.

Recommendations

- Policy SP BG6 Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land should refer to Metropolitan Open Land alongside Green Belt recommendations (as included in Policy SP BG7: Strategy for enhancing the beneficial uses of the Green Belt and Metropolitan Open Land, e.g. Green Belt/MOL).

7. Design and character

6.58 The likely sustainability effects of the design and character policies in Chapter 7 of the Enfield Local Plan are set out in **Table 6.6** and described below the table.

Table 6.6: IIA findings for the design and character policies

IIA objective	SP DE1: Delivering a well-designed, high quality and resilient environment	DM DE2: Design process and Design Review Panel	DM DE3: Inclusive design	SP DE4: Putting heritage at the centre of place making	DM DE5: Strategic and important local views	DM DE6: Tall buildings	DM DE7: Creating liveable, inclusive and quality public realm	DM DE8: Design of business premises	DM DE9: Shopfronts and advertisements	DM DE10: Conserving and enhancing heritage assets	DM DE11: Landscape design	DM DE12: Civic and public developments	DM DE13: Housing standards and design	DM DE14: External amenity standards	DM DE15: Residential extensions and outbuildings
IIA1: Climate change mitigation	++	0	0	+	0	0	++	+	+	+?/-?	0	+	0	0	0
IIA2: Climate change adaptation	+	0	0	0	0	0	+	+	0	0	0	+	0	0	0
IIA3: Housing	0	0	0	0	0	0	0	0	0	0	0	0	+	0	-
IIA4: Health and wellbeing	+	0	+	0	0	+	+	+	0	0	0	++?	+	+	+
IIA5: Services and facilities	+	0	0	0	0	+	+	+	0	0	0	++?	0	0	0
IIA6: Social inclusion	+	+	++	+	0	+	++	+	0	+	0	+	+	+	0
IIA7: Crime and community safety	+	0	0	0	0	++	++	+	+	0	+	+	0	0	0
IIA8: Road safety	++	0	0	0	0	0	++	+	+	0	0	0	0	0	0
IIA9: Economy	+	0	0	+	0	+	0	++/-	-	0	0	0	0	0	0
IIA10: Town and local centres	0	0	0	0	0	+	+	0	+	0	0	0	0	0	0
IIA11: Air pollution	+	0	0	0	0	0	+	+	0	0	0	0	0	0	0
IIA12: Sustainable transport	++	0	0	0	0	0	++	+	0	0	0	0	+	0	0

IIA objective	SP DE1: Delivering a well-designed, high quality and resilient environment	DM DE2: Design process and Design Review Panel	DM DE3: Inclusive design	SP DE4: Putting heritage at the centre of place making	DM DE5: Strategic and important local views	DM DE6: Tall buildings	DM DE7: Creating liveable, inclusive and quality public realm	DM DE8: Design of business premises	DM DE9: Shopfronts and advertisements	DM DE10: Conserving and enhancing heritage assets	DM DE11: Landscape design	DM DE12: Civic and public developments	DM DE13: Housing standards and design	DM DE14: External amenity standards	DM DE15: Residential extensions and outbuildings
IIA13: Biodiversity	++	0	0	+	0	0	++	+	0	0	++	+	0	0	0
IIA14: Historic environment	+	+	+	++	+	+	+	+	+	++	+	+	0	0	+
IIA15: Landscape and townscape	++	+	0	+	++	++	++	+	++	+	++	+	+	0	+
IIA16: Efficient use of land and materials	+	0	0	0	0	+	0	+	0	0	0	+	0	0	0
IIA17: Flooding	0	0	0	0	0	0	+	+	0	0	+	0	0	0	0
IIA18: Water	0	0	0	0	0	0	+	+	0	0	+	0	0	0	0

6.59 Policies SP DE1: Delivering a well-designed, high quality and resilient environment and DM DE7: Creating liveable, inclusive and quality public realm are expected to have significant positive effects in relation to **IIA1: Climate change mitigation**. Policy SP DE1 promotes the enhancement of nature in the urban environment and connecting functional ecological corridors and habitats, which would aid carbon absorption and help reduce emissions. The policy also states that development must put people before private vehicles and integrate land uses with sustainable modes of transport and encourage active travel. Policy DM DE7 prioritises and supports active travel including pedestrian and cycle movement, helping minimise emissions from the private car, with reference also made in the policy to electric vehicle charging points. Policies DM DE12: Civic and public developments, DM DE9: Shopfronts and advertisements and Policy SP DE4: Putting heritage at the centre of place making are expected to have a minor positive effect in relation to this objective. This is because Policy DM DE12 seeks to promote urban greening measures within the Borough whilst Policy DM DE9 refers to the use of energy efficient lighting, therefore helping to minimise emissions. A minor positive effect is expected for Policy SP DE4 because the policy states that Enfield will work in partnership with stakeholders to identify opportunities to improve the energy efficiency of heritage assets and recognise the value of their embodied carbon, which in turn could help reduce CO₂ emissions. An uncertain mixed minor positive and minor negative effect is expected for Policy DM DE10: Conserving and enhancing heritage assets in relation to IIA1, as whilst the policy seeks to improve the energy efficiency of heritage assets or introduce alternative energy sources, the criteria included within the policy may make improving the energy efficiency of heritage assets harder to achieve due to reasons of viability, although this is uncertain.

6.60 Policy SP DE1: Delivering a well-designed, high quality and resilient environment is expected to have a minor positive effect in relation to **IIA2: Climate change adaptation** because the policy requires developments to respond to environmental change and refers to the need for developments to be resilient in their use of resources both in construction and operation. Minor positive effects are also expected for Policies DM DE7: Creating liveable, inclusive and quality public realm and DM DE12: Civic and public developments because, according to Policy DM DE7, development should provide seating and shelter at appropriate locations so as to respond to micro-climate conditions, whilst Policy DM DE12 requires development to be designed to be naturally ventilated so as to maximise daylight and shade. Policy DM DE8: Design of business premises is also expected to have a minor positive effect in relation to this objective because it supports sustainable design and construction techniques within development, such as triple glazing and mechanical ventilation.

6.61 Policy DM DE13: Housing standards and design is expected to have a minor positive effect in relation to **IIA3: Housing** because the policy addresses the housing needs of older and disabled people through the delivery of wheelchair accessible homes. Policy DM DE15: Residential extensions and outbuildings is expected to have a minor negative effect in relation to this objective because the policy may prevent people from adapting their homes in a way that meets their changing and/or specialist needs.

6.62 Policy DM DE8: Design of business premises outlines a number of requirements for new business development to maximise their contribution to the urban environment. The policy will support development that facilitates movement through the retention, improvement or provision of suitably located, safe, overlooked and publicly accessible routes, and will seek to ensure that new development creates a pleasant and safe environment for pedestrians, cyclists and vehicles. The policy will also encourage commuting via cycling and walking through the provision of relevant facilities, such as showers and changing facilities, which facilitate these modes of travel. The policy also supports high levels of visual permeability through an active frontage onto the public realm, which would increase 'eyes on the street'. As such, Policy DM DE8 is likely to contribute to the deterrence of crime and increase safety, as well as encouraging the use of more sustainable modes of transport such as walking and cycling which would minimise CO₂ emissions and air pollution. Minor positive effects are therefore expected against **IIA1: Climate change mitigation, IIA7: Crime and community safety, IIA11: Air pollution and IIA12: Sustainable transport**.

6.63 Policy DM DE12: Civic and public developments may have a significant positive effect in relation to **IIA4: Health and wellbeing** (although this is uncertain) because it supports the development of civic/public buildings which may include healthcare facilities, in addition to leisure and cultural facilities. Policies DM DE6: Tall buildings, SP DE1: Delivering a well-designed, high quality and resilient environment, DM DE7: Creating liveable, inclusive and quality public realm and DM DE14: External amenity standards are all expected to have minor positive effects in relation to this objective. This is because Policies DM DE6 and DM DE14 require the provision of high quality private and communal amenity and play space, access to which is particularly important following the COVID-19 pandemic which has highlighted inequalities in open space accessibility. Policies SP DE1 and DM DE7 promote more active modes of travel (i.e. walking and cycling), which will have beneficial effects on people's physical health and mental wellbeing. Policy SP DE1 also refers to biophilic principles, which focuses on the

relationship humans have with the natural environment. A key aspect of Policy DM DE7 is achieving the Healthy Streets approach, which encourages streets to be welcoming places for everyone to walk, spend time and engage with other people, helping to address social isolation in the Borough. This is necessary to keep residents healthy through physical activity and social interaction, further contributing to a minor positive effect in relation to IIA4. Policies DM DE8: Design of business premises, DM DE13: Housing standards and design and DM DE15: Residential extensions and outbuildings all seek to protect the amenity of occupiers of existing and proposed homes in terms of daylight, sunlight, outlook, privacy, overlooking, noise and disturbance. In addition, Policy DM DE8 determines that larger proposals must consider providing or improving access to green spaces/pocket parks, places to eat and drink and other ancillary facilities for employees. Therefore, all three policies are likely to ensure that residential amenity is protected and therefore a minor positive effect is expected in relation to IIA4. A minor positive effect is also expected for Policy DM DE3: Inclusive design because it will help narrow inequalities in health through inclusive design.

6.64 Policy DM DE12: Civic and public developments may have a significant positive effect in relation to **IIA5: Services and facilities** (although this is uncertain) because it supports the development of civic/public buildings which may include educational facilities and community halls. Policies SP DE1: Delivering a well-designed, high quality and resilient environment and DM DE7: Creating liveable, inclusive and quality public realm are expected to have minor positive effects in relation to this objective because Policy SP DE1 supports the provision of a mix of compatible uses that work together to create viable places that respond to local needs, whilst Policy DM DE7 promotes improved access to public facilities (e.g. public toilets, water fountains, baby changing facilities, cycle changing and shower facilities) to help meet the Healthy Streets indicators. A minor positive effect is also expected in relation to Policy DM DE8: Design of business premises and DM DE6: Tall buildings as DM DE8 determines that larger proposals must consider providing or improving employee access to a range of services and facilities, including green spaces/pocket parks, places to eat and drink, creche/nurseries and other ancillary facilities, whilst DM DE6 identifies the appropriate location for tall building development in urban, built-up areas where most services and facilities are located.

6.65 A significant positive effect is expected for Policy DM DE3: Inclusive design against **IIA6: Social inclusion** because it requires all development proposals to submit an Inclusive Access Statement, which will help create more accessible, welcoming, and inclusive spaces. According to the policy, all development proposals will need to reflect the Borough's diverse population, demonstrate responsive engagement with affected user groups and support ease of access, in addition to dignified emergency evacuation provision. Policy DM DE7: Creating a liveable, inclusive and quality public realm is also expected to have a significant positive effect in relation to this objective because it discourages the development of gated communities or privatised areas of pseudo public realm which do not promote socially inclusive and cohesive neighbourhoods or connectivity between places. It also seeks to create routes and spaces that are safe and accessible to all users, including disabled and mobility impaired people and children in pushchairs. Policies DM DE2: Design process and Design Review Panel, DM DE6: Tall buildings, DM DE14: External amenity standards and SP DE1: Delivering a well-designed, high quality and resilient environment are expected to have minor positive effects in relation to this objective. Policies DM DE6 and DM DE14 make provision for high quality private and communal amenity and play space, with Policy DM DE14 ensuring development is accessible to wheelchair users, whilst SP DE1 requires all spaces to be safe, social, inclusive and surrounded by buildings and uses that respond to local needs. Policy DM DE2 requires all major planning applications to demonstrate meaningful engagement with local communities that give them real power to shape development, and Policies DM DE12: Civic and public developments and DM DE13: Housing standards and design are also expected to have minor positive effects in relation to this objective because they make provision for inclusive access arrangements. Policy SM DE13 also requires no visible external differences between tenures within a local area. A minor positive effect is also expected for Policy SP DE4: Putting heritage at the centre of place making because it seeks to improve access to cultural, built and landscape heritage for the enjoyment and appreciation of everybody in line with best practice. Similarly, Policy DM DE10: Conserving and enhancing heritage assets states that with regard to archaeological remains, desk based assessments should identify opportunities for community participation and improving public understanding, which will also help contribute towards social inclusion and as such is expected to receive a minor positive effect. Likewise, Policy DM DE8 makes provision for inclusive access arrangements.

6.66 A significant positive effect is expected against **IIA7: Crime and community safety** with respect to Policy DM DE6: Tall buildings because the policy seeks to protect residents and users from fire and other emergency situations. This includes the use of double lobbies to prevent tail gating and fob access to individual floors, in addition to well overlooked and secure communal play areas. Further to this, the policy refers to activating the street frontage, which can help reduce levels of crime through 'eyes on the street'. Likewise, Policy DM DE7: Creating a liveable, inclusive and quality public realm is expected to have a significant positive effect in relation to this objective because it promotes safety and counter-terrorism measures, whilst also

seeking to good quality lighting in the public realm and increase activity and natural surveillance at ground floor level so as to increase safety. It also seeks to design out concealment points and dead spaces at ground floor level. Policy SP DE1: Delivering a well-designed, high quality and resilient environment is expected to have a minor positive effect in relation to this objective because the policy seeks to ensure that all development creates safe and secure places that comply with the principles of Secured by Design. Minor positive effects are also expected for Policies DM DE9: Shopfronts and advertisements and DM DE12: Civic and public developments in relation to IIA7 as both policies require development to include an active frontage. As with policy DM DE6: Tall buildings, an activated street frontage can help to reduce crime through 'eyes on the street'. In addition, Policy DM DE9 states that Highways England will be consulted on the road safety aspects of advertisements proposed alongside the Strategic Road Network (SRN). Advertisements that are deemed to be detrimental to the safety of the SRN by virtue of their location, size and/or illumination will be refused, further contributing towards a minor positive effect. Policy DM DE11: Landscape design is also expected to have a minor positive effect in relation to this objective because it states that new areas of landscape planting must be safe.

6.67 Policies SP DE1: Delivering a well-designed, high quality and resilient environment and DM DE7: Creating a liveable, inclusive and quality public realm are expected to have significant positive effects in relation to **IIA8: Road safety** because they both promote more active and sustainable modes of travel, with Policy SP DE1 requiring streets to be safe, uncluttered and suitable to their intended function and Policy DM DE7 promoting road safety and safer cycling and pedestrian movement around town centres and transport nodes. A minor positive effect is expected in relation to Policy DM DE8: Design of business premises and DM DE9: Shopfronts and advertisement as Policy DM DE8 will seek to ensure that the development of new business premises facilitates movement through the provision of safe and publicly accessible routes, which is likely to improve pedestrian safety, and DM DE9 states that Highways England will be consulted on road safety aspects of advertisements proposed alongside the Strategic Road Network (SRN), with advertisements deemed detrimental to the safety of the SRN by virtue of their location, size and/or illumination facing refusal. Policies SP DE1 and DM DE7 are also expected to have significant positive effects in relation to **IIA12: Sustainable transport** because they prioritise and support more active and sustainable travel modes (i.e. walking and cycling). The policy also seeks to promote the provision of electric vehicle charging points and provide good quality signage and lighting to improve wayfinding in the public realm, which may further encourage walking and wheeling. Policy SP DE1 also promotes mixed-use development, which would reduce the need for people to travel as all the amenities they require are in one place. People would therefore not be as reliant on the private car, which would help minimise air pollution. Therefore, both policies are also expected to have a minor positive effect in relation to **IIA11: Air pollution**. Policy DM DE13: Housing standards and design is expected to have a minor positive effect in relation to IIA11 because it requires the provision of cycle parking.

6.68 Policy SP DE1: Delivering a well-designed, high quality and resilient environment is expected to have a minor positive effect in relation to **IIA9: Economy** because it requires all developments and interventions to be high quality and design-led, which may attract more residents to the area with beneficial effects on the economy. Similarly, SP DE4: Putting heritage at the centre of place making seeks to utilise the Borough's cultural, built and landscape heritage to realise economic benefits for affected communities, and as such is expected to receive a minor positive effect. DM DE6: Tall buildings is also expected to receive a minor positive effect as the development of tall buildings can contribute to an area's reputation as a thriving place to live and work, attracting investment and benefitting the local economy. Policy DM DE8: Design of business premises is expected to have a mixed significant positive and minor negative effect against this objective because although it makes provision for well-designed business premises that would help attract people into the office and encourage collaborative working, it could potentially restrict economic development due to the requirements set out within the policy and any knock on viability issues. A minor negative effect is expected for Policy DM DE9: Shopfronts and advertisements against IIA9 because the restrictions set out within the policy could impact on business advertising and signage.

6.69 Policy DM DE7: Creating liveable, inclusive and quality public realm and Policy DM DE6: Tall buildings are expected to have a minor positive effect in relation to **IIA10: Town and local centres** because DM DE7 seeks to improve the public realm by taking account of the hierarchy of streets and opening up links and improved sightlines to high streets, which may increase footfall within the town and local centres and DM DE6 identifies the appropriate location for tall building development in urban, built-up areas, enhancing the vitality and vibrancy of town and local centres. A minor positive effect is also expected for Policy DM DE9: Shopfronts and advertisements in relation to this objective because frontages that maintain visual interest would have beneficial effects on the street scene and potentially increase footfall.

6.70 Policies SP DE1: Delivering a well-designed, high quality and resilient environment and DM DE7: Creating a liveable, inclusive and quality public realm are expected to have significant positive effects on **IIA13: Biodiversity** because both policies

seek to enhance access to nature, as well as functional ecological corridors and habitats within the Borough. This is referenced in Policy DM DE7 as lining routes with trees, including appropriate sustainable drainage systems or other biophilic interventions. A significant positive effect is also expected for Policy DM DE11: Landscape design in relation to this objective because it requires all developments to provide a high quality, comprehensive hard and soft landscaping scheme that includes generous tree, shrub and hedgerow planting consisting of appropriate species and nursery stock in the context of the location, in addition to incorporating suitable wildlife habitats, including micro-habitats. Policies SP DE4: Putting heritage at the centre of place making, DM DE8: Design of business premises and DM DE12: Civic and public developments are expected to have minor positive effects in relation to IIA13 because SP DE4 seeks to recognise, preserve and enhance the contribution of trees, hedging and soft landscaping to local character and the setting of heritage assets and utilise the Borough's cultural, built and landscape heritage to realise environmental benefits for affected communities, DM DE8 seeks to maximise opportunities for inclusion of urban greening / SuDS measures and integration with existing blue and green infrastructure and DM DE12 states that development involving the construction of civic buildings must maximise opportunities for the inclusion of urban greening, biophilic design principles and integration with existing blue and green infrastructure where possible.

6.71 Policies SP DE4: Putting heritage at the centre of placemaking and DM DE10: Conserving and enhancing heritage assets are expected to have significant positive effects in relation to **IIA14: Historic environment**, as both directly preserve and enhance LBE's historic environment. Policy SP DE4: Putting heritage at the centre of placemaking states that the Council will continue to review and update conservation area designations, appraisals, management proposals and Article 4 Directions; the Local Heritage List; the Heritage Strategy; Register Park and Garden Management appraisals and management proposals as well as archaeological designations, on the advice of the Greater London Archaeological Advisory Service (GLAAS). Policy DM DE10 promotes development which conserves and enhances the significance of heritage assets, including Registered Parks and Gardens. Policy DM DE6: Tall buildings supports the development of tall buildings in appropriate locations and states that tall buildings must be designed to minimise and mitigate harm to the significance of heritage assets and their settings. Therefore, Policy DM DE6 is expected to have a minor positive effect in relation to this objective. Policy DM DE5: Strategic and important local views protects important local views and may therefore help prevent any adverse effect that development might otherwise have on the setting of heritage assets within the Borough, with a minor positive effect also recorded against this objective. Policies SP DE1: Delivering a well-designed, high quality and resilient environment and DM DE3: Inclusive design are also expected to have minor positive effects in relation to this objective because SP DE1 requires development to complement heritage assets, whilst SM DE3 requires development proposals to identify access enhancements for heritage assets, while maintaining the significance of the asset and its setting. Minor positive effects are also expected for Policies DM DE7: Creating liveable, inclusive and quality public realm and DM DE11: Landscape design. This is because DM DE7 seeks to improve the public realm and local character of an area, which could potentially benefit the setting of heritage assets, whilst DM DE11 seeks to protect historic landscapes and layouts.

6.72 Policy DM DE8: Design of business premises is also expected to have a minor positive effect on **IIA14: Historic environment** because it only permits development that does not conflict with historic land/building use where this use contributes to the character, appearance and significance of a heritage asset, and avoids and minimises harm to the significance of heritage assets or local character and maximises opportunities for enhancement. Likewise, Policy DM DE9: Shopfronts and advertisements requires the size, siting and illumination of advertisements within Conservation Areas to conserve or enhance heritage assets and protect the special characteristics and the overall visual amenity of the heritage asset and its setting, as well as seeking to retain historic shopfronts and/or surviving details. Therefore, Policy DM DE9 is also expected to have a minor positive effect in relation to this objective. A minor positive effect is also expected for DM DE12: Civic and public developments and Policy DM DE15: Residential extensions. The effect is expected for DM DE12 because the policy requires the development of civic buildings to respect the heritage and respond to the local character and distinctiveness of the area they are situated, whilst for DM DE15 proposals for flat roof dormers within a Conservation Area or setting of a listed building will be refused, as well as extensions that have an adverse visual impact upon designated and non-designated heritage assets. The policy further identifies specific permissions for alterations in Conservation Areas to protect its character and appearance, including respecting the key characteristics of the Conservation Area and not causing cumulative harm.

6.73 Policies SP DE1: Delivering a well-designed, high quality and resilient environment, DM DE5: Strategic and important local views, DM DE7: Creating liveable, inclusive and quality public realm and DM DE11: Landscape design are expected to have significant positive effects in relation to **IIA15: Landscape and townscape** because they set out measures to protect and enhance local distinctiveness and to contribute to a sense of place in the Borough, with Policy DM DE11 requiring all developments to provide a high quality, comprehensive landscape scheme and to protect historic landscapes. Policy SP DE1 promotes development which has an understanding of local context e.g. locally distinctive or historic patterns of development,

whilst Policy DM DE5 states that new development is required to positively contribute to the setting and integrity of important local views and shorter-distance local views. Policy DM DE7: Creating liveable, inclusive and quality public realm also highlights that new development must be designed to the hierarchy of streets and spaces as well as the presence of focal buildings, landmarks, squares, nodes and gateways. The policy also seeks to open up links and improved sightlines to civic buildings, transport hubs, high streets and areas of open space. Policy DM DE9: Shopfronts and advertisements is also expected to have a significant positive effect against this objective because it requires development involving the creation of new, or alterations to existing non-residential ground floor frontages and shop fronts to maintain visual interest with no detrimental impact on the streetscape. The frontage must respect the rhythm, style, materiality and proportions of the building(s) or group of buildings of which they form part of (including the upper floors). Specifically, no more than 10% of the glazed area must be obscured and any window displays should be lit at night (using dedicated energy efficient fittings). Regarding advertisements, they should not be visually dominant nor lead to visual clutter. A significant positive effect is also expected for Policy DM DE6: Tall buildings which permits tall buildings only in areas where they are suitable and seeks to ensure that all tall buildings make a positive contribution to the skyline and considers views at medium, short and long distances. The policy requires development to be of the highest architectural and design quality, and to relate well to the character of the immediate context and its surroundings, taking account of building heights, topography and the pattern of adjoining streets

6.74 Policy DM DE10: Conserving and enhancing heritage assets seeks to make a positive contribution to local character and distinctiveness, including giving consideration to the design character and significance of the landscape of Registered Parks and Gardens, and their setting. The policy also seeks to ensure that development aligns with the aims and objectives of the Heritage Strategy, Conservation Area Character Appraisals and Management Plans and demonstrates an understanding of context and significance. Therefore, it is expected to have a minor positive effect in relation to **IIA15: Landscape and townscape**. Policies SP DE4: Putting heritage at the centre of placemaking and DM DE13: Housing standards and design are also expected to have minor positive effects in relation to this objective. This is because SP DE4 supports the enhancement of the Borough's landscape heritage, while also seeking to respond to the local context in a positive manner which matches in quality those aspects of the historic environment which make a positive contribution to local character and distinctiveness. Policy DM DE13 requires new residential development to be appropriately located, taking into account the nature of the surrounding area, and to be of appropriate scale, bulk and massing. Policy DM DE13 also requires access, parking, cycle parking and refuse storage by reason of design or location, to not adversely affect the streetscape, and ensures that hardstanding does not dominate or cause harm to the character or appearance of the street. Minor positive effects are also expected for Policies DM DE12: Civic and public developments and DM DE15: Residential extensions in relation to this objective because DM DE12 seeks to positively address the public realm through means of enclosure, landscaping, street furniture and the location and design of parking and servicing, whilst DM DE15 must have no adverse visual impact and have regard to the character of the local area, whilst also preserving the lateral separation between dwellings where this makes a positive contribution to local character.

6.75 Policy DM DE2: Design process and Design Review Panel is expected to have a minor positive effect in relation to both **IIA14: Historic environment** and **IIA15: Landscape and townscape** because it encourages all planning applications to seek pre-application advice and requires planning applications to be accompanied by a Design and Access Statement. Once an application is submitted, design quality must be maintained through to building completion, ensuring maximum detail appropriate for the design stage is provided. For major or contentious schemes, including those within the setting of a designated heritage asset however, a higher level of detail must be submitted. Furthermore, according to the policy, applications for significant major development will be reviewed by Enfield's Design Review Panel. This policy is therefore expected to protect and enhance both the historic environment and landscape/townscape through the aforementioned processes. Policy DM DE8: Design of business premises is also expected to have minor positive effects in relation to IIA14 and IIA15 because it seeks to enhance the public realm and locate servicing, parking and refuse to the rear of buildings so as to protect the townscape, in addition to ensuring that the massing and facades of buildings are made visually interesting through architectural detailing, height variation and fenestration. The policy seeks to create a distinct character and not conflict with historic land/building use where this contributes to the character, appearance and significance of a heritage asset.

6.76 Policy DM DE6: Tall buildings is expected to have a minor positive effect in relation to **IIA16: Efficient use of land and materials** because increasing the density of development through tall new buildings or extensions to existing tall buildings, is an efficient use of land. However, the policy contains a lot of criteria that the development of tall buildings must meet and could therefore restrict proposals for tall buildings, though proposals that do not meet this criteria may be considered but they must be justified with reference to the requirements of other development plan policies and/or material considerations. Policies SP DE1: Delivering a well-designed, high quality and resilient environment and DM DE12: Civic and public developments are expected to have minor positive effects in relation to this objective because Policy SP DE1 promotes mixed-use development and the

efficient use of resources within construction and operation, whilst Policy DM DE12 seeks to build flexibility into the design and layout of new development to meet future unanticipated needs over its lifetime. This includes ancillary/alternative uses, for example community uses for parts of schools. Policy DM DE8: Design of business premises is also expected to have a minor positive effect because it states that all new business premises must make efficient use of land.

6.77 Policies DM DE7: Creating liveable, inclusive and quality public realm, Policy DM DE8: Design of business premises and DM DE11: Landscape design are expected to have minor positive effects against **IIA17: Flooding** and **IIA18: Water** because they require proposals to provide sustainable drainage systems. Sustainable drainage systems help manage surface water, whilst also taking account of water quality. Policy DM DE11 also supports designs that facilitate floodplain compensation and preservation of flood flow routes.

Recommendations

- Policy SP DE4: Putting heritage at the centre of place making could be more specific by what is meant by “affected communities” in the sentence “utilise the Borough’s cultural, built and landscape heritage to realise wider social, cultural economic and environmental benefits for affected communities”.

8. Homes for all

6.78 The likely sustainability effects of the homes for all policies, with the exception of SP H1: Housing development sites (see following section), in Chapter 8 of the Enfield Local Plan are set out in **Table 6.7** and described below the table.

Table 6.7: IIA findings for the homes for all policies

IIA objective	SP H2: Affordable housing	DM H3: Housing mix and type	DM H4: Small sites and small housing development	DM H5: Supported and specialist housing	DM H6: Community-led housing	DM H7: Build to rent	DM H8: Large scale purpose built housing	DM H9: Student accommodation	DM H10: Traveller accommodation
IIA1: Climate change mitigation	0	0	+	+	0	0	+	+	+
IIA2: Climate change adaptation	0	0	+	0	0	0	0	0	0
IIA3: Housing	++	++	++	++	++	++	++	++	++/-
IIA4: Health and wellbeing	+	+	+	+	+	0	0	+	+/-
IIA5: Services and facilities	0	0	+	+	0	0	+	+	+
IIA6: Social inclusion	++	++	0	++	++	+	0	+	+/-?
IIA7: Crime and community safety	0	0	0	0	0	0	0	0	0
IIA8: Road safety	0	0	0	0	0	0	0	0	+
IIA9: Economy	+	+	+	+	+	+	+	+	+
IIA10: Town and local centres	0	0	+	0	0	0	0	+	0
IIA11: Air pollution	0	0	+	+	0	0	+	+	+
IIA12: Sustainable transport	0	0	+	+	0	0	+	+	+
IIA13: Biodiversity	0	0	+	0	0	0	0	0	+

IIA objective	SP H2: Affordable housing	DM H3: Housing mix and type	DM H4: Small sites and small housing development	DM H5: Supported and specialist housing	DM H6: Community-led housing	DM H7: Build to rent	DM H8: Large scale purpose built housing	DM H9: Student accommodation	DM H10: Traveller accommodation
IIA14: Historic environment	0	0	0	0	0	0	0	0	+
IIA15: Landscape and townscape	0	+	+	0	0	0	0	+	+
IIA16: Efficient use of land and materials	0	0	++	0	0	0	0	0	0
IIA17: Flooding	0	0	0	0	0	0	0	0	0
IIA18: Water	0	0	0	0	0	0	0	0	0

6.79 All housing policies will contribute to a sufficient supply of homes in the Borough. These policies would directly address the identified key sustainability issues of a deficiency in housing supply and availability of affordable housing across the Borough. In particular, Policy DM H4 seeks to achieve the London Plan target of 3,530 new homes (equivalent to 353 new homes per year until 2029) on sites of less than 0.25 hectares and Policy SP H2: Affordable housing seeks to deliver at least 35% genuinely affordable homes⁵⁷. Policy DM H6: Community-led housing will also seek to ensure that proposals for community-led housing schemes optimise the use of land for residential development in contributing to the delivery of family and affordable housing. The remaining housing policies support a mix of housing types, including specialist housing and accommodation for students and Gypsies and Travellers. Therefore, significant positive effects are expected for these policies in relation to **IIA3: Housing**. However, the significant positive effect for Policy DM H10 is coupled with a minor negative effect, as while it will meet the needs of the Planning Policy for Traveller Sites (PPTS) definition of Gypsies and Travellers (21 pitches), it will not meet the cultural need (23 pitches). All of these policies will also support the local economy by providing accommodation for the working age population and therefore attracting more people of working age to the area, which will support aspirations for economic growth within the Borough. Therefore, minor positive effects are expected in relation to **IIA9: Economy**.

6.80 A number of the housing policies seek to protect the amenity of the Borough's residents, in addition to open space provision. Policy SP H2: Affordable housing requires development involving the provision of affordable housing to provide private outdoor space, whilst Policy DM H6: Community-led housing supports proposals for community led housing that integrate adequate amenity space. Policy DM H9: Student accommodation seeks to ensure that proposals provide an acceptable level of amenity, whilst Policies DM H3: Housing mix and type, DM H4: Small sites and small housing development and DM H5: Supported and specialist housing also seek to protect amenity. Therefore, minor positive effects are expected against **IIA4: Health and wellbeing** in relation to these policies. A mixed minor positive and minor negative effect is expected for Policy DM H10: Traveller accommodation, as while the policy meets the needs of the PPTS definition of Gypsies and Travellers, it will not meet the cultural need and so could have an adverse effect on personal and social wellbeing.

6.81 Policies DM H5: Supported and specialist housing and DM H10: Traveller accommodation will ensure that development offers easy and safe access to community facilities, sustainable modes of transport and other services. DM H10 specifically identifies convenient access to healthcare, retail and education school facilities with available capacity. Additionally, Policies DM H4: Small sites and small housing development, DM H8: Large scale purpose built housing and DM H9: Student accommodation seek to ensure that development is directed towards locations that are well-connected to local services,

⁵⁷ All major housing developments must achieve a minimum of 35% affordable housing. This percentage increases to 50% for development on industrial land that would result in a net loss of industrial floorspace, former Green Belt sites and on publicly owned land.

infrastructure and employment, such as the edge of town centres, local centres or other locations in proximity to services and facilities. Therefore, all policies are expected to have a minor positive effect against **IIA5: Services and facilities**.

6.82 A number of policies seek to ensure that the mixed demands of a growing population are met with a variety of housing sizes, types, tenures, and specialist accommodation. Policy SP H2: Affordable housing is likely to improve social inclusion through mixed residential schemes that include both market and affordable housing, while Policy DM H6: Community-led housing will seek to ensure that provision for affordable housing is made through community led housing schemes, at the same time as encouraging interaction amongst residents and community groups. The provision of affordable housing will also help to address inequalities between different groups of people in the Borough, particularly in regard to the divide between the east and west of the Borough. Policies DM H5: Supported and specialist housing and DM H9: Student accommodation will support the provision of appropriate housing to meet the specialist needs of local people, including disabled and vulnerable people, students and the elderly, and will ensure that development contributes to the creation of inclusive and sustainable neighbourhoods. In particular, Policy DM H5 will provide housing options at a range of costs to accommodate the different financial circumstances of residents, contributing to mixed, balanced, inclusive and sustainable neighbourhoods, whilst Policy DM H9 states that proposals for student accommodation must allocate at least 10% of student rooms that are readily adaptable for occupation by wheelchair users from the outset. Policy DM H3: Housing mix and type seeks to deliver an appropriate mix of homes that would meet a variety of people's needs, such as disabled and elderly people, in addition to being designed with a 'tenure-blind' approach -all of which would help reduce social exclusion. The policy also sets out that at least 10% of new dwellings should be built to M4(3) wheelchair accessible dwelling standard. Policy DM H7: Build to rent will support the provision of rented accommodation that is affordable and is therefore likely to benefit people on a lower income who may not be able to afford their own home. Overall, Policies SP H2, DM H3, DM H5 and DM H6 are expected to have significant positive effects in relation to **IIA6: Social inclusion**, with the remaining housing policies with the exception of DM H10: Traveller accommodation expected to have minor positive effects in relation to this objective. Policy DM H10 is expected to have a mixed minor positive and minor negative effect in relation to IIA6, as not meeting the cultural need would not accord with the Council's wider obligations to meet all needs, and may contribute to an increase in unauthorised developments and encampments which can be a source of tension between Traveller communities and settlements communities, although this is uncertain. Policy DM H10 is expected to have a minor positive effect in relation to **IIA8 Road safety** because it requires sites for transit and permanent pitches to be safely accessed by pedestrians, caravans and other vehicles.

6.83 Several of the housing policies are likely to contribute to the reduction of the use of private vehicles and encourage the use of more sustainable modes of transport, which will help minimise CO₂ emissions associated with the private car, as well as avoiding air pollution. Policies DM H10: Traveller accommodation, DM H4: Small sites and small housing development, DM H5: Supported and specialist housing, DM H8: Large scale purpose built housing and DM H9: Student accommodation will seek to encourage and ensure that development is directed towards locations that are well-connected to local services and employment by walking and cycling, as well as having good public transport accessibility. In addition, Policy DM H8 will ensure that the design of purpose-built shared living development promotes non-car dependent lifestyles, Policy DM H9 requires development proposals to provide adequate cycle parking facilities and Policy DM H4 requires applications to consider the installation of green roofs/walls and tree planting, which will contribute towards a reduction of CO₂ in the Borough. Therefore, each of these policies are expected to have a minor positive effect against **IIA1: Climate change mitigation**, **IIA11: Air pollution** and **IIA12: Sustainable transport**. The encouragement to incorporate green roofs/walls, tree planting and sustainable landscaping into development under Policy DM H4 is also likely to have a minor positive effect on **IIA2: Climate change adaptation** as increased green infrastructure provision is likely to enhance the resilience of housing in the Borough to respond to climate change through sustainable insulation in colder months, improved drainage in wetter months, and increased access to shading in hotter months.

6.84 Policies DM H4: Small sites and small housing development and DM H9: Student accommodation will direct residential development, including student accommodation, towards locations in close proximity to major/district/local centres and will therefore contribute to the enhancement of the vitality and vibrancy of the Borough's town centres through increased footfall. As such, minor positive effects are expected against **IIA10: Town and local centres** in relation to these policies.

6.85 Policies DM H3: Housing mix and type and DM H10: Traveller accommodation are expected to have minor positive effects in relation to **IIA15: Landscape and townscape** because development must have regard to the character of the area and be positively integrated into it, as well as ensuring that the impact of new Traveller accommodation development does not harm the landscape or visual character of the area, particularly the Green Belt. Policy DM H4: Small sites and small housing development supports development on vacant infill areas and backland plots, which would help enhance the character of these areas,

resulting in a minor positive effect in relation to IIA15. Policy DM H10 seeks to ensure that the impact of new Traveller accommodation development does not harm the heritage assets or biodiversity of the area. The policy requires that adequate on-site facilities be provided, including water resources and supply, waste disposal and treatment, for the benefit of residents while avoiding adverse impacts on the natural environment. As such minor positive effects are expected against **IIA13: Biodiversity** and **IIA14: Historic environment**. Policy DM H9: Student accommodation is expected to have a minor positive effect on **IIA15: Landscape and townscape** because development must not have a detrimental impact on the character of the local area. A minor positive effect is expected for DM H4: Small sites and small housing development in relation to **IIA13: Biodiversity**, as where small housing development is proposed it should not have an unacceptable adverse impact on biodiversity and green infrastructure. The policy also states a requirement to identify potential impacts in this regard, and clearly set out measures to minimise and mitigate these.

6.86 Policy DM H4: Small sites and small housing development sets out the Council's approach to smaller sites and small housing development, and states that the Council will support development on vacant infill areas and backland plots, as well as upward extensions of flats and the redevelopment of non-residential buildings in order to deliver additional housing. This policy is therefore likely to ensure the re-use and redevelopment of brownfield sites, contributing towards the efficient use of land in the Borough. As such, a significant positive effect is expected in relation to **IIA16: Efficient use of land and materials**.

6.87 Negligible effects are expected in relation to IIA7: Crime and community safety.

Recommendations

- Where appropriate, some of these policies could include reference to active frontages and passive surveillance so as to reduce crime levels and increase feelings of safety. Although, it is acknowledged that the 'Design and character' policies already provide mitigation (see 'Cumulative effects' section).

Policy SP H1: Housing development sites

6.88 Most elements of Policy SP H1: Housing development sites have already been appraised elsewhere in this IIA Report. Specifically, the total housing provision is already set out under Policy SP SS1: Spatial strategy and so has been assessed in the appraisal of this spatial strategy policy in **Chapter 4** of this IIA Report. Many of the sites allocated under Policy SP H1 have also been appraised as part of the Place policies outlined in **Chapter 5** of this IIA Report. The IIA policy-off findings for the remaining sites allocated under Policy SP H1 are summarised in **Table 6.8** overleaf. These sites were appraised using the IIA assumptions set out in **Appendix B**. In the text following this table, consideration is given to the effects of mitigation outlined in the proforma for each of these sites within Appendix C of the Local Plan.

Table 6.8: IIA findings for the sites outside of the placemaking areas allocated by Policy SP H1: Housing development sites

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
Other proposed site allocations outside of the placemaking areas (urban areas)																																							
U.01	N/A	N/A	++	+	++	--	+	++	+	N/A	N/A	-	0	+	0	+	-	-	-	-	-	++	+	-	0	-	--	N/A	--?	-	--	--	++	0	++	0	--	--	0
U.02	N/A	N/A	++	++	++	--	+	+	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	0	++	+	0	--	--	--	N/A	--?	-	--	--	+	0	+	0	-	-	0
U.03	N/A	N/A	++	-	++	0	+	++	0	N/A	N/A	-	0	++	-	0	--	-	-	-	-	-	-	-	-	--	--	N/A	--?	-	0	-	++	0	++	0	--	--	0
U.04	N/A	N/A	++	++	++	--	+	++	0	N/A	N/A	-	0	+	0	+	--	-	-	-	0	++	+	-	--	--	--	N/A	--?	-	0	-	+	0	+	0	0	0	0
U.05	N/A	N/A	++	++	++	--	+	++	0	N/A	N/A	-	0	+	0	0	-	-	-	-	--	-	--	-	0	-	0	N/A	0?	-	--	--	++	0	++	0	--	--	0
U.06	N/A	N/A	++	++	++	--	+	++	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	--	++	0	0	--	--	N/A	--	--?	--	--	--	++	0	++	0	--	--	--
U.07	N/A	N/A	++	++	++	0	++	++	0	N/A	N/A	-	0	+	0	+	--	-	-	-	-	++	+	-	--	--	--	N/A	--?	0	0	0	+	0	+	0	--	--	--
U.08	N/A	N/A	++	++	++	--	+	++	+	N/A	N/A	-	0	N/A	-	+	--	-	-	-	-	++	+	-	0	-	--	N/A	--?	--	--	--	++	0	++	0	--	--	--
U.09	N/A	N/A	++	+	++	--	+	+	+	N/A	N/A	++	--	+	+	0	-	0	-	-	--	+	-	-	-	--	--	N/A	--?	-	--	--	+	0	+	0	0	0	--
U.10	N/A	N/A	++	++	++	--	+	++	++	N/A	N/A	++	0	+	+	+	-	-	-	-	-	++	+	-	-	--	--	N/A	--?	--	--	--	++	0	++	0	--	--	--
U.11	N/A	N/A	++	-	++	0	+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	-	-	N/A	--	--?	-	0	-	+	0	+	0	0	0	0
U.12	N/A	N/A	+	-	++	0	+	+	+	N/A	N/A	++	0	+	+	+	-	-	-	-	-	++	+	-	0	-	--	N/A	--?	0	0	0	+	0	+	-	--	--	--
U.13	N/A	N/A	++	++	++	--	+	++	++	N/A	N/A	-	0	N/A	-	+	--	-	-	-	-	++	+	-	0	-	--	N/A	--?	-	--	--	++	0	++	0	--	--	--
U.14	N/A	N/A	+	+	++	--	+	++	+	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	++	+	0	-	-	--	N/A	--?	-	--	--	++	0	++	0	--	--	0
U.15	N/A	N/A	+	++	++	--	+	++	++	N/A	N/A	-	0	N/A	-	+	-	-	-	0	++	+	0	--	--	--	N/A	--?	-	0	-	+	0	+	0	-	-	--	
U.16	N/A	N/A	+	++	++	--	+	++	0	N/A	N/A	-	0	+	0	+	--	-	-	-	+	++	++	-	-	--	N/A	--?	--	--	--	+	0	+	0	--	--	--	
U.17	N/A	N/A	+	++	++	--	+	++	+	N/A	N/A	-	0	N/A	-	+	-	-	-	-	-	++	+	0	-	-	--	N/A	--?	-	0	-	++	0	++	0	--	--	--
U.18	N/A	N/A	+	++	++	--	+	++	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	+	++	++	0	0	0	--	N/A	--?	-	--	--	+	0	+	0	0	0	--
U.19	N/A	N/A	+	++	++	--	+	++	+	N/A	N/A	-	0	+	0	+	--	-	-	-	-	++	+	-	-	--	N/A	--?	0	--	--	+	0	+	0	-	-	--	
U.20	N/A	N/A	+	++	++	--	+	++	+	N/A	N/A	++	0	N/A	+	+	-	-	-	-	--	++	0	0	--	--	N/A	--?	-	--	--	++	0	++	0	--	--	0	
U.21	N/A	N/A	+	++	++	0	++	++	++	N/A	N/A	-	0	+	0	+	--	-	-	-	-	++	+	-	0	-	--	N/A	--?	-	0	-	+	0	+	0	--	--	--

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water	
U.22	N/A	N/A	+	++	++	--	+	++	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	+	++	++	0	-	-	--	N/A	--?	-	--	--	+	0	+	0	0	0	0	
U.23	N/A	N/A	+	+	++	--	+	++	+	N/A	N/A	-	0	N/A	-	0	--	-	-	-	--	+	-	0	-	-	0	N/A	0?	-	0	-	++	0	++	0	--	--	--	
U.24	N/A	N/A	+	++	++	--	+	+	++	N/A	N/A	-	0	N/A	-	+	--	-	-	-	++	++	++	0	-	-	--	N/A	--?	-	--	--	++	0	++	0	--	--	--	
U.25	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	N/A	-	+	-	0	-	-	--	++	0	0	0	0	--	N/A	--?	-	0	-	+	0	+	0	-	-	--	
U.26	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	-	++	+	0	--	--	--	N/A	--?	-	0	-	+	0	+	0	0	0	--	
U.27	N/A	N/A	+	++	++	--	+	++	+	N/A	N/A	-	0	N/A	-	+	--	-	-	-	0	++	+	0	0	0	--	N/A	--?	-	--	--	+	0	+	0	0	0	--	
Other proposed site allocations outside of the placemaking areas (outside urban areas)																																								
R.01	N/A	N/A	++	-	++	--	-	++	0	N/A	N/A	-	0	+	0	0	--	-	-	-	--	-	--	-	--	--	N/A	--	--?	-	--	--	--	--	0	-	0	--	--	--
R.02	N/A	N/A	++	-	++	--	-	+	0	N/A	N/A	-	0	N/A	-	+	-	0	-	-	--	++	0	0	--	--	N/A	--	--?	-	--	--	--	--	-	--	0	--	--	--

IIA1: Climate change mitigation

6.89 Some of the site proformas in Appendix C of the Local Plan require measures to encourage sustainable travel such as improved pedestrian and cycle connections, minimisation of parking, public realm improvements and passive surveillance measures. These will help encourage more walking and cycling and help reduce CO₂ emissions. Some of the proformas do, however, promote new vehicular routes, which will not contribute towards modal shift and potentially generate CO₂ emissions. Therefore, the design and infrastructure requirements contained in the site proformas have the potential to contribute both positively and negatively towards the achievement of this IIA objective.

IIA2: Climate change adaptation

6.90 There are no site-specific mitigation measures identified in Appendix C of the Local Plan that will contribute towards the achievement of this objective. Flood management measures are separately addressed under IIA objective 17 below.

IIA3: Housing

6.91 It is understood that all residential sites will provide a mixture of homes. However, there are some proformas in Appendix C of the Local Plan that specifically identify a type of housing to be delivered at certain sites (e.g. family homes). It is assumed that where this is the case, the housing type is meeting a specific identified need and will therefore contribute more positively towards the achievement of this objective.

IIA4: Health and wellbeing

6.92 The measures to encourage active travel outlined under IIA objective 1 above will help to support healthy lifestyles. Where development of a site could result in the loss of open space, the proforma states that any net loss of open space would need to be supported by a masterplan approach. Although no further details are provided, it is assumed that adopting a masterplan approach would help ensure public open space is provided as part of the development as a whole. Further to this, some of the proformas seek to improve existing entrances to green space and so will improve accessibility to these spaces generally. Lastly, many of the site proformas seek to minimise overlooking of rear gardens and so will also contribute positively towards this objective by protecting residential amenity.

IIA5: Services and facilities

6.93 There are no site-specific mitigation measures identified in Appendix C of the Local Plan that will contribute towards the achievement of this objective.

IIA6: Social inclusion

6.94 There are no site-specific mitigation measures identified in Appendix C of the Local Plan that will contribute towards the achievement of this objective.

IIA7: Crime and community safety

6.95 Numerous proformas contain design requirements that necessitate active frontages where appropriate, including in buildings that overlook primary routes and in and along open spaces. Active frontages are a form of passive surveillance and so have the potential to reduce crime levels at the same time as improving people's feelings of safety. Therefore, where active frontages are identified as a requirement for a site, they will help mitigate against crime and improve community safety.

IIA8: Road safety

6.96 There are no site-specific mitigation measures identified in Appendix C of the Local Plan that will contribute towards the achievement of this objective.

IIA9: Economy

6.97 Non-residential uses are encouraged on approach to existing urban centres and although these non-residential uses are not specified in Appendix C of the Local Plan, they are likely to include employment uses and so will contribute towards the achievement of this objective.

IIA10: Town and local centres

6.98 Some of the proformas promote pedestrian permeability and inclusion of 'gateway' design features, which is likely to make places easier to navigate whilst also increasing footfall within certain urban centres. This will help contribute positively towards the achievement of this objective.

IIA11: Air pollution and IIA12: Sustainable transport

6.99 The effects of the site-specific mitigation outlined in Appendix C of the Local Plan on IIA11 and 12 are summarised together, due to the close linkages between air pollution and levels of car use.

6.100 Some of the site proformas require design features to encourage sustainable travel, as outlined under IIA objective 1 above. These site-specific requirements will help encourage more walking and cycling, and help reduce air pollution. Where proformas seek to deliver an enhanced public realm alongside new and enhanced public spaces, they are also expected to encourage walking and associated decreases in air pollution.

6.101 Some of the proformas do, however, promote new vehicular routes and although this will ensure easy access to development sites, will not contribute towards modal shift. Sites located within close proximity to tube or railway station are, however, already expected to have positive effects in relation to these two objectives and according to some of the proformas are also required to improve access and facilities at these stations, which would further encourage public transport use. Further to this, the proformas minimise the number of parking spaces available so as to promote more active and sustainable travel, which will have beneficial effects on these two objectives.

IIA13: Biodiversity

6.102 Some of the proformas require sites to maximise the retention of existing high value trees and hedgerows, plant trees along roads together with biodiversity enhancements and promote more diverse and better connected habitats, which will have beneficial effects on biodiversity and help mitigate any adverse effects as a result of development. Additionally, some proformas require contributions towards river restoration schemes or wetland restoration/creation and so will also have beneficial effects on the wildlife present within and along water bodies and watercourses.

IIA14: Historic environment

6.103 Where relevant, the site proformas require development to address the sensitivity of heritage assets. There are also design requirements for consideration to be given to certain views from certain sites, including to conservation areas, helping to protect and enhance the historic environment.

IIA15: Landscape and townscape

6.104 A number of the site proformas in Appendix C of the Local Plan seek to contribute towards an enhanced public realm, which will have beneficial effects on the streetscape alongside the requirements for new and enhanced public spaces and gateway improvements. There are also a few proformas that promote on-street parking and where there is a long stretch of road, parking spaces and trees must be interspersed and integrated into the public realm. Views to key landscape features such as rivers should be protected and also take into consideration topography to capitalise on long views towards the open countryside. Where buildings border a park, careful consideration must be given to articulation, change of material, colour or window arrangements so as to aesthetically frame the park. Building typologies must be in-keeping with the character of the area, therefore protecting the landscape and townscape and mitigating against any harm to it as a result of development. There are also a few proformas that seek to optimise the capacity of sites by increasing building density but put a limit on building heights where necessary, including not permitting tall buildings in unsuitable areas, so as to not result in any adverse effects on the landscape.

IIA16: Efficient use of land and materials

6.105 Although design principles cannot avoid the loss of greenfield land or best and most versatile agricultural land, a number of the site proformas refer to optimising site density, which is an efficient use of previously developed land and will therefore contribute towards achieving positive effects against this objective.

IIA17: Flooding

6.106 Where sites are considered to be at risk of flooding, Sustainable Drainage Systems (SuDS) are required to be introduced, which will help mitigate flood risk, including surface water flooding. Some proformas also require contributions towards the extension or upgrading of existing flood alleviation schemes. This will help mitigate against any adverse 'policy-off' effects sites are expected to have in relation to this objective.

IIA18: Water

6.107 The site proformas require the introduction of SuDS on certain sites which, alongside flood risk mitigation, will help to protect water quality and resources – helping mitigate any adverse 'policy-off' effects against this objective. Some proformas also require contributions towards river restoration schemes and so will help improve water quality.

9. Economy

6.108 The likely sustainability effects of the economy policies in Chapter 9 of the Enfield Local Plan, with the exception of Policy SP E1: Employment and growth (see following section), are set out in **Table 6.9** and described below the table.

Table 6.9: IIA findings for the economy policies

IIA objective	SP E2: Promoting jobs and inclusive business growth	SP E3: Strategic Industrial Locations	SP E4: Supporting offices	SP E5: Transforming Industrial Sites	DM E6: Locally Significant Industrial Sites	DM E7: Non-designated industrial sites	DM E8: Providing for workspaces	DM E9: Local jobs, skills and local procurement	DM E10: Fostering a successful evening economy	DM E11: Creating a smart and digitally connected Borough	DM E12: Meridian Hinterlands
IIA1: Climate change mitigation	+	+	+	0	0	0	+	0	0	+	+
IIA2: Climate change adaptation	0	0	0	0	0	0	0	0	0	0	0
IIA3: Housing	0	0	0	0	0	0	0	0	0	0	++
IIA4: Health and wellbeing	+	0	0	+	0	0	0	0	+	+	+
IIA5: Services and facilities	+	0	0	0	0	0	0	+	0	0	+
IIA6: Social inclusion	+	0	0	0	0	0	0	+	+	0	+
IIA7: Crime and community safety	0	0	0	0	0	0	0	0	0	0	0
IIA8: Road safety	0	0	0	0	0	0	0	0	0	0	0
IIA9: Economy	++	++	++	++	++	++	++	++	++	++	++
IIA10: Town and local centres	++	0	++	0	0	0	++	0	++	0	0
IIA11: Air pollution	+	+	+	+	0	0	+	0	0	+	+
IIA12: Sustainable transport	+	+	+	+	0	0	+	0	0	0	+
IIA13: Biodiversity	0	0	0	+	0	0	0	0	0	0	-
IIA14: Historic environment	0	0	0	0	0	0	0	0	0	0	--?
IIA15: Landscape and townscape	0	0	0	+	0	0	0	0	0	0	--?
IIA16: Efficient use of land and materials	+	0	+	++	+	+	0	0	0	0	++
IIA17: Flooding	0	0	0	+	0	0	0	0	0	0	--?
IIA18: Water	0	0	0	+	0	0	0	0	0	0	--?

6.109 The current baseline annual mean concentration of nitrogen dioxide, PM10 and PM2.5 at Meridian Hinterlands exceeds WHO guidelines. Further to this, the area has a relatively low PTAL rating and is not within close proximity of Major, District or Local Centres. Yet the increase in SIL sites is likely to contribute to increased traffic in the surrounding areas to the site

particularly due to an increase in employment. However, Policy DM E12: Meridian Hinterlands seeks to deliver a new mixed-use access route or corridor to establish connectivity between Meridian Water and Edmonton Marshes as well as the wider Lee Valley Regional Park. The provision of this route or corridor is likely to increase the amount of people taking public transport, or walking and cycling, rather than relying on personal vehicles, and so would minimise CO₂ emissions, in addition to air pollution. Therefore, the policy is expected to have minor positive effects in relation to **IIA1: climate change mitigation**, **IIA11: Air pollution** and **IIA12: Sustainable transport**.

6.110 Policy DM E8: Providing for workspaces is expected to have minor positive effects in relation to **IIA1: Climate change mitigation**, **IIA11: Air pollution** and **IIA12: Sustainable transport** because it supports the development of co-working spaces within Enfield's centres, where more people are located. Therefore, people are located within closer proximity of their workspaces and can more easily walk or cycle to work, which will minimise CO₂ emissions and air pollution. Policies SP E2: Promoting jobs and inclusive business growth and SP E4: Supporting offices are also expected to have minor positive effects in relation to these three objectives because they support development within town centres, which are within easy reach of a range of services and facilities, whilst also supporting remote working. Therefore, people would not need to rely on the private car as they could more easily walk or cycle to work, or work from home. Policy SP E5: Transforming Industrial Sites is expected to have a minor positive effect against these three objectives because it requires proposals to include walking and cycling links, which is expected to discourage use of the private car and minimise CO₂ emissions and air pollution. Policy DM E8: Providing for workspaces will also seek to provide co-working spaces and infrastructure to support home working, thereby contributing to a reduction in the need to travel and the use of private vehicles. Policy SP E3: Strategic Industrial Locations will seek to encourage the inclusion of land for sustainable transport functions within SIL development. As such, a minor positive effect is expected against IIA1, IIA11 and IIA12 in relation to this policy. In addition, Policy DM E11: Creating a smart and digitally connected Borough promotes access to high quality digital connectivity services in new developments. This would enable smart technology use and reduce the need to travel to work, especially following the COVID-19 pandemic which has seen a significant increase in numbers of people working from home. As such, there would be a reduction in numbers of journeys made within the Borough, helping minimise CO₂ emissions and pollution associated with use of the private car. Policy DM E11 is therefore expected to have a minor positive effect in relation to **IIA1: Climate change mitigation** and **IIA11: Air pollution**.

6.111 Policy DM E12: Meridian Hinterlands is expected to have a significant positive effect in relation to **IIA3: Housing** because although the focus of the policy is to promote the Meridian Hinterlands for employment-led redevelopment, the policy also seeks to release parts of Meridian Hinterlands from SIL designation to incorporate residential components. Minor positive effects are also anticipated in relation to **IIA5: Services and facilities** as the policy seeks to accommodate heavy industrial uses as well as lighter employment, including workshops and creative spaces, which may provide opportunities for training and skills development. Policy DM E12: Meridian Hinterlands is also likely to have a minor positive effect in relation to **IIA6: Social inclusion** as it is located within one of the 10% most deprived areas within England and therefore new employment-led development has the potential to help regenerate the area through intensified industrial development and a mixture of uses in accessible locations, with beneficial effects on social inclusion. Policy SP E2: Promoting jobs and inclusive business growth will support opportunities to encourage a broad-based economy, which serves the needs of residents and businesses through the growth of health and education sectors. As such, minor positive effects are expected against **IIA4: Health and wellbeing** and **IIA5: Services and facilities** in relation to this policy. Policy SP E5: Transforming Industrial Sites is expected to have a minor positive effect in relation to **IIA4: Health and wellbeing** because it requires proposals to incorporate walking and cycling links, in addition to integrating blue and green infrastructure networks, which will encourage more active travel choices as well as access to green space. Policies DM E10: Fostering a successful evening economy, DM E11: Creating a smart and digitally connected Borough and DM E12: Meridian Hinterlands are expected to have minor positive effects in relation to this objective because Policies DM E10 and DM E11 make reference to residential amenity, with Policy DM E10 requiring proposals to not create any unacceptable impact on neighbouring uses in terms of noise, traffic and disturbance taking account of the type and characteristics of other uses. Although not explicitly stated, the requirement under Policy DM E12 to direct heavier industrial uses and those that need round-the-clock operations into permanent SIL will have beneficial effects on residential amenity by taking disruptive development away from more sensitive areas, such as those containing residential development.

6.112 Policy DM E9: Local jobs, skills and local procurement requires development to provide appropriate work-based training and apprenticeships, which would contribute towards enhancing the employability of the resident population and help address social exclusion. Therefore, Policy DM E9 is expected to have a minor positive effect in relation to **IIA5: Services and facilities** and **IIA6: Social inclusion**. In addition, Policy SP E2: Promoting jobs and inclusive business growth seeks to provide co-working spaces and infrastructure to support home working, thereby allowing flexibility to support the employment of a wider range of people and different lifestyles and will seek to improve skills and training opportunities in order to facilitate investment

and job creation in the Borough. As such, a minor positive effect is expected against IIA6 in relation to this policy. Policy DM E10: Fostering a successful evening economy is also expected to have a minor positive effect in relation to IIA6 because it supports a socially inclusive evening economy within the Borough's Major and District centres, as well as outside Major and District centres such as in smaller centres and parks'.

6.113 All of the economic policies will contribute to the protection and enhancement of the local economy by aiming to attract and retain investment and ensure that opportunities for commerce and employment within LBE are secured. In particular, Policies SP E2: Promoting jobs and inclusive business growth and SP E3: Strategic Industrial Locations set out the Council's approach to supporting, protecting and enhancing the role and function of the Borough's employment locations and maximising the provision of employment floorspace and job creation. Policies SP E2 and Policy DM E8: Providing for workspaces also seek to provide co-working spaces and infrastructure to support home working, thereby allowing flexible employment and providing support for a variety of job types. Policy DM E11: Creating a smart and digitally connected Borough promotes the expansion of access to high quality digital connectivity services, which will stimulate economic growth within the Borough. Policy DM E12: Meridian Hinterlands will seek to provide improved economic opportunities at Meridian Water, to accommodate a diverse range of businesses, focusing on industrial-led regeneration. It is also stated that Ravenside and Kenninghall will be designated as SIL, further contributing towards economic opportunities. This policy intends to boost employment space by increasing density and consolidation, while also facilitating the creation of new residential units as part of the industrial-driven new LSIS, whilst Policy DM E6: Locally Significant Industrial Sites seeks to safeguard local business needs, supporting general and light industrial, storage and distribution, research and development and related sui generis uses in the LSIS. Similarly, Policy DM E7: Non-designated Industrial Sites seeks to protect general and light industrial, storage and distribution, research and development and related sui generis uses within non-designated industrial sites. The policy further states that redevelopment will not compromise the function, access, servicing or operation of any remaining or neighbouring employment uses and that in town centre locations, efforts have been made to accommodate employment floorspace as part of any redevelopment scheme. All of these policies are therefore expected to have significant positive effects in relation to **IIA9: Economy**.

6.114 Policies SP E4: Supporting offices and DM E8: Providing for workspaces will support office provision in the Borough's centres including at Meridian Water, thereby maintaining the vitality of these centres. Policy DM E10: Fostering a successful evening economy promotes the expansion of the Borough's evening economy within the Borough's Major and District centres and Meridian Water. As such, significant positive effects are expected against **IIA10: Town and local centres** in relation to these policies. By enabling development within town centre locations in the Borough, as well as supporting proposals that promote the diversification of town centre activities, Policy SP E2: Promoting jobs and inclusive business growth will protect and enhance the vitality and vibrancy of town centres within Enfield, resulting in a significant positive effect in relation to IIA11.

6.115 Policy SP E5: Transforming Industrial Sites is expected to have a minor positive effect in relation to **IIA13: Biodiversity** because it requires proposals within SILs and LSISs to provide environmental improvements and take opportunities to incorporate urban greening and sustainable drainage systems (SuDS) and integrate with and enhance blue and green networks.

6.116 Meridian Hinterlands is located within the Lea Valley SINC, yet no provision is made for mitigating the impacts of development on the SINC. The supporting text does, however, note that in relation to Hinterlands East, opportunities should be taken to introduce green infrastructure, linking to the adjacent Edmonton Marshes, to support improved biodiversity across the site. Further to this, a lot of the site is already built-up. Overall, therefore, Policy DM E12: Meridian Hinterlands is anticipated to have a minor negative effect in relation to **IIA13: Biodiversity**.

6.117 Policy DM E12: Meridian Hinterlands is anticipated to have significant negative effects in relation to **IIA14: Historic environment** and **IIA15: Landscape and townscape**, as the site receives significant negative scores in relation to these two objectives yet no mitigation is provided through the policy. The effects are uncertain, as the actual effects will depend on the final design, scale and layout of development. Policy SP E5: Transforming Industrial Sites is expected to have a minor positive effect in relation to **IIA15: Landscape and townscape** because it supports innovative design approaches to create a buffer and separation between any intensive uses and nearby sensitive uses, whilst also providing opportunities to incorporate urban greening and to enhance blue and green networks, with beneficial effects on the landscape.

6.118 Policies SP E2: Promoting jobs and inclusive business growth, SP E3: Strategic Industrial Locations, SP E4: Supporting offices, SP E5: Transforming Industrial Sites and Policy DM E12: Meridian Hinterlands all support the intensification of employment land, which is an efficient use of previously developed land. In particular, Policy SP E5 encourages the intensification of industrial uses within SILs and LSISs through the more efficient use of space, higher plot ratios, the development of multi-storey schemes, and the assembling of sites within designated employment areas to assist with the

delivery of more intensive formats. Policy SP E5 is expected to have a significant positive effect in relation to this **IIA15: Efficient use of land and materials**, while Policies SP E2 and SP E3 are likely to result in minor positive effects against this objective. Policy DM E12 supports the reconfiguration of SIL across the entire Meridian Water area to broadly maintain the overall quantum of SIL designated land through 'land swaps' and making the efficient use of SIL land by directing heavier industrial uses into permanent SIL, while directing lighter uses into LSIS parcels. This is likely to have a significant positive effect in relation to IIA16. Policy DM E6: Locally significant industrial Sites and Policy DM E7: Non-designated Industrial Sites are also anticipated to have a minor positive effect in relation to IIA16 because DM E6 safeguards existing industrial development and DM E7 protects general and light industrial, storage and distribution, research and development and related sui generis uses. The supporting text to DM E6 states that the policy promotes and protects LSIS as suitable employment locations suitable for industrial-type activities. This will ensure that land is optimised.

6.119 Policy SP E5: Transforming Industrial Sites is expected to have a minor positive effect in relation to **IIA17: Flooding** and **IIA18: Water** because it requires the incorporation of SuDS, which will help to mitigate flood risk whilst also helping prevent water contamination. Policy DM E12: Meridian Hinterlands is expected to have significant negative but uncertain effects in relation to **IIA17: Flooding** and **IIA18: Water** because the site is at risk of surface water flooding and contains watercourses, yet no mitigation is provided by the policy.

6.120 Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA7: Crime and community safety and IIA8: Road safety.

Recommendations

- Although it is acknowledged that Policy DM DE10: Conserving and enhancing heritage assets already provides mitigation (see 'Cumulative effects' section), this policy could identify measures for safeguarding heritage and conservation - perhaps by including a section on this within the Economy policies.
- Instead of outlining the need to deliver green infrastructure in the supporting text to the policies, they could contain wording on this and require green infrastructure delivery – although it is acknowledged that the 'Blue and green Enfield' policies already contain mitigation (see 'Cumulative effects' section).

Policy SP E1: Employment and growth

6.121 Most elements of Policy SP E1: Employment and growth have already been appraised elsewhere in this IIA Report. Specifically, the total provision of industrial and logistics floorspace and office floorspace is already set out under Policy SP SS1: Spatial strategy and so has been assessed in the appraisal of this spatial strategy policy in **Chapter 4** of this IIA Report. Many of the sites allocated under Policy SP E1 have also been appraised as part of the Place policies outlined in **Chapter 5** of this IIA Report. The policy-off IIA findings for the remaining sites allocated under Policy SP E1 are summarised in Table **6.10 overleaf**. These sites were appraised using the IIA assumptions set out in **Appendix B**. In the text following this table, consideration is given to the effects of mitigation outlined in the proforma for each of these sites within Appendix C of the Local Plan.

Table 6.10: IIA findings for the sites allocated outside of the placemaking areas allocated by Policy SP E1: Employment and growth

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	II4: Health and wellbeing	II5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water	
Other sites outside of the placemaking areas																																								
U.29	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	0	-	-	-	-	-	-	-	-	-	N/A	--?	0	--	--	++	0	++	0	--	--	--	
U.30	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	--	-	-	-	-	+	-	-	-	-	-	-	N/A	--?	-	0	-	++	0	++	--	--	--	--
U.31	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	--	-	-	-	-	+	0	-	-	-	-	-	N/A	--?	0	0	0	+	0	+	0	-	-	--
U.32	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	--	-	-	-	-	+	-	-	-	-	-	-	N/A	--?	0	0	0	+	0	+	-	-	--	--
U.33	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	++	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	-	--	-	-	-	-	-	N/A	--?	0	--	--	+	0	+	0	-	-	--
U.34	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	++	N/A	N/A	N/A	N/A	+	+	0	--	-	-	-	-	+	-	-	-	-	-	-	N/A	--?	0	--	--	+	0	+	0	-	-	0
U.35	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	0	-	-	-	-	--	-	-	-	-	-	N/A	--?	0	0	0	+	0	+	0	0	0	--
R.03	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	++	++	0	--	-	-	-	-	-	--	-	-	-	-	N/A	--	--?	0	--	--	++	0	++	-	--	--	--
R.04	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0	--	-	-	-	-	--	--	-	-	-	-	N/A	--	--?	N/A	N/A	--?	--	-	--	0	--	--	--
R.05	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	--	-	-	-	-	-	N/A	--	--?	0	--	--	++	0	++	0	--	--	--

IIA1: Climate change mitigation

6.122 Some of the site proformas in Appendix C of the Local Plan require improved pedestrian and cycle connectivity, which will help encourage more walking and cycling, and help reduce CO₂ emissions. Some of the proformas do, however, promote new vehicular routes, which will not contribute towards modal shift and potentially generate CO₂ emissions. Therefore, the design and infrastructure requirements contained in the site proformas have the potential to contribute both positively and negatively towards the achievement of this IIA objective. However, with regard to buildings and associated emissions, there is a reference in two of the site proformas (U.31 and U.34) to solar photovoltaics (PV), which are a renewable source of energy and so would help reduce emissions associated with the running of buildings.

IIA2: Climate change adaptation

6.123 There are no site-specific mitigation measures identified in Appendix C of the Local Plan that will contribute towards the achievement of this objective.

IIA3: Housing

6.124 There are no site-specific mitigation measures identified in Appendix C of the Local Plan that will contribute towards the achievement of this objective.

IIA4: Health and wellbeing

6.125 Some of the site proformas in Appendix C of the Local Plan require development to safeguard the amenity of residential occupiers and so will protect residential amenity, with beneficial effects on people's health and wellbeing. One of the sites, R.03, is also required by its proforma to deliver a new public open space and so will contribute significantly towards this objective.

IIA5: Services and facilities

6.126 There are no site-specific mitigation measures identified in Appendix C of the Local Plan that will contribute towards the achievement of this objective.

IIA6: Social inclusion

6.127 There are no site-specific mitigation measures identified in Appendix C of the Local Plan that will contribute towards the achievement of this objective.

IIA7: Crime and community safety

6.128 A number of proformas require high levels of visual permeability, which alongside active frontages that have the potential to reduce crime and improve feelings of safety, will increase ease of movement. This is particularly important at night and in open spaces where people may not feel particularly safe, and so will have beneficial effects on this objective.

IIA8: Road safety

6.129 Developers are required to allow sufficient space at development sites for safe highways access so as to improve road safety, and so will contribute towards the achievement of this objective. There is also a requirement in one of the proformas (U.34) for traffic management measures, which will help ensure that all road users, including pedestrians and cyclists, can move safely and efficiently. The mitigation measures outlined in the proformas and therefore expected to contribute towards better road safety.

IIA9: Economy

6.130 There are no site-specific mitigation measures identified in Appendix C of the Local Plan that will contribute towards the achievement of this objective, other than what has already been achieved through the allocation of employment sites in support of economic growth.

IIA10: Town and local centres

6.131 Improvements to the public realm and pedestrian permeability, as stipulated by a number of proformas, are likely to increase footfall, which will help support economic growth at the urban centres. This will help contribute more positively towards the achievement of this objective.

IIA11: Air pollution and IIA12: Sustainable transport

6.132 The effects of the site-specific mitigation outlined in Appendix C of the Local Plan on IIA11 and 12 are summarised together, due to the close linkages between air pollution and levels of car use.

6.133 A selection of the site proformas in Appendix C of the Local Plan require development to contribute towards increasing the provision of more direct and frequent bus services to improve connectivity to and from industrial areas, in addition to enhanced pedestrian and cycle connectivity (e.g. wider footpaths), including from nearby railway stations. This will encourage public transport use and walking/cycling, reducing reliance on the private car and associated air pollution. To support this, some of the proformas require the creation of pedestrian gateways, the delivery of streetscape improvements and the creation of linear open spaces, which will also facilitate pedestrian and cycle movement. High levels of visual permeability are also supported at street level and fact yard and loading spaces must be located away from the street and river edge, which will also increase pedestrian permeability and avoid these potential barriers to movement. Some of the proformas do, however, promote new vehicular routes and although this will ensure easy access to development sites, will not contribute towards modal shift. However, they also contain requirements to minimise the number of parking spaces available so as to promote more active and sustainable travel, which will have beneficial effects on these two objectives.

IIA13: Biodiversity

6.134 The proformas in Appendix C of the Local Plan require developers to explore opportunities for urban greening (including green roofs), tree planting and biodiversity improvements, including the retention of existing high value trees and the reinforcement of green buffers along the railway line, which form existing wildlife corridors. This will help mitigate any adverse 'policy-off' effects on biodiversity and lead to biodiversity improvements. The creation of linear open spaces and green links, as required by some of the proformas, will also contribute to biodiversity levels. There is also a requirement to reinforce green buffers along the railway line, which will positively contribute to existing wildlife corridors. One of the sites, R.03, is also required by its proforma to deliver ecological enhancements in strengthening the links between the Lee Valley Regional Park and Enfield Chase, together with the existing Wildlife Corridor and Metropolitan Site of Importance for Nature Conservation (SINC). It must also deliver a new public open space.

IIA14: Historic environment

6.135 Where relevant, the site proformas require development to give careful consideration to the historic environment, namely conservation areas and listed buildings. The design requirements contained in some of the site proformas are therefore expected to help mitigate any negative 'policy-off' effects expected as a result of development, in addition to contributing positively towards the achievement of this objective.

IIA15: Landscape and townscape

6.136 The proformas require streetscape improvements and although specific detail is not provided, this is likely to enhance the townscape with beneficial effects on this objective. Improvements to the public realm are supported, including the provision of trees, planting and street furniture, and the requirement for yard and loading spaces to be located away from the street and river edge so as to make the public realm a more attractive place to be. Existing building lines must be reinforced and where buildings border the river, careful consideration must be given to articulation, change of material, colour or window arrangements so as to add visual interest to this important frontage, in addition to considering the impact on long views from the east of the reservoirs. There are a number of proformas that seek to intensify sites by increasing building heights but a limit to the height of buildings is also applied, including not permitting tall buildings in unsuitable areas, so as to protect long views and minimise impacts on neighbouring lower rise buildings. There are also a few proformas stipulating that employment/industrial buildings must be articulated and broken down to avoid a large, single mass building. The design requirements outlined in the proformas for the employment sites are therefore expected to contribute positively towards this objective.

IIA16: Efficient use of land and materials

6.137 Although one of the employment sites, R.04, is located on greenfield land and the loss of this greenfield land cannot be mitigated, the site proformas generally require the provision of stacked industrial uses so as to make the most efficient use of available land, contributing positively towards this objective.

IIA17: Flooding

6.138 Where sites are considered to be at risk of flooding, Sustainable Drainage Systems (SuDS) should be introduced, which will help mitigate flood risk, including surface water flooding. This will help mitigate against any adverse 'policy-off' effects sites are expected to have in relation to this objective.

IIA18: Water

6.139 The site proformas require the introduction of SuDS on certain sites, which alongside flood risk mitigation will also help protect water quality and resources – helping mitigate any adverse 'policy-off' effects against this objective.

10. Town centres and high streets

6.140 The likely sustainability effects of the town centres and high streets policies in Chapter 10 of the Enfield Local Plan are set out in **Table 6.11** and described below the table.

Table 6.11: IIA findings for the town centres and high streets policies

IIA objective	SP TC1: Promoting town centres	SP TC2: Encouraging vibrant and resilient town centres	DM TC3: Floorspace above commercial premises	DM TC4: Markets	DM TC5: Meanwhile uses	DM TC6: Managing the clustering of town centres
IIA1: Climate change mitigation	+	+	+	0	0	0
IIA2: Climate change adaptation	0	0	0	0	0	0
IIA3: Housing	+	0	+	0	+	0
IIA4: Health and wellbeing	+	0	+	+	0	+
IIA5: Services and facilities	+	+	+	0	0	0
IIA6: Social inclusion	+	0	0	0	0	+
IIA7: Crime and community safety	+	+	+	0	0	0
IIA8: Road safety	0	0	0	0	0	0
IIA9: Economy	++	++	++	+	+	+
IIA10: Town and local centres	++	++	++	+	++	+
IIA11: Air pollution	+	+	+	0	0	+
IIA12: Sustainable transport	+	+	+	0	0	0
IIA13: Biodiversity	0	+	0	0	0	0
IIA14: Historic environment	+	+	0	0	+	0
IIA15: Landscape and townscape	+	+	0	+	+	+
IIA16: Efficient use of land and materials	++	++	++	0	0	0
IIA17: Flooding	0	0	0	0	0	0
IIA18: Water	0	0	0	0	0	0

6.141 Policy SP TC1: Promoting town centres is expected to have a minor positive effect in relation to **IIA1: Climate change mitigation** because it seeks to manage streets and spaces in a way that facilitates active travel, whilst promoting the use of public transport and reducing traffic. It also supports a diverse range of town centre uses, in addition to residential and employment development, which would reduce the need for people to travel longer distances via car to reach services and facilities, in addition to employment opportunities. Policies DP TC2: Encouraging vibrant and resilient town centres and DM TC3: Floorspace above commercial premises are also expected to have minor positive effects in relation to this objective because like

Policy SP TC1, SP TC2 seeks to contribute towards improving active and public transport, whilst both policies support a mix of uses within the town centres, reducing the need to travel. Policies SP TC1 and DM TC5 are also expected to have a minor positive effect in relation to **IIA3: Housing**. SP TC1 supports appropriate and balanced residential development in town centre locations within the Borough, whilst the supporting text to DM TC5 states that housing may for part of proposals be for meanwhile uses while land is awaiting longer-term housing development. A minor positive effect is also expected for Policy DM TC3 in relation to IIA3 because it does not support proposals that may result in the net loss of residential floorspace. Furthermore, the explanation text encourages residential uses above commercial premises in town centre locations to increase the numbers of people living within a sustainable location, while contributing towards the Borough's housing requirements.

6.142 Policy SP TC1: Promoting town centres supports active travel and a mix of uses within town centre locations, which will enable people to walk to a range of services and facilities, increasing levels of physical exercise. Policy DM TC4: Markets requires all proposals to include adequate arrangement measures to avoid or mitigate unreasonable impacts on residential amenity of adjoining and neighbouring occupiers, whilst Policy DM TC3: Floorspace above commercial premises requires no adverse effects on surrounding residential amenity and promotes the use of floorspace for leisure, intensive sport and recreation uses. Both policies likely to have beneficial effects on people's health and wellbeing. Policy DM TC6: Managing the clustering of town centres limit the concentration of proposals for establishing services such hot food takeaways and betting shops in town centres likely to have a beneficial effect on people's health and wellbeing, particularly those who may be more vulnerable than others. Therefore, all three policies are expected to have a minor positive effect in relation to **IIA4: Health and wellbeing**.

6.143 Policies SP TC1: Promoting town centres, SP TC2: Encouraging vibrant and resilient town centres and DM TC3: Floorspace above commercial premises are expected to have minor positive effects in relation to **IIA5: Services and facilities** as they seek to provide good access to a competitive range of services and facilities in the Borough. Policy SP TC1 is also expected to have a minor positive in relation to **IIA6: Social inclusion** because it seeks to create a inviting public spaces through public realm improvements and cultural attractions, in addition to encouraging better connected communities, which will have beneficial effects on social cohesion. Enhancing characteristics and features that make a positive contribution to the locality may also increase the level of human activity, which may help to address social isolation in the Borough. This is because town centre locations can play an important role for local people in terms of providing for meeting spaces and allowing for informal interactions to occur. Policy DM TC6: Managing the clustering of town centres is also expected to have a minor positive effect in relation to IIA6 because it states that all development should actively contribute to the delivery of inclusive and mixed communities.

6.144 Policies SP TC1: Promoting town centres, DP TC2: Encouraging vibrant and resilient town centres and TC3 Floorspace above commercial premises are expected to have minor positive effects in relation to **IIA7: Crime and community safety**. This is because Policy SP TC1 seeks to create a safe environment through public realm improvements and cultural attractions which activate the street, whilst Policy SP TC2 seeks to address anti-social behaviour and crime. Policy DM TC3: Floorspace above commercial premises has the potential to help increase the perception of safety by requiring access to residential upper floors to be via the principal elevation and integrated into the shopfront, increasing natural surveillance in commercial areas. Creating safe places which deter crime and reduce the fear of crime is expected to help ensure public safety in these areas and along active transport routes.

6.145 Significant positive effects are expected for Policies SP TC1: Promoting town centres, DP TC2: Encouraging vibrant and resilient town centres and DM TC3: Floorspace above commercial premises against **IIA9: Economy** and **IIA10: Town and local centres** because they promote economic growth in the Borough, particularly at town centre locations. Policy SP TC1 focuses investment within and around town centres, whilst Policy DP TC2 requires key centres within the Borough (i.e. Enfield Town Centre) to accommodate a diverse range of town centre and community uses, in addition to residential and employment development. Policy DM TC3 actively encourages the re-use and refurbishment of the upper floors of shops and/or commercial premises within Enfield's town centres, which may attract more people to the area and increase footfall. Policy DM TC5: Meanwhile uses is expected to have a significant positive effect in relation to IIA10 because it supports the expansion of temporary uses (e.g. creative, exhibition and performance spaces) in town and local centres, which would diversify the range of uses within the urban cores. Policies DM TC4: Markets and DM TC6: Managing the clustering of town centres are expected to have minor positive effects in relation to **IIA10: Town and local centres** because new markets could increase footfall within town and local centres and Policy DM TC6 supports the vitality and viability of the Borough's town centres through a mix of development – all of which would have beneficial effects on the economy. For this reason, both policies are expected to have minor positive effects against **IIA9: Economy**. Policy DM TC5 is also expected to have a minor positive effect in relation to this objective as it seeks to provide positive activation of sites for economic benefits to the area.

6.146 Policies SP TC1: Promoting town centres, SP TC2: Encouraging vibrant and resilient town centres and DM TC3: Floorspace above commercial premises will help promote a modal shift away from the private car by promoting active travel through delivering a mix of uses all in one place, helping to minimise air pollution. The potential for a modal shift in transport choices is likely to help limit the release of air pollutants arising from transport emissions. Benefits for certain groups in the Borough who are likely to be particularly vulnerable to air pollution are likely to be most pronounced. This includes younger, older, and pregnant people and those with cardiovascular or respiratory illnesses. Therefore, all three policies are expected to have minor positive effects in relation to **IIA12: Sustainable transport** and **IIA11: Air pollution**. A minor positive effect is also expected for Policy DM TC6: Managing the clustering of town centres in relation to IIA11 as the policy supports the provision or expansion of banqueting suites in town centres providing that the development has adequate servicing arrangements and does not result in an increase of on-street parking and traffic congestion in the surrounding area.

6.147 Policy SP TC2: Encouraging vibrant and resilient town centres is expected to have a minor positive effect in relation to **IIA13: Biodiversity** because the policy promotes urban greening and enhancing links to blue and green networks.

6.148 A minor positive effect is expected against **IIA14: Historic environment** and **IIA15: Landscape and townscape** with respect to Policies SP TC1: Promoting town centres and SP TC2: Encouraging vibrant and resilient town centres as both policies seek to preserve and enhance the historic environment. Policy DM TC5: Meanwhile uses is also expected to receive a minor positive effect in relation to IIA14 as it makes direct reference to The Heritage Strategy as a consideration when deciding on the development of creative, exhibition and performance spaces for meanwhile use. Further to this, a minor positive is anticipated for Policy DM TC5: Meanwhile uses in relation to IIA15 because it would reduce the number of vacant units with town centres, enhancing the townscape. A minor positive effect is also expected for Policies DM TC4: Markets and DM TC6: managing the clustering town centres as DM TC4 requires no negative impacts on the appearance or functioning of the public realm, whilst DM TC6 only supports development in town centres that will not cause harm to the character of the area.

6.149 Policies SP TC1: Promoting town centres, SP TC2: Encouraging vibrant and resilient town centres and DM TC3: Floorspace above commercial premises are expected to have significant positive effects in relation to **IIA16: Efficient use of land and materials** because they promote an efficient use of land within the Borough. Policy SP TC1 seeks to optimise the use of land around town centres, whilst Policy DM TC3 encourages a vertical mix of uses within vacant shops and other commercial premises. Policy SP TC2: Encouraging vibrant and resilient town centres seeks to maximise proposals for town centre uses in designated centres and actively supports co-working spaces in town and local centre locations, making efficient use of land.

6.150 Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA8: Road safety, IIA17: Flooding and IIA18: Water.

Recommendations

- No recommendations.

11. Rural Enfield

6.151 The likely sustainability effects of the rural Enfield policies in Chapter 11 of the Enfield Local Plan are set out in **Table 6.12** and described below the table.

Table 6.12: IIA findings for the rural Enfield policies

IIA objective	DM RE1: Character of the Green Belt and open countryside	DM RE2: Improving access to the countryside and green corridors	SP RE3: Supporting the rural economy	DM RE4: Farm diversification and rural employment
IIA1: Climate change mitigation	0	++	+	+
IIA2: Climate change adaptation	0	0	0	0

IIA objective	DM RE1: Character of the Green Belt and open countryside	DM RE2: Improving access to the countryside and green corridors	SP RE3: Supporting the rural economy	DM RE4: Farm diversification and rural employment
IIA3: Housing	-	0	0	0
IIA4: Health and wellbeing	+	++	+	+
IIA5: Services and facilities	0	++	+	+
IIA6: Social inclusion	0	+	0	+
IIA7: Crime and community safety	0	0	0	0
IIA8: Road safety	0	+	+	0
IIA9: Economy	-	0	++	0
IIA10: Town and local centres	0	0	0	0
IIA11: Air pollution	0	++	+	+
IIA12: Sustainable transport	0	++	+	+
IIA13: Biodiversity	+	0	+	+
IIA14: Historic environment	++	++	0	+
IIA15: Landscape and townscape	++	0	+	+
IIA16: Efficient use of land and materials	0	0	+	0
IIA17: Flooding	0	0	0	0
IIA18: Water	0	0	0	0

6.152 Policy DM RE2: Improving access to the countryside and green corridors will seek to ensure that new development protects, maintains and improves walking and cycling routes in the Borough and is therefore likely to encourage the use of more sustainable and active modes of travel. As such, Policy DM RE2 is expected to have significant positive effects in relation to **IIA1: Climate change mitigation, IIA11: Air pollution and IIA12: Sustainable transport**.

6.153 Policy SP RE3: Supporting the rural economy will seek to prevent development that results in a significant increase in the use of private vehicles and supports development which facilitates the use of sustainable transport, while Policy DM RE4: Farm diversification and rural employment will support proposals involving a diversification of use from agriculture to other business uses or sport and recreational activities provided the proposed use does not generate a significant number of additional vehicle trips. Therefore, minor positive effects are expected against IIA1, IIA11 and IIA12 in relation to these policies.

6.154 Policy DM RE1: Character of the Green Belt and open countryside sets out the Council's approach to preventing development adjoining to or within close proximity to the Green Belt. As such, this policy could restrict the delivery of housing in certain parts of the Borough, with a minor negative effect expected against **IIA3: Housing** in relation to this policy.

6.155 Policy DM RE1: Character of the Green Belt and open countryside seeks to ensure that new development adjoining to or in close proximity to the Green Belt enhances the blue and green infrastructure network through better connectivity and the

creation of new publicly accessible open spaces, as well as complementing and improving the quality of existing open spaces. As such, a minor positive effect is expected against **IIA4: Health and wellbeing** in relation to this Policy.

6.156 Policy DM RE2: Improving access to the countryside and green corridors will support new development which will improve public access to key attractions such as the Lee Valley Regional Park, Enfield Chase, Forty Hall, Capel Manor and Chingford Reservoirs, as well as creating interconnected routes with extensions to open spaces along the river corridors, including the Lee Navigation, New River Path and Green Loop. The policy will also support enhancements to the strategic link route for cyclists, equestrians and pedestrians, thereby facilitating access to green spaces and encouraging active recreation. As such, significant positive effects are expected against **IIA4: Health and wellbeing** and **IIA5: Services and facilities**, while a minor positive effect is expected against **IIA6: Social inclusion** in relation to this policy. Policy SP RE3: Supporting the rural economy will seek to support rural business growth and enterprise initiatives which support community development. Furthermore, it seeks to support development of outdoor facilities for sport and recreational activities. As such, minor positive effects are expected against **IIA4: Health and wellbeing** and **IIA5: Services and facilities** in relation to this policy.

6.157 Policy DM RE4: Farm and agricultural diversification outlines the Council's approach to agricultural land uses and will support proposals involving a change of use from agriculture to other ecological, business, tourism, or sport and recreation uses, subject to certain criteria being met. By supporting the provision of outdoor and indoor sport and leisure development, the policy is likely to improve access to these services and facilities, with beneficial effects on the physical health and mental wellbeing of the population. Policy DM RE4 will also support proposals which promote sustainable agriculture and public participation in food growing, particularly those that contribute to education, training and the development of local supply chains. Therefore, minor positive effects are expected against **IIA4: Health and wellbeing**, **IIA5: Services and facilities** and **IIA6: Social inclusion** in relation to Policy DM RE5.

6.158 Policy DM RE2: Improving access to the countryside and green corridors seeks to ensure that walking and cycling routes in the Borough meet the needs of different users. As such, minor positive effects are expected against **IIA8: Road safety** in relation to this policy. In addition, Policy SP RE3: Supporting the rural economy will seek to ensure that development proposals in rural areas provide safe access to the highway network, resulting in a minor positive effect against **IIA8**.

6.159 Policy DM RE1: Character of the Green Belt and open countryside sets out the Council's approach to preventing inappropriate development adjoining to or within close proximity of the Green Belt. As such, this policy is also likely to restrict the delivery of employment development in certain parts of the Borough, with a minor negative effect expected against **IIA9** in relation to this policy. Policy SP RE3: Supporting the rural economy will support proposals which seek to improve the balance of job opportunities in rural areas and promote economic diversification, enabling local employment and further economic development in these areas. As such, a significant positive effect is expected against **IIA9: Economy** in relation to this policy.

6.160 Policy DM RE1: Character of the Green Belt and open countryside seeks to ensure that development adjoining to or in close proximity to the Green Belt conserves nature and contributes to environmental improvements in the Borough through the establishment or extension of the Borough's network of greenways and green corridors as well as the provision of trees along transport routes where possible. The policy also states that development will be expected to provide environmental enhancements where feasible.

6.161 Policy DM RE2: Improving access to the countryside and green corridors will support development proposals that protect and enhance green and open spaces in the Borough and improve interconnection between these spaces, thereby protecting biodiversity and delivering biodiversity enhancements by promoting the creation of ecological networks. Similarly, Policy SP RE3: Supporting the rural economy supports initiatives which safeguard the natural environment and foster comprehensive sustainable outcomes. As such, minor positive effects are expected against **IIA13: Biodiversity** in relation to these policies.

6.162 Policy DM RE4: Farm and agricultural diversification seeks to ensure that proposals involving a change of use or diversification of farms do not have any detrimental impact on designated and non-designated heritage assets (including their setting) as a result of development and will therefore contribute towards the protection and conservation of heritage assets in the Borough. The policy also seeks to ensure that proposals do not have any detrimental impact on nature conservation or wildlife habitats and seeks to ensure that proposals contribute to regeneration and strategic policy priorities such as landscape restoration, culture and tourism. As such, minor positive effects are expected against **IIA13: Biodiversity** and **IIA14: Historic environment**. In addition, Policy DM RE4 states that the proposals involving a change of use from agriculture will be supported where adequate landscaping and screening is provided to minimise any potential visual impacts. As such, the policy will contribute towards the protection and enhancement of the local landscape and a minor positive effect is expected against **IIA15: Landscape and townscape**.

6.163 Policy DM RE1: Character of the Green Belt and open countryside seeks to ensure that new development adjoining to or within close proximity of the Green Belt reinforces and better reveals the character, appearance and significance of designated or non-designated heritage assets and the historic landscape, whilst also enhancing the blue and green infrastructure network in Enfield. As such, a significant positive effect is expected against **IIA14: Historic environment** in relation to this policy. Policy DM RE2: Improving access to the countryside and green corridors will support development which provides or enhances way-finding across the Borough's network of walking and cycling routes, including heritage trails and discovery walks. It also seeks to preserve and enhance the character of historic routes and vistas. Therefore, the policy also is likely to result in a significant positive effect against **IIA14: Historic environment**.

6.164 Policy DM RE1: Character of the Green Belt and open countryside will ensure that new development does not detract from the open character of Green Belt and surrounding landscape. The policy includes measures to ensure that development does not have a detrimental impact on the visual amenity of the landscape and Green Belt and retains a clear distinction between the Green Belt and the edge of the urban area. As such, Policy DM RE1 is expected to have a significant positive effect against **IIA15: Landscape and townscape**. Policy DM RE2: Improving access to the countryside and green corridors will promote development that improves public access to key attractions and the connections between them, including links to important viewing points. As such, Policy DM RE2 is expected to have a minor positive effect against IIA15.

6.165 Policy SP RE3: Supporting the rural economy will seek to prevent the development of incongruous or isolated new buildings and therefore will ensure that development respects the local surroundings and landscape character. As such, a minor positive effect is expected against IIA15 in relation to this policy.

6.166 Policy SP RE3: Supporting the rural economy will support proposals for the reuse of unused existing buildings before new buildings will be considered for development, resulting in a minor positive effect against **IIA16: Efficient use of land and materials**.

6.167 Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA7: Crime and community safety, IIA10: Town and local centres, IIA17: Flooding and IIA18: Water.

Recommendations

- No recommendations.

12. Culture, leisure and recreation

6.168 The likely sustainability effects of the culture, leisure and recreation policies in Chapter 12 of the Enfield Local Plan are set out in **Table 6.13** and described below the table.

Table 6.13: IIA findings for the culture, leisure and recreation policies

IIA objective	SP CL 1: Promoting culture and creativity	DM CL2: Leisure and tourism	DM CL3: Visitor accommodation	SP CL4: Promoting sporting excellence	DM CL5: Sport, open space and recreation	DM CL6: Protecting and attracting public houses
IIA1: Climate change mitigation	+	0	+	+	+	0
IIA2: Climate change adaptation	0	0	0	+	0	0
IIA3: Housing	0	0	+	0	0	0
IIA4: Health and wellbeing	+	+	+	++	++	0
IIA5: Services and facilities	+	0	0	+	++	++

IIA objective	SP CL1: Promoting culture and creativity	DM CL2: Leisure and tourism	DM CL3: Visitor accommodation	SP CL4: Promoting sporting excellence	DM CL5: Sport, open space and recreation	DM CL6: Protecting and attracting public houses
IIA6: Social inclusion	+	+	0	++	++	+
IIA7: Crime and community safety	0	0	+	+	0	0
IIA8: Road safety	0	0	+	0	0	0
IIA9: Economy	+	++	++	+	+	0
IIA10: Town and local centres	++	++	0	0	+	++
IIA11: Air pollution	+	0	+	+	+	++
IIA12: Sustainable transport	+	0	+	+	+	0
IIA13: Biodiversity	0	+	0	+	+	0
IIA14: Historic environment	0	0	0	+	0	+
IIA15: Landscape and townscape	0	+	+	+	0	0
IIA16: Efficient use of land and materials	+	+	+	0	0	0
IIA17: Flooding	0	0	0	0	+	0
IIA18: Water	0	+	0	0	0	0

6.169 Policies SP CL1: Promoting culture and creativity, DM CL3: Visitor accommodation and DM CL5: Sport, open space and recreation are expected to have minor positive effects in relation to **IIA1: Climate change mitigation** as they will promote walking, cycling and the use of public transport by focusing development in accessible locations, which is expected to reduce CO₂ emissions associated with the car. Policy SP CL4: Promoting sporting excellence is also expected to have a minor positive effect against this objective, as it will seek to encourage the use of public transport options.

6.170 Policy SP CL4: Promoting sporting excellence will support the development of sports, recreation and leisure facilities, provided that associated landscaping includes provisions to promote climate change resilience. As such, a minor positive effect is expected against **IIA2: Climate change adaptation** in relation to this Policy.

6.171 Policy DM CL3: Visitor accommodation is expected to have a minor positive effect in relation to **IIA3: Housing** because it seeks to avoid the net loss of existing housing within the Borough.

6.172 Policy DM CL2: Leisure and tourism will support proposals that increase the contribution that tourism, arts and cultural heritage and sports make to the quality of life and social well-being of the Borough's residents. Policy DM CL2 will also seek to promote proposals that make greater use of rural parts of Enfield and the Lee Valley as a leisure and recreational resource, provided that they do not negatively harm biodiversity or water quality. Therefore, the policy is likely to result in improved access to such facilities and is expected to result in minor positive effects against **IIA4: Health and wellbeing** and **IIA6: Social inclusion**, as well as **IIA13: Biodiversity** and **IIA18: Water**. Policy SP CL1: Promoting culture and creativity supports proposals which promote culture and creativity in line with the objectives within the Cultural Strategy for Enfield. The health benefits of arts and culture are frequently cited within the Strategy with respect to the community cohesion that culture can create. This has

numerous health benefits, from combatting loneliness, to aiding recovery from physical and mental illness. As such, this policy is likely to have a minor positive effect against **IIA4: Health and wellbeing** and **IIA6: Social Inclusion**.

6.173 Policy SP CL4: Promoting sporting excellence will support proposals which contribute to the objectives of the Enfield Health and Well Being Strategy, including the provision of publicly accessible sport and leisure facilities within public parks and a hierarchy of priority locations at and within the vicinity of Tottenham Hotspur's football club, training centre, Hotspurs Way, Whitewebbs Lane, Land at Picketts Lock, Enfield Playing Fields and Firs Farm. Policy SP CL4 will also seek to support development proposals that deliver community access and education improvements to all sectors of the community, as well seeking opportunities to protect, expand, and improve the quality and condition of Enfield's sport and physical health facilities. As such, this policy is likely to address the deficiency of open space in the Borough, resulting in significant positive effects against **IIA4: Health and wellbeing**, **IIA5: Services and facilities** and **IIA6: Social inclusion**. Policy DM CL3: Visitor accommodation is also expected to have a minor positive effect in relation to **IIA4: Health and wellbeing** because it seeks to maximise opportunities for walking and cycling. Policy DM CL5: Sport and recreation is expected to have significant positive effects against IIA4, IIA5 and IIA6, as it will support the creation of new sports facilities and enhancement of existing ones, specifically where a need has been identified and resist the loss of sports and recreational buildings and land, thereby encouraging more active and healthy lifestyles. The policy will also seek to ensure improvements to open space provision, the deficiency of which has been identified as a key sustainability issue in Enfield. Furthermore, Policy DM CL5 will also seek to ensure that the development of artificial pitches do not have an adverse impact on the amenity of local residents in terms of noise and light pollution.

6.174 Policy DM CL6: Protecting and attracting public houses sets out the Council's approach to the conservation and provision of public houses in the Borough and will seek to ensure that they are protected for their important community, social and economic role in local communities, with a presumption in favour of the retention of public houses and bars in Enfield. As such, the policy is likely to maintain and improve access to such community services and encourage social inclusion, resulting in a significant positive effect against **IIA5: Services and facilities** and a minor positive effect against **IIA6: Social inclusion**. The effect against IIA6 is minor, as the provision of pubs does not meet the needs of all (e.g. for religious reasons).

6.175 Policy SP CL1: Promoting culture and creativity is expected to have a minor positive effect in relation to **IIA5: Services and facilities** as it seeks to provide good access to a competitive and diverse range of services and facilities in the Borough, including community facilities. In addition, this policy is likely to create a more attractive public realm as it supports the provision of cultural infrastructure, new entertainment uses and public art installations. This further supports the minor positive effect already recorded for this policy against **IIA6: Social inclusion**.

6.176 Policy DM CL3: Visitor accommodation is expected to have minor positive effects in relation to **IIA7: Crime and community safety**. This is because Policy DM CL3 states that proposals must provide active ground floor frontages to the public realm, particularly in town centre locations, which is likely to improve safety through 'eyes on the street'. In addition, this policy will seek to ensure that drop off and pick up arrangements appropriate to the size and location of the accommodation are provided within proposals for visitor accommodation. Therefore, a minor positive effect is expected against **IIA8: Road safety** in relation to this policy.

6.177 A significant positive effect is expected against **IIA9: Economy** in relation to Policy DM CL2: Leisure and tourism while a minor positive effect is expected in relation to Policy SP CL1: Promoting culture and creativity. Policy SP CL1 will promote economic growth in the Borough through the provision of cultural infrastructure and creative workspace, particularly within the Borough's town centres, and will support creative industry uses in Strategic Industrial Locations and Locally Significant Industrial Sites, at the same time as protecting and enhancing locations for culture and performance activities and festivals, including the arts, which tend to be centred around the town and district centres. Similarly, Policy DM CL2 will support the provision of visitor attractions, accommodation and facilities for tourism and business, and the prevention of the loss of existing visitor, leisure and cultural attractions, particularly within main town centres. As such, significant positive effects are expected against **IIA10: Town and local centres** in relation to policies SP CL1 and DM CL2. Policy DM CL3: Visitor accommodation is expected to have a significant positive effect in relation to **IIA9: Economy**, as it seeks to prevent the loss of important visitor economy facilities for, including visitor accommodation, and promotes the provision of visitor accommodation in the Borough which would have beneficial effects on the local tourism industry. In addition, Policy SP CL4: Promoting sporting excellence seeks to expand and improve the provision of sport and leisure facilities in Enfield (which respects the professional sporting function of the Tottenham Hotspurs Training Centre), which is likely to attract visitors to the Borough and provide benefits to the tourism industry and other commercial activity. Similarly, DM CL5: Sport, open space and recreation promotes proposals for the development or

enhancement of sports facilities where a need has been identified, particularly in or close to town centres and easily accessible locations. As such, a minor positive effect is expected against IIA9 in relation to policies SP CL4 and DM CL5.

6.178 Policy DM CL6: Protecting and attracting public houses will ensure that the loss of public houses and their associated economic value is avoided and will result in the refusal of proposals which affect the operational and ancillary amenity space of a public house. The policy will also encourage proposals involving new public houses within town centre locations and other easily accessible locations in order to promote the evening economy, thereby maintaining the vitality and vibrancy of the Borough's centres. As such, significant positive effects are expected against **IIA9: Economy** and **IIA10: Town and local centres**.

6.179 Both Policy SP CL1: Promoting culture and diversity and Policy DM CL3: Visitor accommodation will promote walking and cycling, in addition to use of public transport. Therefore, the policies will promote a modal shift away from the private car, which would reduce vehicular emissions and thus improve air quality. The potential for a modal shift in transport choices is likely to help limit the release of air pollutants arising from transport emissions. Benefits for certain groups in the Borough who are likely to be particularly vulnerable to air pollution are likely to be most pronounced. This includes younger, older, and pregnant people and those with cardiovascular or respiratory illnesses. For this reason, the policies are expected to have minor positive effects in relation to **IIA11: Air pollution** and **IIA12: Sustainable transport**. Policy SP CL4: Promoting sporting excellence will seek to ensure that the development of sports, recreation and leisure facilities includes improvements to the site's connectivity with the surrounding public transport network and supports opportunities to improve public transport and active travel connections from Enfield's sport and physical health facilities to residential areas and open spaces in line with the Playing Pitch Strategy and Blue and Green Strategy.

6.180 In addition, Policy DM CL5: Sport, open space and recreation will seek to ensure that developments that enhance or provide open space, sport and leisure facilities are well-connected to public transport and facilitate pedestrian and cycling movement. As such, minor positive effects are also expected against IIA11 and IIA12 in relation to policies SP CL4 and DM CL5.

6.181 Policy SP CL4: Promoting sporting excellence will support the development of sports, recreation and leisure facilities. Although development could have adverse effects on biodiversity, development will only be permitted where associated landscaping includes provisions to promote biodiversity, in addition to preserving and enhancing existing watercourses, ponds, trees and other biodiversity features. As such, a minor positive effect is expected against **IIA13: Biodiversity** in relation to this policy. In addition, Policy DM CL5: Sport, open space and recreation requires proposals to enhance the biodiversity of the site, contributing to the objectives identified in the Enfield Biodiversity Action Plan. Therefore, a minor positive effect is also expected against IIA13 in relation to this Policy.

6.182 Policy SP CL4: Promoting sporting excellence will seek to ensure that the development of sports, recreation and leisure facilities does not result in unacceptable visual and landscaping impacts and protects important views and gaps such as those from Forty Hall Conservation Area. The policy will also seek to preserve and enhance parts of the Registered Parks and Gardens of Myddleton Hall as well as the local heritage assets of Myddleton and Whitewebbs Park. As such, minor positive effects are expected against **IIA14: Historic environment** and **IIA15: Landscape and townscape**.

6.183 Policy DM CL6: Protecting and attracting public houses sets out the Council's approach to the conservation and provision of public houses in the Borough and will seek to ensure that the appearance and character of public house buildings, including any features of historic or cultural significance, are not adversely affected. As such, a minor positive effect is expected against **IIA14: Historic environment** in relation to Policy DM CL6.

6.184 Policy DM CL2: Leisure and tourism will support proposals for tourism and leisure developments that bring benefits to local businesses, communities and visitors in rural areas provided that they respect the size, character and function of their setting. As such, a minor positive effect is expected against **IIA15: Landscape and townscape** in relation to Policy DM CL2. In addition, Policy DM CL3: Visitor accommodation will support proposals which protect and deliver growth in the visitor economy provided that they meet certain criteria such as being proportionate to their location in terms of size, scale and function. The policy states that proposals will be supported where they are sympathetic to the character of the area, but also capable of creating modern and fit-for-purpose spaces that reflect current needs. Therefore, the policy is likely to ensure that the local landscape and townscape is protected, resulting in a minor positive effect against IIA15.

6.185 Policy DM CL2: Leisure and tourism will also support the re-use of suitable rural buildings for visitor accommodation and other small scale rural development, resulting in a minor positive effect against **IIA16: Efficient use of land and materials**. In

addition, Policy DM CL3: Visitor accommodation will support proposals for the conversion of existing buildings to accommodate visitors in the rural parts of Enfield, especially within Enfield Chase and Lee Valley Regional Park, and Policy SP CL1: Promoting culture and creativity seeks the provision of cultural infrastructure or creative workspace through the re-use of existing facilities. As such, a minor positive effect is expected against IIA16 in relation to both Policy DM CL3 and SP CL1.

6.186 A minor positive effect is expected against **IIA17: Flooding** in relation to Policy DM CL5: Sport, open space and recreation as it will seek to ensure that developments for the provision of open space, sport and leisure facilities integrate sustainable urban drainage systems into the design and layout.

6.187 The IIA findings for the sites allocated under Policy SP CL4: Promoting sporting excellence are summarised in **Table 6.14** overleaf.

Recommendations

- No recommendations.

Table 6.14: IIA findings for the sites allocated under Policy SP CL4: Promoting sporting excellence

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a GP surgeries	4b Access to recreation	4c Loss of recreation	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a Access to employment	9b Safeguarding employment land	9c Employment provision	IIA9: Economy	IIA10: Town and local centres	11a NO ₂ pollution	11b PM10 pollution	11c PM2.5 pollution	IIA11: Air pollution	12a Sustainable transport	12b Services and facilities	IIA12: Sustainable transport	13a International and national biodiversity and geodiversity assets	13b Locally designated wildlife sites, Priority Habitats and Ancient Woodland	IIA13: Biodiversity	14a Proximity to historic assets: sites within existing settlements	14b Proximity to historic assets: sites outside of existing settlements	IIA14: Historic environment	15a Landscape and townscape	15b Open space	IIA15: Landscape and townscape	16a Brownfield/greenfield land	16b Agricultural Land Classification	IIA16: Efficient use of land and materials	17a Flood zones	17b Surface water flood risk	IIA17: Flooding	IIA18: Water
Policy SP CL4: Promoting sporting excellence																																							
R.06	N/A	N/A	N/A	N/A	++	N/A	++	N/A	++	N/A	N/A	N/A	--	N/A	--	0	--	-	-	-	--	N/A	--	-	--	--	N/A	--	0?	0	--	--	--	0	-	0	--	--	--
R.07	N/A	N/A	N/A	N/A	++	N/A	++	N/A	0	N/A	N/A	N/A	0	N/A	0	0	--	-	-	-	--	N/A	--	-	++	++	N/A	--	--?	+	+	+	--	-	--	0	+	+	--

13. Movement and connectivity

6.188 The likely sustainability effects of the movement and connectivity policies in Chapter 13 of the Enfield Local Plan are set out in **Table 6.15** and described below the table.

Table 6.15: IIA findings for the movement and connectivity policies

IIA objective	SP T1: Promoting a sustainable and decarbonised transport system	DM T2: Forming a healthy and connected Enfield	DM T3: Constructing a vibrant and safe Enfield for everyone
IIA1: Climate change mitigation	++	++	++
IIA2: Climate change adaptation	0	0	0
IIA3: Housing	0	0	0
IIA4: Health and wellbeing	+	+	+
IIA5: Services and facilities	+	+	+
IIA6: Social inclusion	+	+	+
IIA7: Crime and community safety	0	0	0
IIA8: Road safety	++	++	++
IIA9: Economy	0	0	0
IIA10: Town and local centres	0	0	0
IIA11: Air pollution	++	++	++
IIA12: Sustainable transport	++	++	++
IIA13: Biodiversity	0	0	0
IIA14: Historic environment	0	0	0
IIA15: Landscape and townscape	0	0	0
IIA16: Efficient use of land and materials	0	+	0
IIA17: Flooding	0	0	0
IIA18: Water	0	0	0

6.189 All of the above policies are expected to have a significant positive effect in relation to **IIA1: Climate change mitigation** because each of the policies promote measures that encourage a substantial shift from private car journeys to active and more sustainable transport modes, including increasing cycling, walking and the use of public transport. Policy SP T1: Promoting a sustainable and decarbonised transport system supports mitigation of road-based transport to minimise industrial / commercial emissions and encourages the maximum use of alternative modes, Policy DM T2: Forming a healthy and connected Enfield

seeks to limit the availability of parking by including measures which reduce parking demand, such as car clubs and supporting integrated and well-designed walking and cycling routes, whilst Policy T3: Constructing a vibrant and safe Enfield for everyone seeks to ensure that development is designed as car-free or offer a very low level of parking provision and is well connected by public transport with active travel opportunities. Policies SP T1, DM T2 and DM T3 therefore seek to reduce reliance on the private car and encourage alternative sustainable transport opportunities, which will in turn help minimise CO₂ emissions and as such, are also expected to receive a significant positive effect in relation to **IIA11: Air Pollution** and **IIA12: Sustainable Transport**.

6.190 All the above policies are anticipated to have minor positive effects in relation to **IIA4: Health and wellbeing** as each of the policies encourage physical exercise through walking and cycling, which has beneficial effects on people's health. Improved air quality through encouraging sustainable transport use will also benefit public health, particularly the health of younger and older people with cardiovascular or respiratory problems, as well as pregnant women. The provision of an appropriate low level of car parking spaces under Policy SP T3: Constructing a vibrant and safe Enfield for everyone would also benefit those whose mobility is impaired and rely on private car use, limiting potential social isolation in the Plan area. These policies would therefore have positive effects in relation to the protected characteristics of age, disability, and pregnancy and maternity.

6.191 All the above policies will increase travel choice and improve sustainable transport connectivity, which could help improve access to everyday services and facilities. Policy SP T1: Promoting a sustainable and decarbonised transport system seeks to invest in new and planned transport, with the intention to significantly increase the proportion of journeys via walking, cycling and public transport, DM T2: Forming a healthy and connected Enfield seeks to encourage a modal shift by improving walking access and routes to local services, including schools and retail locations whilst DM T3: Constructing a vibrant and safe Enfield for everyone seeks to achieve 20 minute accessibility to destinations and services from developments through the implementation of a Transport Assessment which identifies key local services, including shopping, education, healthcare, and greenspaces, within a 20-minute Active Travel Zone from the development site. All policies are expected to therefore have minor positive effects in relation to **IIA5: Services and facilities**.

6.192 Policy SP T1: Promoting a sustainable and decarbonised transport system promotes sustainable transport and therefore the inclusion of those who may not have access to a car, in addition to requiring things like footpaths to meet prescribed width guidelines so as to ensure access for all. The policy also seeks to assist individuals with mobility impairments. Policy DM T2: Forming a healthy and connected Enfield states that all development in the Borough should support the Healthy Streets approach, which would result in improvements to the public realm, fostering an improved environment for social interaction in the local community. Similarly, Policy DM T3: Constructing a vibrant and safe Enfield for everyone seeks to achieve equality of access to opportunities for Enfield's residents. Therefore, minor positive effects are expected in relation to **IIA6: Social inclusion** for all three policies.

6.193 Significant positive effects are expected against **IIA8: Road safety** with respect to Policies SP T1: Promoting a sustainable and decarbonised transport system, DM T2: Making active travel the natural choice and DM T3: Constructing a vibrant and safe Enfield for everyone because they seek to reduce volume of cars on the roads which is likely to improve pedestrian safety. Policy SP T1: Promoting a sustainable and decarbonised transport system seeks to make improvements to active travel and public transport by improving safety through well-designed walking and cycling routes and both DM T2 and DM T3 seek to actively promote road safety and contribute to creating safer cycling and pedestrian movement around town centres, transport nodes and quieter neighbourhoods, including implementing traffic-calming measures within residential areas and the wider pedestrian environment, where necessary. DM T3 further seeks to ensure safe connections to existing transport networks and making improvements to the pedestrian environment, including the provision of safe road crossings and expected development to be well-connected, high quality, convenient and safe active travel routes within and beyond the development site, that are easy and safe to use (i.e. permeable and well lit). These policies will also contribute to a reduction in the number of vehicles on the road, increasing the safety of roads for pedestrians.

6.194 A minor positive effect is expected against **IIA16: Efficient use of land and materials** in relation to Policy DM T2: Forming a healthy and connected Enfield as the policy supports the redevelopment of existing car parks for alternative uses.

6.195 Negligible effects are expected in relation to IIA2: Climate change mitigation, IIA3: Housing, IIA5: Services and facilities, IIA7: Crime and community safety, IIA9: Economy, IIA10: Town and local centres, IIA13: Biodiversity, IIA14: Historic environment, IIA15: Landscape and townscape, IIA17: Flooding and IIA18: Water.

Recommendations

- No recommendations.

14. Environmental protection

6.196 The likely sustainability effects of the environmental protection policy in Chapter 14 of the Enfield Local Plan are set out in **Table 6.16** and described below the table.

Table 6.16: IIA findings for the environmental protection policy

IIA objective	SP ENV1 : Local environmental protection
IIA1: Climate change mitigation	0
IIA2: Climate change adaptation	0
IIA3: Housing	0
IIA4: Health and wellbeing	++
IIA5: Services and facilities	0
IIA6: Social inclusion	0
IIA7: Crime and community safety	0
IIA8: Road safety	0
IIA9: Economy	0
IIA10: Town and local centres	0
IIA11: Air pollution	++
IIA12: Sustainable transport	0
IIA13: Biodiversity	+
IIA14: Historic environment	0
IIA15: Landscape and townscape	0
IIA16: Efficient use of land and materials	0
IIA17: Flooding	0
IIA18: Water	+

6.197 Policy SP ENV1: Local Environmental Protection aims to ensure that new development should actively contribute to the health and wellbeing of both existing and future occupiers by effectively mitigating the adverse effects of nuisance generating impacts including air, noise and vibration and light pollution, as well as harm to human health and the environment from land contamination or instability. The policy will also require risk assessments to accompany the development and proposals for

hazardous installations and waste facilities to mitigate their impact on factors such as amenity, noise and other pertinent environmental considerations. The policy will therefore protect the amenity of residents, and a significant positive effect is expected against **IIA4: Health and wellbeing**.

6.198 Policy SP ENV1 sets out the Council’s approach to directly address air quality in the Borough, which has been identified as a key sustainability issue for Enfield. The policy requires that all major development must be at least “air quality neutral”, and that all major development in the Air Quality Focus Areas – as identified in the Enfield Air Quality Action Plan, are accompanied by air quality assessments. Therefore, the policy is expected to have a significant positive effect in relation to **IIA11: Air pollution**.

6.199 Policy SP ENV1 will also seek to minimise and provide protection from unacceptable impacts caused by light pollution on the amenity of nearby natural habitats, biodiversity and the ecology of watercourses. Other measures in the policy will also benefit biodiversity, such as measures to avoid vibration or noise pollution, which could otherwise adversely affect certain species. As such, this policy is likely to result in a minor positive effect against **IIA13: Biodiversity**.

6.200 Policy SP ENV1 will ensure that proposals for new development that would adversely affect the water quality of the water catchment, groundwater or surface water, which includes waterways, identified Source protection Zones (SPZ) or aquifers, are refused. The policy will also seek to prevent pollution caused by run off through sustainable drainage techniques and other pollution prevention methods. As such, Policy SP ENV1: Local Environmental Protection is expected to have a minor positive effect against **IIA18: Water**.

6.201 Negligible effects are expected in relation to IIA1: Climate change mitigation, IIA2: Climate change adaptation, IIA3: Housing, IIA5: Services and facilities, IIA6: Social inclusion, IIA7: Crime and community safety, IIA8: Road safety, IIA9: Economy, IIA10: Town and local centres, IIA12: Sustainable transport, IIA14: Historic environment, IIA15: Landscape and townscape, IIA16: Efficient use of land and materials and IIA17: Flooding.

Recommendations

- No recommendations.

15. Delivering and monitoring

6.202 The likely sustainability effects of the delivering and monitoring policies in Chapter 15 of the Enfield Local Plan are set out in **Table 6.17** and described below the table.

Table 6.17: IIA findings for the delivering and monitoring policies

IIA objective	SP D1: Securing contributions to mitigate the impact of development	DM D2: Masterplans and Design Codes to achieve comprehensive development	DM D3: Infrastructure and phasing	DM D4: Monitoring and review
IIA1: Climate change mitigation	+	0	0	0
IIA2: Climate change adaptation	0	0	0	0
IIA3: Housing	+	0	0	++
IIA4: Health and wellbeing	+	+	+	0
IIA5: Services and facilities	+	0	+	0
IIA6: Social inclusion	+	+	0	0
IIA7: Crime and community safety	0	0	0	0

IIA objective	SP D1: Securing contributions to mitigate the impact of development	DM D2: Masterplans and Design Codes to achieve comprehensive development	DM D3: Infrastructure and phasing	DM D4: Monitoring and review
IIA8: Road safety	++	0	+	0
IIA9: Economy	+	+	0	++
IIA10: Town and local centres	0	0	0	0
IIA11: Air pollution	+	0	0	0
IIA12: Sustainable transport	+	0	+	0
IIA13: Biodiversity	+	0	0	0
IIA14: Historic environment	+	0	0	0
IIA15: Landscape and townscape	+	+	0	0
IIA16: Efficient use of land and materials	0	0	0	0
IIA17: Flooding	+?	0	0	0
IIA18: Water	+?	0	0	0

6.203 Policy SP D1: Securing contributions to mitigate the impact of development is expected to have a minor positive effect in relation to **IIA1: Climate change mitigation**, as it requires new development proposals to pay contributions to priorities such as tackling climate change, improving air quality, and providing Biodiversity Net Gain (BNG).

6.204 Policy SP D1: Securing contributions to mitigate the impact of development is expected to have a minor positive effect in relation to **IIA3: Housing** because new development proposals are required to pay affordable and specialised housing contributions, which would increase the provision of affordable and specialised housing in the Borough. In addition, Policy DM D4: Monitoring and review outlines the Council's approach to monitoring the implementation of policies and proposals set out in the Local Plan and states that where monitoring indicates a significant and persistent shortfall in the delivery of housing targets set out in the Plan, the Council will implement an action plan to increase the supply of land and associated infrastructure including the direct provision of new housing. Therefore, a significant positive effect is expected against IIA3 in relation to this policy.

6.205 A minor positive effect is expected against **IIA4: Health and wellbeing** for Policy SP D1: Securing contributions to mitigate the impact of development as the policy seeks contributions in new developments for healthcare facilities and services.

6.206 Policy DM D3: Infrastructure and phasing will seek to ensure that proposals demonstrate that sufficient infrastructure capacity exists or will be made available to support the development over its lifetime. Depending on what types of infrastructure is affected by the policy, this may include healthcare facilities, and so an uncertain minor positive effect is expected in relation to **IIA4: Health and wellbeing**. Policy SP D1: Securing contributions to mitigate the impact of development is expected to have a minor positive effect in relation to **IIA5: Services and facilities** because it seeks development contributions for the provision of healthcare facilities and services, school and childcare places, cultural facilities, and other essential community facilities within the Borough. The policy further seeks contributions to improve training, skills and job brokerage which will support raising attainment. As such, a minor positive effect is expected against IIA5 in relation to this Policy. Policy DM D3: Infrastructure and phasing will ensure that development proposals demonstrate that sufficient infrastructure capacity exists in Enfield or will be made available to support the development in line with the priorities and phasing requirements outlined in the Infrastructure

Delivery Plan. As such, this policy will ensure that infrastructure in the Borough does not become overburdened as a result of new development. Therefore, a minor positive effect is expected against IIA5 in relation to Policy DM D3.

6.207 Policy DM D2: Masterplans to achieve comprehensive development requires applicants to demonstrate their appropriate engagement and consultation with the local community. Therefore, this policy is likely to reduce social exclusion within the Borough, resulting in a minor positive effect against **IIA6: Social inclusion**. SP D1: Securing contributions to mitigate the impact of development is also expected to receive a minor positive effect against IIA6, as it seeks to secure contributions towards safety improvements to maintain and create healthy streets within the Borough. The policy also seeks payments for affordable housing and specialised housing needed to meet acute housing needs, in addition to essential community facilities. This may contribute towards reducing poverty and social exclusion, contributing towards sustainable, inclusive and mixed communities. Providing suitable accommodation that meets the requirements of a range of user types and are likely to benefit first-time buyers, who are often younger people, and ensure that homes are suitable for older people, people with health problems or disabilities, and expectant/growing families.

6.208 A significant positive effect is expected against **IIA8: Road safety** in relation to Policy SP D1: Securing contributions to mitigate the impact of development because it supports highway improvements with reference to healthy streets. In addition, Policy DM D3: Infrastructure and phasing will ensure that road infrastructure is phased appropriately with associated development. Therefore, this policy is likely to help in avoiding road safety becoming an issue, resulting in a minor positive effect against IIA8.

6.209 Policy SP D1: Securing contributions to mitigate the impact of development is expected to have a minor positive effect in relation to **IIA9: Economy** because the policy seeks to secure contributions from the Enfield Community Infrastructure Levy to support training, skills and job brokerage, which will improve the employment prospects of local communities in the Borough. Policy DM D2: Masterplans and Design Codes to achieve comprehensive development will seek to ensure that proposals are accompanied by a masterplan if they form to an entire site allocation, which must demonstrate that the proposal does not compromise the overall delivery of the site allocation or prejudice future development of other parts of the site or adjoining land. As such, this policy is likely to ensure that proposals are considerate of future development and will encourage sustainable growth and investment in the Borough, resulting in a minor positive effect against IIA9. Policy DM D4: Monitoring and review states that where monitoring indicates a significant and persistent shortfall in the delivery of employment targets set out in the Plan, the Council will implement an action plan to increase the supply of land and associated infrastructure including the direct provision of employment uses. As such, a significant positive effect is also expected against IIA9 in relation to Policy DM D4.

6.210 Policy SP D1: Securing contributions to mitigate the impact of development is expected to have a minor positive effect in relation to **IIA11: Air pollution** and **IIA12: Sustainable transport**. This is because the policy seeks to help fund the implementation of essential infrastructure, including but not limited to Crossrail (and other strategic infrastructure) that may encourage the use of sustainable transport modes through the Mayor of London's Community Infrastructure Levy contributions, as well as contributions to public transport, active travel and improving local air quality, the policy also promotes contributions towards residual highway improvements (to maintain and create healthy streets) which seeks to make local streets more inclusive for everyone to walk, cycle and spend time on.

6.211 Policy DM D3: Infrastructure and phasing will seek to ensure that proposals demonstrate that sufficient infrastructure capacity exists or will be made available to support the development over its lifetime. Depending on what types of infrastructure is affected by the policy, this may include sustainable transport infrastructure such as public transport services, an uncertain minor positive effect is expected in relation to **IIA12: Sustainable transport**.

6.212 Policy SP D1: Securing contributions to mitigate the impact of development is expected to have a minor positive effect in relation to **IIA13: Biodiversity** as it seeks to secure contributions towards Biodiversity Net Gain (BNG) and parks and open spaces (in particular Registered Parks and Gardens and access to the countryside and Greenways).

6.213 Policy SP D1: Securing contributions to mitigate the impact of development is expected to have a minor positive effect in relation to **IIA14: Historic Environment** as it seeks to secure contributions to help preserve heritage at risk within the Borough. Achieving BNG (or other types of improvements) could also help improve the setting of Registered Parks and Gardens in the Borough, further contributing towards the minor positive effect recorded.

6.214 Policy SP D1: Securing contributions to mitigate the impact of development is expected to have a minor positive effect in relation to **IIA15: Landscape and townscape**, as it supports the development of parks and open spaces, which will also help protect and enhance the landscape. Policy DM D2: Masterplanning and Design Codes seeks to achieve comprehensive

development and so is also expected to receive a minor positive effect in relation to IIA15, as the policy specifically states that schematic site-wide masterplans should respond positively to the Local Plan's landscape considerations and be informed by design codes. This may help preserve or enhance the landscape / townscape. Policy SP D1: Securing contributions to mitigate the impact of development could have minor positive effects against **IIA17: Flooding** and **IIA18: Water**, although these are uncertain, because it states that development proposals must include provision for site specific mitigation (e.g. sustainable drainage systems). The effect is uncertain because SuDS are simply given as an example; there is no assurance that managing flood risk will be a priority in the policy.

6.215 Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA7: Crime and community safety, IIA10: Town and local centres, and IIA16: Efficient use of land and materials.

Recommendations

- No recommendations.

Chapter 7

Cumulative effects

7.1 This chapter summarises the likely effects of each individual component of the Local Plan – the vision, strategic objectives, and policies – on each of the IIA objectives in Enfield’s IIA framework, as illustrated in **Table 7.1**. The combined effects of all the Plan policies working together are then discussed, highlighting that many of the potential negative sustainability effects identified for individual provisions for development will be reduced or avoided by strong policy requirements governing all development in the Borough. **Table 7.2** at the end of the chapter then provides a single overall cumulative effect for the Enfield Local Plan in relation to the achievement of each of the IIA objectives. These tables use the same symbols and colour coding to represent sustainability effects as shown in **Figure 2.2**.

7.2 The IIA has highlighted the potential for some cumulative effects to be felt across the Borough due to the large-scale development proposed in a range of locations (e.g. potential increases in air pollution). Conversely, some of the cumulative effects, both positive (e.g. for social inclusion, local economy or health and wellbeing) and negative (e.g. for historic environment or biodiversity) are likely to be concentrated in particular locations within the Borough where a cluster of new growth/intensification occurs, e.g. in the south east around Edmonton Green, Meridian Water and Angel Edmonton, or the centre of the Borough around Enfield Town and Southbury, or the new settlements at Chase Park and Crews Hill.

Table 7.1: Summary of cumulative IIA effects for vision, strategic objectives and all strategic and development management policies

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
2. Good Growth in Enfield																		
Vision	+?	0	+?	+?	+?	+?	0	0	+?	+?	+?	+?	+?	+?	+?	0	+?	+?
Strategic objective 1	0	0	++	0	0	+	0	0	+	0	0	0	0	0	0	0	0	0
Strategic objective 2	0	0	0	++	0	+	0	0	0	0	0	0	0	0	0	0	0	0
Strategic objective 3	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Strategic objective 4	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Strategic objective 5	+	0	0	+	0	++	0	0	0	0	+	+	0	0	0	0	0	0
Strategic objective 6	+	0	0	0	0	0	0	0	0	0	+	++	0	0	0	0	0	0
Strategic objective 7	+	+	0	++	0	0	0	0	0	0	0	0	++	0	0	0	0	0
Strategic objective 8	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Strategic objective 9	0	0	0	+	0	0	0	0	0	0	+	0	0	0	0	0	0	+
Strategic objective 10	+	++	0	0	0	0	0	0	0	0	0	0	+	0	0	0	++	+
Strategic objective 11	0	0	0	++	0	0	0	0	0	0	0	0	++	0	0	0	+	0

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
Strategic objective 12	+	+	0	++	0	0	0	0	0	0	0	0	++	0	0	0	0	0
Strategic objective 13	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Strategic objective 14	-?	0	0	+	0	0	0	0	++	0	-?	0	0	0	0	0	0	0
Strategic objective 15	+	0	0	0	0	0	0	0	++	+	+	+	0	0	0	0	0	0
Strategic objective 16	0	0	0	0	+	+	0	0	+	++	0	0	0	0	0	0	0	0
Strategic objective 17	0	0	0	+	0	0	0	0	+	0	0	0	+	+	+	0	0	0
Strategic objective 18	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0
Strategic objective 19	0	0	+	0	+	+	0	0	+	++	0	0	0	0	0	0	0	0
Strategic objective 20	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0	0	0
SP SS1: Spatial strategy	+	0	++	+	+	+	0	0	++	++	+	+	+	-?	-?	+	-?	-
SP SS2: Making good places	+	0	0	+	+	+	0	0	+	+	+	+	+	+	+	+	0	0
3. Place																		
SP PL1: Enfield Town	+	0	++	++	+++?	+	+	+	++	++	0	++	-	-?	-?	++	0	-
SP PL2: Southbury	++	0	++	++	+++?	+	+	+	++	++	+	++	+	-?	+++?	++	-	-

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
SP PL3: Edmonton Green	++	+	++	++	++?	++	+	+	++	++	0	++	+	+?	+?	++	+?	+
SP PL4: Angel Edmonton	++	0	++	++/- -?	++?	++	+	++	++	++	+	++	+	--?	+?	++	0	0
SP PL5: Meridian Water	++/-	+	++	++	++	++	0	+	++	++	+	++/-	+	0?	+?	++	-?	-
SP PL6: Southgate	++	0	++	++	++	+	0	+	++	++	0	++	-	-?	+?	++	-	0
SP PL7: New Southgate	+	0	++	++	++?	++	+	+	+	+	0	++	-	-?	+?	++	-	+
SP PL8: Palmers Green	+	0	++	++	++?	+	+	0	++	++	0	++	-	0?	+?	++	-	-
SP PL9: Rural Enfield	++	+	0	++	+	0	0	+	++	0	++/-	-	++	+?	++/-	-?	+	+
SP PL10: Chase Park	++	+	++	++	++	+	0	+	+	++	0	+	++	+?	++/-?	--?	-	-
SP PL11: Crews Hill	++	+	++	++	++	+	0	+	++	+	0	+	+	0	+++/- ?	+/-?	-	-
4. Sustainable Enfield																		
SP SE1: Responding to the climate emergency	++	++	0	+	0	0	0	0	0	0	+	+	+	+	0	+	+	+
DM SE2: Sustainable design and construction	++	+	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0
DM SE3: Whole-life carbon and circular economy	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
DM SE4: Reducing energy demand and increasing low carbon energy supply	++	+	0	0	0	0	0	0	0	0	+	0	0	+	0	0	0	0
DM SE5: Renewable energy development	++	0	0	+	0	+	0	0	0	0	0	0	0	+	+	+	0	0
DM SE6: Climate change adaptation and managing heat risk	0	++	0	+	0	0	0	0	0	0	0	0	+	0	+	+	0	0
DM SE7: Managing flood risk	0	+	0	+	0	0	+	0	0	0	0	0	+	0	0	+	++	+
DM SE8: Protection and improvement of watercourses	0	+	0	0	0	0	0	0	0	0	0	0	+	+	0	0	+	++
DM SE9: Sustainable drainage systems	0	+	0	+	0	0	0	0	0	0	0	0	+	0	0	0	++	+
5. Addressing equality and improving health and wellbeing																		
SP SC1: Improving health and wellbeing of Enfield's diverse communities	+	0	0	++	++	++	0	+	0	0	+	+	++	0	0	0	0	0
SP SC2: Protecting and enhancing social and community infrastructure	+	0	+	+	++	++	+	0	+	+	+	+	0	0	0	+	0	0
6. Blue and green Enfield																		
SP BG1: Enfield's blue and green infrastructure network	++	+	0	++	+	+	0	+	0	+	+	++	++	+	++	0	+	++
SP BG2: Protecting nature conservation sites	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	0	0	+

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
SP BG3: Protecting Epping Forest Special Area of Conservation	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	0	0	+
SP BG4: Biodiversity net gain, landscape restoration and offsetting	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	0	0	0
SP BG5: Green Belt and Metropolitan Open Land	0	0	-	0	0	0	0	0	-	0	0	0	+	+	++	+	0	0
SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land	0	0	-	0	0	0	0	0	+	0	0	+	+	+	++	+	0	0
SP BG7: Strategy for enhancing the beneficial uses of the Green Belt and Metropolitan Open Land	0	0	-?	+	0	0	0	0	-?	0	0	0	++	0	+	0	0	+
DM BG8: Protecting open space	0	0	0	++	0	+	0	0	0	0	0	0	+	+	+	0	+	+
DM BG9: Watercourses	0	0	0	+	0	+	0	0	0	0	0	+	+	0	+	0	0	-
DM BG10: Urban greening and biophilic principles	+	+	0	0	0	0	0	0	0	0	+	0	+	0	+	0	+	+
DM BG11: Allotments and community food production	0	0	0	+	0	+	0	0	0	0	0	0	+	0	+	+	0	0
DM BG12: Burial and crematorium spaces	0	0	0	-	0	0	0	0	0	0	0	-	--?	-	--	--	0	-?
DM BG13: Blue and green infrastructure plans	+	+	0	+	0	+	+	0	0	0	+	+	+	+	+	0	+	+

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
7. Design and character																		
SP DE1: Delivering a well-designed, high quality and resilient environment	++	+	0	+	+	+	+	++	+	0	+	++	++	+	++	+	0	0
DM DE2: Design process and Design Review Panel	0	0	0	0	0	+	0	0	0	0	0	0	0	+	+	0	0	0
DM DE3: Inclusive design	0	0	0	+	0	++	0	0	0	0	0	0	0	+	0	0	0	0
SP DE4: Putting heritage at the centre of place making	+	0	0	0	0	+	0	0	+	0	0	0	+	++	+	0	0	0
DM DE5: Strategic and important local views	0	0	0	0	0	0	0	0	0	0	0	0	0	+	++	0	0	0
DM DE6: Tall buildings	0	0	0	+	+	+	++	0	+	+	0	0	0	+	++	+	0	0
DM DE7: Creating liveable, inclusive and quality public realm	++	+	0	+	+	++	++	++	0	+	+	++	++	+	++	0	+	+
DM DE8: Design of business premises	+	+	0	+	+	+	+	+	++/-	0	+	+	+	+	+	+	+	+
DM DE9: Shopfronts and advertisement	+	0	0	0	0	0	+	+	-	+	0	0	0	+	++	0	0	0
DM DE10: Conserving and enhancing heritage assets	+?/- ?	0	0	0	0	+	0	0	0	0	0	0	0	++	+	0	0	0
DM DE11: Landscape design	0	0	0	0	0	0	+	0	0	0	0	0	++	+	++	0	+	+

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
DM DE12: Civic and public developments	+	+	0	+++?	+++?	+	+	0	0	0	0	0	+	+	+	+	0	0
DM DE13: Housing standards and design	0	0	+	+	0	+	0	0	0	0	0	+	0	0	+	0	0	0
DM DE14: External amenity standards	0	0	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0
DM DE15: Residential extensions and outbuildings	0	0	-	+	0	0	0	0	0	0	0	0	0	+	+	0	0	0
8. Homes for all																		
SP H1: Housing development sites	+?/- ?	0	++	+++/- -?	++	+	0	0	+	++	+?/- ?	+++?/- -?	--?	-?	-?	+++/- -?	-?	-
SP H2: Affordable housing	0	0	++	+	0	++	0	0	+	0	0	0	0	0	0	0	0	0
DM H3: Housing mix and type	0	0	++	+	0	++	0	0	+	0	0	0	0	0	+	0	0	0
DM H4: Small sites and small housing development	+	+	++	+	+	0	0	0	+	+	+	+	+	0	+	++	0	0
DM H5: Supported and specialist housing	+	0	++	+	+	++	0	0	+	0	+	+	0	0	0	0	0	0
DM H6: Community-led housing	0	0	++	+	0	++	0	0	+	0	0	0	0	0	0	0	0	0
DM H7: Build to rent	0	0	++	0	0	+	0	0	+	0	0	0	0	0	0	0	0	0
DM H8: Large scale purpose built housing	+	0	++	0	+	0	0	0	+	0	+	+	0	0	0	0	0	0

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
DM H9: Student accommodation	+	0	++	+	+	+	0	0	+	+	+	+	0	0	+	0	0	0
DM H10: Traveller accommodation	+	0	++/-	+/-	+	+/-?	0	+	+	0	+	+	+	+	+	0	0	0
9. Economy																		
SP E1: Employment and growth	+/-?	0	0	+	+/-	+	0	0	++	++	+/-?	++/-- ?	-- ?/+	-?	-?	+	--?	--?
SP E2: Promoting jobs and inclusive business growth	+	0	0	+	+	+	0	0	++	++	+	+	0	0	0	+	0	0
SP E3: Strategic Industrial Locations	+	0	0	0	0	0	0	0	++	0	+	+	0	0	0	0	0	0
SP E4: Supporting offices	+	0	0	0	0	0	0	0	++	++	+	+	0	0	0	+	0	0
SP E5: Transforming Industrial Sites	0	0	0	+	0	0	0	0	++	0	+	+	+	0	+	++	+	+
SP E6: Locally Significant Industrial Locations	0	0	0	0	0	0	0	0	++	0	0	0	0	0	0	+	0	0
DM E7: Non-designated industrial sites	0	0	0	0	0	0	0	0	++	0	0	0	0	0	0	+	0	0
DM E8: Providing for workspaces	+	0	0	0	0	0	0	0	++	++	+	+	0	0	0	0	0	0
DM E9: Local jobs, skills and local procurement	0	0	0	0	+	+	0	0	++	0	0	0	0	0	0	0	0	0
DM E10: Fostering a successful evening economy	0	0	0	+	0	+	0	0	++	++	0	0	0	0	0	0	0	0

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
DM E11: Creating a smart and digitally connected Borough	+	0	0	+	0	0	0	0	++	0	+	0	0	0	0	0	0	0
DM E12: Meridian Hinterlands	+	0	++	+	+	+	0	0	++	0	+	+	-	--?	--?	++	--?	--?
10. Town centres and high streets																		
SP TC1: Promoting town centres	+	0	+	+	+	+	+	0	++	++	+	+	0	+	+	++	0	0
SP TC2: Encouraging vibrant and resilient town centres	+	0	0	0	+	0	+	0	++	++	+	+	+	+	+	++	0	0
DM TC3: Floorspace above commercial premises	+	0	+	+	+	0	+	0	++	++	+	+	0	0	0	++	0	0
DM TC4: Markets	0	0	0	+	0	0	0	0	+	+	0	0	0	0	+	0	0	0
DM TC5: Meanwhile uses	0	0	+	0	0	0	0	0	+	++	0	0	0	+	+	0	0	0
DM TC6: Managing the clustering of town centre uses	0	0	0	+	0	+	0	0	+	+	0	0	0	0	+	0	0	0
11. Rural Enfield																		
DM RE1: Character of the Green Belt and open countryside	0	0	-	+	0	0	0	0	-	0	0	0	+	++	++	0	0	0
DM RE2: Improving access to the countryside and green corridors	++	0	0	++	++	+	0	+	0	0	++	++	0	++	0	0	0	0

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
SP RE3: Supporting the rural economy	+	0	0	+	+	0	0	+	++	0	+	+	+	0	+	+	0	0
DM RE4: Farm diversification and rural employment	+	0	0	+	+	+	0	0	0	0	+	+	+	+	+	0	0	0
12. Culture, leisure and recreation																		
SP CL1: Promoting culture and creativity	+	0	0	+	+	+	0	0	+	++	+	+	0	0	0	+	0	0
DM CL2: Leisure and tourism	0	0	0	+	0	+	0	0	++	++	0	0	+	0	+	+	0	+
DM CL3: Visitor accommodation	+	0	+	+	0	0	+	+	++	0	+	+	0	0	+	+	0	0
SP CL4: Promoting sporting excellence	+	+	0	++	+	++	+	0	+	0	+	+	+	+	+	0	0	0
DM CL5: Sport, open space and recreation	+	0	0	++	++	++	0	0	+	+	+	+	+	0	0	0	+	0
DM CL6: Protecting and attracting public houses	0	0	0	0	++	+	0	0	0	++	++	0	0	+	0	0	0	0
13. Movement and capacity																		
SP T1: Promoting a sustainable and decarbonised transport system	++	0	0	+	+	+	0	++	0	0	++	++	0	0	0	0	0	0
DM T2: Forming a healthy and connected Enfield	++	0	0	+	+	+	0	++	0	0	++	++	0	0	0	+	0	0
DM T3: Constructing a vibrant and safe Enfield for everyone	++	0	0	+	+	+	0	++	0	0	++	++	0	0	0	0	0	0

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
14. Environmental Protection																		
SP ENV1 : Local environmental protection	0	0	0	++	0	0	0	0	0	0	++	0	+	0	0	0	0	+
15. Delivering and monitoring																		
SP D1: Securing contributions to mitigate the impact of development	+	0	+	+	+	+	0	++	+	0	+	+	+	+	+	0	+?	+?
DM D2: Masterplans and Design Codes to achieve comprehensive development	0	0	0	+	0	+	0	0	+	0	0	0	0	0	+	0	0	0
DM D3: Infrastructure and phasing	0	0	0	+	+	0	0	+	0	0	0	+	0	0	0	0	0	0
DM D4: Monitoring and review	0	0	++	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0

IIA objective 1: Ensure the Local Plan serves to minimise LBE's per capita CO₂ emissions such that the Council will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040

7.3 The effects of human activities on the climate are irreversible on the timescale of humans alive today, although every little bit of avoided future temperature increase results in less warming. There are regulations in place that seek to reduce emissions, namely the amended Building Regulations 2010 and Future Building Standard from 2025 that require CO₂ emissions from new build homes and other buildings, including offices and shops, to be 30% lower than current standards. Alongside this, the new Local Plan includes a number of ambitious and aspirational policies seeking to mitigate climate change, particularly in the 'Sustainable Enfield' section but also within the vision and strategic objectives. Policies such as SP SE1: Responding to the climate emergency and DM SE5: Renewable energy development set out wide ranging measures which will combine to help achieve IIA1. These policies require new development in Enfield to adhere to high standards of design and construction, and major developments will be required to be net zero carbon.

7.4 In terms of reducing emissions from transport sources, in conjunction with expansion of the Ultra Low Emission Zone and the shift to electric vehicles which may help reduce emissions associated with private vehicles, Local Plan policies SP T1: Promoting a sustainable and decarbonised transport system and DM T2: Forming a healthy and connected Enfield specifically aim to reduce car use and to encourage Enfield's residents to walk and cycle day to day. The spatial strategy particularly supports development in urban areas with easy access to public transport and everyday facilities, and alongside these policies will help the London Borough of Enfield achieve its aim of becoming carbon neutral by 2040. One of the main placemaking area (Chase Park) does, however, have less public transport options available than other placemaking areas and facilities are not necessarily within easy walking distance of one another. Further to this, the spatial strategy supports development of two new logistics hubs close to the M25, which would increase road transport emissions. The Place policies do, however, set out locally specific ways in which development will be required to facilitate and encourage modal shift, which will reduce transport-related emissions and mitigate the potential increases associated with the overall level of growth proposed through the Local Plan. Despite this, the overall scale of growth that is proposed to be delivered in Enfield will inevitably result in increased carbon emissions from buildings, commercial activities and road traffic, despite the strong mitigation that is built into the Plan.

7.5 Overall, the Local Plan is expected to have a cumulative minor positive (+) effect in relation to achieving IIA objective 1.

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

7.6 The effects of human activities on the climate are irreversible on the timescale of humans alive today, although anticipating the adverse effects of climate change and taking appropriate action to prevent or minimise the damage they can cause may minimise the severity of the impact of climate change on residents within Enfield. Climate change adaptation is addressed directly through strategic objective 10 and various Local Plan policies, particularly those in the 'Sustainable Enfield' section of the Plan. Policy DM SE6: Climate change adaptation and managing heat risk sets out measures to avoid exacerbating the urban heat island effect, which is known to be an issue in Enfield, requiring developments to incorporate mitigation measures to avoid overheating and to improve the micro-climate. Policy DM SE4: Reducing energy demand and increasing low carbon energy supply seeks to optimise roof space to deliver green roofs, which would also contribute towards regulated indoor temperatures and increased air quality. Some of the placemaking areas – Edmonton Green, Angel Edmonton, Meridian Water, Palmers Green and Chase Park – fall within Flood Zones 2 and/or 3 and so are at risk of flooding. Although covered in more detail under IIA objective 17 below, a number of other Local Plan policies specifically address the increased risk of flooding resulting from climate change, including DM SE7: Managing flood risk and DM SE9: Sustainable drainage systems. The protection and enhancement of green infrastructure, for example through Policy SP BG1: Enfield's blue and green infrastructure network, will also help to manage flood risk by maintaining permeable surfaces to aid infiltration.

7.7 Overall, the Local Plan is expected to have a cumulative minor positive (+) effect in relation to achieving IIA objective 2.

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

7.8 The Local Plan provides for a total of at least 34,710 new homes over the Plan period focussed on urban areas but also in rural placemaking areas. The Plan will contribute significantly to the Borough's housing need and should help to provide a mix of

different housing types and tenures. Policy SP H1: Housing development sites allocates 75 sites for housing development, with a total capacity of just over 26,000 new homes within the Plan period. All of the residential site allocations will have at least minor positive effects on IIA3 due to the nature of the development proposed. Policies in the 'Homes for all' section of the Local Plan will combine to ensure that the housing provided on the allocated sites is of high quality and includes a range of types and tenures, including housing to meet the needs of specific groups such as the elderly and students. Policy SP H2: Affordable housing commits the Council to at least 35% of all new homes over the Plan period being affordable⁵⁸. Policy DM H10: Traveller accommodation will ensure that provision is made for the Planning Policy for Traveller Sites definition of Gypsies and Travellers. The amended Building Regulations 2010 alongside other policies, particularly those in the 'Design and character' section of the Local Plan, will ensure that housing is built to high standards of design and construction. In particular, Policy DM DE13: Housing standards and design sets out detailed criteria that new housing developments must adhere to, including preserving local amenity, being appropriately scaled and meeting accessible housing standards. Policy DM DE14: External amenity standards will ensure that appropriate outside amenity space is delivered within new housing developments, something that has been recognised as particularly important in the wake of the COVID-19 pandemic.

7.9 Overall, the Local Plan is expected to have a cumulative significant positive (++) effect in relation to achieving IIA objective 3.

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

7.10 The Local Plan includes strategic objectives 2, 7, 11 and 12 and various policies that will combine to improve the health and wellbeing of local people, both directly and indirectly. In particular, strategic objective 2 and Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities require development proposals to contribute to healthy and active lifestyles and to tackle health inequality, for example by providing access to sustainable transport links, green and blue infrastructure and open space and play facilities. The policy also requires certain development proposals to be subject to a Health Impact Assessment. Other Local Plan policies will address health and wellbeing indirectly, in particular those that seek to increase levels of walking and cycling – as well as increasing levels of physical activity, this will reduce car use and the associated pollutants which can be damaging to human health. Various cross-cutting policies address active travel, in particular DM T2: Forming a healthy and connected Enfield and a number of the Place policies detail the ways in which development in certain parts of the Borough will seek to increase levels of walking and cycling, to the benefit of public health. Further to this, the large scale of development proposed in the spatial strategy has a correspondingly large potential to provide new healthcare facilities, alongside green and blue infrastructure, which can be used both recreationally and for travel.

7.11 Policies in the Local Plan addressing the protection and enhancement of open spaces, including those policies in the Blue and green Enfield and Rural Enfield sections of the Local Plan, will further benefit public health by ensuring access to high quality open spaces within the Borough which can be used for active outdoor recreation. One of the key placemaking areas, Meridian Water, seeks to achieve a 30% public open space target at each phase of development, whilst another, Rural Enfield, supports the development of a 1,000ha woodland and open space. The urban extension at Chase Park also makes provision for a new and improved network of green infrastructure, alongside the extension of Trent Country Park. Further to this, the Plan seeks to encourage healthy and affordable food production through Policy DM BG11: Allotments and community food production.

7.12 The large amount of growth provided for by the Local Plan could put pressure on existing healthcare facilities such as GP surgeries; however the Local Plan makes provision for new infrastructure delivery, particularly through the Delivering and monitoring policies.

7.13 Overall, the Local Plan is expected to have a cumulative minor positive (+) effect in relation to achieving IIA objective 4.

⁵⁸ All major housing developments must achieve a minimum of 35% affordable housing. This percentage increases to 50% for developments on industrial land that would result in a net loss of industrial floorspace, former Green Belt sites and on publicly owned land.

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

7.14 The spatial strategy focuses development in urban areas close to public transport and so residents would be likely to have easy access to services, facilities and community infrastructure.

7.15 The large amount of growth provided for by the Local Plan could put increased pressure on local services, facilities and infrastructure, if appropriate provision is not made as part of new developments. While most of the increased pressure will come from residential development, the development of mixed-use and employment sites will also increase pressure for transport infrastructure as well as some types of services and facilities. However, the Local Plan makes provision for the delivery of new services, facilities and infrastructure through a number of specific policies and the large scale of development has a correspondingly large potential to provide new services and facilities. Policy SP SS1 sets out that Enfield Town, Meridian Water, Edmonton, Southbury, Southgate, New Southgate and Angel Edmonton will be major urban foci of high quality growth, accommodating a range of uses. In addition, policies in the Delivering and Monitoring section of the Plan should combine to mitigate the increased pressure from new development. Policy SP D1: Securing contributions to mitigate the impact of development addresses the funding of infrastructure such as parks and open space, schools and childcare places and public transport and highway improvements. Crucially, Policy DM D3: Infrastructure and phasing requires planning applications to provide information about the phasing of new developments and associated infrastructure requirements – this will help to ensure appropriate phasing so that existing services, facilities and infrastructure are not overloaded by new residents before new provision is made.

7.16 Other policies in the Local Plan address the provision of specific types of infrastructure; for example, Policies SP SC1: Improving health and wellbeing of Enfield's diverse communities, SP SC2: Protecting and enhancing social and community infrastructure, DM CL5: Sport, open space and recreation and DM CL6: Protecting and attracting public houses.

7.17 Overall, the Local Plan is expected to have a cumulative significant positive (++) effect in relation to achieving IIA objective 5.

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

7.18 The Local Plan includes several policies that directly seek to promote social inclusion, as well as strategic objective 5. Policy DM DE3: Inclusive design will apply to all development proposals and requires them to create more accessible, welcoming and inclusive spaces and places. Developments must provide an Inclusive Access Statement as part of the Design and Access Statement and proposals must reflect the diversity of the Borough's population, demonstrate responsive engagement with user groups with protected characteristics and provide flexible spaces which can be adapted to meet changing needs. Policy DM DE7: Creating liveable, inclusive and quality public realm requires developments to contribute to improving the permeability and accessibility of the public realm, while a number of the policies in the Homes for all section of the Local Plan address the particular housing needs of different groups, for example through Policy DM H5: Supported and specialist housing. The spatial strategy supports the development of a significant number of new homes of different types, including affordable housing, and so will help ensure that as many people as possible have access to a home – particularly in sustainable locations with access to public transport for those who do not have a car.

7.19 The sites that are allocated in the Local Plan were assessed against this IIA objective on the basis of whether they are located within the most deprived areas of Enfield, as new housing or industrial development in those areas can stimulate their regeneration. The two overarching housing and employment site allocation policies (SP H1: Housing development sites and SP E1: Employment and growth) are both expected to have minor positive effects on this objective.

7.20 Overall, the Local Plan is expected to have a cumulative minor positive (+) effect in relation to achieving IIA objective 6.

IIA objective 7: Reduce crime and increase community safety

7.21 Most of the Local Plan policies will have negligible effects on this IIA objective as most will not directly influence levels of crime and community safety (this is also not addressed by the vision and strategic objectives). However, policies within the Design and character section of the Local Plan directly address this issue. Policies DM DE6: Tall buildings and DM DE7: Creating liveable, inclusive and quality public realm include specific measures that will help to reduce crime and improve safety. DM DE6 seeks to protect residents and users from fire and other emergency situations and also makes reference to activating

the street frontage, which can help reduce levels of crime through 'eyes on the street'. Policy DM DE7 promotes safety and counter-terrorism measures, whilst also seeking to increase activity and natural surveillance at ground floor level so as to increase safety. A number of other policies in the Local Plan make reference to the creation of safe and secure places, or active frontages, including SP DE1: Delivering a well-designed, high quality and resilient environment, DM DE8: Design of business premises, DM DE9: Shopfronts and advertising, DM DE11: Landscape design and DM DE12: Civic and public developments. Several of the Place policies will also have minor positive effects on IIA7 as they make reference to the safety of new developments in specific parts of the Borough.

7.22 Overall, the Local Plan is expected to have a cumulative minor positive (+) effect in relation to achieving IIA objective 7.

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

7.23 Most of the Local Plan policies will have negligible effects on IIA8 as they will not directly affect road safety; this is also not addressed by the vision and strategic objectives. However, a small number of policies including both of the policies in the Movement and connectivity section of the Local Plan set out measures that will protect road users and improve their safety. SP T1: Promoting sustainable transport and DM T2: Making active travel the natural choice both seek to ensure the safety of pedestrians and cyclists, while SP DE1: Delivering a well-designed, high quality and resilient environment and DM DE7: Creating liveable, inclusive and quality public realm will both have significant positive effects on this objective because they require streets to be safe, uncluttered and suitable to their intended function and promote road safety and safer cycling and pedestrian movement around town centres and transport nodes. A number of other policies, including several of the Place policies, will have positive effects on IIA8 because of measures included within them to ensure that development does not adversely affect road safety.

7.24 Overall, the Local Plan is expected to have a cumulative minor positive (+) effect in relation to achieving IIA objective 8.

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

7.25 Employment needs will be met through the intensification of existing industrial areas in the east of the Borough, and new sites in urban and rural locations. The Local Plan provides for at least 304,000 sqm of net additional industrial and logistics floorspace and 40,000 sqm net additional office floorspace. Policy SP E1: Employment and growth allocates seventeen sites to deliver industrial development within the Borough. This includes two new logistics hubs that will be delivered close to Junctions 24 and 25 of the M25. One site allocated via Policy SP E1, R.02, will only be brought forward in conjunction with neighbouring Hertsmere Borough Council. The policies in the Economy section of the Local Plan set out various ways in which the Council will seek to stimulate the Borough's economy, creating high quality new workplaces in appropriate locations. Rural areas will also be managed for a number of sustainable countryside uses, including food production, forestry, eco-tourism, recreation, education, leisure and sporting excellence, with beneficial effects on the rural economy. The policies in the Town centres and high streets section of the Local Plan will also have broadly very positive effects on IIA9, as protecting and enhancing the vitality and vibrancy of town centres within Enfield will benefit the local economy.

7.26 There is some potential tension between the policies in the Local Plan that seek to protect and enhance the built and natural environment and the objective of supporting the local economy. For example, policies such as SP BG4: Green Belt and Metropolitan Open Land set out strict criteria that will apply to certain development proposals, and so could be seen as potentially restricting employment-related developments, to the detriment of the local economy. However, overall it is considered that such measures will serve to direct economic growth to the most appropriate locations within the Borough, rather than stifling growth, and it is also recognised that protecting and enhancing the local environment will have indirect positive effects for the economy, by making the Borough more attractive to visitors and investors.

7.27 Overall, the Local Plan is expected to have a cumulative significant positive (++) effect in relation to achieving IIA objective 9.

IIA objective 10: Support the vitality of the Borough's town and local centres

7.28 The spatial strategy will help to improve the Borough's town and local centres because it supports the development of a mix of employment, retail, leisure, housing, community and cultural uses at Enfield Town, Southbury, Edmonton Green, Angel Edmonton, Meridian Water, Southgate, New Southgate and Palmers Green. This will contribute significantly towards the local

economy at the same time as enhancing the vitality of the centres. Policies within the Town centres and high streets section of the Local Plan directly address the vitality of the Borough's town centres. In particular, Policy SP TC1: Promoting town centres seeks to secure the long-term vitality and viability of Enfield's town centres by focussing growth and investment in those areas, ensuring an appropriate balance of uses and maintaining and enhancing local character and the quality of the built environment. Policy SP TC2: Encouraging vibrant and resilient town centres also directly addresses this objective, seeking to ensure that town centres develop as vibrant and economically successful hubs that meet the needs of all users. In general, the Town centres and high streets policies will combine to ensure that Enfield's town centres (new and existing) are high quality environments that contain an appropriate range and mix of businesses, services and facilities, and that commercial operations are appropriately distributed within them.

7.29 Other policies in the Local Plan, particularly those relating to the quality of the built environment, will also positively affect the achievement of IIA10 as they will combine to ensure that town centres are attractive environments for people to spend time in, increasing footfall and spending.

7.30 Overall, the Local Plan is expected to have a cumulative significant positive (++) effect in relation to achieving IIA objective 10.

IIA objective 11: Minimise air pollution and IIA objective 12: Minimise the need to travel and support a modal shift away from the private car

7.31 The likely cumulative effects of the Local Plan on IIA11 and 12 are summarised together, due to the close linkages between air pollution and levels of car use – for many of the policies, the likely effects on these two objectives are the same.

7.32 The entire Borough is designated an Air Quality Management Area and contains seven Air Quality Focus Areas. Although there have been some decreases in nitrogen dioxide levels, these statistics were impacted by the COVID-19 lockdowns in 2021 and 2022. Future baseline air pollution levels are likely to be reduced by increasing uptake of electric vehicles, driven by the Mayor of London's recent expansion of the Ultra Low Emission Zone, the Government's commitment to ban all new petrol and diesel cars from 2035 and gradual rollout of electric vehicle charging networks. Electric vehicles do, however, contribute to non-exhaust emissions through particulates from tyres.

7.33 WSP's Air Quality Appraisal, which accompanies the Publication Local Plan, identifies numerous receptors across the Borough and predicts levels of air pollution based on the level of growth planned in the Local Plan. According to the Future Baseline scenario, the annual mean NO₂ air quality objective of 40µg/m³ is not exceeded at any of the 6,589 receptors included within the model. The annual mean PM₁₀ air quality objective of 40µg/m³ is also not exceeded, as well as the annual mean PM_{2.5} air quality objective of 20µg/m³. The Mayor of London's PM_{2.5} air quality target of 10µg/m³ would, however, be exceeded at all of the receptor locations, with the exception of 16 hospital locations, 4 play area locations, 1 residential dwelling location and 114 school locations. It was also predicted that there would be a maximum of 10 exceedances of the daily mean PM₁₀ air quality objective.

7.34 The spatial strategy supports development across the Borough but particularly in the urban areas around railway stations and tube stations, where frequent bus services are also present, and so has the potential to reduce reliance on the private car and associated air pollution. Although one of the four main placemaking areas, Chase Park, has less public transport options available than elsewhere, the Local Plan includes numerous policies (and strategic objectives) seeking to encourage modal shift and increase levels of sustainable transport use, which will have the associated benefits of reducing air pollution from car use. These policies will help to mitigate the potential negative effects of the overall scale of growth proposed in the Local Plan, which could lead to increased traffic in the area. In particular, the policies in the Movement and capacity section of the Local Plan directly address this issue. Policies SP T1: Promoting a sustainable and decarbonised transport system and DM T2: Forming a healthy and connected Enfield specifically aim to reduce car use and to encourage Enfield's residents to walk and cycle day to day. The Place policies also set out locally specific ways in which development will be required to facilitate and encourage modal shift, which will reduce transport-related air pollution and mitigate the potential increases associated with the overall level of growth proposed through the Local Plan. However, the mixed-use development schemes provided for within almost all of the Place policies may attract more people to each area, which could increase the number of cars on the road with adverse effects on air quality.

7.35 While there are policies in the Local Plan which could result in enhancements to the highways network, such as Policy SP D1: Securing contributions to mitigate the impact of development, which could be seen as potentially discouraging modal shift, it is also noted that reducing congestion could help to reduce concentrations of pollutants in those congestion hotspots.

7.36 Overall, the Local Plan is expected to have cumulative minor positive (+) effects in relation to achieving IIA objectives 11 and 12.

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

7.37 The London Borough of Enfield contains or is close to a number of designated and non-designated biodiversity assets, a number of which are suffering from recreational use pressures and pollution, in addition to habitat loss and fragmentation exacerbated by climate change. These pressures are likely to continue, including as a result of the large-scale housing and employment growth proposed through the Local Plan. The spatial strategy focuses most growth within the urban areas of the Borough although some is also directed to rural placemaking areas. While both brownfield and greenfield land can harbour valuable biodiversity, the potential for significant harm is generally greater for greenfield development. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. The IIA of the Local Plan has identified where development in particular locations in the Borough has a greater potential to adversely affect biodiversity assets but impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application. Uncertainty also exists as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.

7.38 Likely effects on internationally designated sites have been assessed through the separate Habitats Regulations Assessment. The HRA Screening concluded that a number of Plan policies and all site allocations could have a likely significant effect on Epping Forest SAC, Lee Valley SPA and Ramsar site and Wormley Hoddesdonpark Wood SAC, alone or in combination with other plans or projects. However, through the information reviewed and mitigation measures considered during the Appropriate Assessment stage of HRA, it was possible to conclude that no adverse effect on integrity will occur in relation to most potentially significant effects on most European sites as a result of confirmed mitigation measures detailed in the HRA. At the time of writing, adverse effects on the integrity of the European sites listed above due to air pollution could not be ruled out. HRA is an iterative process and as such, this conclusion is expected to be updated in light of emerging evidence and comments from key consultees.

7.39 Various policies contained within the Local Plan, particularly those in the Blue and green Enfield section, specifically aim to conserve and enhance biodiversity. Policies SP BG2: Protecting nature conservation sites and SP BG4: Biodiversity net gain, landscape restoration and offsetting will provide particularly strong mitigation, while policies relating to green infrastructure provision, urban greening and watercourses will also help to avoid the potential adverse effects of development and may even deliver improvements. The Environment Act 2021 will also help address habitat loss and fragmentation by making biodiversity net gain mandatory in most development from 2024. Taken together, these should limit the potential adverse impacts of the large amount of new development provided for by the Local Plan.

7.40 Overall, due to the scale of the development proposed through the Local Plan, a potential but uncertain cumulative minor negative effect (-?) is expected in relation to achieving IIA objective 13.

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

7.41 The large-scale housing and employment development that is provided for by the Local Plan could have negative effects on the cultural heritage of Enfield, for example by impacting upon the setting of heritage assets such as almost 500 listed buildings and 22 Conservation Areas.

7.42 The spatial strategy could adversely affect heritage assets and their settings, particularly where development is proposed within conservation areas and/or close to heritage assets such as listed buildings, including in the placemaking areas at Enfield Town, Angel Edmonton, New Southgate, Crews Hill and Chase Park. High level assessment individual site allocations identified widespread potential to impact the historic environment due to development being provided in locations where conservation areas, listed buildings and local heritage assets are present, as well as large open areas on the edge of settlements.

7.43 A number of Local Plan policies address the protection and enhancement of the historic environment and so should help to mitigate the potential negative effects of new development on cultural heritage. In particular, Policy SP DE4: Putting heritage at the centre of place making, which requires new development to respond to the cultural, built and landscape heritage of existing communities and take opportunities to integrate it into the sustainable growth agenda; as well as better revealing heritage which is not formally recognised, valued or understood, and preparing a heritage statement. In addition, Policy DM DE10: Conserving

and enhancing heritage assets sets out detailed criteria that will apply to new developments, with proposals being required to conserve and enhance the significance of heritage assets and to put them to viable uses consistent with their conservation; to utilise the Borough's heritage resource to realise wider social, cultural, economic and environmental benefits for affected communities; to make a positive contribution to local character and distinctiveness; and to draw on the contribution made by the historic environment to the character and identity of a place. Other policies that address high quality design more generally should also provide mitigation for the potential impacts of new development on cultural heritage features in and around the Borough.

7.44 Overall, due to the scale of the development proposed through the Local Plan and the proximity of allocated sites to sensitive heritage features, a potential but uncertain cumulative minor negative effect (-?) is identified in relation to achieving IIA objective 14.

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

7.45 Enfield sits within the Northern Thames National Character Area, which is characterised by "*a diverse landscape ranging from the wooded Hertfordshire plateaux and river valleys, to the open landscape and predominantly arable area of the Essex heathlands, with areas of urbanisation mixed in throughout*". Enfield's landscape character is partly defined by its topography with higher ground in the north west of the Borough (mostly rural designated as Green Belt), gradually descending through the urban areas into the Lee Valley in the east of the Borough. The large-scale new development to be delivered through the Local Plan could have adverse effects on the character and quality of the Borough's landscapes and townscapes; however it also offers opportunities to achieve enhancements through high quality and appropriately located new development which may benefit the townscape.

7.46 The large-scale housing and employment development proposed through the spatial strategy could have an adverse effect on the landscape, particularly where development is proposed on the edge of existing settlements and on greenfield land in the rural areas, such as in the placemaking areas at New Southgate, Chase Park and Crews Hill. The development site allocations have been assessed against this objective on the basis of whether they are located within a settlement and/or contain built development, as well as the scale of the sites. This is because development sites that are adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites, particularly towards the northwest of the Borough. Larger scale sites may also have more of an impact. However, the actual effect on landscape/townscape will also depend on the design, scale and layout of development within the site, which may help mitigate any adverse effects on landscape and/or enhance effects on the existing townscape. Therefore, all effects are currently recorded as uncertain.

7.47 The Local Plan includes a number of policies which specifically aim to conserve and enhance the quality and character of the area, including policies relating to the Green Belt (SP BG5: Green Belt and Metropolitan Open Land and SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land). Policies relating to the provision of green infrastructure will benefit the overall character and appearance of Enfield and the setting of built development, while policies requiring high quality design will also provide mitigation. Given the urban nature of much of the Borough, the policies in the Local Plan relating to the protection and enhancement of the townscape and built environment will be particularly important in mitigating the potential negative effects of new development on this objective. This includes policies such as SP DE1: Delivering a well-designed, high-quality and resilient environment and DM DE5: Strategic and important local views.

7.48 Overall, the Local Plan is expected to have a potential but uncertain cumulative mixed significant positive and minor negative effect (++) in relation to achieving IIA objective 15.

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

7.49 Enfield's spatial strategy is based on a brownfield first approach. As such, most of the placemaking areas are based around existing urban centres and therefore comprise previously developed land – with the exception of Rural Enfield, Chase Park and Crews Hill. A number of the policies in the Town centres and high streets section of the Local Plan will have positive effects on IIA16 as they seek to direct development to town centre locations where brownfield land is more likely to be available and promote the efficient use of land in those areas. Policy DM H4: Small sites and small housing development promotes efficient land use in relation to small housing developments and policy DM SE3: Whole-life carbon and circular economy requires that development proposals prioritise the reuse and retrofit of existing buildings wherever possible before considering

the design of new buildings. However, some negative effects have been identified against this IIA objective, including from Policy DM BG12: Burial and crematorium spaces which allocates sites on greenfield land. The overarching housing and employment policies are both expected to have mixed effects on this objective.

7.50 Overall, the Local Plan is expected to have a cumulative minor positive effect (+) in relation to achieving IIA objective 16.

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

7.51 The River Lee is the Borough's primary watercourse, which runs north to south along the eastern boundary of the Borough through a highly urbanised catchment. The main tributaries to the River Lee that flow through the Borough are: Pymmes Brook, Salmons Brooks and Turkey Brook. They generally flow eastwards through Enfield towards the River Lee. The topography of Enfield follows that of these tributaries, with the Borough generally sloping in an easterly direction towards the River Lea. Land adjacent to the three main River Lee tributaries is categorised as fluvial Flood Zones 2 and 3.

7.52 The overall scale of development proposed through the Local Plan could result in an increased risk of flooding, particularly if development is on greenfield land or in areas of high fluvial or surface water flood risk. The eastern edge of the Borough falls within Flood Zones 2 and 3. The tributaries of the River Lee stretch towards the west of the Borough and so there are some areas elsewhere that also fall within Flood Zones 2 and 3, including Chase Park, identified as a key placemaking areas in the emerging Local Plan, in addition to Edmonton Green, Angel Edmonton, Meridian Water and Palmers Green, also fall within Flood Zones 2 and 3 and so are also at risk of fluvial flooding. There is a fairly even distribution of areas within the Borough at risk of surface water flooding, some notable areas being to the north of Clay Hill in close proximity to Whitewebbs Golf Course & Tottenham Hotspur Football Club, in addition to Enfield Golf Club to the south east of Chase Park. Some areas proposed for development are therefore subject to both types of flood risk.

7.53 However, the Local Plan includes numerous policies seeking to ensure that new development does not increase the risk of flooding, including DM SE7: Managing flood risk and DM SE9: Sustainable drainage systems in particular. A number of other policies in the Plan make reference to the management of flood risk including some of the Place policies.

7.54 Overall, the Local Plan is expected to have a potential but uncertain cumulative minor negative effect (-?) in relation to achieving IIA objective 17.

IIA objective 18: Minimise water use and protect water quality

7.55 The overall scale of development proposed through the Local Plan will result in increased demand for water abstraction and treatment. Enfield is supplied by Thames Water for both potable and wastewater services and sits within the London Water Resource Zone and an area of water stress where demand is high and supply subject to constraints. In addition, the Borough is served by the Deephams Sewage Treatment Works, which the Environment Agency has highlighted the need for a significant upgrade to serve the growing population. There are also a number of water quality issues that impact the Borough, with none of the main watercourses currently meeting the Water Framework Directive required ecological status of 'Good'. However, the Thames Tideway Tunnel, which seeks to upgrade London's sewer system, will intercept, store and ultimately transfer sewage waste away from The River Thames. The project was granted a Development Consent Order in September 2014 and construction began in 2015, and is expected to be completed by 2024.

7.56 Most of the policies in the Local Plan have negligible effects on this objective, although a small number directly seek to address water quality in the Borough and so will have significant positive effects and should help to mitigate the potential adverse effects of new development. In particular, Policy SE9: Sustainable drainage systems requires developments to use sustainable drainage systems (SuDS) to reduce pollution, where relevant. Policy SP BG1: Enfield's blue and green infrastructure network requires development proposals to protect, improve and enhance access to blue spaces and the wider water environment and to improve the relationship with the river and naturalise the riverbank through the removal of hard engineered walls and culverts and introducing new habitats to the river corridor. Policies such as these will provide mitigation for the potential negative effects of the overall scale of new development on the water environment.

7.57 Overall, the Local Plan is expected to have a potential but uncertain cumulative minor negative effect (-?) in relation to achieving IIA objective 18.

Summary of IIA cumulative effects of the Enfield Local Plan

7.58 Table 7.2 summarises the single overall cumulative effect of the Publication version Local Plan on each of the IIA objectives, which have been described above.

Table 7.2: Summary of IIA cumulative effects for the whole Enfield Local Plan: Main Issues and Preferred Approaches document

IIA objective	Enfield Local Plan: Main Issues and Preferred Approaches document
IIA1: Climate change mitigation	+
IIA2: Climate change adaptation	+
IIA3: Housing	++
IIA4: Health and wellbeing	+
IIA5: Services and facilities	++
IIA6: Social inclusion	+
IIA7: Crime and community safety	+
IIA8: Road safety	+
IIA9: Economy	++
IIA10: Town and local centres	++
IIA11: Air pollution	+
IIA12: Sustainable transport	+
IIA13: Biodiversity	-?
IIA14: Historic environment	-?
IIA15: Landscape and townscape	++/-?
IIA16: Efficient use of land and materials	+
IIA17: Flooding	-?
IIA18: Water	-?

7.59 It can be seen from **Table 7.5** and the discussion above, that the preferred approach set out in the Publication Local Plan is likely to have an overall positive cumulative effect in relation to achieving the majority of the IIA objectives, covering social, economic and environmental issues, health and equalities and community safety. Where there are potential negative effects identified (e.g. on biodiversity, historic environment, landscape/townscape, water quality), these are uncertain because they will depend on the detailed design and layout of new developments proposed on allocated sites, which are unknown at this stage.

Chapter 8 Monitoring

8.1 The SEA Regulations require that "*the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action*" and that the environmental report should provide information on "*a description of the measures envisaged concerning monitoring*". Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

8.2 Although national Planning Practice Guidance states that monitoring should be focused on the significant environmental effects of implementing the Local Plan, the reason for this is to enable local planning authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions. Since effects which the IIA expects to be minor may become significant and vice versa, monitoring measures have been proposed in this IIA Report in relation to all of the IIA objectives in the IIA framework. As the Local Plan is implemented and the likely significant effects become more certain, the Council may wish to narrow down the monitoring framework to focus on those effects of the Local Plan likely to be significantly adverse.

8.3 Table 8.1 sets out a number of suggested indicators for monitoring the potential sustainability effects of implementing the Local Plan. The data used for monitoring in many cases will be provided by outside bodies, for example the Environment Agency. It is therefore recommended that the Council remains in dialogue with statutory environmental consultees and other stakeholders and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable. This table will be updated at subsequent stages of the Local Plan preparation to reflect any revisions made to the proposed monitoring indicators for the Local Plan itself.

Table 8.1: Proposed monitoring indicators

IIA objective	Proposed monitoring indicators
IIA objective 1: Ensure the Local Plan serves to minimise LBE's per capita CO ₂ emissions such that the Borough is on track to achieve carbon neutrality by 2030.	<ul style="list-style-type: none"> ■ Per capita reduction in CO₂ emissions in the Borough ■ Carbon emissions from transport ■ Decentralised energy network development ■ Electric vehicle charging points
IIA objective 2: Ensure resilience to climate change particularly mindful of the likelihood of climate change leading to problematic high temperatures, worsened flood risk and increased risk of drought.	<ul style="list-style-type: none"> ■ Renewable energy generation: installation of new capacity for energy generation from renewable resources ■ Number of new residential developments where the energy/emissions standards in the Building Regulations Part L have been exceeded
IIA objective 3: Deliver housing to meet agreed targets and support an appropriate mix of housing types and tenures, including affordable and specialist housing, including housing for the elderly and disabled people.	<ul style="list-style-type: none"> ■ Percentage of total housing units completed that are affordable ■ Percentage of affordable housing units that are intermediate/ social rented ■ Housing size for market/social rented housing Quantum and proportion of Part M4(3) compliant homes delivered ■ Completion of the Council's Vulnerable Adults Accommodation Strategy

IIA objective	Proposed monitoring indicators
	<ul style="list-style-type: none"> ■ Net additional dwellings in previous year ■ Gross affordable housing completions ■ Percentage of total housing units that are intermediate/social rented ■ Net additional pitches for gypsies and travellers ■ Housing size (no. of beds) for market/social rented housing ■ Housing density ■ Percentage of completed developments exceeding code for sustainable homes Level 3 ■ Percentage of new dwellings built to Lifetime Homes standards ■ Planned housing provision ■ Completion of the Council's Vulnerable Adults Accommodation Strategy
<p>IIA objective 4: Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the Borough.</p>	<ul style="list-style-type: none"> ■ S.106 contributions accumulated per annum for improvements to public transport, leisure services, education, health and community services ■ Percentage population living within 500m of a GP ■ Quantity of open space (by type) ■ Children and young people's satisfaction with parks and play areas (Enfield's Tell Us Survey) ■ Satisfaction with parks and play areas ■ Obesity rates in adults and children ■ Life expectancy ■ New recreation and leisure facilities ■ Recorded cases of dementia
<p>IIA objective 5: Support good access to services, facilities and wider community infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.</p>	<ul style="list-style-type: none"> ■ Number of primary and secondary school places ■ Percentage of population within 30 minute public transport time of educational, healthcare and community facilities ■ S.106 contributions accumulated per annum for improvements to public transport, leisure services, education, health and community services ■ GCSE passes ■ Review and publication of relevant Council Strategies, which influence the provision of recreation, leisure, culture and arts facilities ■ Qualifications ■ Burial spaces

IIA objective	Proposed monitoring indicators
IIA objective 6: Encourage social inclusion, promotion of equality and a respect through diversity.	<ul style="list-style-type: none"> ■ Employment / unemployment rate in the Borough ■ Index of Multiple Deprivation
IIA objective 7: Reduce crime and increase community safety.	<ul style="list-style-type: none"> ■ Crime rates – total offences per population ■ Serious acquisitive crime rate ■ Percentage of people who feel safe during the day ■ Percentage of people who feel unsafe at night ■ Theft rate ■ Number of drug offences
IIA objective 8: Focus on delivering the 'Vision Zero' target for road safety.	<ul style="list-style-type: none"> ■ Killed or Seriously Injured (KSI) casualty figures for adults and children
IIA objective 9: Support a strong, diverse and resilient economy that provides opportunities for all.	<ul style="list-style-type: none"> ■ Total amount of additional employment floorspace ■ New jobs ■ Employment floorspace designated as Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites ■ Economic activity: % population in employment ■ Total amount of office floorspace (Class E) in (i) town centres (ii) local authority area ■ New business registration rate / resident population over 16 years ■ Employment floorspace designated as SIL ■ Previously developed land that has been vacant or derelict for more than 5 years
IIA objective 10: Support the vitality of the Borough's town and local centres.	<ul style="list-style-type: none"> ■ Total amount of additional floorspace for 'town centre' uses in town centres ■ Total amount of additional retail floorspace in town centres ■ New recreation, leisure, culture and arts facilities delivered ■ The delivery of the eleven Place policies ■ Pedestrian footfall count ■ Number of new visitor accommodation units delivered in town centres and/or Lee Valley Regional Park
IIA objective 11: Minimise air pollution.	<ul style="list-style-type: none"> ■ % of journeys to work by public transport or active transports ■ Air quality – average NO₂ and PM₁₀ levels (mg/m³) ■ Per capita reduction in CO₂ emissions in the Borough ■ Renewable energy generation: installation of new capacity for energy generation from renewable resources

IIA objective	Proposed monitoring indicators
<p>IIA objective 12: Minimise the need to travel and support a modal shift away from the private car.</p>	<ul style="list-style-type: none"> ■ Delivery and implementation of travel plans and transport assessments ■ Delivery of the Upper Lee Valley Transport Study in partnership with Transport for London ■ Travel to work ■ Delivery and implementation of Travel Plan with Transport for London's iTrace system ■ Completed sections of Enfield walk and cycle networks ■ Rail service frequency ■ Completed sections of Enfield walk and cycle networks
<p>IIA objective 13: Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks.</p>	<ul style="list-style-type: none"> ■ Change in areas of biodiversity importance ■ Natural England's SSSI condition assessments for SSSIs within the Borough ■ Achievement of Biodiversity Action Plan targets ■ Losses/changes to biodiversity status of SINCs
<p>IIA objective 14: Sustain and enhance the significance of heritage assets.</p>	<ul style="list-style-type: none"> ■ Number of buildings on Historic England's Buildings at Risk Register ■ Review of Conservation Area Appraisals and Management Proposals (every 5 years) ■ Number and % of Listed Buildings (all grades), Scheduled Monuments, Registered Parks and Gardens and Conservation Areas
<p>IIA objective 15: Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes.</p>	<ul style="list-style-type: none"> ■ Landscape character appraisals and impacts ■ % of development built on brownfields sites/previously developed land ■ Number and extent of field boundaries affected ■ Quantity of Green Belt land ■ Extension of Enfield Characterisation
<p>IIA objective 16: To achieve efficient use of land and materials.</p>	<ul style="list-style-type: none"> ■ Previously developed land that has been vacant or derelict for more than 5 years ■ Capacity of new waste management facilities (North London Waste Plan) ■ Amount of municipal waste arising and managed (by management type, by waste planning authority) ■ Best and most versatile agricultural land in the Borough ■ Production of primary land-won aggregates by the mineral planning authority

IIA objective	Proposed monitoring indicators
IIA objective 17: To manage and reduce the risk of flooding	<ul style="list-style-type: none"> ■ Number of planning permissions granted contrary to the advice of the Environment Agency on flood and water quality grounds ■ Properties at risk from flooding ■ The progress of flood alleviation schemes and river restoration works ■ Number of & of permitted developments incorporating SuDS ■ Water conservation and efficiency and sustainable drainage measures incorporated into new developments
IIA objective 18: Minimise water use and protect water quality.	<ul style="list-style-type: none"> ■ Water conservation and efficiency and sustainable drainage measures incorporated into new developments ■ River quality chemical and biological ■ Water use per household ■ Delivery of water supply, drainage and sewerage infrastructure to support new development ■ Number of planning permissions granted contrary to the advice of the Environment Agency on flood and water quality grounds

Chapter 9

Conclusions and next steps

Conclusions

9.1 This IIA report has been prepared to accompany the Regulation 19 consultation of the Publication Version of the Local Plan. The IIA has sought to identify significant sustainability effects, including health, equalities and community safety emerging from the Enfield Local Plan, through an integrated impact assessment process that seeks to meet requirements in the SEA Regulations and NPPF and good practice set out in the PPG.

9.2 The Publication Local Plan draws on the consultation feedback from the early Issues and Options and Main Issues and Preferred Approaches consultation stages but takes account of the current policy context set by the NPPF and requirements in the recently adopted London Plan in setting out a preferred spatial strategy for meeting a medium to high level of growth (32,500 homes). The Enfield Local Plan's preferred approach is set out in Policy SS1: Spatial Strategy and directs the new growth required to sites in existing settlements, strategic areas within the Green Belt, and a limited number of sites which will be released from the Green Belt due to the exceptional circumstances identified in the Local Plan. The spatial strategy pursues the more intensive use of urban land, particularly in a number of the placemaking areas identified in policies PL1 to 11 in Chapter 3 of the Local Plan. It also allows for employment needs to be met through intensification of existing industrial areas (SILs and LSIS), a small extension of strategic industrial land, and new sites in urban and rural locations.

9.3 In addition to the preferred spatial strategy for new development needs, the Publication Local Plan provides a strong policy direction on the full range of local planning issues across the Borough, i.e. addressing the Borough's response to climate change, improving the environmental quality and social inclusivity of the Borough, creating healthier communities, planning for sustainable travel and connectivity, and seeking to reduce disparities between the east and west of the Borough. The proposed policies in the Publication Local Plan have the potential to generate new significant positive changes for the county across the range of sustainability issues tested in this IIA process, as shown in the number of positive cumulative effects identified in **Chapter 7** of this IIA Report.

9.4 Nevertheless, the large-scale development proposed through the Enfield Local Plan, some of which will be on greenfield land does have the potential to generate new adverse effects during construction but also occupancy by new residents (and their associated travel movements) on the Borough's sensitive biodiversity and heritage assets, landscape and townscape, water and air quality and agricultural land. It is clear that every effort is being made in the Enfield Local Plan to avoid and minimise such adverse effects through the definition of a robust and diverse range of placemaking and development management policy approaches.

9.5 The London Borough of Enfield does not exist in isolation. Neighbouring boroughs and districts are also planning to deliver considerable amounts of development. This will result in in-combination effects, in particular increased urbanisation including the generation of additional traffic, and put pressure on resources, such as water, air quality, heritage and on ecological networks. It is therefore important that Enfield Council continues to work closely with its neighbours and the Greater London Authority to make sure that their plans are co-ordinated to provide an integrated approach to maintaining and enhancing quality of life for all their residents, workers and visitors, and to ensure that a rich, high quality and resilient environment is created.

Next Steps

9.6 This IIA Report will be available for consultation alongside the Publication Version of the Local Plan. Following approval by Full Council at its meeting on 6 March 2024, consultation is expected to commence from 7 March (or thereafter) to around 19 April 2024.

9.7 That consultation will be on the version of the Local Plan that the Council proposes to submit to the Secretary of State for examination and will be accompanied by this IIA Report.

9.8 Following the above periods of public consultation, the Local Plan will be independently examined by a Government-appointed Planning Inspector appointed by the Secretary of State, who will consider and challenge its content and any objections to it and reach a decision on its overall 'soundness' before it can proceed to be adopted.

LUC

December 2023

Appendix A

Consultation comments

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

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

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

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

Respondent	Section of the IIA Scoping Report	Representation	Response
		<p>We recommend that the wording of the objective be revisited and clarified for a number of reasons;</p> <ul style="list-style-type: none"> ■ The objective puts emphasis on 'land that contributes to ecological connectivity', however biodiversity net gain should be applied much more widely, by individual developers and at wider functional scales (as referred to in Paragraph 3.7). ■ The objective (and the final bullet point of 3.35) implies that biodiversity net gain is to be achieved by avoiding and mitigating impacts on existing habitats. This will not in itself achieve measurable net gain. Policies must be designed to ensure that developments go above and beyond this to deliver habitat enhancements, only in this way can net gain, as opposed to no net loss, be achieved. 	<p>A new bullet point under Paragraph 3.38 has been added: "There is a clear opportunity to deliver biodiversity improvements through efforts to improve the ecological status of these watercourses through restoration and enhancement efforts." LUC Water quality has been recognised as a key issue in Table 3.1 'Key sustainability issues for Enfield Borough and likely evolution without the Local Plan' of the June 2021 IIA produced by LUC.</p> <p>AECOM Objective wording changed to: Deliver biodiversity net gain at an ambitious scale through individual development contributions and a wider strategic focus on avoiding/mitigating impacts..... LUC In the June 2021 IIA produced by LUC, the wording of IIA objective 13 was changed back to its original wording, but with the appraisal question "Will the Local Plan... deliver biodiversity net gain through individual development contributions?" added to provide clarity on this objective.</p>
	Chapter 4 – Climate Change Adaptation	<p>...in our response to the Regulation 18 consultation we raised concerns regarding the lack of a revised Strategic Flood Risk Assessment (SFRA) to support the new Enfield Local Plan, this should form a key part of the evidence base.</p> <p>We will likely find any future local plan submission unsound unless it is supported by up to date SFRAs sites. We will expect all updated SFRAs to include model reruns with the most up to date climate change allowances. Therefore our existing Lee model should be updated to reflect these allowances. We will be able to provide you with any modelling that we hold, including some modelling already</p>	<p>AECOM Noted – This comment has been passed onto LBE and the Borough will respond accordingly.</p> <p>LUC As above.</p>

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

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

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

Respondent	Section of the IIA Scoping Report	Representation	Response
		<ul style="list-style-type: none"> ■ Flood risk policies should firstly aim to steer any future development away from areas of greatest flood risk. In other words, development should be directed towards flood zone 1 first, then flood zone 2, and finally where all other options have been exhausted flood zone 3. This assessment criteria should also be applied to any site allocation document. It is essential that the current and future impacts of climate change are factored in to this assessment, therefore SFRAs must be updated. This element of the assessment criteria is supported by Paragraph 160 of the NPPF. ■ The sequential approach should be applied where all options to allocate development outside of areas of highest flood risk have been exhausted (as per part 1 of this assessment criteria). Therefore all policy and site allocations should aim to move more vulnerable development to areas of lowest flood risk within a site. This could involve locating more vulnerable development in areas of a site at lower risk of flooding (if a site has areas of flood zone 1 or 2). Other options include locating more vulnerable development, such as housing, above less vulnerable development, such as offices or shops. This part of the assessment criteria is supported by Paragraph 161(d) of the NPPF. ■ Should development be allowed to go ahead in areas at risk of flooding then it must be designed to be safe for its lifetime without increasing flood risk elsewhere. This is supported by Paragraph 163 of the NPPF. ■ Any flood risk policy must aim to reduce flood risk overall. Therefore, all policies should maximise opportunities to restore rivers to more natural states, aim to reconnect rivers with their floodplains, and promote development-free buffer strips around main rivers. This is a requirement of Paragraph 161b of the NPPF and Policy SI 17 of the Draft London Plan. 	<p>LUC</p> <p>This comment relates more specifically to policy wording in the Local Plan than the IIA. However, the IIA framework against which the Local Plan will be appraised contains the following relevant questions relating to flood risk:</p> <ul style="list-style-type: none"> ■ Will the Local Plan...minimise the risk of flooding to people, property and infrastructure from rivers? ■ Will the Local Plan...avoid development in locations at risk from flooding or which could increase the risk of flooding elsewhere, taking into account the impacts of climate change?
		<p>The environmental impact of developments should be minimised through sustainable design and management of resource</p>	<p>AECOM</p>

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

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

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

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

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

Respondent	Section of the IIA Scoping Report	Representation	Response
			<p>LUC</p> <p>Key issues for this topic area are provided in Table 3.1. Further to this, the IIA framework against which the Local Plan will be appraised contains the following relevant questions relating to water quality:</p> <ul style="list-style-type: none"> ■ Will the Local Plan...ensure that development does not lead to the deterioration of groundwater, surface water or river water quality? ■ Will the Local Plan...locate development where adequate foul drainage, sewage treatment facilities, adequate potable water supply and surface water drainage can be made available?
		<p>It should be highlighted, in light of the borough's industrial history, that development in some areas could impact the underlying principal aquifer, waterways, and the associated potable/ drinking water supply. New local plan policies must be designed to ensure that development is correctly located so as to minimise impacts of water resources and current infrastructure must be retrofitted or upgraded to bring it in line with future water supply resilience targets. This will help to strengthen the scope of this chapter to include the wider water environment.</p>	<p>AECOM</p> <p>Noted – this point will be considered in the development of Local Plan policies.</p> <p>LUC</p> <p>This comment relates more specifically to the Local Plan than the IIA. However, Table 3.1 in the June 2021 IIA produced by LUC states “ Although there are a number of existing policies that address the Borough's water resources which would continue to apply in the absence of the Local Plan, there is an opportunity to build on these overarching policies through more specific policy wording that addresses the insufficient supply of water in the Borough and the provision of water infrastructure and upgrades to water resource services, specifically Deephams STW.”</p>
		<p>Development adjacent to rivers, and above SPZs and aquifers, has the potential to adversely impact water resources and quality. Development in these areas also represents an opportunity to engage with stakeholders and ensure the actions of the WFD and RBMPs are carried out.</p>	<p>AECOM</p> <p>Noted – this detail is better suited in the development of Local Plan policies and will be considered through this process.</p> <p>LUC</p>

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

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

Respondent	Section of the IIA Scoping Report	Representation	Response
		<p>resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation. If creating a Green Infrastructure Strategy for the borough, there is opportunity to think of climate change within this strategy.</p>	<p>LUC</p> <p>This comment relates more specifically to the Local Plan than the IIA. However, three IIA objectives specifically address flood risk, green infrastructure and climate change adaptation, respectively. It is noted that there is a lot of overlap between them:</p> <ul style="list-style-type: none"> ■ IIA objective 17 seeks "To manage and reduce the risk of flooding", with reference to Sustainable Drainage Systems (SuDS) in the appraisal questions. ■ IIA objective 13 seeks to "Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks". ■ IIA objective 2 seeks to "Ensure resilience to climate change particularly mindful of the likelihood of climate change leading to problematic high temperatures, worsened flood risk and increased risk of drought. <p>All policies will be appraised against these objectives.</p>
	<p>Chapter 12 – Landscapes and green infrastructure</p>	<p>would be useful to further conceptually link biodiversity net gain (discussed in Section 3) and GI together, as they complement each other and can help deliver environmental net gains.</p>	<p>AECOM</p> <p>Figure 12.1 was used to demonstrate the plethora of co-benefits green infrastructure can provide, including the biodiversity benefits.</p> <p>LUC</p> <p>The following appraisal question has been added under IIA objective 13: Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks.</p> <ul style="list-style-type: none"> ■ Will the Local Plan...safeguard and strengthen local ecological/green infrastructure networks that contribute to ecological connectivity both within Enfield Borough and their links with ecological networks in neighbouring boroughs?

Respondent	Section of the IIA Scoping Report	Representation	Response
		<p>When delivering the Local Plan, a strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 175 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Evidence of a strategic approach can be underpinned by Green Infrastructure Strategy. We encourage the provision of green infrastructure to be included as a specific policy or priority for the Local Plan or alternatively it can be integrated into relevant other policy areas, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure. Please see Chapter 8 of the draft London Plan for further policy guidance.</p>	<p>AECOM</p> <p>Noted – this is a consideration for the development of the Local Plan and SPDs so has not resulted in amendments to the IIA Scoping report.</p> <p>LUC</p> <p>This comment relates more specifically to the Local Plan than the IIA. However, IIA objective 13 seeks to "Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks" and asks the following appraisal question "Will the Local Plan...safeguard and strengthen local ecological/green infrastructure networks that contribute to ecological connectivity both within Enfield Borough and their links with ecological networks in neighbouring boroughs?". All policies will be appraised against this objective.</p>
Historic England	Chapter 10 – Heritage and townscape	<p>the Planning (Listed Buildings and Conservation Areas) Act 1990 should be the principal point of reference in terms of the built heritage</p>	<p>AECOM</p> <p>Paragraph 10.6 has been added in the National context section of Chapter 10 to reference this piece of legislation.</p> <p>LUC</p> <p>As above.</p>
		<p>Historic England has produced a number of other advice notes that should also be included here.</p> <p>These include (please see here)</p> <ul style="list-style-type: none"> ■ GPA 1 Local Plan Making ■ GPA 3 Managing Significance in Decision Making in the Historic Environment ■ HEAN 3 The Historic Environment and Site Allocations ■ HEAN 4 Tall Buildings 	<p>AECOM</p> <p>As these are guide notes these resources have not been included in the policy baseline review.</p> <p>However the point has been acknowledged and these documents will be considered during the development of relevant Local Plan policies.</p> <p>LUC</p> <p>Not referenced in IIA Report.</p>

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

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

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

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

Appendix A
 Consultation comments

Enfield Local Plan: Integrated Impact Assessment
 December 2023

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

¹ LUC (2021). Green Belt and Metropolitan Open Land Study. (see https://www.enfield.gov.uk/data/assets/pdf_file/0007/12112/Green-Belt-and-MOL-Assessment_Appendices_Part1-LUC-2021-Planning.pdf)

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

² LUC (2021). Green Belt and Metropolitan Open Land Study. (see https://www.enfield.gov.uk/data/assets/pdf_file/0007/12112/Green-Belt-and-MOL-Assessment_Appendices_Part1-LUC-2021-Planning.pdf)

Respondent	Section of the IIA Report	Representation	LUC's response
	Strategy, IIASA/SEA, SA27: Land at Crews Hill	report fails to do – and this failure is fatal to the reliability of the SEA - is to objectively test the value of the four SILs within Enfield. The Parish Council's position is that the SIL at Brimsdown is low value industrial land, has poor road connections to main trunk roads and is not well-placed for employment. The Brimsdown site could be a candidate for redevelopment as a mixed-use housing allocation. Slavish adherence to and not testing this industrial site because that land is identified as a historic industrial site and therefore is a SIL has no place in an SA/SEA assessment at this stage when all options should be on the table. The Parish Council notes the CPRE update report also lists Brimsdown as a brownfield land suitable for redevelopment.	<p>brownfield sites, were included within the HELAA which was the starting point for identifying reasonable alternative options to be subject to IIA.</p> <p>The Council has undertaken and produced detailed evidence reviewing employment land in the borough, namely the Employment Land Review³, Industrial Intensification Study⁴ and Employment Topic Paper⁵. These documents informed the proposed preferred options within the Regulation 18 Draft Local Plan and all evidence was published alongside the consultation.</p> <p>As there is a great need for continued retention of SIL as well as an increase in industrial floorspace over the plan period, it is the Council's position that there should be no net loss in employment floorspace within designated employment areas. This is consistent with London Plan policies E7 and E1. As such, SIL release was not identified as a preferred option within the Draft Local Plan.</p>
Friends of Firs Farm	Chapter 6: Blue and green Enfield, BG10: Burial and crematorium spaces, IIA	The Integrated Impact Assessment (IIA) accompanying the draft plan ⁸ indicates that, regarding Policy DM BG10: Burial and crematorium spaces, that the sites allocated for crematoria (i.e. Firs Farm and Church Street Recreation Ground) would have similar effects when assessed against the IIA objectives. This clearly does not properly consider the ecological and flood prevention role of Firs Farm when compared with Church Street Recreation Ground. This is also not consistent with the assessment of cumulative effects presented in Table 7.4 of the IIA document, which identifies differential effects for the two proposed sites in terms of flood risk.	<p>Firs Farm Recreation Ground (Part) and Church Street Recreation Ground both receive uncertain significant negative effects in relation to IIA objective 13: biodiversity and geodiversity. This is due to the fact both sites are within close proximity of biodiversity assets.</p> <p>Firs Farm Recreation Ground (Part) is incorrectly recorded as having a significant negative effect in relation to IIA objective 17: flooding when it should have been recorded as having a minor negative effect. This is because it has a predicted peak flood depth of greater than 100mm. The justification text for this site against IIA objective 17 in Appendix E should instead read "Site has a predicted peak flood depth of greater than 100mm and is on greenfield land. However, the site does not fall within Flood Zones 2 or 3". The justification text for Church Street Recreation Ground should be the same. Table 7.4 in Chapter 7 of the IIA should</p>

³ AECOM (2018). London Borough of Enfield Employment Land Review. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0016/4921/enfield-employment-land-review-report-aecom-planning.pdf)

⁴ AECOM (2020). Enfield Industrial Intensification Study. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0022/5890/aecom-final-draft-enfield-industrial-intensification-report-2020-planning.pdf)

⁵ Enfield Council (2021). Enfield Local Plan: Employment Topic Paper. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0020/11576/Enfield-Employment-Topic-Paper-2021-Planning.pdf)

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

Respondent	Section of the IIA Report	Representation	LUC's response
		<p>providing a link between the North Circular Road and the northern areas of Enfield. This conflicts with the mainly residential uses and green spaces along Firs Lane, and the presence of several schools in the area. Enfield Council has implemented several measures in recent years to discourage car traffic along Firs Lane and to encourage the use of more sustainable travel modes. For example, traffic calming measures have been implemented along much of the length of Firs Lane, and access gates have been placed just north of the junction with Barrowell Green to prevent larger vehicles travelling along it. At Firs Farm specifically, Transport for London has provided finance for the provision of cycle routes, which would be partly lost should the proposal for cremation/burial use be implemented. Most recently, the 456 bus route between Crews Hill and North Middlesex Hospital has been provided to improve public transport services.</p> <p>Traffic assessments for similar types of development¹⁰ acknowledge that a high proportion of people visiting the site will do so by private car, due to the nature of crematoriums, and people from out with the local area are unlikely to walk, cycle or take public transport to travel to and from a crematorium. This source also indicates that a proposed crematorium could generate approximately 40 two-way vehicle trips per hour during the weekday development AM and PM peak periods. The assessments reported by Enfield Council appear not to have taken this into account. Friends of Firs Farm believe that the additional traffic on Firs Lane resulting from this proposal, should it go ahead, would worsen noise and air pollution, and reduce road safety. This would also impact adversely and unacceptably on the amenity of Firs Farm, both in terms of biodiversity and enjoyment of the open spaces.</p>	<p>of the Ultra-low Emissions Zone to the North Circular Road in 2021 or petrol and diesel car ban in 2035⁶), or site specific mitigation.</p>
LBE Conservative Group	Chapter 13: Movement and connectivity, T1: Promoting sustainable transport, IIA	The Integrated Impact Assessment has not set out the reality of the proposals on Enfield's roads.	The Strategic Transport Assessment will provide a detailed analysis of the impacts of development on LBE's road and its findings will be used to ensure growth is phased alongside transport improvements.

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

Respondent	Section of the IIA Report	Representation	LUC's response
Enfield Climate Action Forum (Encaf) Land Use Working Group	Chapter 12: Culture, leisure and recreation. CL2: Leisure and tourism, IIA	DMCL2 explains that the Council “considers that the leisure and visitor experience in the borough has the potential to contribute significantly to Enfield’s economic growth. It can contribute to enhancing quality of life through delivering experiences for visitors and a greater variety of jobs and training opportunities. Importantly, it can help support regeneration, and diversify and develop the rural economy”. The Integrated Impact Assessment (IAA) Chapter 12 identifies as an issue “the need to protect valued landscapes, including designed landscapes and extensive semirural landscape character areas in the north of the borough, and avoid loss of Green Belt that contributes to the established Green Belt purposes”	Policy DM CL2: Leisure and tourism receives a significant positive effect in relation to IIA objective 9: economy, for the reasons outlined by the respondent. The policy receives a minor positive effect in relation to IIA objective 15: landscape and townscape, as tourism and leisure developments are required to respect the size, character and function of their setting.
Enfield Climate Action Forum (Encaf) Land Use Working Group	Chapter 3: Place, PL9: Crews Hill, IIA	The Integrated Impact Assessment (IAA) scoping report proposes a heritage related objective to: <ul style="list-style-type: none"> • Sustain and enhance the significance of heritage assets, support the integrity, special interest, character, appearance and historic setting of historic settlements and heritage assets, both designated and non-designated; • facilitate enhancements to the fabric and setting of the historic environment; • support access to, interpretation and understanding of the historic environment (including through investigations and studies which better reveal the significance of archaeological assets). CL9 Crews Hill, CL10 Chase Park and PL1 Enfield Town do not do this.	Policies SP PL1: Enfield Town, SP PL9: Crews Hill and SP PL10: Chase park all receive uncertain mixed minor positive and minor negative effects in relation to IIA objective 14: historic environment for the reasons outlined in Chapter 5 of the IIA.
Natural England	Chapter 14: Environmental protection, ENV1: Local environmental protection, SA/HRA	In accordance with the paragraph 175 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside	The consideration of reasonable alternatives has been a key focus of attention within the IIA process. The site assessment criteria in Appendix B of the Reg 18 IIA Report contain a number of objectives relating to the environment. IIA objective 13: biodiversity and geodiversity looks at the proximity of sites to Sites of Special Scientific Interest, Sites of Importance for Nature Conservation, Local Nature Reserves, Priority Habitats and Ancient Woodland, whilst IIA objective 4: health and wellbeing looks at the proximity of sites to areas of open space, Metropolitan Open Land, Green

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

Appendix A
 Consultation comments

Enfield Local Plan: Integrated Impact Assessment
 December 2023

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

Respondent	Section of the IIA Report	Representation	LUC's response
			<p>expected to have adverse effects in relation to IIA objectives 4: health and wellbeing, 9: economy, 11: air pollution, 12: sustainable transport and 17: flooding. With regard to the environment, the site is expected to have adverse effects in relation to IIA objectives 9: economy, 11: air pollution and 17: flooding.</p> <p>At Reg 18 stage, LUC provided some recommendations on changes to policy wording to address adverse effects identified, as outlined in Table 2.4 of the Reg 18 IIA report. Although these recommendations did not specifically address Policies SP PL9 (Land at Crews Hill) and SP PL10 (Chase Park), they did in general recommend mitigation to address flood risk and the impact of development on climate change, in addition to policy wording to specifically identify how people's health and wellbeing could be improved. At Reg 19 stage, further consideration will be given to whether the policies of the proposed plan taken as a whole adequately mitigate any adverse effects of the chosen spatial strategy on the environment and people's health.</p>
<p>Hadley Wood Neighbourhood Planning Forum</p>	<p>Chapter 8: Homes for all, H1: Housing development sites, site selection, SA45: Land between Camlet Way and Crescent West, Hadley Wood</p>	<p>The updated Plan includes the Hadley Wood site but fails to evidence what alternatives were considered to the release from the Green Belt of the site. The Inspector's Examination of the East Herts Local Plan makes it clear that justification must be provided for each site, and notes that East Herts Council's Review was at a strategic level - so as to justify large parcels as a whole - with its applicability to small sites adjacent to urban areas being debatable. Enfield has made that same mistake. https://www.welhat.gov.uk/media/12878/EX39-Green-Belt-review-note-December-2017/pdf/ED39_Green_Belt_review_note_Dec_2017.pdf?m=636489409149570000</p>	<p>The consideration of reasonable alternatives has been a key focus of attention within the IIA process. The hierarchy outlined in Table 2.3 of the Reg 18 IIA was used by LBE in Stage 2 of their Site Selection methodology to help identify sites that could form part of spatial strategy that provides a sustainable pattern of development. As stated in paragraph 2.34 of the Reg 18 IIA, "The hierarchy seeks to ensure that previously developed land in the urban area will be given the highest priority, with isolated greenfield sites in the Green Belt given the lowest priority". As explained in paras 2.34-2.35 of the Reg 18 IIA, all site options that emerged from Stage 1: Identification and initial sift of sites were subject to IIA as reasonable alternatives, except those that were assessed by the Council as being isolated Green Belt sites (priorities 7 and 8).</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation, therefore the IIA has not assessed sites against the purposes of Green Belt. The performance of potential development locations in Green Belt terms was subject to a separate assessment. The Council appointed LUC to produce a</p>

Appendix A
Consultation comments

Enfield Local Plan: Integrated Impact Assessment
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Respondent	Section of the IIA Report	Representation	LUC's response
			<p>Green Belt and Metropolitan Open Land Study⁷, which can be found on their website. The Study draws out strategic variations in the contributions of Green Belt land to the five Green Belt purposes set out in the National Planning Policy Framework, and assesses the potential harm to the designation if any land were to be de-designated from the Green Belt through the Local Plan process. The Green Belt and Metropolitan Open Land Study informed Stage 2 of the Site Selection process.</p>

⁷ LUC (2021). Green Belt and Metropolitan Open Land Study. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0007/12112/Green-Belt-and-MOL-Assessment_Appendices_Part1-LUC-2021-Planning.pdf)

Appendix B

Site assessment assumptions

Table B.1: Site assessment criteria and assumptions

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
IIA objective 1: Ensure the Local Plan serves to minimise LBE's per capita CO₂ emissions such that the Council will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040							
All types of site options							
The extent to which the location of development sites would facilitate the use of sustainable modes of transport in place of cars is considered separately under IIA objective 12 below. The location of development will not otherwise significantly affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage. Those policies in the Local Plan have been appraised separately to the site options. This IIA objective has therefore been scoped out of the site options assessment.							
IIA objective 2: Ensure resilience to climate change particularly mindful of the likelihood of climate change leading to problematic high temperatures, worsened flood risk and increased risk of drought							
All types of site options							
The extent to which flood risk can be managed and reduced is considered separately under IIA objective 17 below. The location of development will not otherwise significantly affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage. Those policies in the Local Plan have been appraised separately to the site options. This IIA objective has therefore been scoped out of the site options assessment.							
IIA objective 3: Deliver housing to meet agreed targets and support an appropriate mix of housing types and tenures, including affordable and specialist housing, including housing for the elderly and disabled people							
Residential/mixed-use (incl. residential uses) site options							
All residential site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites will provide opportunities for the development of a larger number of homes and so would have significant positive effects.							
<i>3a Housing provision</i>	Capacity for >=100 housing units	Capacity for <100 housing units	N/A	N/A	N/A	■ Contained within the shapefile for each site	Scoring of significance will match the major and minor effects.
Industrial/employment site options							
The location of industrial/employment/mixed-use sites is not considered likely to affect this objective; therefore this objective has been scoped out for industrial/employment/mixed-use sites.							
IIA objective 4: Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the Borough							
Residential/mixed-use (incl. residential uses) site options							

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
Residential sites that are close to existing healthcare facilities (i.e. GP surgeries) will help to ensure that residents have good access to healthcare services. Other factors not captured by the assessment of site options include there being capacity at those healthcare facilities to accommodate new residents and whether new residential development supports the provision of additional healthcare capacity.							
Public health will also be influenced by the proximity of sites to open spaces, walking and cycle paths, easy access to which can encourage participation in active outdoor recreation.							
<i>4a GP surgeries</i>	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	>800m from nearest NHS GP surgery	N/A	<ul style="list-style-type: none"> ■ LBE GP surgeries 	Each criterion 4a to 4c is scored: <ul style="list-style-type: none"> ■ Major positive +3 ■ Minor positive +1 ■ Minor negative -1 ■ Major negative -3
<i>4b Access to recreation</i>	<=800m from open space, including Metropolitan Open Land and green loops/links ⁸ AND <=400m from walking or cycle path	<=800m from open space, including Metropolitan Open Land and green loops/links OR <=400m from walking or cycle path	N/A	>800m from open space, including Metropolitan Open Land and green loops/links AND >400m from walking or cycle path	N/A	<ul style="list-style-type: none"> ■ LBE open spaces (excluding cemeteries, churchyards and civic spaces) ■ LBE Metropolitan Open Land ■ LBE green loops ■ LBE green links ■ LBE Lee Valley Regional Park ■ LBE Public Rights of Way ■ Sustrans National and 	Scores totalled and then averaged (i.e. total score divided by 3). Overall, significance is scored as follows: <ul style="list-style-type: none"> ■ Significant positive >=2 ■ Minor positive >0 to <2 ■ Minor negative <0 to >-2 ■ Significant negative <=-2
<i>4c Loss of recreation</i>	N/A	N/A	All other sites.	N/A	Contains existing open space, including Metropolitan Open Land and green loops/links OR		

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

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
					Contains walking or cycle path	<ul style="list-style-type: none"> Regional Cycle Routes ■ LBE local cycle routes 	
Industrial/employment site options							
The location of industrial/employment/mixed-use sites is not considered likely to affect this objective; therefore this objective has been scoped out for industrial/employment/mixed-use sites.							
IIA objective 5: Support good access to services, facilities and wider community infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.							
Residential/mixed-use (incl. residential uses) site options							
The effect of residential site options on the educational element of this objective was assessed on the basis of the access that they provide to existing educational facilities. Other factors not captured by the assessment of site options include to there being capacity at those schools to accommodate new pupils and whether new residential development supports the provision of additional school places. The access a site has to more general services and facilities is considered separately under IIA objective 10 below.							
<i>5a Education</i>	<=800m from one existing primary school AND <=800m from existing secondary school	<=800m from one existing primary school OR <=800m from existing secondary school	N/A	>800m from existing primary or secondary school	N/A	<ul style="list-style-type: none"> ■ LBE primary schools ■ LBE secondary schools 	Scoring of significance will match the major and minor.
Industrial/employment site options							
The location of industrial/employment/mixed-use sites is not considered likely to affect this objective; therefore this objective has been scoped out for industrial/employment/mixed-use sites.							
IIA objective 6: Encourage social inclusion, promotion of equality and a respect through diversity							
All types of site options							
The London Borough of Enfield contains a number of Lower-Layer Super Output Areas (LSOAs) that fall within the most deprived areas in England. Therefore, site options that fall within the most deprived areas of the Borough can help regenerate those areas through residential, industrial and mixed-use development and the delivery of supporting infrastructure.							

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
<i>6a Deprivation</i>	Any part of the site is located within one of the 10% most deprived areas in England	Any part of the site is located within one of the 10-20% most deprived areas in England	All other sites	N/A	N/A	<ul style="list-style-type: none"> ONS Index of Multiple Deprivation 	Scoring of significance will match the major, minor and negligible effects.
IIA objective 7: Reduce crime and increase community safety							
All types of site options							
The effects of new development on levels of crime and fear of crime will depend on factors such as the incorporation of green space within development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of development sites; rather they will be determined through the policies in the Local Plan and detailed proposals for each site. This objective was therefore scoped out of the site options assessment.							
IIA objective 8: Focus on delivering the 'Vision Zero' target for road safety							
All types of site options							
The location of development will not significantly affect the achievement of this objective as effects will depend largely on the detailed proposals for sites, such as the incorporation of walking and cycling routes, which would be influenced by policies in the Local Plan and details submitted at the planning application stage. The policies in the Local Plan were appraised separately to the site options. This objective was therefore scoped out of the site options assessment.							
IIA objective 9: Support a strong, diverse and resilient economy that provides opportunities for all							
Residential site options							
The location of residential sites will influence the achievement of this objective by affecting how easily residents would be able to access job opportunities in existing employment areas.							
<i>9a Access to employment</i>	<=100m of Strategic Industrial Location or Locally Significant Industrial Site	N/A	N/A	>100m of Strategic Industrial Location or Locally Significant Industrial Site	N/A	<ul style="list-style-type: none"> LBE Strategic Industrial Locations LBE Locally Significant Industrial Sites 	Each criterion 9a to 9b is scored: <ul style="list-style-type: none"> Major positive +3 Negligible 0 Minor negative -1 Major negative -3
<i>9b Safeguarding employment land</i>	N/A	N/A	All other sites	N/A	Any part of the site is located		Scores totalled and then averaged (i.e. total score)

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
					within a Strategic Industrial Location or a Locally Significant Industrial Site		divided by 2). Overall, significance is scored as follows: <ul style="list-style-type: none"> ■ Significant positive >=2 ■ Minor positive >0 to <2 ■ Negligible 0 ■ Minor negative <0 to >-2 ■ Significant negative <=-2
Mixed-use (incl. residential uses) site options							
The location of residential and mixed-use sites will affect how easily residents are able to access job opportunities in existing employment areas, in addition to ensuring new job opportunities are provided to match population growth that is being planned for within the Local Plan.							
<i>9a Access to employment</i>	<=100m of Strategic Industrial Location or Locally Significant Industrial Site	N/A	N/A	>100m of Strategic Industrial Location or Locally Significant Industrial Site	N/A	<ul style="list-style-type: none"> ■ LBE Strategic Industrial Locations ■ LBE Locally Significant Industrial Sites ■ GIS 	Each criterion 9a to 9c is scored: <ul style="list-style-type: none"> ■ Major positive +3 ■ Minor positive +1 ■ Negligible 0 ■ Minor negative -1 ■ Major negative -3 Scores totalled and then averaged (i.e. total score divided by 3). Overall,
<i>9b Safeguarding employment land</i>	N/A	N/A	All other sites	N/A	Any part of the site is located within a Strategic Industrial Location		

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
					or a Locally Significant Industrial Site		significance is scored as follows: <ul style="list-style-type: none"> ■ Significant positive >=2 ■ Minor positive >0 to <2 ■ Negligible 0 ■ Minor negative <0 to >-2 ■ Significant negative <=-2
<i>9c Employment provision</i>	Large site (>=10ha)	Small site (<10ha)	N/A	N/A	N/A		
Industrial/employment site options							
The provision of new industrial/employment/mixed-use sites in any location is likely to have a positive effect on this objective by ensuring that new job opportunities are provided to match the population growth that is being planned for within the Local Plan. Effects will be particularly positive where sites are large in size as they will result in more job creation.							
<i>9c Employment provision</i>	Large site (>=10ha)	Small site (<10ha)	N/A	N/A	N/A	■ GIS	Scoring of significance will match the major and minor effects.
IIA objective 10: Support the vitality of the Borough's town and local centres							
All types of site options							
The London Borough of Enfield has identified a town centre hierarchy in the Regulation 19 Proposed Submission Local Plan This classifies settlements in the Borough as Major Centres, District Centres and Local Centres ⁹ . New development located within or near to one of these centres has the potential contribute to the vitality of those centres. As each site is assessed individually, this contribution is considered to be minor rather than significant.							
<i>10a Major, District and Local Centres</i>	N/A	<=100m of Major, District or Local Centres	>100m of Major, District or Local Centres	N/A	N/A	■ LBE Major Centres	Scoring of significance will match the major,

⁹ Local Centres include Large Local Centres, Small Local Centres and Local Shopping Parades.

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						<ul style="list-style-type: none"> ■ LBE District Centres ■ LBE Local Centres 	minor and negligible effects.
IIA objective 11: Minimise air pollution							
All types of site options							
<p>The assessment of effects of site options in relation to air quality focuses on the variation across the Borough in baseline concentrations of key air pollutants and how residential development at different locations would result in different levels of exposure to these pollutants.</p> <p>In 2021, the WHO updated its recommended guidelines for air pollutants (“WHO global air quality guidelines: particulate matter (PM_{2.5} and PM₁₀), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide” - https://www.who.int/publications/i/item/9789240034228). The new air quality guidelines reflect the best available health evidence and WHO’s recommendations continue to be recognised globally as the targets that should be met to protect public health. Minor negative effects are assumed to occur when residential development would occur in a location where the current baseline annual mean concentration of a pollutant (per LAEI 2019 data) exceeds these 2021 WHO guidelines. Major negative effects are assumed to occur in locations where current annual mean pollution exceeds both the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK’s national air quality objectives (see https://uk-air.defra.gov.uk/assets/documents/Air_Quality_Objectives_Update_20230403.pdf).</p> <p>We do not give consideration to whether a site is within or outside of an Air Quality Management Area (AQMA) under this objective, as the whole Borough has been declared an AQMA. This is as a result of a 2011 air quality assessment that showed the 1 hour mean objective of 200µg m-3 (not to be exceeded more than 18 times a year) for NO₂ and 24 hour mean objective of 50µg m-3 (not to be exceeded more than 35 days in one year) for PM₁₀ to have been exceeded in parts of the Borough. If the assessment of site options was to give consideration to the AQMA, all site options would receive the same effect, which would not help in identifying which ones perform better or worse in air quality terms.</p> <p>The assessment of site options has not taken into account planned measures that will improve future air quality (such as the expansion of the Ultra Low Emissions Zone across all London boroughs in 2023 or the ban on sale of new petrol and diesel cars in 2035¹⁰), or site-specific mitigation.</p> <p>The effect of the Plan as a whole on air quality will be assessed elsewhere, within the cumulative effects section of the IIA. This will be informed by air quality modelling being carried out on behalf of the Council by third party consultants.</p>							

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

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
11a NO ₂ pollution	N/A	N/A	0-10 µg/m ³	10-40 µg/m ³	>40 µg/m ³	LAEI annual mean ground level concentration 2019 Source: https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory-laei-2019 (this also includes the WHO Guidelines for air quality) https://www.enfield.gov.uk/_data/assets/pdf_file/0011/30143/Air-quality-status-report-2022-Environment.pdf https://www.iqair.com/uk/england/enfield	Each criterion 11a to 11c is scored: <ul style="list-style-type: none"> ■ Negligible 0 ■ Minor negative -1 ■ Major negative -3 Scores totalled and then averaged (i.e. total score divided by 3). Overall, significance is scored as follows: <ul style="list-style-type: none"> ■ Negligible 0 ■ Minor negative <0 to >-2 ■ Significant negative <=-2
11b PM ₁₀ pollution	N/A	N/A	0-15 µg/m ³	15-40 µg/m ³	>40 µg/m ³		
11c PM _{2.5} pollution	N/A	N/A	0-5 µg/m ³	5-20 µg/m ³	>20 µg/m ³		

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

All types of site options

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

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
<i>12a Sustainable transport</i>	PTAL = 5 or 6a	PTAL = 4	PTAL = 3	PTAL = 2	PTAL = 0, 1a or 1b	<ul style="list-style-type: none"> London Datastore PTAL ratings 	Each criterion 12a to 12b is scored: <ul style="list-style-type: none"> Major positive +3 Minor positive +1 Minor negative -1 Major negative -3 Scores totalled and then averaged (i.e. total score divided by 2). Overall, significance is scored as follows: <ul style="list-style-type: none"> Significant positive >=2 Minor positive >0 to <2 Negligible 0 Minor negative <0 to >-2 Significant negative <=-2
<i>12b Services and facilities</i>	<=200m of Major, District or Local Centres	201-400m of Major, District or Local Centres	N/A	401-800m of Major, District or Local Centres	>800m of Major, District or Local Centres	<ul style="list-style-type: none"> LBE Major Centres LBE District Centres LBE Local Centres 	

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

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

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

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
proxy for this in relation to SSSIs and internationally designated sites). Instead, this would be determined once more specific proposals are developed and submitted as part of a planning application.							
Open space, including Metropolitan Open Land and Green Chains, is addressed below under IIA objective 15.							
Residential site options							
<i>13a International and national biodiversity and geodiversity assets</i>	N/A	N/A	All other sites	Intersects with 'all planning applications', 'residential' or 'rural residential' IRZ ¹¹	Intersects with internationally or nationally designated site	<ul style="list-style-type: none"> ■ Natural England SSSI Impact Risk Zones ■ Natural England Special Area of Conservation ■ Natural England Special Protection Area ■ Natural England Ramsar site ■ Natural England National Nature Reserve <p>The 'all planning applications' and 'rural residential' IRZs only relate to development outside or extending outside</p>	<p>If any of the criteria receive a major negative effect then the score is significant negative.</p> <p>If both criteria 13a and 13b receive a minor negative effect then the score is significant negative.</p> <p>If only one of criteria 13a and 13b receive a minor negative effect then the score is minor negative.</p> <p>For all other sites the score is negligible.</p>

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

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						of existing settlements/urban areas. Use the following dwelling capacity categories to establish relevance of IRZ: <ul style="list-style-type: none"> - 500+ - 100+ - 50+ - 10+ <ul style="list-style-type: none"> ■ GIS settlement boundaries 	
<i>13b Locally designated wildlife sites, Priority Habitat Inventory and Ancient Woodland</i>	N/A	N/A	All other sites	<=250m from a locally designated site, Priority Habitat or Ancient Woodland	Intersects with a locally designated site, Priority Habitat or Ancient Woodland	<ul style="list-style-type: none"> ■ LBE Local Wildlife Sites (also referred to as Sites of Importance for Nature Conservation, Sites of Nature Conservation Interest, Sites of Metropolitan/Borough/Local Importance, or 	

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						other locally-specific terms) <ul style="list-style-type: none"> ■ Natural England Local Nature Reserves ■ Natural England/LBE Priority Habitat Inventory ■ Natural England Ancient Woodland Inventory 	
Mixed-use (incl. residential uses) site options							
<i>13a International and national biodiversity and geodiversity assets</i>	N/A	N/A	All other sites	Intersects with 'all planning applications', 'residential', 'rural residential', 'rural non-residential', 'air pollution' or 'water supply' IRZ	Intersects with internationally or nationally designated site	<ul style="list-style-type: none"> ■ Natural England SSSI Impact Risk Zones ■ Natural England Special Area of Conservation ■ Natural England Special Protection Area ■ Natural England Ramsar site ■ Natural England National Nature Reserve 	<p>If any of the criteria receive a major negative effect then the score is significant negative.</p> <p>If both criteria 13a and 13b receive a minor negative effect then the score is significant negative.</p> <p>If only one of criteria 13a and 13b receive a minor</p>

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						<p>The 'all planning applications' and 'rural residential' IRZs only relate to development outside or extending outside of existing settlements/urban areas.</p> <p>Use the following dwelling capacity categories to establish relevance of IRZ:</p> <ul style="list-style-type: none"> - 500+ - 100+ - 50+ - 10+ <p>■ GIS settlement boundaries</p>	<p>negative effect then the score is minor negative. For all other sites the score is negligible.</p>
<p><i>13b Locally designated wildlife sites, Priority Habitat Inventory and Ancient Woodland</i></p>	<p>As for residential site options</p>					<p>■ LBE Local Wildlife Sites (also referred to as Sites of Importance for Nature Conservation, Sites of Nature</p>	

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						Conservation Interest, Sites of Metropolitan/Borough/Local Importance, or other locally-specific terms) <ul style="list-style-type: none"> ■ Natural England Local Nature Reserves ■ Natural England/LBE Priority Habitat Inventory ■ Natural England Ancient Woodland Inventory 	
Industrial/employment site options							
<i>13a International and national biodiversity and geodiversity assets</i>	N/A	N/A	All other sites	Intersects with 'rural non-residential', 'air pollution' and 'water supply' or 'all planning applications' IRZ	Intersects with internationally or nationally designated site	<ul style="list-style-type: none"> ■ Natural England SSSI Impact Risk Zones ■ Natural England Special Area of Conservation ■ Natural England Special Protection Area 	

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						<ul style="list-style-type: none"> ■ Natural England Ramsar site ■ Natural England National Nature Reserve <p>The 'rural non-residential' and 'all planning applications' IRZs only relate to development outside or extending outside of existing settlements/urban areas. Therefore, only sites falling within these two IRZs that are outside or extend outside of existing settlements/urban areas rate minor negative.</p> <ul style="list-style-type: none"> ■ GIS settlement boundaries 	
<i>13b Locally designated wildlife sites, Priority Habitat Inventory and Ancient Woodland</i>	As for residential site options						

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

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
All types of site options							
<p>The NPPF states that the "significance [of a heritage asset] can be harmed or lost through alteration or destruction of the heritage asset or development within its setting". However, development could also enhance the significance of the asset, provided that the development preserves those elements of the setting that make a positive contribution to or better reveal the significance of the asset. In all cases, effects from a Local Plan site allocation will be subject to a degree of uncertainty as the actual effects on heritage assets will depend on the particular scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features, for example where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect.</p> <p>The proximity tests outlined below are intended to provide a basis for screening for the potential for adverse effects on heritage assets but in the absence of a separately commissioned historic environment sensitivity study or similar of all reasonable alternative site options they are subject to a high degree of uncertainty. Distances used are based on professional judgement. Longer screening distances are used for site options outside of existing settlements to reflect typically longer sightlines in rural vs. urban areas.</p>							
<i>14a Proximity to historic assets: sites within existing settlements</i>	N/A	N/A	All other sites	101-250m	<=100m	<ul style="list-style-type: none"> ■ Historic England listed buildings ■ Historic England scheduled monuments ■ Historic England parks and gardens ■ LBE conservation areas ■ LBE locally listed heritage assets ■ LBE archaeological priority areas 	Scoring of significance will match the major, minor and negligible effects. However, all effects to acknowledge uncertainty (?) in the absence of a heritage impact assessment: <ul style="list-style-type: none"> ■ All other 0? ■ Minor negative -? ■ Major negative --?
<i>14b: Proximity to historic assets: sites outside of existing settlements</i>	N/A	N/A	All other sites	501-1,000m	<=500m		

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						<ul style="list-style-type: none"> GIS settlement boundaries 	
IIA objective 15: Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes							
All types of site options							
<p>Enfield's 'Character of Growth' informed the IIA of most site options at Regulation 19 stage. The study provides recommendations on the acceptable level of development and change in landscape and townscape terms for different areas of the Borough. Some site options were located in parts of the Borough located outside of the Character of Growth Study's scope (broadly those in the Green Belt or open spaces). IIA of these site options in landscape/ townscape terms fell back on a more simplistic appraisal method used at Regulation 18 stage, based on the size of sites and whether they are located in urban or more rural areas. Actual effects on landscape and townscape will also depend on the design, scale and layout of development within the site, which may help mitigate and/or enhance effects on the existing townscape.</p>							
<i>15a Landscape and townscape</i>	N/A	N/A	Site falls within an area where 'Transformative Change' is recommended.	Site falls within an area where 'Medium Change' is recommended.	Site falls within an area where 'Limited Change' is recommended.	LBE 'Character of Growth' study, specifically: <ul style="list-style-type: none"> 'Scale of Change Recommendation' map layer 	If any of the criteria receive a major negative effect then the score is significant negative. If only one of criteria 15a and 15b receive a minor negative effect then the score is minor negative.
<i>15b Open space</i>	N/A	N/A	All other sites	N/A	Contains existing open space, including Metropolitan Open Land and Green Chains	<ul style="list-style-type: none"> LBE open spaces (excluding cemeteries, churchyards and civic spaces) LBE Metropolitan Open Land LBE green loops LBE green links 	

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						<ul style="list-style-type: none"> LBE Lee Valley Regional Park 	
IIA objective 16: To achieve efficient use of land and materials							
All types of site options							
<p>Appraisal of site options in relation to this IIA objective considered whether the site is greenfield or brownfield and also what quality of agricultural land it contains.</p> <p>Development on brownfield land represents a more efficient use of land in comparison to the development of greenfield sites. Larger scale sites may also have more of an impact and therefore sites above 3 hectares have been used as an indication of larger scale development. The effects of development on waste generation will depend largely on residents' behaviour. However, where development takes place on previously developed land there may be opportunities to reuse onsite buildings and materials, thereby reducing waste generation. Although open spaces may contain a small number of buildings to maintain recreational use, they are largely undeveloped and considered greenfield land.</p> <p>Furthermore, all new development will result in the increased consumption of minerals for construction but this will not be influenced by the location of the development. The location of development sites can influence the efficient use of minerals as development in Minerals Safeguarding Areas may sterilise mineral resources and restrict the availability of resources in the Borough. However, there are no Minerals Safeguarding Areas within LBE so this issue was scoped out of the IIA of site options.</p>							
<i>16a Brownfield/greenfield land</i>	>=3ha on brownfield land	<3ha on brownfield land	N/A	<3ha on greenfield land	>=3ha on greenfield land	<ul style="list-style-type: none"> GIS area LBE 	<p>If criterion 16a receives a major positive effect the site scores significant positive, irrespective of criterion 16b.</p> <p>If criterion 16a is not major positive, then each criterion 16a to 16b is scored:</p> <ul style="list-style-type: none"> Major positive +3 Minor positive +1 Negligible 0 Minor negative -1 Major negative -3
<i>16b Agricultural Land Classification</i>	N/A	N/A	All other sites	Greenfield land classed as Grade 3 agricultural land	Greenfield land classed as Grades 1 or 2 agricultural land	<ul style="list-style-type: none"> Natural England Agricultural Land Classification 	

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
							Scores totalled and then averaged (i.e. total score divided by 2). Overall, significance is scored as follows: <ul style="list-style-type: none"> ■ Significant positive >=2 ■ Minor positive >0 to <2 ■ Minor negative <0 to >-2 ■ Significant negative <=-2
IIA objective 17: To manage and reduce the risk of flooding							
All types of site options							
Site options were assessed by reference to the distribution of flood risk areas in the Borough. The effects of new development on this IIA objective will also depend to some extent on its design, for example whether it incorporates sustainable drainage systems (SuDS), which is unknown and cannot be addressed at this stage. Where site options are located in areas of high flood risk, it could increase the risk of flooding in those areas (particularly if the sites are not previously developed) and would increase the number of people and assets at risk from flooding. These factors are outside the scope of the site options appraisal.							
<i>17a Flood zones</i>	N/A	N/A	All other sites	>=25% within Flood Zone 2	>=25% within Flood Zone 3	<ul style="list-style-type: none"> ■ Environment Agency Flood Zones 2 and 3 	If any of the criteria receive a major negative effect then the score is significant negative. If both criteria 17a and 17b receive a minor negative effect then the
<i>17b Surface water flood risk</i>	N/A	N/A	All other sites	Contains land with a 1 in 100 year risk of surface water flooding	Contains land with a 1 in 30 year risk of surface water flooding	<ul style="list-style-type: none"> ■ Environment Agency Surface Water Flooding (1 in 30 year risk and 1 in 100 year risk) 	

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
							score is significant negative. If only one of criteria 17a and 17b receive a minor negative effect then the score is minor negative.
IIA objective 18: Minimise water use and protect water quality							
All types of site options							
Levels of water consumption within new development will be determined by its design and onsite practices, rather than the location of the site. However, the location of development could affect water quality during construction depending on its proximity to watercourses, water bodies and Source Protection Zones. The extent to which water quality is actually affected would depend on construction techniques and the use of SuDS within the design.							
<i>18a Water quality</i>	N/A	N/A	All other sites	N/A	Site contains a watercourse, water body or falls within a Source Protection Zone	<ul style="list-style-type: none"> ■ Environment Agency Source Protection Zones ■ OS Open Map Local 	Scoring of significance will match the major and negligible effects.

Table B.2: Amendments to the site assessment assumptions

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

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

Appendix B
Site assessment assumptions

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December 2023

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

Appendix C

Plans, policies and programmes

Air and water quality

International

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

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

National

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

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

C.3 The Environment Act 2021¹⁵ sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. Regarding air quality, the Act sets out legislation which covers:

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

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

¹² United Nations Department of Economic and Social Affairs (2015) The 2030 Agenda for Sustainable Development. (<https://sdgs.un.org/2030agenda>)

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

¹⁴ Ministry of Housing, Communities and Local Government (2019). Water supply, wastewater and water quality. (see <https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality>)

¹⁵ HM Government (2021) Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

¹⁶ DEFRA (2022) Establishing the Best Available Techniques for the UK (UK BAT). (see <https://www.gov.uk/government/publications/establishing-the-best-available-techniques-for-the-uk-uk-bat/establishing-the-best-available-techniques-for-the-uk-uk-bat#current-situation>)

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

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

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

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

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

C.8 The Water Supply (Water Quality) Regulations 2018²⁰ outlines guidelines and standards for maintaining the quality of water in a given water supply system. This regulation aims to ensure the safety and potability of water that is provided to the public. It covers various aspects related to water quality, including monitoring, testing, treatment, and reporting of water quality data. The regulation also sets out specific parameters for different contaminants and substances in the water, such as microbiological organisms, chemicals, and physical characteristics.

C.9 The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017²¹ focuses on ensuring good qualitative and quantitative health, i.e. on reducing and removing pollution and on ensuring that there is enough water to support wildlife at the same time as human needs.

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

C.11 The Environmental Permitting Regulations 2016²³ streamline the legislative system for industrial and waste installations into a single permitting structure for those activities which have the potential to cause harm to human health or the environment.

¹⁷ DEFRA (2019). Clean Air Strategy. (see

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

¹⁸ HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see

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

¹⁹ HM Government (2018). The Road to Zero. (see

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

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

²¹ HM Government (2017). The Water Environment (Water Framework Directive) (England and Wales) Regulations. (see

<https://www.legislation.gov.uk/uksi/2017/407/contents/made>)

²² Department for Environment Food and Rural Affairs and Department for Transport (2017). UK plan for tackling roadside nitrogen dioxide concentrations. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633270/air-quality-plan-detail.pdf)

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

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

C.12 The Air Quality Standards Regulations (2016)²⁴ set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO₂). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMAs).

C.13 The Water White Paper (2012)²⁵ provides the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It outlines the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

C.14 National Policy Statement for Waste Water (2012)²⁶ sets out Government policy for the provision of major waste water infrastructure. The policy set out in this National Policy Statement is, for the most part, intended to make existing policy and practice in consenting nationally significant waste water infrastructure clearer and more transparent.

C.15 Future Water: The Government's Water Strategy for England (2008)²⁷ sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, while discharge from sewers will be reduced.

C.16 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)²⁸ sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the Strategy are to:

- Further improve air quality in the UK from today and long term.
- Provide benefits to health quality of life and the environment.

C.17 The Environmental Protection Act 1990²⁹ makes provision for the improved control of pollution to air, water and land by regulating the management of waste and the control of emissions. The Act seeks to ensure that decisions pertaining to the environment are made in an integrated manner, in collaboration with appropriate authorities, non-governmental organisations and other persons.

C.18 The Environmental Protection Act 1990: Part 2A: Contaminated Land Statutory Guidance³⁰ establishes a framework for identifying and remediating land that has been polluted by hazardous substances. The Guidance provides detailed instructions and criteria for assessing and managing contaminated sites to ensure environmental protection and public health.

C.19 The Private Water Supplies (England) Regulations 2016 apply to all private water supplies intended for human consumption and water used for food preparation purposes. The Regulations require the local authority to carry out a risk assessment of every relevant supply in the district or borough. This involves a survey of the source of the supply and surrounding area to see if any contamination is possible. It includes checking any storage tanks, treatment systems and pipework associated with the supply. This will identify any actual and potential hazards that may affect the health of those drinking the water and what action is needed to mitigate those hazards.

²⁴ HM Government (2016). The Air Quality Standards Regulations. (see <https://www.legislation.gov.uk/uksi/2010/1001/contents/made>)

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

²⁶ HM Government (2012). National Policy Statement for Waste Water. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69505/pb13709-waste-water-nps.pdf)

²⁷ HM Government (2008). Future Water: The Government's water strategy for England (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf)

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

²⁹ HM Government (1990). Environmental Protection Act 1990. (see <https://www.legislation.gov.uk/ukpga/1990/43/contents>)

³⁰ Department for Environment, Food, and Rural Affairs (1990). The Environmental Protection Act 1990: Part 2A: Contaminated Land Statutory Guidance (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/223705/pb13735cont-land-guidance.pdf)

Sub-national

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

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

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

C.23 The Control of Dust and Emissions Supplementary Planning Guidance (SPG) (2021)³⁴ seeks to reduce emissions of dust, PM₁₀ and PM_{2.5} from construction and demolition activities in London. It also aims to control nitrogen oxides (NOx) from these same activities by introducing an Ultra Low Emissions Zone (ULEZ) for non-road mobile machinery.

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

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

Implications of the policy review

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

³¹ Greater London Authority (2021) The London Plan. (see <https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents>)

³² Greater London Authority (2023) Air Quality Positive (AQP) guidance. (see <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/air-quality-positive-aqp-guidance>)

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

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

³⁵ Environment Agency (2022) Thames River Basin District River Basin Management Plan. (see <https://www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022>)

³⁶ Greater London Authority (2018) London Environment Strategy. (see https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf)

Biodiversity

International

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

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

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

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

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

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

National

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

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

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

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

³⁷ COP26 United Nations Declaration on Forests and Land Use (2021)

³⁸ United Nations Department of Economic and Social Affairs (2015). The 2030 Agenda for Sustainable Development. (see <https://sdgs.un.org/2030agenda>)

³⁹ Convention on Biological Diversity (1992). International Convention on Biological Diversity.

⁴⁰ Council of Europe (1979). Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention).

⁴¹ Ramsar Convention on Wetlands of International Importance (1976)

⁴² Department for Levelling Up, Housing and Communities (2023). National Planning Policy Framework.

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NPPF_Sept_23.pdf)

⁴³ Ministry of Housing, Communities and Local Government (2019). Natural Environment. (see <https://www.gov.uk/guidance/natural-environment>)

C.35 The Environment Act 2021⁴⁴ sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. Biodiversity elements in the Act include:

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

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

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

C.37 The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019⁴⁶ protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

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

⁴⁴ HM Government (2021) Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

⁴⁵ HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

⁴⁶ HM Government (2019). The Conservation of Habitats and Species Regulations. (see <https://www.legislation.gov.uk/ukdsi/2019/9780111176573/schedules>)

⁴⁷ Department for Environment, Food and Rural Affairs (2008). The England Biodiversity Strategy Climate Change Adaptation Principles. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69270/pb13168-ebs-ccap-081203.pdf)

C.39 The Natural Environment and Rural Communities Act 2006⁴⁸ places a duty on public bodies to conserve biodiversity.

Sub-national

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

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

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

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

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

C.45 The Lee Valley Regional Park Biodiversity Action Plan 2019-2029⁵³ provides a framework for biodiversity action for the regional park. The overarching vision of the Plan is "*to work with partners and communities to conserve, create, restore and enhance the habitats of the Regional Park, providing access to and appreciation of this area*".

Implications of the policy review

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

Climate change adaptation and mitigation

International

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

⁴⁸ HM Government (2006). Natural Environment and Rural Communities Act 2006. (see: <https://www.legislation.gov.uk/ukpga/2006/16/contents>)

⁴⁹ Greater London Authority (2021) The London Plan. (see <https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents>)

⁵⁰ Greater London Authority (2018) London Environment Strategy. (see https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf)

⁵¹ Greater London Authority (2013). Tree and woodland strategies. (see <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance-and-spgs/tree-and-woodland>)

⁵² Greater London Authority (2023). Urban Greening Factor (UGF) guidance. (see <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/urban-greening-factor-ugf-guidance>)

⁵³ Lee Valley Regional Park Authority (2019). Lee Valley Regional Park's Biodiversity Action Plan 2019-2029. (see <https://www.leevalleypark.org.uk/biodiversity-action-plan>)

⁵⁴ United Nations Climate Change The Paris Agreement (2015)

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

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

National

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

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

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

C.52 The NPPF

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

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

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

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

⁵⁵ United Nations Department of Economic and Social Affairs (2015). The 2030 Agenda for Sustainable Development. (see <https://sdgs.un.org/2030agenda>)

⁵⁶ Ministry for Housing, Communities and Local Government (2021). Flood risk and coastal change. (see <https://www.gov.uk/guidance/flood-risk-and-coastal-change>)

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

⁵⁸ Ministry of Housing, Communities and Local Government (2015). Renewable and low carbon energy. (see <https://www.gov.uk/guidance/renewable-and-low-carbon-energy>)

⁵⁹ HM Government (2021) Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

⁶⁴ Ibid

⁶⁵ Ibid

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

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

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

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

C.64 Other key commitments within the Strategy include:

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

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

C.66 Key aims of the Strategy include:

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

⁶⁶ Department for Business, Energy & Industrial Strategy (2022) UK Hydrogen Paper (see <https://www.gov.uk/government/publications/uk-hydrogen-strategy>)

⁶⁷ Department for Business, Energy & Industrial Strategy (2021) Industrial decarbonisation strategy (see <https://www.gov.uk/government/publications/industrial-decarbonisation-strategy>)

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

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

C.67 The Energy Performance of Buildings Regulations 2021⁶⁹ seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

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

C.69 Key aims of the paper include:

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

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

⁷⁰ Department for Business, Energy & Industrial Strategy (2020). Energy white paper: Powering our net zero future. (see <https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future>)

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

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

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

C.71 The Flood and Water Management Act 2010⁷² and **The Flood and Water Regulations 2019**⁷³ set out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

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

⁷² HM Government (2010). Flood and Water Management Act. (see <https://www.legislation.gov.uk/ukpga/2010/29/contents>)

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

C.72 The 25 Year Environment Plan⁷⁴ sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Actions relating to climate change are as follows:

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

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

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

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

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

⁷⁴ HM Government, 2018. A Green Future: Our 25 Year Plan to Improve the Environment. (see

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

⁷⁵ HM Government (2018). The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate. (see

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

⁷⁶ HM Government (2017). UK Climate Change Risk Assessment 2017. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf)

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

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

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

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

C.78 The UK Renewable Energy Strategy (2009)⁸⁰ describes the ways in which we will tackle climate change by reducing our CO₂ emissions through the generation of a renewable electricity, heat and transport technologies.

C.79 The Climate Change Act 2008⁸¹ sets targets for UK greenhouse gas emission reductions of at least 80% by 2050, against a 1990 baseline.

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

Sub-national

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

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

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

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

⁷⁸ HM Government (2011). Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf)

⁷⁹ HM Government (2009). The UK Low Carbon Transition Plan. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228752/9780108508394.pdf)

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

⁸¹ HM Government (2008). Climate Change Act 2008. (see https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf)

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

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

⁸⁴ Greater London Authority (2018) London Environment Strategy. (see https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf)

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

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

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

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

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

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

Implications of the policy review

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

Population, communities, health and wellbeing

International

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

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

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

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

⁸⁷ Greater London Authority (2022). Carbon Offset Guidance. (see https://www.london.gov.uk/sites/default/files/gla_carbon_offsetting_guidance_2022.pdf)

Greater London Authority (2022). Whole Life-Cycle Carbon Assessments guidance. (see https://www.london.gov.uk/sites/default/files/lpg_-_wlca_guidance.pdf)

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

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

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

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

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

National

C.94 The NPPF (2023)⁹² includes as part of its social objective the promotion of “*strong, vibrant and healthy communities*” by:

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

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

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

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

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

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

⁸⁹ United Nations (2002) Declaration on Sustainable Development (Johannesburg Declaration). (see https://www.un.org/esa/sustdev/documents/WSSD_POI_PD/English/POI_PD.htm)

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

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

⁹² Department for Levelling Up, Housing and Communities (2023). National Planning Policy Framework. (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NPPF_Sept_23.pdf)

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

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

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

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

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

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

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

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

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

⁹⁵ Ministry of Housing, Communities and Local Government (2019). Healthy and Safe communities. (see <https://www.gov.uk/guidance/health-and-wellbeing>)

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

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

⁹⁸ Ministry of Housing, Communities and Local Government (2019). Noise. (see <https://www.gov.uk/guidance/noise--2>)

⁹⁹ Ministry of Housing, Communities and Local Government (2019). Light pollution. (see <https://www.gov.uk/guidance/light-pollution>)

¹⁰⁰ Ministry of Housing, Communities and Local Government (2014). Open space, sports and recreation facilities, public rights of way and local green space. (see <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>)

¹⁰¹ Department for Levelling Up, Housing and Communities (2022). White Paper Levelling Up the United Kingdom. (see <https://www.gov.uk/government/publications/levelling-up-the-united-kingdom>)

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

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

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

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

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

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

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

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

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

¹⁰⁴ Department of Health and Social Care (2021). Build Back Better: Our Plan for Health and Social Care. (see <https://www.gov.uk/government/publications/build-back-better-our-plan-for-health-and-social-care>)

¹⁰⁵ Department for Health and Social Care and Cabinet Office (2021). COVID-19 mental health and wellbeing recovery action plan. (see <https://www.gov.uk/government/publications/covid-19-mental-health-and-wellbeing-recovery-action-plan>)

¹⁰⁶ Department for Levelling Up, Housing and Communities (2022). A fairer private rented sector. (see <https://www.gov.uk/government/publications/a-fairer-private-rented-sector/a-fairer-private-rented-sector#executive-summary>)

¹⁰⁷ Ministry of Housing, Community and Local Government (2020). The charter for social housing residents: social housing white paper. (see <https://www.gov.uk/government/publications/the-charter-for-social-housing-residents-social-housing-white-paper#full-publication-update-history>)

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

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

C.113 The 25 Year Environment Plan¹¹¹ (2018) sets out goals for improving the environment over the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. The document identifies six key areas upon which action will be focused. Those of relevance to the topics of population growth, health and wellbeing are 'using and managing land sustainably' and 'connecting people with the environment to improve health and wellbeing':

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

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

C.115 The Environmental Noise Regulations¹¹³ apply to environmental noise, mainly from transport. The Regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

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

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

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

¹⁰⁹ Public Health England (2021). Addendum: Hot food takeaways use in the new Use Class Order. (<https://www.gov.uk/government/publications/healthy-weight-environments-using-the-planning-system/addendum-hot-food-takeaways-use-in-the-new-use-class-order>)

¹¹⁰ Public Health England (2019). PHE Strategy 2020-25. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/831562/PHE_Strategy_2020-25.pdf)

¹¹¹ HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

¹¹² Homes England (2018). Strategic Plan 2018 to 2023. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752686/Homes_England_Strategic_Plan_AW_REV_150dpi_REV.pdf)

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

¹¹⁴ Department for Communities and Local Government (2017). Fixing our broken housing market. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf)

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

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

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

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

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

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

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

¹¹⁵ Department for Communities and Local Government (2015). Planning policy for traveller sites. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf)

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

¹¹⁷ Marmot, M (2011). Fair Society, Healthy Lives: The Marmot Review.

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

¹¹⁹ HM Government (2011). Laying the Foundations: A Housing Strategy for England. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7532/2033676.pdf)

¹²⁰ HM Government (2010). Healthy Lives, Healthy People: Our strategy for public health in England. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216096/dh_127424.pdf)

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

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

Sub-national

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

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

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

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

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

Implications of the policy review

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

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

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

Economy and employment

International

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

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

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

National

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

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

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

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

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

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

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

¹²³ United Nations Department of Economic and Social Affairs (2015). The 2030 Agenda for Sustainable Development. (see <https://sdgs.un.org/2030agenda>)

¹²⁴ Ministry of Housing, Communities and Local Government (2020). Town centres and retail. (see <https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres>)

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

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

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

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

C.139 Agriculture Act 2020¹²⁸ sets out how farmers and land managers in England will be rewarded in the future with public money for "public goods" – such as better air and water quality, thriving wildlife, soil health, or measures to reduce flooding and tackle the effects of climate change, under the Environmental Land Management Scheme. These incentives will provide a vehicle for achieving the goals of the Government's 25 Year Environment Plan and commitment to reach zero emissions by 2050. The Act will help farmers to stay competitive, increase productivity, invest in new technology and seek a fairer return from the marketplace.

C.140 Agricultural Transition Plan 2021 to 2024¹²⁹ aims to drive competitiveness, increase productivity, reduce carbon emissions, and generate fairer returns across the agricultural industry. The Transition Plan introduces several new schemes to improve the environment, animal health and welfare, and farm resilience and productivity (e.g. grants will be available for sustainable farming practices, creating habitats for nature recovery and making landscape-scale changes such as establishing new woodland and other ecosystem services).

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

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

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

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

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

¹²⁹ Department for Environment, Food and Rural Affairs (2020). Agricultural Transition Plan 2021 to 2024. (see <https://www.gov.uk/government/publications/agricultural-transition-plan-2021-to-2024>)

¹³⁰ HM Government (2018). Industrial Strategy: Building a Britain fit for the future. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/664563/industrial-strategy-white-paper-web-ready-version.pdf)

Sub-national

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

Implications of the policy review

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

Historic environment

International

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

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

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

National

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

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

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

¹³¹ Greater London Authority (2021). The London Plan. (see <https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents>)

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

¹³³ Council of Europe (1985). Convention for the Protection of the Architectural Heritage of Europe. (<https://www.coe.int/en/web/culture-and-heritage/granada-convention>)

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

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

C.150 The Environment Act 2021¹³⁶ sets out the UK's new framework for environmental protection. It includes the creation of Conservation Covenant agreements between a landowner and a responsible body for the purposes of conservation. This can include to preserve land as a place of "*archaeological, architectural artistic, cultural or historic interest*".

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

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

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

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

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

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

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

¹³⁵ Ministry of Housing, Communities and Local Government (2019). Historic Environment. (see <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>)

¹³⁶ HM Government (2021). Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

¹³⁷ Department for Digital, Culture Media and Sport (2017). The Heritage Statement 2017. (see <https://www.gov.uk/government/publications/the-heritage-statement-2017>)

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

¹³⁹ Historic England (2022). Tall Buildings: Historic England Advice Note 4. (see <https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings-v2/#:~:text=This%20revised%20Historic%20England%20Advice,buildings%20within%20the%20historic%20environment.&text=How%20to%20identify%20appropriate%20locations,relation%20to%20the%20historic%20environment>)

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

¹⁴¹ Historic England (2015). The Historic Environment in Local Plans. (see <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/gpa1/>)

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

¹⁴³ HM Government (2010). The Government's Statement on the Historic Environment for England. (see <https://www.gov.uk/government/publications/the-governments-statement-on-the-historic-environment-for-england>)

C.158 The Planning (Listed Buildings & Conservation Areas) Act 1990¹⁴⁴ changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

C.159 Ancient Monuments and Archaeological Areas Act 1979¹⁴⁵ was a law passed by the UK government to protect the archaeological heritage of England, Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

C.160 The Historic Buildings and Ancient Monuments Act 1953¹⁴⁶ makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

Sub-national

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

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

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

Implications of the policy review

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

Landscape

International

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

¹⁴⁴ HM Government (2002). Planning (Listed Buildings & Conservation Areas) Act (1990). (see http://www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga_19900009_en.pdf)

¹⁴⁵ HM Government (1979). Ancient Monuments & Archaeological Areas Act. (see <https://consult.environment-agency.gov.uk/engagement/bostonbarriertwao/results/b.21---ancient-monuments-and-archaeological-areas-act-1979.pdf>)

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

¹⁴⁷ Greater London Authority (2021). The London Plan. (see <https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents>)

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

¹⁴⁹ Council of Europe (2000). The European Landscape Convention (Florence). (see <https://www.coe.int/en/web/landscape/the-european-landscape-convention>)

National

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

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

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

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

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

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

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

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

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

Sub-national

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

¹⁵⁰ Ministry of Housing, Communities and Local Government (2019). Natural Environment. (see <https://www.gov.uk/guidance/natural-environment>)

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

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

¹⁵³ HM Government, 2018. A Green Future: Our 25 Year Plan to Improve the Environment. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

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

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

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

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

Implications of the policy review

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

Transport and accessibility

International

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

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

National

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

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

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

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

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

¹⁵⁷ United Nations Department of Economic and Social Affairs (2015). The 2030 Agenda for Sustainable Development. (see <https://sdgs.un.org/2030agenda>)

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

¹⁵⁹ Ministry of Housing, Communities and Local Government (2014). Travel Plans, Transport Assessments and Statements. (see <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>)

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

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

C.180 The Environment Act 2021¹⁶¹ sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers local air quality management frameworks and the recall of motor vehicles.

C.181 Decarbonising Transport: A Better, Greener Britain (2021)¹⁶² sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. The document commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars and vans by 2035¹⁶³. The document also sets out how the government will improve public transport and increase support for active travel, as well as creating a net zero rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

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

C.183 Decarbonising Transport: Setting the Challenge (2020)¹⁶⁵ sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies¹⁶⁶ to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

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

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

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

¹⁶¹ HM Government (2021). Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

¹⁶² Department for Transport (2021). Decarbonising Transport: A Better, Greener Britain. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf)

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

¹⁶⁴ Secretary for Transport (2022). Cycling and Walking Investment Strategy Report to Parliament 2022. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1087944/Cycling-and-walking-investment-strategy-report-to-Parliament-2022-web.pdf)

¹⁶⁵ Department for Transport (2020). Decarbonising Transport: Setting the Challenge. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf)

¹⁶⁶ These have not been summarised, since the upcoming TDP will supersede them to some extent: the Road to Zero strategy, Maritime 2050 and the Clean Maritime Plan, the Aviation 2050 Green Paper and forthcoming net zero aviation consultation and Aviation Strategy, the Cycling and Walking Investment Strategy, Future of Mobility: Urban Strategy, the 2018 amendments to the Renewable Transport Fuel Obligation, Freight Carbon Review, the Rail Industry Decarbonisation Taskforce and the Carbon Offsetting for Transport Call for Evidence.

¹⁶⁷ HM Government (2018). The Road to Zero. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf)

¹⁶⁸ Department for Transport (2017). Transport Investment Strategy. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/918490/Transport_investment_strategy.pdf)

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

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

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

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

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

Sub-national

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

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

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

Implications of the policy review

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

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

¹⁷⁰ Department for Transport (2013). Door to Door: A strategy for improving sustainable transport integration. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/142539/door-to-door-strategy.pdf)

¹⁷¹ Greater London Authority (2021). The London Plan. (see <https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents>)

¹⁷² Greater London Authority (2022) Sustainable Transport, Walking and Cycling guidance (see <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/sustainable-transport-walking-and-cycling-guidance>)

¹⁷³ Greater London Authority (2018) London Environment Strategy. (see https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf)

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

Appendix D

Baseline information

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

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

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

Air quality

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

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

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

D.5 Pollution in Enfield comes from a variety of sources. This includes sources outside of the Borough, and, in the case of particulate matter, a significant proportion from outside of London and even the UK. Borough-wide carbon emissions increased by 2% over the 2017 Climate Action Plan baseline year and 6% over 2018. However, in accordance with national and global targets, the Council has met the previous carbon emission reduction target of 40% in 2020, as reductions of 45% of Borough emissions were made between 2009 and 2018.¹⁷⁴

■

D.6 The entirety of the London Borough of Enfield has been subject to an Air Quality Management Area since 2001 owing to high levels of nitrogen dioxide and PM₁₀ (Particulate Matter less than 10 micron in diameter) exceeding the standards set by the London Air Quality Management Plan, in the Borough's busy roadside locations.¹⁷⁵

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

¹⁷⁴ Enfield Council (2022). Authority Monitoring Report 2021/2022. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)

¹⁷⁵ Enfield Council (2022). Enfield Air Quality Action Plan 2022-2027. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0017/34271/Enfield-Air-Quality-Action-Plan-2022-Environment.pdf)

air quality limit value for nitrogen dioxide, which is set at 40µg/m³. These concentrations are lower than in previous years and the monitored levels will have been impacted by the lockdowns in 2021 and 2022.¹⁷⁶

D.8 According to WSP's Air Quality Appraisal, which accompanies the Publication Local Plan, numerous receptors were identified across the Borough and levels of air pollution measured. According to the Baseline scenario, the annual mean NO₂ air quality objective of 40µg/m³ is predicted to be exceeded at 1,414 receptors (20%) of the 6,589 receptors included within the model. Of these, 26 receptors are schools and 12 hospitals, while the remaining receptor points are residential. The maximum annual mean NO₂ concentration is predicted to be 66.2µg/m³ at a residential receptor on A406 Bowes Road. The receptors where exceedances of the annual mean NO₂ air quality objective are predicted are primarily located along A roads, including the A406, A109, A1110, A1003, A105, A111, A10, A1010, A1055, A1005 and A110. Some exceedances are also predicted along the B137 and the B154, and two smaller roads, Silver Street and Victoria Road, just north of the A406.

D.9 The annual mean PM₁₀ air quality objective of 40µg/m³ is not predicted to be exceeded at any of the modelled receptor locations in the Baseline 2019 scenario. However, the air quality objective for daily mean PM₁₀ concentrations is 50µg/m³ to be exceeded no more than 35 times a year. In the Baseline 2019 scenario, it is predicted that there would be a maximum of 16 exceedances of the daily mean PM₁₀ air quality objective.

D.10 There are 96 Public Highway and Public Car Park electric vehicle charging points installed within Enfield, as of February 2023¹⁷⁷. In the Council's Climate Action Plan, there is a commitment to provide an additional 250 charging sockets for electric vehicles on public highways and public car parks by 2025.¹⁷⁸

D.11 There is growing concern from local stakeholders about the impact of air pollution on the Epping Forest Special Area of Conservation (SAC) from traffic movements along the A406. With key development sites such as Meridian water within LBE's boundary, the Borough must carefully consider the impacts any development brings with regards to increased traffic on road infrastructure and the knock-on effect this may have on the SAC.

Likely future changes without the Local Plan

D.12 The entire Borough is designated an Air Quality Management Area and contains seven Air Quality Focus Areas. Although there have been some decreases in nitrogen dioxide levels, these statistics were impacted by the COVID-19 lockdowns in 2021 and 2022. As the country recovers from the pandemic and people travel into work more, there is likely to be an increase in nitrogen dioxide and other pollutants associated with transport. However, this may in part be mitigated by expansion of the Ultra Low Emission Zone, the Government's commitment to ban all new petrol and diesel cars from 2030¹⁷⁹ and the subsequent increase in electric vehicles, partially in response to the electric Building Regulations 2010, in addition to an increased uptake in walking and cycling. Electric vehicles do, however, contribute to non-exhaust emissions through particulates from tyres. Without the Local Plan, air quality is likely to continue to decline as a result of population growth and car dependency but possibly more slowly than historic trends suggest, as a result of the factors listed above. Without the Local Plan, sites may be located in inaccessible locations which increase reliance on private vehicles, particularly if there is a lack of access to public transport, and walking and cycling routes.

Implications for health

D.13 There is an ever-growing evidence base for the connections between air pollution and heart and lung health and the link to premature mortality, with connections also being made to other conditions such as diabetes, dementia, mental health and birth outcomes, and most recently potential links to COVID-19.

D.14 Some of the effects occur over a short period, from minutes to days, whereas others result from long term exposure. Air pollution is known to cause some health conditions, and can also exacerbate existing health conditions, such as triggering an asthma attack.

¹⁷⁶ Enfield Council (2022). Authority Monitoring Report 2021/2022. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)

¹⁷⁷ Enfield Council (2022). Authority Monitoring Report 2021/2022. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)

¹⁷⁸ Enfield Council (2021). Electric vehicle charging. (see <https://new.enfield.gov.uk/services/roads-and-transport/electric-vehicle-charging/>)

¹⁷⁹ Prime Minister Rishi Sunak confirmed in a speech on 20 September 2023 that the planned ban on the sale of petrol and diesel cars would be pushed back five years from 2030 to 2035

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

Biodiversity

D.16 Enfield boasts a wealth of biodiversity, having important populations of nationally and internationally scarce plant and animal species. It also has several important habitats including important grassland habitats and more than three hundred hectares of woodland. The Enfield Biodiversity Action Plan¹⁸⁰ records the Borough as having an approximate green coverage of 38%. Despite this, the Mayor of London classifies 22% of the Borough's population as having a lack of access to nature.

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

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

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

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

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

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

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

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

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

¹⁸⁰ Enfield Council (2011). Nature for People; A Biodiversity Action Plan for Enfield. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0019/5392/planning-application-information-biodiversity-action-plan.pdf)

¹⁸¹ Enfield Council (2021) Enfield's Blue and Green Strategy (2021-2031). (see https://www.enfield.gov.uk/_data/assets/pdf_file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf)

Likely future changes without the Local Plan

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

Implications for health

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

D.26 According to the recently published World Health Organisation report 'Nature, Biodiversity and Health: An Overview of Interconnections'¹⁸² increased exposure to nature has been associated with a lower risk of specific health conditions including depression, anxiety, cortisol, blood pressure, pre-term birth, low birthweight, type 2 diabetes, and reduced risk of death from all causes. There is generally positive evidence relating to the impacts of activities in natural environments on children's mental health and their cognitive, emotional and behavioural functioning. These health benefits are thought to arise through a range of pathways, including providing opportunities and safe spaces for physical activity, for restoration and relaxation, and for socialising with friends and family. Exposure to green and blue space is also associated with higher levels of life satisfaction. Impacts appear to differ according to socio-economic status and other demographic factors such as age or gender. The '15 minute neighbourhood' concept is encouraged as part of Natural England's Green Infrastructure Framework. This seeks to ensure that everyone has access to good quality natural greenspace within 15 minutes walking distance from their homes, in line with the Accessible Natural Greenspace Standards and Green Flag Criteria.

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

Climate change adaptation

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

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

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

¹⁸² World Health Organisation (2021). Nature, Biodiversity and Health: An Overview of Interconnections. (see <https://apps.who.int/iris/bitstream/handle/10665/341376/9789289055581-eng.pdf>)

¹⁸³ UK Climate Risk (2021) Third UK Climate Risk Independent Assessment. (see <https://www.ukclimaterisk.org/wp-content/uploads/2021/06/Technical-Report-The-Third-Climate-Change-Risk-Assessment.pdf>)

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

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

D.31 Heavy rainfall and flooding events have been demonstrated to have increased potential to occur in the UK as the climate has generally become wetter. For example, for the most recent decade (2012–2021) UK summers have been on average 6% wetter than 1991–2020 and 15% wetter than 1961–1990.¹⁸⁵

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

D.33 The Intergovernmental Panel on Climate Change (IPCC) special report on global warming outlines that, under emissions in line with current pledges under the Paris Agreement, global warming is expected to surpass 1.5°C, even if these pledges are supplemented with very challenging increases in the scale and ambition of mitigation after 2030. This increased action would need to achieve net zero CO₂ emissions in less than 15 years.¹⁸⁶ It has since been suggested in the Environmental Improvement Plan published in January 2023 that "*whilst we aim to limit global warming to 1.5°C, evidence shows that we must be prepared for warming up to 4°C*", emphasising the importance of climate change adaptation measures and recognition in local policy.¹⁸⁷

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

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

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

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

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

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

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

¹⁸⁸ Department for Environment, Food and Rural Affairs, Department for Business, Energy and Industrial Strategy, Met Office and Environment Agency (n.d.) UK Climate Projections. (see <https://www.metoffice.gov.uk/pub/data/weather/uk/ukcp18/science-reports/ukcp-infographic-headline-findings.pdf>)

¹⁸⁹ Enfield Council (2016). Local Flood Risk Management Strategy (see https://www.enfield.gov.uk/data/assets/pdf_file/0021/5547/flooding-information-local-flood-risk-management-strategy-2016.pdf)

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

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

D.38 In 2018, Enfield Council developed a Sustainable Drainage Design and Evaluation Guide¹⁹² to make sure new developments comply with Borough policies. Sustainable Drainage Systems (SuDS) play an important role in increasing the resilience of the drainage network and improving water quality of receiving watercourses. There is a wide range of existing SuDS techniques in operation across Enfield. Some of these are relatively old features such as highway drainage ditches and ponds, more recently rain gardens and permeable paving have been installed as part of highway works and other projects. The guide promotes the idea of integrating SuDS into development to address issues with conventional drainage¹⁹³. In addition to SuDS, Natural Flood Management (NHM) techniques such as holding water upstream can provide alternative methods of preparing for climate change and flood risk, as well as delivering co-benefits, and should be considered where appropriate.

Likely future changes without the Local Plan

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

Implications for health

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

- Disruption to health, social care and emergency management services and schools provision, from flooding, heatwaves and storms.
- Flooding poses multiple risks to people’s health, such as heart attacks, trauma, an increase in waterborne infectious diseases, and common mental and post-traumatic stress disorders. Damp housing and damage to water and sanitation infrastructure can further reinforce the adverse effects on health.
- Climate change may bring increases in both cold weather excess mortality and heat-related deaths and illness occurring in the summer. Excess heat represents a serious threat for the entire population, but the elderly and small children, and people with pre-existing cardiovascular, respiratory and renal diseases, diabetes and neurological disorders, are more susceptible. Urban areas tend to be at greater risk due to the “urban heat island” effect. The number of excess deaths in England resulting from heatwaves (excluding COVID-19) in 2022 was 2,803 for those aged 65 and over. Cumulative excess deaths resulting from heatwaves in summer 2022 was the highest recorded on record since the heatwave plan for England was introduced in 2004.¹⁹⁴
- Cases of food poisoning in the UK that are linked to warm weather have been increasing rapidly.
- Wildfire likelihood and severity set to increase due to climate change.

¹⁹⁰ Enfield Council (2016). Local Flood Risk Management Strategy (see https://www.enfield.gov.uk/data/assets/pdf_file/0021/5547/flooding-information-local-flood-risk-management-strategy-2016.pdf)

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

¹⁹² Enfield Council (2018). Sustainable Drainage Design and Evaluation Guide (see <http://online.flipbuilder.com/mccloy.consulting/ftvi/mobile/index.html>)

¹⁹³ Enfield Council (2018). Sustainable Drainage Design and Evaluation Guide (see <http://online.flipbuilder.com/mccloy.consulting/ftvi/mobile/index.html>)

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

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

Climate change mitigation

D.41 Carbon dioxide (CO₂) is the main greenhouse gas, accounting for about 80% of the UK greenhouse gas emissions. Emissions are produced when fossil fuels such as coal or gas are burnt or processed. In recent years, increasing emphasis has been placed on the role of regional bodies and local government in contributing to energy efficiency improvements, and hence reductions in carbon dioxide emissions. In line with the wider UK, London has seen a decrease in CO₂ emissions in recent years. One of the main drivers for reduced levels of emissions has been a decrease in the use of coal for electricity generation, accounting for a decrease in emissions for domestic electricity.

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

Table D.1: CO₂ emissions estimates in Enfield 2005-2019¹⁹⁶

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

¹⁹⁵ Office for National Statistics (2021). 2005 to 2019 UK local and regional CO₂ emissions – data tables. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/996057/2005-19_UK_local_and_regional_CO2_emissions.xlsx)

¹⁹⁶ Office for National Statistics (2021). 2005 to 2019 UK local and regional CO₂ emissions – data tables. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/996057/2005-19_UK_local_and_regional_CO2_emissions.xlsx)

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

D.43 The Department for Business, Energy & Industrial Strategy produced the following consumption figures for Enfield in 2020.¹⁹⁷

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

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

Table D.2: Energy consumption in Enfield by type 2005-2020¹⁹⁸

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

D.45 The use of private vehicles can also generate CO₂ emissions, although just under one third of Enfield residents do not own a vehicle, which is significantly below the London average (see 'Transport' section).

D.46 Enfield Council declared a climate change emergency in summer 2019. Their Climate Action Plan 2020¹⁹⁹, overseen by a dedicated Climate Change Taskforce subsequently explains how the Borough will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040. It sets out Enfield's current carbon emissions and the action they will need to take

¹⁹⁷ Department for Business, Energy and Industrial Strategy (2022). Total final energy consumption at regional and local authority level: 2005 to 2020 (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1106843/subnational_total_final_energy_consumption_2020.xlsx)

¹⁹⁸ Department for Business, Energy and Industrial Strategy (2022). Total final energy consumption at regional and local authority level: 2005 to 2020 (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1106843/subnational_total_final_energy_consumption_2020.xlsx)

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

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

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

- Stay within a maximum cumulative carbon dioxide emissions budget of 7.1 million tonnes (MtCO₂) for the period of 2020 to 2100. At 2017 CO₂ emission levels, Enfield would use this entire budget within seven years from 2020.
- Initiate an immediate programme of CO₂ mitigation to deliver cuts in emissions averaging a minimum of -13.2% per year to deliver a Paris aligned carbon budget. These annual reductions in emissions require national and local action and could be part of a wider collaboration with other local authorities.
- Reach zero or near zero carbon no later than 2042. This report provides an indicative CO₂ reduction pathway that stays within the recommended maximum carbon budget of 7.1 MtCO₂. At 2042, 5% of the budget remains. This represents very low levels of residual CO₂ emissions by this time, or the Authority may opt to forgo these residual emissions and cut emissions to zero at this point. Earlier years for reaching zero CO₂ emissions are also within the recommended budget, provided that interim budgets with lower cumulative CO₂ emissions are also adopted.

Likely future changes without the Local Plan

D.48 Despite efforts to reduce greenhouse gas emissions, the effects of human activities on the climate are irreversible on the timescale of humans alive today, although every little bit of avoided future temperature increase results in less warming. Climate change will therefore continue to prevail. The London Plan contains policies that seek to reduce greenhouse gas emissions, and Enfield's Climate Action Plan 2020 will also contribute towards this goal. The most recent Climate Change Committee Report does, however, state that policy development continues to be too slow and confidence in the UK meeting its targets has decreased in the past year. Without the Local Plan, sustainable design and construction techniques may not be adopted in new build development, whilst development sites may be located in inaccessible locations that increase reliance on private vehicles, although expansion of the Ultra Low Emission Zone and the shift to electric vehicles may help reduce emissions associated with private vehicles. Carbon emissions associated with buildings may be reduced, in response to the amended Building Regulations 2010 and implementation of the Future Buildings Standard from 2025 that require CO₂ emissions from new build homes and other buildings, including offices and shops, to be 30% lower than current standards. This will be achieved through the installation of low carbon technology, such as solar panels and heat pumps, and using materials in a more energy efficient way to keep in heat.

Implications for health

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

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

²⁰⁰ Enfield Council (2023). Climate Action. (see <https://www.enfield.gov.uk/services/environment/climate-action>)

²⁰¹ Tyndall Centre (2023). Setting Climate Commitments for Enfield. (see <https://carbonbudget.manchester.ac.uk/reports/E09000010/>)

excess deaths resulting from heatwaves in summer 2022 was the highest recorded on record since the heatwave plan for England was introduced in 2004.²⁰²

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

Population, Communities and Equalities

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

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

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

Table D.3: Estimated populations by ward in Enfield

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

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

²⁰³ Office for National Statistics (2023) How the population changed in Enfield: Census 2021. (see <https://www.ons.gov.uk/visualisations/censuspopulationchange/E09000010/>)

²⁰⁴ Office for National Statistics (2021). City Population Enfield (see https://citypopulation.de/en/uk/london/wards/E09000010_enfield/)

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

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

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

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

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

²⁰⁵ Office for National Statistics (2023). How the population changed in Enfield: Census 2021. (see <https://www.ons.gov.uk/visualisations/censuspopulationchange/E09000010/>)

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

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

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

Table D.4: Estimated age distribution in Enfield

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

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

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

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

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

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

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

²⁰⁸ Office for National Statistics (2021). City Population Enfield (see https://citypopulation.de/en/uk/london/wards/E09000010_enfield/)

²⁰⁹ Office for National Statistics (2023). How the population changed in Enfield: Census 2021. (<https://www.ons.gov.uk/visualisations/censuspopulationchange/E09000010/>)

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

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

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

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

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

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

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

Likely future changes without the Local Plan

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

Implications for health

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

Crime and community safety

D.71 According to official crime summary data published by the Metropolitan Police²¹⁴, the number of notifiable offences committed in Enfield between April 2022 and March 2023 was 34,357 – a near negligible reduction of 0.1% compared to the previous 12-month period. The official Met Police crime rate for this period was 103 offences per 1,000 residents which was slightly below the 109.7 offences per 1,000 recorded for the entirety of London.

²¹¹ Office for National Statistics (2023). Births in England and Wales: summary tables (see <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/datasets/birthsummarytables>)

²¹² Office for National Statistics (2021). Census Maps (see <https://www.ons.gov.uk/census/maps/>)

²¹³ UK Parliament (2023) Challenges of an ageing population. (see <https://www.parliament.uk/business/publications/research/key-issues-parliament-2015/social-change/ageing-population/>)

²¹⁴ Metropolitan Police (2023). Overview of Crimes: Enfield. (see <https://public.tableau.com/app/profile/metropolitan.police.service/viz/MonthlyCrimeDataNewCats/Coversheet>)

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

Table D.5: Volume of Offences by Type in Enfield April 2022-March 2023²¹⁵

What are the volumes by Offence Type? <i>click on the Offence Name to drill down to subgroup</i>		
Theft	249,097	
Violence Against the Person	241,432	
Vehicle Offences	109,351	
Other Accepted Crime	103,136	
Public Order Offences	58,846	
Burglary	54,449	
Arson and Criminal Damage	53,821	
Drug Offences	41,903	
Robbery	29,559	
Sexual Offences	24,895	
Miscellaneous Crimes Against Society	11,986	
Possession of Weapons	6,102	

D.73 Data made available through the Enfield Borough Profile 2022²¹⁶ shows that 11,861 cases of Antisocial Behaviour were recorded in Enfield in 2021, 30% lower than 2020 levels.

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

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

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

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

Likely future changes without the Local Plan

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

²¹⁵ Metropolitan Police (2023). Overview of Crimes: Enfield. (see <https://public.tableau.com/app/profile/metropolitan.police.service/viz/MonthlyCrimeDataNewCats/Coversheet>)

²¹⁶ Enfield Council (2022). Enfield Borough Profile 2022. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0028/28945/Borough-profile-2022-Your-council.pdf.pdf)

²¹⁷ Enfield Community Safety Unit (2020). Crime and Scrutiny Panel Report 17th March 2020. (see <https://governance.enfield.gov.uk/documents/s80680/Crime%20Scrutiny%20Performance%20Report%20-%20March%202020.pdf>)

²¹⁸ Enfield Community Safety Unit (2020). Crime and Scrutiny Panel Report 17th March 2020. (see <https://governance.enfield.gov.uk/documents/s80680/Crime%20Scrutiny%20Performance%20Report%20-%20March%202020.pdf>)

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

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

Implications for health

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

Economy and employment

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

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

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

D.83 Despite the success of Enfield's industrial and manufacturing sector, the diversity of the Borough's employment offer is relatively narrow and focused on a few key industry sectors. It is noted in the Council's Economic Development Strategy²²³ that Enfield must diversify industrial areas to create places that can support future business growth. The Borough needs to diversify the local employment offer and attract new industries, particularly from London's growing knowledge economy of creative, cultural, technology and science and the new industrial economies of making and green industries.

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

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

²²¹ AECOM (2017) Industry in Enfield. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0010/4222/industry-in-enfield-report-aecom-planning.pdf)

²²² AECOM (2017) Industry in Enfield. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0010/4222/industry-in-enfield-report-aecom-planning.pdf)

²²³ Enfield Council (2021) Enfield's Economic Development Strategy. (see <https://governance.enfield.gov.uk/documents/s85666/Enfield%20Economic%20Development%20Strategy%20250121.pdf>)

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

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

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

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

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

D.89 The GLA sets out employment projections for Enfield and the most current projections the GLA's 2022 employment projections. From a baseline of 120,000 jobs in 2021, the GLA's 2022 employment projections anticipate an increase to 126,000 jobs by 2026 and 136,000 jobs by 2036. This represents a 5% increase in jobs by 2026, and a 13.3% increase in jobs by 2036.²²⁸

Likely future changes without the Local Plan

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

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

²²⁵ Enfield Council (2022) Town Centre Action Plans. (see <https://letstalk.enfield.gov.uk/towncentreactionplans>)

²²⁶ Ibid

²²⁷ Opportunity London (2023) Meridian Water. (see <https://opportunity.london/boroughs/enfield#opp61>)

²²⁸ Enfield Council (2022). Authority Monitoring Report 2021/2022. (see https://www.enfield.gov.uk/data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)

Implications for health

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

Health

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

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

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

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

D.96 In 2017, Enfield recorded the prevalence of common mental disorders for residents aged 16 and over at 49,261 persons, approximately 19.2% of the Borough's population, and 2.3% above the national average²³⁴. Additionally, in 2017/18 the estimated number of children and young people with mental disorders (aged 5 to 17) was 7,206 – though this is little sufficient evidence to accurately compare this to national statistics. This includes emotional, conduct, and hyperkinetic disorders.

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

²²⁹ Public Health England (2023). Local Authority Health Profiles: Enfield. (see <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132701/pat/15/ati/501/are/E09000010/iid/93347/age/187/sex/4/cat/-1/ctp/-1/yr/1/cid/4/tbm/1>)

²³⁰ Enfield Council (2020). Enfield Borough Profile 2020. (see <https://new.enfield.gov.uk/services/your-council/Borough-and-wards-profiles/Borough-profile-2020-your-council.pdf>)

²³¹ Enfield Council (2023) Council Plan 2023-2026. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0022/34087/Enfield-Council-Plan-2023-2026-Your-Council.pdf)

²³² Enfield Council (2023) Council Plan 2023-2026 (see https://www.enfield.gov.uk/_data/assets/pdf_file/0022/34087/Enfield-Council-Plan-2023-2026-Your-Council.pdf)

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

²³⁵ Enfield Council (2022). Authority Monitoring Report 2021/2022. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)

Likely future changes without the Local Plan

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

Implications for health

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

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

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

Heritage and townscape

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

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

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

²³⁶ UK Chief Medical Officers (2019) UK Chief Medical Officers' Physical Activity Guidelines. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/832868/uk-chief-medical-officers-physical-activity-guidelines.pdf)

²³⁷ Enfield Council (2019) Enfield Heritage Strategy. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0024/3957/heritage-strategy-2019-24-planning.pdf)

²³⁸ Historic England (2023). Map Search: Enfield. (see <https://historicengland.org.uk/listing/the-list/map-search>)

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

D.105 Historic England maintains a nationwide Heritage at Risk (HAR) register, updated on an annual basis. The 2022 HAR register²⁴⁰ records 20 entries that are at risk within the Borough. Of these, six are Grade II* listed buildings, and two are conservation areas (Church Street and Fore Street). Four are registered parks and gardens (Grovelands, Broomfield and Trent Park) and the remaining HARs are either Grade I or II listed buildings.

D.106 The National Lottery Heritage Fund (NLHF) has identified Enfield as an area of focus over the period 2019-24. This recognises the low number of previous grant awards per capita and areas of the Borough with high rates of deprivation. Further to an award from the NLHF, the Council has awarded £83,000 directly to 10 cultural heritage projects through the Stories of Enfield programme which began running in September 2021.²⁴¹

Likely future changes without the Local Plan

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

Implications for health

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

Housing

D.109 Properties in Enfield have an overall average price of £580,688. The majority of sales in Enfield during 2022/23 were terraced properties, selling for an average price of £566,407. Flats sold for an average of £348,071, with semi-detached properties fetching £757,920. Overall, sold prices in Enfield in 2022/23 were 6% up on 2021 and 13% up on the 2020 peak of £513,532.²⁴³ In comparison, North London, with an overall average price of £853,462 was cheaper than nearby North West London (£919,534), Central London (£1,656,257) and West London (£1,316,521). The most expensive area within North London was Islington (£843,053) and the cheapest was Enfield (£580,688).²⁴⁴

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

D.111 Enfield's Housing and Growth Strategy 2020-2030²⁴⁶ acknowledges that there is a national housing crisis which is having significant local impact on the area. The strategy identifies a growing population with increasing numbers of householders on low incomes with no access to social or affordable homes. At the same time, private sector rents and the number of private

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

²⁴¹ Enfield Council (2022). Authority Monitoring Report 2021/2022 (see https://www.enfield.gov.uk/data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)

²⁴² Historic England (2018) Wellbeing and the Historic Environment. (see <https://historicengland.org.uk/images-books/publications/wellbeing-and-the-historic-environment/wellbeing-and-historic-environment/>)

²⁴³ Rightmove (2023) House Prices in Enfield (see <https://www.rightmove.co.uk/house-prices/enfield.html>)

²⁴⁴ Ibid

²⁴⁵ Office for National Statistics (2023) Housing affordability in England and Wales: 2022 (see <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2022>)

²⁴⁶ Enfield Council (2020) More and better homes for Enfield: Housing and Growth Strategy 2020-2030 (see https://www.enfield.gov.uk/data/assets/pdf_file/0023/4586/housing-and-growth-strategy-2020-2030-housing.pdf)

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

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

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

D.114 In the London Plan²⁴⁹, Enfield Borough has a 10-year housing target of 12,460 new homes (1,246 each year) and 3,530 new homes on smaller sites. The Borough must also achieve 195 units per year for older persons. The latest Authority Monitoring Report states that an overall total of 1,041 dwellings were completed (net) for all types of accommodation in 2021/22. This figure includes all types of housing such as care home bedrooms and student accommodation, as well as conventional housing. This means that the number of dwellings completed fell short of the GLA's annual housing target for Enfield of 1,246 homes per annum.²⁵⁰

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

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

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

²⁴⁷ Ibid

²⁴⁸ Ibid

²⁴⁹ Mayor of London (2021). The London Plan. (see <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>)

²⁵⁰ Enfield Council (2022). Authority Monitoring Report 2021/2022 (see https://www.enfield.gov.uk/_data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)

²⁵¹ Ibid

²⁵² Ibid

²⁵³ Enfield Council (2020) Preventing Homelessness and Rough Sleeping Strategy: 2020-2025. (see <https://governance.enfield.gov.uk/documents/s78850/Preventing%20Homelessness%20and%20Rough%20Sleeping%20Strategy.pdf>)

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

D.119 Enfield's Homelessness and Rough Sleeping Strategy 2020-2025²⁵⁵ sets out a vision for ending homelessness in Enfield over the next five years. Alongside the Council's Housing and Growth Strategy, which sets out how the Council will deliver more homes and better homes for Enfield, the Homelessness and Rough Sleeping Strategy provides five ambitions to end homelessness. These ambitions include:

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

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

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

Likely future changes without the Local Plan

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

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

²⁵⁴ Ibid

²⁵⁵ Ibid

²⁵⁶ Arc (2020). London Borough's Gypsy and Traveler Accommodation Needs Assessment. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0023/5684/enfield-gypsy-and-travellers-assessment-final-report-2020-planning.pdf)

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

Implications for health

D.124 Housing is often cited as an important social determinant of health, recognising the range of ways in which a lack of housing, or poor-quality housing, can negatively affect health and wellbeing. The causal relationships between tangible physical housing defects and poor health outcomes are widely accepted. A 2020 study²⁵⁷ concluded that housing service provision, tenants' experience of property quality and aspects of neighbourhood are all demonstrated to be significantly correlated with measures of health and wellbeing. The study found clear evidence of negative physical health effects of toxins within the home, damp and mould, cold indoor temperatures, overcrowding and safety factors and also of negative mental health effects arising from cold indoor temperatures, overcrowding/lack of personal space, and damp and mould.

D.125 In 2021, the charity Shelter also released findings of their study²⁵⁸ into the most common problems impacting renters' mental and physical health. The most substantial impacts include damp and mould, which affects 26% of all renters; being unable to heat their home (also affects 26%); constantly struggling to pay rent (21%) and fear of eviction (19%). The study further found that 39% said their housing problems or worries left them feeling stressed and anxious, 22% said their housing issues or worries made the physically sick and 21% said their housing issues had negatively affected their performance at work.

Landscape and green infrastructure

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

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

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

D.129 A 2020 study by Essential Living found that Enfield ranked as the 4th greenest borough in London, with an overall "Green Space Score" of 44.56, just 4.28 off the greenest borough, Richmond upon Thames²⁶². The overall Green Space Score is calculated using the following survey metrics: amount of green space in hectares; percentage of green space in the Borough; public perception of green space; air quality; public "happiness"; and public anxiety. Whilst this is a significant improvement on previous data showing Enfield as the 9th greenest borough, there remains some green space accessibility concerns, particularly with reference to the east of the Borough and the Lee Valley Regional Park. Connections to these areas are restricted by physical barriers including industrial land and the River Lea.²⁶³ Other physical barriers to accessing the wider network include

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

²⁵⁸ Shelter (2021) Health of one in five renters harmed by their home. (see https://england.shelter.org.uk/media/press_release/health_of_one_in_five_renters_harmed_by_their_home)

²⁵⁹ Enfield Council (2021). Enfield's Blue and Green Strategy 2021-2031. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf)

²⁶⁰ Ibid

²⁶¹ Ibid

²⁶² Essential Living (2020). The Greenest Cities in Europe. (see <https://www.essentialliving.co.uk/blogs-insights/the-greenest-cities-in-europe/>)

²⁶³ Enfield Council (2010). The Enfield Plan Core Strategy 2010-2025. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0015/4623/planning-policy-information-the-enfield-plan-core-strategy-november-2010.pdf)

roads, railway crossings, rivers and the lack of open space within deprived wards. Population growth is also placing more pressure on the Borough's existing green spaces and natural ecosystems.²⁶⁴

D.130 To address these concerns, the Enfield Blue and Green Strategy 2021-2031 sets out how the Borough's open spaces, habitats, landscapes and water assets will be protected, maintained, enhanced and expanded over the next ten years to make Enfield the greenest Borough in London by 2031, including through achieving a 25% increase in blue-green infrastructure in Enfield, and improving access to the Borough's green spaces.²⁶⁵

D.131 Around 40% of the Borough's area is designated Green Belt and there are several sizeable parks within the built-up area. The largest park is Trent Country Park with 400 acres of meadow, woodland, and lakes, plus a water garden, animal corner, café and a full walks and events programme.²⁶⁶ Other notable attractions include Enfield Chase (a former royal hunting ground and deer park), Capel Manor and the registered gardens of Trent Park, Forty Hall and Myddelton House.²⁶⁷

D.132 The quantity of open space (ha per 1,000 population) varies between wards across Enfield. Some wards fall below the recommended open space (quantity) standard. Whilst the quantity of open space / play space is an important factor, quality, value and ease of accessibility of open spaces may have a more significant impact in terms of the recreational offer and benefits afforded to health and wellbeing.²⁶⁸

D.133 According to the latest Annual Monitoring Report, there was no net loss of designated Green Belt or Metropolitan Open Land over the monitoring period 2021/22 with the Borough's Green Belt extent remaining at 3,058ha.²⁶⁹

D.134 According to the latest Annual Monitoring Report, there was no net loss of Protected Open Space over the monitoring period 2021/22 with the area of Protected Open Space remaining at 579ha.²⁷⁰

Likely future changes without the Local Plan

D.135 The Borough's landscapes and townscapes are vulnerable to adverse effects from urban expansion and increasing recreational pressures, particularly as around 40% of the Borough is Metropolitan Green Belt. Without the Local Plan, it is possible that sites may come forwards in areas with high landscape sensitivity. The Local Plan may also help to address concerns for the Borough's landscape and green infrastructure, including improving the quality of green infrastructure provision in new developments, removing barriers to wider green networks, and improving access to green space in more deprived areas across the Borough.

Implications for health

D.136 Now more than ever before, equitable access to high-quality green spaces is vital to promoting healthier lifestyles, especially in response to the COVID-19 pandemic. There is increasingly compelling evidence showing that access to blue and green spaces is essential to health and wellbeing. People with better access to greenspace enjoy a wide range of health benefits from lower levels of cardiovascular disease through to maintaining a healthier weight and reduced levels of depression. Disadvantaged groups appear to gain a larger health benefit and have reduced socio-economic related inequalities in health when living in greener communities, so greenspace and greener urban environment can also be used as an important tool in the drive to build a fairer and more equal place.²⁷¹

²⁶⁴ Enfield Council (2021). Enfield's Blue and Green Strategy 2021-2031. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf)

²⁶⁵ Enfield Council (2021). Enfield's Blue and Green Strategy 2021-2031. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf)

²⁶⁶ Enfield Council (2022). Authority Monitoring Report 2021/2022. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)

²⁶⁷ Enfield Council (2021). Enfield's Blue and Green Strategy 2021-2031. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf)

²⁶⁸ LUC (2020). Enfield Blue and Green Infrastructure Audit. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0012/11910/Enfield-Blueand-Green-Infrastructure-Audit-2020-Planning.pdf)

²⁶⁹ LUC (2020). Enfield Blue and Green Infrastructure Audit. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0012/11910/Enfield-Blueand-Green-Infrastructure-Audit-2020-Planning.pdf)

²⁷⁰ LUC (2020). Enfield Blue and Green Infrastructure Audit. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0012/11910/Enfield-Blueand-Green-Infrastructure-Audit-2020-Planning.pdf)

²⁷¹ Enfield Council (2021). Enfield's Blue and Green Strategy 2021-2031. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf)

D.137 In Enfield, around a fifth of adults are estimated to have depression or anxiety, while one tenth of children and young people are estimated to have a mental health disorder. Around two thirds of adults, two fifths of 10-to-11-year-olds and a quarter of 4-to 5-year-olds in the Borough are classed as overweight or obese. This comes at both a human and financial cost: the estimated annual cost of common mental disorders (depression or anxiety) in Enfield is £98 million. As with the rest of the UK population, much of the burden of ill-health in Enfield could be prevented through the creation of greener, less polluted and physically active spaces.²⁷²

Transport

D.138 Enfield's road network comprises approximately 68km of principal roads, 37km of TfL road network, 51km of non-principal classified roads, and 466km of unclassified roads. Only three main roads cross through the Borough; the M25 to the north, the A10 (London to Cambridge) running up through the centre of the Borough, and the A406 (The North Circular) across the southern edge of the Borough.

D.139 The Borough has 22 train / tube stations and is serviced by four separate lines. These include:

- The London Underground Piccadilly Line – servicing the west of the Borough with four associated stations;
- West Anglia Main line to London – servicing Liverpool Street to Hertford East;
- London Overground – servicing Liverpool Street to Chestnut; and
- Govia Thameslink Railway – servicing Moorgate to Hertford North and Wootton on Stone.

D.140 Between 2017 and 2019 Network Rail delivered the £170 million Lee Valley Rail programme, which increased capacity on the West Anglia mainline. A significant element of this is the delivery of a new four platform train station at Meridian Water to service the new 10,000 home development in the area. The London Borough of Enfield worked with the Mayor of London to submit a forward funding bid to the Government's Housing Infrastructure Fund (HIF). The objective of the bid was to deliver a four Trains Per Hour service and road infrastructure to unlock the early delivery of homes at Meridian Water.

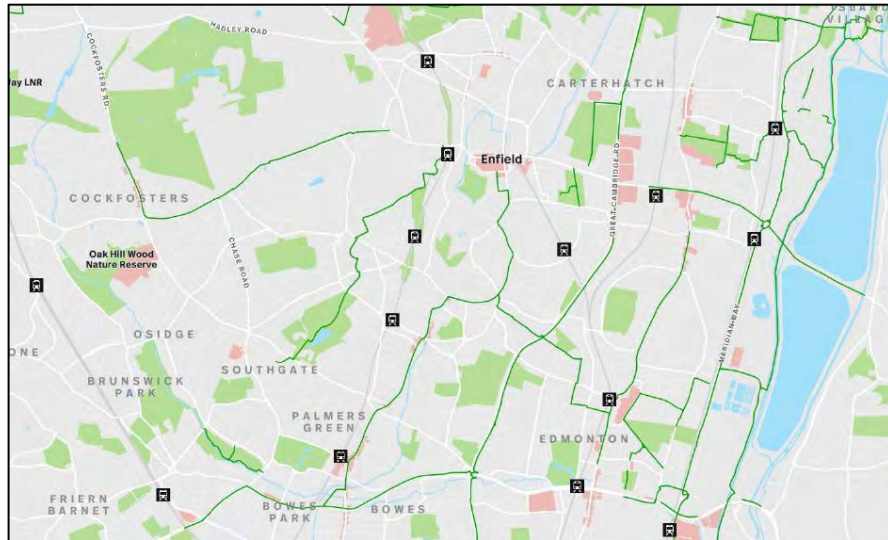
D.141 Both Routes 1 and 12 of the National Cycle Network (NCN) run through the London Borough of Enfield. Route 1 comprises a long distance cycle route connecting Dover to Shetland. It runs through the east of Enfield following the River Lea. Route 12 runs in sections from Enfield Lock to Spalding via Stevenage, St Neots, and Peterborough. The section within Enfield is currently incomplete and temporarily starts from Hadley Wood as opposed to Enfield Lock.

D.142 The London Borough of Enfield Transport Plan 2019²⁷³ notes that Enfield is one of five Outer London Boroughs identified as having the greatest number of potentially cyclable trips, with nearly 80% of car trips in Enfield of cyclable length. The below figure demonstrates the Borough's established cycle routes, in dark green.

²⁷² Ibid

²⁷³ Enfield Council (2018). The London Borough of Enfield Transport Plan 2019. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0019/4825/enfield-transport-plan-2019-2041-roads.pdf)

Figure D.1: Established cycle routes within LBE²⁷⁴

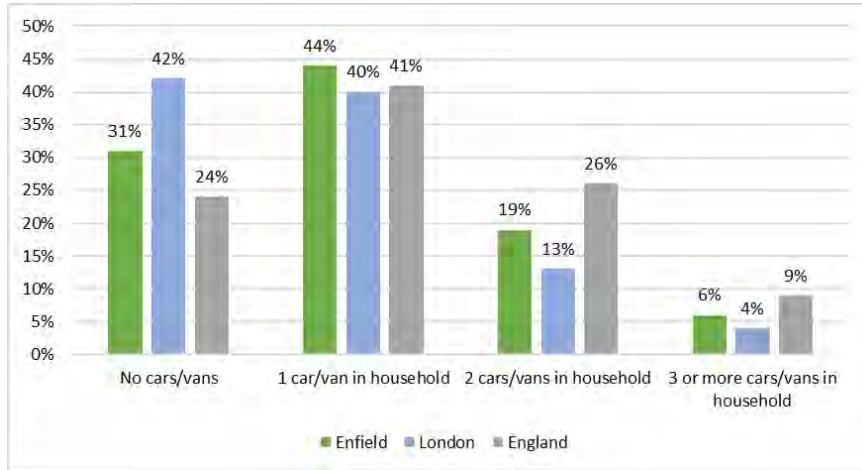


D.143 Enfield is served by a network of 38-day bus routes, 7 school-day only services, and 8-night bus routes, which altogether service the 547 bus stops within the Borough. The North London Sub-Regional Transport Plan report states that travelling by bus accounts for 14% of all journeys made by LBE residents.

D.144 With regard to personal vehicles, the below figure, taken from 2021 ONS Census data, demonstrates that approximately 31% of Enfield residents do not own a car or van. This is notable for being significantly below the London regional level (where circa 42% of people do not own a car or van). This may reflect the level of public transport accessed in the Borough. However, given the Borough's issues around inequality and deprivation, it is likely this is a result of affordability, particularly where TfL note Londoners are more likely to own a car if they live in outer London.

²⁷⁴ Cycle Enfield (2019). (see <https://journeysandplaces.enfield.gov.uk/map/>)

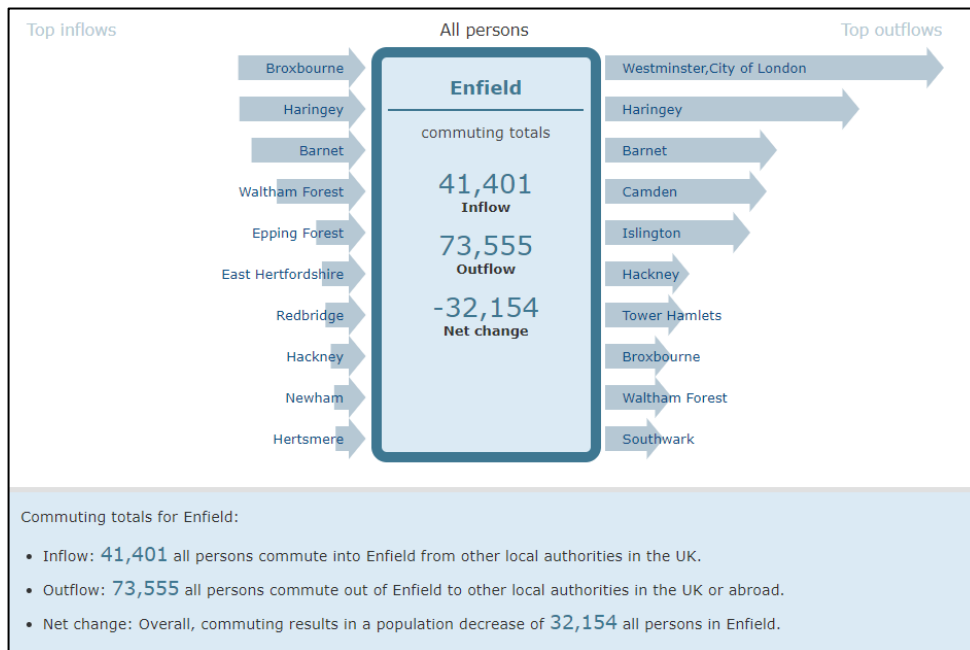
Figure D.2: Car and Van ownership across Enfield, London, and England



D.145 It is important to note that this data should be viewed in the context of LBE’s location within Greater London. Statistical comparison with England as a whole should be caveated by the understanding that the public transport model in London, as well as the extent, capacity and modal variety of the network is unique in England. In this context it is likely to be more instructive to compare public transport use in LBE to that of Greater London rather than to England as a whole.

D.146 Enfield is subject to greater outflow for employment than inflow, with the largest number of commuters, 13,690 outflowing to Westminster, City of London, with only 190 inflowing from this borough. Conversely, more people inflow into Enfield from Broxbourne (5,002) than any other borough, with 2,203 travelling in the opposite direction. As a total, commuting to places of work results in an overall negative flow of people in Enfield of -32,154. This is illustrated below in **Figure D.3.**

Figure D.3: Commuting Totals for Enfield – Inflows and Outflows²⁷⁵



²⁷⁵ Nomis (2011). Location of usual residence and place of work by sex. (see <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>)

Likely future changes without the Local Plan

D.147 Commuting trends are likely to continue as they are, although there may be a greater increase in people commuting out of the Borough as the UK continues to recover following the COVID-19 pandemic. As described above, in the last few years there has been a lot of investment in public transport, in particular the opening of Meridian Water railway station in 2019. Around one third of residents in Enfield own a vehicle, which is considerably lower than the London average. It is therefore likely that without the Local Plan, use of public transport will continue and maybe increase with further investment, particularly as there are policies in place in the Local Plan and London Plan to encourage more active and sustainable transport modes. Without the Local Plan, sites may be in inaccessible locations with no easy access to public transport, as the location of development within close proximity to existing services and facilities can influence use of public transport, and more active modes.

Implications for health

D.148 A lack of sustainable and active travel options can have negative impacts on public health whilst also increasing reliance on relatively expensive private motorised transit and exacerbating existing inequalities. Encouraging active travel, such as walking, wheeling and cycling can have a wide range of positive implications for health, including increased physical activity and opportunities for social interaction. In addition, an increase in active travel could be associated with a decrease in reliance on often expensive vehicular transport, and an associated decrease in air pollutants that can be harmful to human health.

Water

D.149 Water is a distinctive feature of the Borough's landscape, with more than 100 kilometres of watercourses – more than any other London borough. The River Lea is most significant watercourse running through the Borough. It is the easternmost tributary to the Thames, joining it at Tower Hamlets. The Borough includes an extensive network of canals (River Lea Navigation), rivers (River Lea), reservoirs (William Girling and King George V) and lakes. It should be recognised that part of the Borough is a Drinking Water Surface Water Protected Area and is located over a principal aquifer (also protected for drinking water purposes under the WFD).²⁷⁶

D.150 Enfield's urban river network is, however, largely hidden from view (due to culverts or diversion into underground sewers) and inaccessible. The New River – a man-made watercourse built in the seventeenth century to bring fresh water from Hertfordshire to London – is a rare exception to this. The River Lea and its tributaries (Salmons Brook, Turkey Brook and Pymmes Brook) flow through the heart of Enfield's emerging growth areas (Meridian Water, Enfield Town, Edmonton Green and Ponders End) where there are significant opportunities to reconnect people and nature to the waterfront (e.g. new footpath and cycle routes).²⁷⁷

D.151 The Pymmes Brook, Salmon Brook and Turkey Brook are the main River Lea tributaries that make up LBE's water network. The WFD requires all EU watercourses to achieve a 'Good' overall (ecological and chemical) status by 2027. **Table D.3** below sets out the hydromorphological designation, current overall status and reasons for not achieving 'Good' status for the main watercourses that run through LBE. As per the Environment Agency data, the River Lea has been separated into three different catchments, which all sit within LBE's boundary.

Table D.6: LBE watercourses and regulatory status

Watercourse	Catchment area	Designation	Overall status (2016)	Reasons for not achieving 'Good' status
Lea Navigation (Fieldes Weir to Enfield Lock)	45.48km ²	Heavily modified	Poor	Urbanisation Surface water abstraction Sewage discharge Misconnection

²⁷⁶ Enfield Council (2021). Enfield's Blue and Green Strategy 2021-2031 (see https://www.enfield.gov.uk/data/assets/pdf_file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf)

²⁷⁷ Ibid

Watercourse	Catchment area	Designation	Overall status (2016)	Reasons for not achieving 'Good' status
				Inland boating and structures Invasive non-native species Use of restricted substance
Lea Navigation (Enfield Lock to Tottenham Locks)	15.811km ²	Heavily modified	Bad	Urbanisation Transport drainage Sewage discharge Inland boating and structures Misconnections Flood protection structures Invasive non-native species
Small River Lee (and tributaries)	40.034km ²	Not designated artificial or heavily modified	Moderate	Urbanisation Sewage discharge Invasive non-native species Misconnection Land drainage
Pymmes Brook	40.778km ²	Heavily modified	Moderate	Sewage discharge Urbanisation Transport drainage Misconnections Flood protection structures
Salmon Brook	36.956km ²	Heavily modified	Moderate	Urbanisation Transport drainage Trade/Industry discharge Poor soil management Poor livestock management Flood protection structures Misconnections
Turkeybrook	48.209km ²	No designated artificial or heavily modifies	Poor	Urbanisation Transport drainage Private sewage treatment and domestic sewage discharge Poor nutrient management

D.152 The adopted Thames Water WRMP notes that the Thames Water supply area is “designated as seriously water stressed” meaning that demand is very high in relation to available supply. The resilience of supply could potentially be affected by extreme weather events and climate change patterns as well as technical challenges such as leakage. Whilst it also notes that approximately 25% of the water put into supply is lost through leakages. The WRMP estimates that by 2045 there will be a

shortfall of 387 million litres of water per day for the Thames Water supply area, and that by 2100 this will rise to 688 million litres of water per day.

D.153 Land contamination is a central issue in LBE, and land contamination and water quality are closely linked. LBE has a long established history with industrial uses and is significantly affected by Source Protection Zones (SPZs). This is particularly noticeable in the east and centre of the Borough. There are nine SPZ1s that run through the Borough, which are surrounded by and connected by three SPZ2s. There are no SPZ3s in the Borough boundaries

D.154 Regarding wastewater, services for Enfield are provided by Thames Water. The Borough is served by the Deephams Sewage Treatment Works (STW), this serves Enfield as well as the neighbouring Boroughs of Epping, Waltham, Forest, and Haringey. This will need significant upgrade in order to continue to service a growing population.

D.155 Nitrate Vulnerable Zones (NVZs) are areas designated as being at risk from agricultural nitrate pollution, in accordance with the 2015 Nitrate Pollution Prevention Regulations. Waters are defined as polluted if they contain nitrate concentrations greater than 50mg/l. The entirety of the Borough is covered by the Lee NVZS443.

D.156 Part of the Borough is a Drinking Water Surface Water Protected Area, this is an area where 'raw' water is extracted from rivers or reservoirs. Raw water requires protection to ensure that it is not polluted which could lead to additional purification treatment. As with the majority of the south east of England, LBE is located over a principal aquifer (Chalk), this is also protected for drinking water purposes under the WFD.

Likely future changes without the Local Plan

D.157 The Borough contains waterbodies of poorer water quality which do not meet 'Good' status. Pollution sources responsible for this include transport drainage and wastewater discharged. Without the Local Plan, it is possible that unplanned development could be in areas that could lead to further water quality issues and risks to the natural environment. However, existing safeguards such as the Water Framework Directive would help to reduce the potential for this to occur. Without the Local Plan, it is likely that the Thames Water supply area will continue to be seriously water stressed.

Implications for health

D.158 Inadequate wastewater treatment and poor water quality in watercourses can result in the contamination of drinking water sources, which may increase the risk of some waterborne diseases.²⁷⁸ Poor water quality as a result of pollutants in watercourses can also result in exposure to harmful chemicals. Industrial waste or agricultural runoff have the potential to introduce toxins into water sources. Exposure to these chemicals through drinking water or recreational activities in contaminated watercourses may lead to adverse health effects. Poor water quality can further harm the Borough's biodiversity, natural ecosystems and wildlife, which can have indirect health consequences for Enfield residents as ecosystems provide essential functions such as water purification and nutrient cycling.²⁷⁹

²⁷⁸ World Health Organization (2023) Drinking-water. (see <https://www.who.int/news-room/fact-sheets/detail/drinking-water#:~:text=Contaminated%20water%20and%20poor%20sanitation,hepatitis%20A%2C%20typhoid%20and%20polio>)

²⁷⁹ UK Parliament (2022) Water quality in rivers. (see <https://publications.parliament.uk/pa/cm5802/cmselect/cmenvaud/74/report.html>)

Appendix E

IIA findings for the spatial strategy options

E.1 This appendix sets out the IIA findings for the spatial strategy options considered throughout the plan-making process.

Spatial strategy options considered at Regulation 18 stage

E.2 The spatial strategy options considered at Regulation 18 stage are shown in **Table E.1**, with the findings illustrated in **Table E.2** and described below the table, by IIA objective. The Council's reasons for identifying the options subject to IIA at Regulation 18 stage is described in **Chapter 2**.

Table E.1: Reasonable alternative spatial options considered during preparation of the Regulation 18 Enfield Local Plan

Spatial strategy options considered, as described in IIA Report	Appraised as reasonable alternative in IIA Report?
<p>Option 1A: Baseline growth</p> <p>This is based on accommodating 17,000 new homes with some other land uses, including limited nature recovery and green and blue infrastructure improvements. Growth is distributed in the urban area only.</p>	Yes
<p>Option 1B: Baseline growth</p> <p>Similar to Option 1A, growth is distributed in the urban area and employment areas</p>	Yes
<p>Option 2A: Medium growth <i>[this is Medium Growth 2 in Table 2.2 of Draft Local Plan]</i></p> <p>Medium growth in the urban area and employment areas</p>	Yes
<p>Option 2B: Medium growth</p> <p>This is based on accommodating approximately 25,000 new homes with a full range of land uses, including extensive nature recovery and green and blue infrastructure investment with growth distributed in the urban area, employment areas and some release of the Green Belt. ...</p>	Yes
<p>Option 2C: Medium growth</p> <p>Similar to Option 2B, this option looks to accommodate 25,000 new homes, largely focused in the urban area some release of Green Belt. Growth is largely focused in the seven urban placemaking areas and the two rural placemaking areas. A zoning approach is taken to most of the rural areas to facilitate development of multi-layered mosaic of sustainable rural land uses and creation of National Park city designation area. No release of SIL</p>	Yes
<p>Option 2D: Medium growth</p> <p>Similar to Options 2B and C, this option looks to accommodate 25,000 new homes focused in the urban area only.</p>	Yes
<p>Option 3A: High growth</p> <p>This option is based on 55,000 homes, largely delivered in the urban area only.</p>	Yes

Spatial strategy options considered, as described in IIA Report	Appraised as reasonable alternative in IIA Report?
Option 3B: High growth Similar to Option 3A, but the focus is in the urban area and employment areas	Yes
Option 3C: High growth <i>[this is High Growth in Table 2.2 of Draft Local Plan]</i> Similar to options 3B and C, this is widespread growth across the Borough including the urban area, employment areas and the Green Belt	Yes
Option 3D: High growth Similar to Option 3A, growth is focused in the urban area and Green Belt	Yes
Option 4: seeking to accommodate most growth outside the Borough	No – not a reasonable alternative as it is outside the geographical scope of the Local Plan
Option 5: seeking to accommodate most of the development in the urban area to the east of the A10	Yes
Option 6: seeking to accommodate majority of development in the urban area to the west of the A10	Yes

Table E.2: Summary of IIA effects for the spatial strategy options at Regulation 18 stage

IIA objective	Option 1: Baseline growth		Option 2: Medium growth				Option 3: High growth				Option 5	Option 6
	1A: Focused in the urban area only	1B: Focused in the urban area and employment areas	2A: Focused in the urban area and employment areas	2B: Growth in the urban area, employment areas and some release of Green Belt	2C: Focused in the urban area and Green Belt (this is the Preferred Option)	2D: Focused in the urban area only	3A: Focused in the urban area only	3B: Focused in the urban area and employment areas	3C: Growth across the Borough including the urban area, employment areas and the Green Belt	3D: Focused in the urban area and Green Belt	5: Focus growth in the urban area east of the A10	6: Focus growth in the urban area west of the A10
IIA1: Climate change mitigation	+	+?/-	+	+?/-	+?/-	+	+	+	+?/-	+?/-	+	+
IIA2: Climate change adaptation	0	0	0	0	0	0	0	0	0	0	0	0
IIA3: Housing	+?/-	+	++?	++	+++?	++?/-	++/--	+++?	++	+++?	+?/-	+?/-
IIA4: Health and wellbeing	++	++	++/-?	++/-?	++/-?	++/-?	++/--?	++/--?	++/--?	++/--?	++/--?	++/--?
IIA5: Services and facilities	++	++	++/-?	++/-?	++/-?	++/-?	++/-?	++/-?	++/-?	++/-?	++/-?	++/-?
IIA6: Social inclusion	+?/-?	+?/-?	+	+	+	+/-	+/-	+/-	+/-	+/-	++/-	+/-

Appendix E
IIA findings for the spatial strategy options

Enfield Local Plan IIA
December 2023

IIA objective	Option 1: Baseline growth		Option 2: Medium growth				Option 3: High growth				Option 5	Option 6
	1A: Focused in the urban area only	1B: Focused in the urban area and employment areas	2A: Focused in the urban area and employment areas	2B: Growth in the urban area, employment areas and some release of Green Belt	2C: Focused in the urban area and Green Belt (this is the Preferred Option)	2D: Focused in the urban area only	3A: Focused in the urban area only	3B: Focused in the urban area and employment areas	3C: Growth across the Borough including the urban area, employment areas and the Green Belt	3D: Focused in the urban area and Green Belt	5: Focus growth in the urban area east of the A10	6: Focus growth in the urban area west of the A10
IIA7: Crime and community safety	-?	-?	-?	-?	-?	-?	--?	--?	--?	--?	-?	-?
IIA8: Road safety	0	0	0	0	0	0	0	0	0	0	0	0
IIA9: Economy	++	++/-?	++/-?	++/-?	++/-?	++	++	++/-?	++/--?	++/-?	++/-?	++/-?
IIA10: Town and local centres	++	++	++	++	++	++	++	++	++	++	+	+
IIA11: Air pollution	++/--	++/--	++/--	++/--	++/--	++/--	++/--	++/--	++/--	++/--	++/--	++/--
IIA12: Sustainable transport	++?	++?	++?	++?/-	++?/-	++?	++?	++?	++?/-	++?/-	++?	++?

Appendix E
IIA findings for the spatial strategy options

Enfield Local Plan IIA
December 2023

IIA objective	Option 1: Baseline growth		Option 2: Medium growth				Option 3: High growth				Option 5	Option 6
	1A: Focused in the urban area only	1B: Focused in the urban area and employment areas	2A: Focused in the urban area and employment areas	2B: Growth in the urban area, employment areas and some release of Green Belt	2C: Focused in the urban area and Green Belt (this is the Preferred Option)	2D: Focused in the urban area only	3A: Focused in the urban area only	3B: Focused in the urban area and employment areas	3C: Growth across the Borough including the urban area, employment areas and the Green Belt	3D: Focused in the urban area and Green Belt	5: Focus growth in the urban area east of the A10	6: Focus growth in the urban area west of the A10
IIA13: Biodiversity	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?
IIA14: Historic environment	-?	-?	-?	-?	-?	--?	--	--	--	--	--?	--?
IIA15: Landscape and townscape	-?	-?	-?	-?	-?	--?	--	--	--?	--?	--?	--?
IIA16: Efficient use of land	++	++	++	++/-	++/-	++	++	++	++/-	++/-	++	++
IIA17: Flooding	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?
IIA18: Water	-?	-?	-?	-?	-?	-?	--?	--?	--?	--?	-?	-?

IIA objective 1: Ensure the Local Plan serves to minimise LBE's per capita CO₂ emissions such that the Council will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040

E.3 All options within Options 1 to 3 focus development in urban areas around the transport nodes in the Borough, which consist of a mixture of railway stations and tube stations. It is unknown whether Options 5 and 6 would focus development around the transport nodes, however, given the number of nodes within the urban areas either side of the A10 it is assumed that development would be reasonably close to either a railway and/or tube station. These railway stations and tube stations are located in built up urban areas, where frequent bus services are also present, in addition to everyday services and facilities, including employment opportunities – all of which are within walking distance of one another. This element of all Options 1 to 3, 5 and 6 is therefore likely to reduce use of the private car and associated CO₂ emissions, with minor positive effects expected in relation to IIA1: Climate change mitigation. However, these effects are recorded as uncertain because levels of walking and cycling within the Borough are not currently very high. For example, 95% of the Borough's population is not physically active enough to maximise benefits to their health (see baseline information). Additionally, the sheer scale of developed proposed by these options would result in significant population growth, as well as an increase in the presence of cars. Options 2B, 2C, 3C and 3D also support development of Green Belt land in the north west of the Borough, where very few railway stations are located (there are no tube stations), bus services are less frequent and services and facilities are not within easy walking distance of one another. Therefore, it is very likely that new residents in these locations would have to drive to their workplace, as well as everyday services and amenities, which would increase greenhouse gas emissions associated with transport. Options 2B, 2C, 3C and 3D are therefore also expected to result in minor negative effects in relation to this objective. The incorporation of energy efficient design in new developments could also help reduce greenhouse gas emissions, but this would be influenced by other policies in the Local Plan and determined at planning application stage.

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

E.4 Given the high-level nature of these spatial options, it is not possible to distinguish between them with respect to climate change adaptation. The spatial distribution of development is not likely to influence sustainable design and construction techniques in development or respond to extreme weather effects as a result of climate change. Flood risk is dealt with separately under IIA objective 17. All options are expected to have negligible effects in relation to this objective.

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

E.5 The high growth options (3A to 3D) seek to meet the housing requirement identified in the London Plan for the first ten years¹ and then apply the government's standard methodology for calculating housing need in the remaining period up to 2039. All four options would therefore deliver the number of new homes identified under the high growth scenario. As such, they are expected to have significant positive effects in relation to IIA3: Housing. Option 3A would result in a significant increase in the density of development around the transport nodes, involving the development of significantly taller buildings which would result in a very high proportion of flats, studios and 1-bedroom dwellings. Development would therefore not provide the range of housing types needed in the Borough, which could potentially discriminate against certain groups of people, such as larger families or those with specialist housing requirements. For this reason, Option 3A is also expected to have a significant negative effect in relation to this objective. Option 3C, on the other hand, supports development in employment areas and the Green Belt, in addition to transport nodes, which may help in the delivery of a greater mix of housing types. Options 3B and 3D also support development in either employment areas or the Green Belt (respectively), therefore they should help to deliver a greater mix of housing types, but the significant positive effect is uncertain.

E.6 The baseline growth options (1A and 1B) seek to meet the housing requirement identified in the London Plan for the first ten years in full and then deliver a significantly lower number of homes in the remaining Local Plan period. Therefore, although Options 1A and 1B would deliver the number of new homes identified under this baseline growth scenario, they may not meet future housing needs in full, although this is uncertain. Both options are therefore expected to have minor positive but uncertain effects in relation to this objective. Option 1A would result in an increase in the density of development around the transport

¹ The London Plan covers the period up to 2041 but only provides housing targets for the first ten years of the London Plan period.

nodes only but because it is not providing as much growth as Option 3A, it is expected to have a minor negative effect in relation to this objective in terms of meeting the Borough's need for a range of housing sizes and types.

E.7 The medium growth options (2A to 2D) seek to meet the housing requirement identified in the London Plan and carry this same annual requirement forward, beyond the first ten years of the London Plan period. All four medium growth options would deliver the number of new homes identified under the medium growth scenario and are therefore expected to have significant positive effects in relation to this objective. The effects are recorded as uncertain because the Council has had to predict what their housing targets might be beyond the first ten years of the London Plan period. As was the case with Options 1A and 3A, Option 2D focuses development at the transport nodes only and is therefore expected to result in an increase in the density of development in these areas, which could potentially limit the availability of housing types in the Borough. Therefore, Option 2D is also expected to have a minor negative effect in relation to this objective. Option 2B, on the other hand, supports development in employment areas and the Green Belt, in addition to transport nodes, which may help in the delivery of a greater mix of housing types. Options 2A and 2C also support development in either employment areas or the Green Belt (respectively), therefore they should help to deliver a greater mix of housing types, but the significant positive effect is uncertain.

E.8 Options 5 and 6 (deliver housing in the urban areas east or west of the A10) would result in a significant increase in the density of development in the urban areas but are unlikely to be able to meet the full housing need of the Borough, resulting in a minor positive uncertain effect. In addition, due to development being focused in the urban areas either side of the A10, it is likely to involve the development of significantly taller buildings which would result in a very high proportion of flats, studios and 1-bedroom dwellings. Development would therefore not provide the range of housing types needed in the Borough, which could potentially discriminate against certain groups of people, such as larger families or those with specialist housing requirements. For this reason, Options 5 and 6 are also expected to have a minor negative effect in relation to this objective.

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

E.9 As set out in the baseline information in the IIA Scoping Report produced by AECOM, there is an east-west divide in terms of inequality in Enfield, and this correlates with health indicators. For example, Enfield is the fifth worst Borough in England for obesity, with significantly higher levels of obesity in the east when compared to the west. All options focus development in urban areas around the transport nodes in the Borough, which consist of a mixture of railway stations and tube stations. These railway stations and tube stations are located in built up urban areas, where existing primary healthcare facilities are available. New residents would also be located within very close proximity to other services and facilities, which may encourage them to walk or cycle to reach these services, with beneficial effects on their physical health. All options are therefore expected to have significant positive effects in relation to IIA4: Health and wellbeing. However, as set out in the baseline information, there are very few GP surgeries on the estates within Enfield and where GP surgeries are present, they are often outdated with inadequate facilities. Development does, however, offer an opportunity for new development to provide new GP surgeries and improve the design of existing GP surgeries, in the areas that need them the most. The volume of development proposed by the high and medium growth options would undoubtedly place a lot of pressure on existing services, particularly GP surgeries, whilst also potentially resulting in the loss of Metropolitan Open Land to make room for housing. Furthermore, higher density development can contribute to social isolation and poorer health. Indeed, there is growing evidence of the link between high density development and the negative public health impacts this has. Therefore, Options 3A to 3D are also expected to have significant negative but uncertain effects in relation to this objective, whilst Options 2A to 2D are expected to have minor negative but uncertain effects. In addition, Options 2B and 3C support more distributed growth across the Borough than the other options, supporting development within the Green Belt (as does Option 2C), but there are no GP surgeries located in the Green Belt to the north west of the Borough. The services and facilities that are present within the Green Belt are not close to potential development locations and would therefore discourage active travel choices (e.g. walking and cycling). Options 5 and 6 could also have a significant negative effect as Option 5 concentrates development to the east of the A10, which could place more pressure on the existing GP surgeries within the estates in the east of the Borough, while Option 6 would not support any development east of the A10 therefore opportunities to improve existing GP provision would be lost.

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

E.10 All options focus development in urban areas around the transport nodes in the Borough, which consist of a mixture of railway stations and tube stations. These railway stations and tube stations are located in built up urban areas, where a number

of existing services and facilities are present. New residents would therefore not be required to travel far to reach the services, as they would be within walking distance of them. For example, there are a number of primary schools located within close proximity of the transport nodes, in addition to secondary schools. Options 2B, 2C and 3C also support development of Green Belt land in the north west of the Borough. However, the majority of the Green Belt allocation sites are not located within close proximity of a primary or secondary school. Despite this, all options are expected to have significant positive effects in relation to this objective. The volume of development proposed by the high and medium growth scenario options, and the options that concentrate the development in the urban areas east or west of the A10 would be likely to place a lot of pressure on existing services, such as primary and secondary school places, although this is uncertain. Therefore, Options 2A to 2D, 3A to 3D and Options 5 and 6 are also expected to have minor negative but uncertain effects in relation to this objective.

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

E.11 Enfield is characterised by an east-west divide in terms of inequality and deprivation, with the eastern part of the Borough containing ten Lower Super Output Areas that fall within the 10% most deprived nationally. All options support development around the transport nodes, which are spread across the Borough but not towards the north west, which comprises Green Belt land. Development is expected to help regenerate the areas surrounding the transport nodes but due to the fact the transport nodes are spread fairly evenly across the majority of the Borough, development would not be directed into the more deprived areas only. Therefore, although all options would, to an extent, help regenerate the more deprived areas of the Borough, they would also enhance the less deprived areas and not specifically address the gap in inequality between the east and west. Moreover, the level of development proposed by the high growth options, and the concentration of development within urban areas particularly under Options 3A, 3B, 5 and 6, would result in a significant increase in the density of development around the transport nodes in LBE. As a result, there would be a significant increase in the height of existing tall buildings and new high-rise buildings, which would limit the mix of housing types available and potentially discriminate against certain groups of people such as those with specialist housing requirements. Open space within urban areas may also be lost to new housing, contributing to inequalities in access to open space. This is particularly important following the Covid-19 pandemic, which has highlighted the importance of public open space, particularly if people do not have access to a private garden. Therefore, the high growth options (3A to 3D) are expected to have mixed minor positive and minor negative effects in relation to this objective. Option 5 which concentrates development to the east of the A10 could have a significant positive effect on social inclusion by focusing development in the more deprived eastern part of the Borough, but it could have the same potential negative effects in terms of high density, tall buildings, and pressure on open space. Option 6 which concentrates development to the west of the A10 would only have a minor positive effect as it would not address the gap in inequality between the east and west, and would have the same minor negative effects by requiring high density development in the western urban areas. Option 2D (medium growth in the urban area only) is also expected to have a mixed minor positive and minor negative effect because like Option 3A, it seeks to intensify land around transport nodes only and may therefore result in an over reliance on flats and a subsequent decrease in housing mix. The baseline growth options support the lowest number of new homes and would therefore contribute a lower amount of affordable housing than the medium and high growth options. Therefore, Options 1A and 1B are expected to have mixed minor positive and minor negative but uncertain effects in relation to this objective. The remaining options (2A to 2C) are expected to have minor positive effects in relation to IIA6: Social inclusion because they would provide more development than the baseline growth options, as well as a greater range of housing types due to more widespread growth.

IIA objective 7: Reduce crime and increase community safety

E.12 The spatial distribution of development is not likely to influence levels of crime, anti-social behaviour, fear of crime and perceptions of safety, which will be more influenced by policies which seek to deliver inclusive design. As set out in the IIA Scoping Report, crime is generally concentrated in the east of the Borough at Southgate, Palmers Green, and the boundary the Borough shares with Haringey Council, in addition to around transport nodes. Crime levels have been rising in the area, partly due to the fact that the Borough has the largest youth population in Greater London, with some of the highest levels of crime recorded in the school-transport corridors. All options concentrate growth at the transport nodes, whilst Options 1B, 2A, 2B, 3B and 3C also support development at SIL and LSIS sites, located in the east of the Borough. Overall, all options are expected to have minor negative effects in relation to IIA7: Crime and community safety, although this is uncertain as there may be policies included in the Local Plan to support high quality developments, improvements to estates that suffer from poor quality housing and a high quality public realm that supports the integration of communities and natural surveillance including through the co-location of shops, services, community centres and green spaces. The higher growth options may have more of an adverse

effect than the other options because the much higher level of growth proposed under Option 3 could result in higher levels of crime. Therefore, a significant negative but uncertain effect has been recorded for Options 3A to 3D.

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

E.13 The spatial distribution of development will not affect the achievement of this objective, which relates to healthy streets principles that encourage walking and cycling; these are more likely to be addressed through Local Plan policy. Therefore, all options are likely to have negligible effects in relation to IIA8: Road safety.

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

E.14 Concentrating development at the transport nodes in the Borough which are very central and well-connected, is expected to encourage the retention and expansion of town and local centre commercial and retail uses. The transport nodes in the Borough contain a range of services and facilities, and therefore offer job opportunities. Options 1A, 2D and 3A seek to focus development at the transport nodes only. Concentrating new residential development in these central and well-connected areas would help boost the economy by increasing the available workforce and attracting investment to the area, whilst also helping improve these local economies. These three options (1A, 2D and 3A) are therefore expected to have significant positive effects in relation to this objective. An even larger proportion of job opportunities are provided at the SIL and LSIS sites and with Options 1B, 2A, 2B, 3B, 3C and 5 (and 6 to a lesser extent as there are just a few LSIS sites in the south of the Borough west of the A10) concentrating future residential development in the employment areas, as well as at the transport nodes, there would be a loss in SIL and LSIS land. Options 1B, 2A, 2B, 3B, 3C, 5 and 6 are therefore expected to have mixed significant positive and minor negative effects in relation to IIA9: Economy. The minor negative effects are recorded as uncertain because although there may be a loss in employment land, residential development may be provided as part of mixed-use schemes at the SIL and LSIS sites. In addition, Options 2B and 3C spread development more evenly across the Borough, including on Green Belt land. However, the areas of Green Belt land where intensification is proposed, are not located within the main urban centres of the Borough, where more job opportunities are available. Conversely, supporting development in these areas may have positive effects on the rural economy and jobs. Option 3C is therefore expected to have a mixed significant positive and significant negative effect in relation to this objective, whilst Option 2B is still expected to have a mixed significant positive and minor negative effect, because although both options may support the rural economy, they could also result in the loss of SIL and LSIS land. This is particularly the case for Option 3C, which proposes the highest number of new homes out of all options. The negative effects are recorded as uncertain because residential development may be provided as part of mixed-use schemes at the SIL and LSIS sites. Options 2C and 3D also allow for some development on Green Belt land, therefore they are expected to have a minor negative but uncertain effect for directing some residential development to areas of Green Belt land where there are less existing job opportunities, but a positive effect in terms of supporting the rural economy. They would both still have a significant positive effect however, as they both also support a significant amount of development in the urban areas at the transport nodes, which are well connected to employment opportunities.

IIA objective 10: Support the vitality of the Borough's town and local centres

E.15 Concentrating development at the transport nodes in the Borough which are very central and well-connected, is expected to encourage the retention and expansion of town and local centre commercial and retail uses. Options 1A, 2D and 3A are therefore expected to enhance the vitality and vibrancy of the town and local centres in the Borough, resulting in significant positive effects against IIA10: Town and local centres. Option 5 would only support the town and local centres to the east of the A10 and Option 6 would only support the town and local centres to the west of the A10, therefore both of these options would only have a minor positive effect. All the remaining options support development at the transport nodes in the Borough, but also support the development of SIL and LSIS sites (Options 1B, 2A, 2B, 3B and 3C) and/or intensification within the Green Belt (Options 2C, 2D, 3C and 3D). Although the SIL, LSIS and Green Belt sites are located on the edge and/or outside of the town and local centres and development under these options may not directly revitalise the town and local centres, these options still support development around the transport nodes, where the town and local centres are located. All remaining options are therefore also expected to have significant positive effects in relation to this objective.

IIA objective 11: Minimise air pollution

E.16 All options focus development in urban areas around the transport nodes in the Borough, which consist of a mixture of railway stations and tube stations. These railway stations and tube stations are located in built up urban areas, where frequent

bus services are also present, in addition to everyday services and facilities that are within walking distance of one another. All options are therefore likely to reduce reliance on the private car, which would help minimise air pollution. However, the actual use of more active and sustainable modes of travel will depend on people's behaviour. Further to this, the Borough experiences severe problems with air quality, especially between the east and west of the Borough, with the entire Borough being declared an Air Quality Management Area (AQMA). Therefore, although all options focus development within close proximity to sustainable travel modes, where services and facilities are within easy walking and cycling distance of one another, the amount of development proposed by all options is expected to have significant adverse effects on air quality through population increase and a higher presence of cars. Having said that, walking and cycling could be encouraged through the design of new development and incorporation of Healthy Streets principles. Options 2B, 2C, 3C and 3D also support development of Green Belt land in the north west of the Borough, where very few railway stations are located (there are no tube stations), bus services are less frequent and services and facilities are not within easy walking distance of one another. Therefore, new residents in these locations would be more reliant on the private car, contributing towards air pollution. Overall, all options are expected to have mixed significant positive and significant negative effects in relation to IIA11: Air pollution.

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

E.17 All options focus development in urban areas around the transport nodes in the Borough, which consist of a mixture of railway stations and tube stations. These railway stations and tube stations are located in built up urban areas, where frequent bus services are present, in addition to everyday services and facilities that are within walking distance of one another. These options are therefore likely to reduce reliance on the private car and increase more sustainable modes of transport. However, the use of more sustainable modes of transport will depend on people's behaviour, especially following the Covid-19 pandemic where there has been a significant reduction in people using public transport. Indeed, the majority of residents in the Borough use a private car to get to work instead of public transport. All options are therefore expected to have significant positive but uncertain effects in relation to IIA12: Sustainable transport. However, Options 2B, 2C, 3C and 3D also support development of Green Belt land in the north west of the Borough, where very few railway stations are located (there are no tube stations), bus services are less frequent and services and facilities are not within easy walking distance of one another. Therefore, residents in these locations are expected to be more reliant on the private car, particularly because they are within close proximity of the M25 which borders the northern edge of LBE. These four options are therefore also likely to result in minor negative effects in relation to this objective.

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

E.18 The Borough does not contain a Special Protection Area (SPA), Special Area of Conservation (SAC) or a Ramsar site. However, it is located within close proximity to the Lee Valley SPA and Ramsar site which is located to the north and south of the Borough in Lee Valley Regional Park, which runs along the eastern edge of Enfield. The Epping Forest SAC is also located just outside the Borough, to the east. The Chingford Reservoir Site of Special Scientific Interest (SSSI) is located within the Borough, along its eastern edge. There is also one Local Nature Reserve (LNR) within the Borough, known as Covert Way, located just south of Hadley Wood. A large number of Sites of Importance in Nature Conservation (SINC) are spread across the Borough.

E.19 All options would intensify development at transport nodes in the urban areas of the Borough, where no internationally designated biodiversity assets are present. Although there is one SSSI and one NNR present within the Borough, neither are located within close proximity to where development is proposed under all options. However, the zones of influence for some of the SACs, SPAs and Ramsar sites just outside the Borough extend into the Borough and indirect effects due to general population increase and pressure on any nature conservation sites, for example from recreation and increased air pollution, could still occur. The SINC are spread relatively evenly across the Borough, with most containing a railway station. All options would therefore include land that falls within a SINC. Options 2B, 2C, 3C and 3D also promote development in the Green Belt in areas that comprise a mixture of both greenfield and brownfield sites. Greenfield and brownfield sites can have biodiversity interest which would be lost as a result of development. Overall, all options are expected to have significant negative effects in relation to IIA13: Biodiversity. The effects are recorded as uncertain because designated nature conservation sites could be avoided through site design, and there may be opportunities to promote habitat connectivity if new developments include green infrastructure.

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

E.20 The northern edge of the Borough does not contain a large proportion of heritage assets whereas the remainder of the Borough does, especially the more built-up areas such as Enfield Town. A number of Conservation Areas are located along the periphery of the built-up area within the edge of the Green Belt, the largest being Trent Park which is also a Registered Park and Garden. All options seek to intensify the areas surrounding the railway and tube stations within the Borough, which tend to be located within close proximity to a large number of Listed Buildings, whilst also falling within or close to Conservation Areas. The high growth options (Options 3A to 3D) would provide the highest number of new homes at around 36,000. This is significantly higher than the remaining options and considering the fact that Option 3A seeks to concentrate development within the urban area only, effects on the historic environment would be substantial. All high growth options are expected to have significant negative effects in relation to IIA14: Historic environment due to the scale of development proposed.

E.21 Options 1A and 1B would support the lowest number of new homes in the Borough. Option 1A supports intensification around travel nodes in the urban area only, whereas Option 1B supports intensification of existing SIL and LSIS sites, in addition to travel nodes in the urban area. The SIL and LSIS sites identified for potential development contain very few heritage assets with some containing none at all, and therefore development within them is unlikely to result in adverse effects on the historic environment. Overall, Options 1A and 1B are expected to have minor negative but uncertain effects in relation to this objective. Option 2D is expected to have a significant negative effect in relation to this objective because it supports a medium number of new homes in the urban area only, where most historic assets are located. Options 2A, 2B and 2C on the other hand, are expected to have minor negative effects in relation to this objective because although they do not propose the lowest number of new homes when compared to the other growth scenarios, they do not solely focus development in the urban area and instead spread growth more widely across the Borough. Similar to Option 2D, Options 5 and 6 concentrate development within the urban areas to the east and west of the A10 respectively, but are unlikely to deliver the same level of growth as the high growth options, therefore they are expected to have significant negative effects also. The effects of all the options except 2D and 3A to 3D are recorded as uncertain because development could potentially reduce adverse impacts on the historic environment through mitigation and the design, scale, and layout of development.

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

E.22 Options 3A to 3D would result in a significant increase in the density of development in the Borough around the transport nodes, as well as in SIL and LSIS sites under Options 3B and 3C. There would need to be a significant increase in the height of existing tall buildings, in addition to new high-rise buildings, both of which would fundamentally alter the character of the urban area and Borough as a whole. Option 3C would deliver the same number of new homes to Options 3A and 3B but would spread this development more evenly across the Borough, including areas that fall within the Green Belt. Option 3D would also direct some of the development to the Green Belt as well as the urban areas. However, the intensification of areas within the Green Belt under the high growth scenario could potentially alter the landscape in the north west of the Borough. All of the high growth options are therefore expected to have significant negative effects in relation to IIA15: Landscape and townscape. However, for Options 3C and 3D, the effect is recorded as uncertain because development within the Green Belt could be designed in a way that helps mitigate any adverse impacts on the character of the area.

E.23 Options 1A and 1B would support the lowest number of new homes in the Borough. Option 1A supports intensification around travel nodes in the urban area and would therefore result in an increase in density within the urban area, whilst Option 1B would result in an increase in density within SIL and LSIS sites, as well as the urban area. However, this increase in density would not be comparable to that under the high growth scenario options. Overall, Options 1A and 1B are expected to have minor negative but uncertain effects in relation to this objective. The effects are recorded as uncertain as the actual effects would depend on the final design, scale, and layout of development. Options 2A to 2D support a higher number of new homes than Options 1A and 1B and could therefore potentially result in more adverse effects on townscape and/or landscape character, particularly Option 2D which focuses development in the urban area only. Overall, Option 2D is expected to have a significant negative but uncertain effect against this objective, whilst Options 2A, 2B and 2C are expected to have minor negative but uncertain effects. Similar to Option 2D, Options 5 and 6 concentrate development within the urban areas to the east and west of the A10 respectively, therefore they are expected to have significant negative but uncertain effects also.

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

E.24 All options would result in intensification around transport nodes within the Borough, which fall on previously developed land that is classified as land predominantly in urban use. All options are therefore expected to have significant positive effects

in relation to IIA16: Efficient use of land. However, Options 2B, 2C, 3C and 3D also promote development in the Green Belt in areas that comprise a mixture of both greenfield and brownfield sites, all of which are classified as Grade 3 agricultural land. Therefore, although these four options would promote the development of previously developed land, they would also promote the development of greenfield sites, which is not an efficient use of land. Therefore, Options 2B, 2C, 3C and 3D are also expected to have minor negative effects in relation to this objective.

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

E.25 The River Lee, in addition to King George's Reservoir and William Girling Reservoir located along the eastern edge of the Borough create a flood risk. The immediate area surrounding these waterbodies falls within Flood Zones 3a and 3b, as well as Flood Zone 2. All options promote development in urban areas around transport nodes within the Borough, a number of which are located in the east of the Borough. The above mentioned flood zones also stretch to the west of the Borough along New River (Old Course) and a number of brooks, most of which are also located within close proximity to transport nodes. The NPPF discourages the development of housing within areas at the highest risk of flooding. However, development may be able to incorporate surface water management measures, such as sustainable drainage systems to address the existing flood risk, as well as that generated by new development. It is also likely that under Options 1A, 1B, 2A, 2D, 3A, 3B, 5 and 6 housing would be delivered through an increase in height of existing buildings and would therefore not cause a reduction in permeable surfaces. Options 2B, 2C, 3C and 3D support development of Green Belt land in the north west of the Borough, some of which comprises greenfield land. As such, development would reduce the amount of permeable surface available and potentially contribute to surface water run-off, increasing flood risk. Overall, all options are expected to have minor negative but uncertain effects in relation to IIA17: Flooding.

IIA objective 18: Minimise water use and protect water quality

E.26 The Borough is covered entirely by the London Water Resource Zone, with its potable water and waste water services supplied by Thames Water. Greater London is mostly supplied by surface water resources (80%), with the remainder delivered through groundwater abstractions. Availability of water resources is a key issue in the Borough, given that the Thames Water Supply is designated as "seriously water stressed" and that climate change may lead to limited water availability in the future, particularly in the summer. The Borough contains a fairly high proportion of land covered by Source Protection Zones 1 and 2², and it is therefore unlikely that development would be able to avoid these Source Protection Zones. Development in some locations could therefore contaminate water supplies without mitigation. However, all options support development in existing built-up areas and therefore any effect on Source Protection Zones is likely to be limited. Due to the fact all options contain land that falls within Source Protection Zones 1 and 2 but already contain built development, minor negative but uncertain effects are expected. However, the level of growth anticipated under the higher growth options 3A to 3D would place more pressure on water resources and water treatment capacity, therefore significant negative but uncertain effects are expected for Options 3A to 3D.

Spatial strategy options considered at Regulation 19 stage

E.27 Since the spatial strategy options were appraised at Regulation 18 stage in 2021, the Council has identified three additional spatial strategy options. The Council's reasons for identifying the options subject to IIA at Regulation 19 stage are described in **Chapter 2**. Broadly, it is as a result of more urban sites becoming available and so the Council can now achieve more growth than previously anticipated.

E.28 All three options would deliver the same growth in the urban areas (around 30,000 new homes) with options 8 and 9 providing for some additional growth in the rural areas, focussed on rural placemaking areas. The appraisals of the spatial options do not consider where these placemaking areas would be located within the rural area – this is considered elsewhere in the IIA through the appraisal of site options and allocated sites. As such, uncertainties and potential negative effects identified in the appraisal of spatial options may be reduced when the effects of specific development locations and associated site allocation and development management policies are assessed.

E.29 The spatial strategy options considered at Regulation 19 stage are shown in **Table E.3**, with the findings illustrated in **Table E.4** and described below the table, by IIA objective.

² There is no land in LBE covered by Source Protection Zone 3.

Table E.3: Reasonable alternative spatial options considered during preparation of the Regulation 19 Enfield Local Plan

Spatial strategy options considered	Appraised as reasonable alternative in IIA Report?
<p>Option 7: Revised baseline growth - This is based on accommodating around 30,000 new homes and some other land uses within urban areas only (and is in effect, an update to Option 1A). It reflects the additional sites identified since the Regulation 18 stage, and the further work undertaken to assess and optimise delivery on sites proposed for allocation in the urban areas. Alongside this development there is scope for some nature recovery and green and blue infrastructure improvements.</p>	<p>Yes</p>
<p>Option 8: Medium to High Growth with 2 Rural Placemaking Areas - This option looks to accommodate 34,500 new homes, largely focused in the urban area with some release of Green Belt. Growth is largely focused in the eight urban placemaking areas and the two rural placemaking areas. A zoning approach is taken to most of the rural areas to facilitate development of a multi-layered mosaic of sustainable rural land uses, ambitious nature recovery and rewilding. Intensification of existing industrial areas and new sites in urban and rural areas. No release of SIL.</p>	<p>Yes</p>
<p>Option 9: Medium to High Growth with 1 Rural Placemaking Area - This option looks to accommodate 31-32,000 new homes, largely focused in the urban area with some release of Green Belt. Growth is largely focused in the eight urban placemaking areas and on one rural placemaking area (either Crews Hill or Chase Park). A zoning approach is taken to some of the rural areas to facilitate development of multi-layered mosaic of sustainable rural land uses, nature recovery and rewilding. Intensification of existing industrial areas and new sites in urban and rural areas. No release of SIL.</p>	<p>Yes</p>

Table E.4: Summary of IIA effects for the spatial options

IIA objective	Spatial Strategy Option		
	7: Revised Baseline Growth	8: Medium to High Growth with 2 Rural Placemaking Areas	9: Medium to High Growth with 1 Rural Placemaking Area
IIA1: Climate change mitigation	+	+?/-?	+?/-?
IIA2: Climate change adaptation	0	0	0
IIA3: Housing	+	++?	++?
IIA4: Health and wellbeing	++/-?	++/-?	++/-?
IIA5: Services and facilities	++/-?	++/-?	++/-?
IIA6: Social inclusion	+/-	+	+
IIA7: Crime and community safety	-?	-?	-?
IIA8: Road safety	0	0	0
IIA9: Economy	++	++/-?	++/-?
IIA10: Town and local centres	++	++	++
IIA11: Air pollution	++/--	++/--	++/--
IIA12: Sustainable transport	++?	++/-?	++/-?
IIA13: Biodiversity	--?	--?/+?	--?/+?
IIA14: Historic environment	--?	--?	--?
IIA15: Landscape and townscape	-?	-?	-?
IIA16: Efficient use of land and materials	++	++/-	++/-
IIA17: Flooding	-?	-?	-?
IIA18: Water	-?	-?	-?

IIA objective 1: Ensure the Local Plan serves to minimise LBE's per capita CO₂ emissions such that the Council will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040

E.30 All three new options focus development in urban areas, around the transport nodes in the Borough, which consist of a mixture of railway stations and tube stations. These railway stations and tube stations are located in built up urban areas, where frequent bus services are also present, in addition to everyday services and facilities, including employment opportunities – all of which are within walking distance of one another. This element of all **Options 7, 8 and 9** is therefore likely to reduce use of the private car and associated CO₂ emissions, with minor positive effects expected in relation to **IIA1: Climate change mitigation**. However, these effects are recorded as uncertain because levels of walking and cycling within the Borough are not currently very high. For example, 95% of the Borough's population is not physically active enough to maximise benefits to their health (see baseline information). Although positive effects are expected in terms of CO₂ emissions per capita, it should be noted that the scale of development proposed under all three options would result in significant population growth in the Borough, therefore total CO₂ emissions may still increase.

E.31 Options 8 and 9 also support development of Green Belt land in the north west of the Borough, where there are less public transport options and facilities are less likely to be within easy walking distance. Therefore, it is very likely that new residents in these locations would have to drive to their workplace, which would increase greenhouse gas emissions associated with transport. Development in these locations may also create a need for residents to drive to access everyday services and amenities. The resulting minor negative effect in relation to this objective is subject to some uncertainty as there is potential for the scale of growth in rural placemaking areas under **Options 8 and 9** to deliver new social infrastructure alongside housing development to minimise the need for travel and vehicle use to access schools, lower tier shops and so on. **Option 8** proposes two rural sites, and **Option 9** proposes one of two rural site options; the potential negative effects could therefore be greater for Option 8, but not enough to differentiate the score against **IIA objective 1**.

E.32 As noted in the introduction to this section, appraisals for individual site allocations and accompanying development management policies elsewhere in the IIA may show that uncertainties and potential negative effects are likely to be reduced or avoided. The incorporation of energy efficient design in new developments could also help reduce greenhouse gas emissions but this would be influenced by other policies in the Local Plan and determined at planning application stage.

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

E.33 Given the high-level nature of these spatial options, it is not possible to distinguish between them with respect to climate change adaptation. The spatial distribution of development is not likely to influence sustainable design and construction techniques in development or respond to extreme weather effects as a result of climate change. Flood risk is dealt with separately under **IIA objective 17**. All options are expected to have negligible effects in relation to this objective.

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

E.34 All options meet the housing requirement identified in the London Plan for the first ten years of the plan period in full. Option 7 and then rolls that same amount of housing delivery per annum across the remainder of the plan period. **Options 8 and 9** provide for slightly higher growth (34,500 homes and 31-32,000 homes respectively), the additional growth being provided in the Green Belt.

E.35 All options would deliver a significant number of new homes (although less than the 'High Growth' options considered at Regulation 18 stage). **Options 8 and 9** would broadly meet the London Plan requirement for the London Borough of Enfield for the period to 2029, as well as making a contribution towards the wider shortfall within London.

E.36 All options would result in an increase in the density of development around the transport nodes in the urban area, involving the development of taller buildings which would result in a high proportion of flats, studios and 1-bedroom dwellings. This higher density development is not likely to provide the full range of housing types needed in the Borough, which could potentially discriminate against certain groups of people, such as larger families or those with specialist housing requirements. **Options 8 and 9** also support some development in the Green Belt, focussed in rural placemaking areas, which is likely to help in the delivery of a greater mix of housing types.

E.37 Taking all of the above into consideration, the effects of **Option 7** are judged to be minor positive while those for **Options 8 and 9** are judged to be significant positive effects in relation to **IIA3: Housing**. The more positive effects identified for Options 8 and 9 are due to two factors. Firstly, the contribution these options make to helping address the shortfall between the London Plan requirement and objectively assessed housing need. Secondly, the potential for development in rural areas to deliver lower density family housing and to make a greater contribution to providing affordable homes, allowing the plan as a whole to provide a wider mix of types and tenures of housing that meet different needs. All positive effects are subject to some uncertainty due to uncertainty about exactly what mix of housing would be delivered under each option and how well this would align with need.

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

E.38 As set out in the previous assessment, the baseline information in the IIA Scoping Report produced by AECOM noted that, there is an east-west divide in terms of inequality in Enfield, and this correlates with health indicators. For example, Enfield is the fifth worst Borough in England for obesity, with significantly higher levels of obesity in the east when compared to the west.

E.39 All three revised options still focus development in urban areas around the transport nodes in the Borough. The railway stations and tube stations are located in built up urban areas, where existing primary healthcare facilities are available. New residents would also be located within very close proximity to other services and facilities, which may encourage them to walk or cycle to reach these services, with beneficial effects on their physical health. All three revised options are therefore expected to have **significant positive effects** in relation to **IIA4: Health and wellbeing**.

E.40 However, as set out in the baseline information and noted in previous assessments, there are very few GP surgeries on the estates within Enfield and where GP surgeries are present, they are often outdated with inadequate facilities. Development does, however, offer an opportunity for new development to provide new GP surgeries and improve the design of existing GP surgeries, in the areas that need them the most. The volume of development proposed by the high and medium growth options would undoubtedly place a lot of pressure on existing services, particularly GP surgeries, whilst also potentially resulting in the loss of Metropolitan Open Land to make room for housing.

E.41 Furthermore, higher density development can contribute to social isolation and poorer health. Indeed, there is growing evidence of the link between high density development and the negative public health impacts this has. Although **Options 8 and 9** include development within more rural areas, all three options would result in the same level of development within the urban area. Therefore, all three options are expected to have minor negative but uncertain effects in relation to IIA objective 4: Health and Wellbeing.

E.42 Options 8 and 9 support more distributed growth across the Borough than the other options, where there are currently less facilities and infrastructure. However, the majority of this development will be focussed in one or two rural placemaking areas. This offers greater potential than piecemeal development to deliver significant new social infrastructure particularly, as in this case, where development will be delivered in the form of comprehensively masterplanned, strategic scale developments. Despite this, infrastructure provision in strategic new developments in the Green Belt may not rival that available in existing service centres and transport nodes, particularly in the short term before the developments are fully built out. These potential positive effects are uncertain when considering the spatial strategy options in isolation as they will depend on the detail of the spatial strategy policy and associated strategic allocation policies

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

E.43 All three revised options focus some or all development in urban areas around the transport nodes in the Borough, which consist of a mixture of railway stations and tube stations. These railway stations and tube stations are located in built up urban areas, where a number of existing services and facilities are present. New residents would therefore not be required to travel far to reach the services, as they would be within walking distance of them. For example, there are a number of primary schools located within close proximity of the transport nodes, in addition to secondary schools. The scale of development proposed could provide opportunities to deliver significant improvements to infrastructure, benefiting new and existing residents and communities.

E.44 Options 8 and 9 also support development of Green Belt land in the north west of the Borough, and the majority of the Green Belt allocation sites are not located within close proximity of a primary or secondary school, or other community infrastructure. However, much of the development in rural areas would be focussed in identified rural placemaking areas, with

greater potential for good provision of services, facilities and social infrastructure, as discussed in more detail above in relation to IIA objective 4: Health and wellbeing. All options are expected to have **significant positive effects** in relation to this objective, as the majority of development is in the urban areas which have the benefit of good facilities. The amount of development proposed could place a lot of pressure on existing services, such as primary and secondary school places, although this is uncertain. Therefore, all revised **Options 7, 8 and 9** are also expected to have **minor negative but uncertain effects** in relation to this objective.

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

E.45 Enfield is characterised by an east-west divide in terms of inequality and deprivation, with the eastern part of the Borough containing ten Lower Super Output Areas that fall within the 10% most deprived nationally. All options support development around the transport nodes, which are spread across the Borough but not in the north west, which comprises Green Belt land.

E.46 Development is expected to help regenerate the areas surrounding the transport nodes but due to the fact the transport nodes are spread fairly evenly across the majority of the Borough, development would not be directed into the more deprived areas only. Therefore, although all options would, to an extent, help regenerate the more deprived areas of the Borough, they would also enhance the less deprived areas and not specifically address the gap in inequality between the east and west.

E.47 The concentration of development within urban areas in all the revised options, would result in an increase in the density of development around the transport nodes in LBE, albeit not as high as envisaged in the high growth spatial options appraised at Regulation 18 stage, before additional urban sites had been identified by the Council. As a result, there would be an increase in the height of existing tall buildings and new high-rise buildings. This, could lead to over-provision of flats vs. other types of dwelling in the housing mix and therefore limit the mix of housing types available and potentially discriminate against certain groups of people such as those with specialist housing requirements. Higher density urban development is also likely to be more expensive to provide than lower density development in rural areas and may therefore contribute a lower proportion of affordable housing. Open space within urban areas may also be lost to new housing, contributing to inequalities in access to open space. This is particularly important following the Covid-19 pandemic, which has highlighted the importance of public open space, particularly if people do not have access to a private garden.

E.48 Taking all of the above into account, **Option 7** is expected to have a **mixed minor positive and minor negative effect** in relation to **IIA6: Social inclusion** because of its purely urban focus while **Options 8 and 9** that also provide for development in the rural area are expected to have **minor positive effects**.

IIA objective 7: Reduce crime and increase community safety

E.49 The spatial distribution of development is not likely to have a major influence on levels of crime, anti-social behaviour, fear of crime and perceptions of safety, which will be more influenced by policies which seek to deliver inclusive design. As set out in the IIA Scoping Report, and the Regulation 18 IIA, crime is generally concentrated in the east of the Borough at Southgate, Palmers Green, and the boundary the Borough shares with Haringey Council, in addition to around transport nodes. Crime levels have been rising in the area, partly due to the fact that the Borough has the largest youth population in Greater London, with some of the highest levels of crime recorded in the school-transport corridors. All options concentrate growth at the transport nodes, which may exacerbate existing issues. In addition, all options would result in relatively high density development in urban areas, which may be linked to higher levels of crime.

E.50 Overall, all options are expected to have minor negative effects in relation to IIA7: Crime and community safety, although this is uncertain as there will be policies included in the Local Plan to support high quality developments, improvements to estates that suffer from poor quality housing and a high quality public realm that supports the integration of communities and natural surveillance including through the co-location of shops, services, community centres and green spaces.

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

E.51 The spatial distribution of development will not affect the achievement of this objective, which relates to healthy streets principles that encourage walking and cycling; these are more likely to be addressed through Local Plan policy. Therefore, all options are likely to have negligible effects in relation to **IIA8: Road safety**.

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

E.52 Concentrating development at the transport nodes in the Borough which are very central and well-connected, is expected to encourage the retention and expansion of town and local centre commercial and retail uses. The transport nodes in the Borough contain a range of services and facilities, and therefore offer job opportunities. **Option 7** seeks to focus development at the transport nodes only. Concentrating new residential development in these central and well-connected areas would help boost the economy by increasing the available workforce and attracting investment to the area, whilst also helping improve these local economies. **Option 7** is therefore expected to have significant positive effects in relation to this objective.

Options 8 and 9 spread development more evenly across the Borough, including on Green Belt land. However, the areas of Green Belt land where intensification is proposed, are not located within the main urban centres of the Borough, where more job opportunities are available. Conversely, supporting development in these areas may have positive effects on the rural economy and jobs. **Options 8 and 9** are therefore they expected to have a **minor negative but uncertain effect** for directing some residential development to areas of Green Belt land where there are less existing job opportunities, but a **positive effect** in terms of supporting the rural economy. They would both also have a **significant positive** effect more widely, as they support a significant amount of development in the urban areas at the transport nodes, which are well connected to employment opportunities.

IIA objective 10: Support the vitality of the Borough's town and local centres

E.53 As for all previous options, the revised options concentrate development at the transport nodes in the Borough which are very central and well-connected, encouraging the retention and expansion of town and local centre commercial and retail uses. **Option 7** is therefore expected to enhance the vitality and vibrancy of the town and local centres in the Borough, resulting in **significant positive effects** against **IIA10: Town and local centres**. **Options 8 and 9** support development at the transport nodes in the Borough, but also support the development of rural sites. Although the Green Belt sites are located on the edge and/or outside of the town and local centres and development under these options may not directly revitalise the town and local centres, these options still support development around the transport nodes, where the town and local centres are located. All options are therefore expected to have **significant positive effects** in relation to this objective.

IIA objective 11: Minimise air pollution

E.54 As with the original options, all three revised options focus development in urban areas around the transport nodes in the Borough, which consist of a mixture of railway stations and tube stations. These railway stations and tube stations are located in built up urban areas, where frequent bus services are also present, in addition to everyday services and facilities that are within walking distance of one another. **Options 7, 8 and 9** are therefore likely to reduce reliance on the private car, which would help minimise air pollution. However, the actual use of more active and sustainable modes of travel will depend on people's behaviour and the majority of residents in the Borough use a private car to get to work instead of public transport. Further to this, the Borough experiences severe problems with air quality, especially between the east and west of the Borough, with the entire Borough being declared an Air Quality Management Area (AQMA). Therefore, although all options focus development within close proximity to sustainable travel modes, where services and facilities are within easy walking and cycling distance of one another, the amount of development proposed by all options is expected to have significant adverse effects on air quality through population increase and an associated growth in the number of cars on the road. Walking and cycling could be encouraged through the design of new development and incorporation of Healthy Streets principles.

E.55 **Options 8 and 9** also support development of Green Belt land in the north west of the Borough, where very few railway stations are located (there are no tube stations), bus services are less frequent, and services and facilities are not within easy walking distance of one another. Therefore, new residents in these locations would be more reliant on the private car, contributing towards air pollution. It may be possible to mitigate this through provision of high quality public transport links to new strategic developments; the effects of any such provision are assessed in the IIA of the proposed plan policies.

E.56 Overall, all options are expected to have **mixed significant positive and significant negative** effects in relation to **IIA11: Air pollution**.

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

E.57 All options focus development in urban areas around the transport nodes in the Borough, at least in part, these options are therefore likely to reduce reliance on the private car and increase more sustainable modes of transport. However, the use of

more sustainable modes of transport will depend on people's behaviour, especially following the Covid-19 pandemic where there has been a significant reduction in people using public transport. Indeed, the majority of residents in the Borough use a private car to get to work instead of public transport. **All options are** therefore expected to have significant positive but uncertain effects in relation to **IIA12: Sustainable transport**.

E.58 However, **Options 8 and 9** also support development of Green Belt land in the north west of the Borough, where very few railway stations are located (there are no tube stations), bus services are less frequent, and services and facilities are not within easy walking distance of one another. Therefore, residents in these locations are expected to be more reliant on the private car, particularly because they are within close proximity of the M25 which borders the northern edge of LBE. As development would be concentrated within one or two rural areas, there is greater scope for ensuring sustainable transport options are available. Development at this scale will take time and so these two options are therefore also likely to result in minor negative effects in relation to this objective, especially in the short to medium term.

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

E.59 The Borough does not contain a Special Protection Area (SPA), Special Area of Conservation (SAC) or a Ramsar site. However, it is located within close proximity to the Lee Valley SPA and Ramsar site which is located to the north and south of the Borough in Lee Valley Regional Park, which runs along the eastern edge of Enfield. The Epping Forest SAC is also located just outside the Borough, to the east. The Chingford Reservoir Site of Special Scientific Interest (SSSI) is located within the Borough, along its eastern edge. There is also one Local Nature Reserve (LNR) within the Borough, known as Covert Way, located just south of Hadley Wood. A large number of Sites of Importance in Nature Conservation (SINC) are spread across the Borough.

E.60 All options would intensify development at transport nodes in the urban areas of the Borough, where no internationally designated biodiversity assets are present. Although there is one SSSI and one NNR present within the Borough, neither are located within close proximity to where development is proposed under all options. However, the zones of influence for some of the SACs, SPAs and Ramsar sites just outside the Borough extend into the Borough and indirect effects due to general population increase and pressure on any nature conservation sites, for example from recreation and increased air pollution, could still occur. The SINC are spread relatively evenly across the Borough, with most containing a railway station. All options would therefore include land that falls within a SINC. **Options 8 and 9** also promote development in the Green Belt in areas that comprise a mixture of both greenfield and brownfield sites (either of which can have biodiversity interest). The Green Belt areas contain a number of areas of priority habitat and locally designated wildlife sites. Overall, all options are expected to have **significant negative effects** in relation to IIA13: Biodiversity. The effects are recorded as **uncertain** because designated nature conservation sites could be avoided through site design, and there may be opportunities to promote habitat connectivity if new developments include green infrastructure.

E.61 **Options 8 and 9** propose ambitious biodiversity improvements so are considered to have **uncertain minor positive effects** on **IIA objective 13**; these improvements are uncertain as they depend on the timing and location of development. Biodiversity improvements proposed under **Option 7** are more limited and are considered to be **negligible** relative to the likely future baseline in the absence of the Local Plan (which would still require biodiversity net gain for all development).

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

E.62 The northern edge of the Borough does not contain a large concentration of heritage assets whereas the remainder of the Borough does, especially the more built-up areas such as Enfield Town. A number of Conservation Areas are located along the periphery of the built-up area within the edge of the Green Belt, the largest being Trent Park which is also a Registered Park and Garden. As all options seek to intensify the areas surrounding the railway and tube stations within the Borough, proposed development is likely to be located within close proximity to a large number of Listed Buildings, whilst also falling within or close to Conservation Areas. The medium- high growth options (**Options 8 and 9**) would a higher number of homes than **Option 7**, and **both medium-high growth options** are expected to have **significant negative effects** in relation to **IIA14: Historic environment** due to the scale of development proposed. **Option 7**, however, would concentrate development in the urban areas only and effects on the historic environment would also be substantial. Therefore **Option 7** is also considered to have potential **significant negative effects** on **IIA objective 14**.

E.63 The effects of all the revised options are recorded as uncertain because development could potentially reduce adverse impacts on the historic environment through mitigation and the design, scale, and layout of development.

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

E.64 All revised options (**7, 8 and 9**) would result in an increase in the density of development in the Borough around the transport nodes. There would need to be an increase in the height of existing tall buildings, in addition to new high-rise buildings, both of which would alter the character of the urban area although these potentially negative effects in increased development density would be less than envisaged at Regulation 18 stage due to the identification of more sites in the urban area across which development could be distributed. **Options 8 and 9** would deliver more homes than **Option 7** but would spread this development more evenly across the Borough, including areas that fall within the Green Belt.

E.65 However, the intensification of areas within the Green Belt to deliver medium-high growth could potentially alter the landscape in the north west of the Borough. All three of the revised options are expected to have **minor negative effects** in relation to **IIA15: Landscape and townscape**. However, the effect is recorded as **uncertain** because development within the Green Belt could be designed in a way that helps mitigate any adverse impacts on the character of the area.

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

E.66 All options would result in intensification around transport nodes within the Borough, which fall on previously developed land that is classified as land predominantly in urban use. All three revised options are therefore expected to have significant positive effects in relation to **IIA16: Efficient use of land**. However, **Options 8 and 9** also promote development in the Green Belt in areas that comprise a mixture of both greenfield and brownfield sites, all of which are classified as Grade 3 agricultural land. Therefore, although these two options would promote the development of previously developed land, they would also promote the development of greenfield sites, which is not an efficient use of land. Therefore, **Options 8 and 9** are also expected to have minor negative effects in relation to this objective.

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

E.67 The River Lee, in addition to King George's Reservoir and William Girling Reservoir located along the eastern edge of the Borough create a flood risk. The immediate area surrounding these waterbodies falls within Flood Zones 3a and 3b, as well as Flood Zone 2. All options promote development in urban areas around transport nodes within the Borough, a number of which are located in the east of the Borough. The above mentioned flood zones also stretch to the west of the Borough along New River (Old Course) and a number of brooks, most of which are also located within close proximity to transport nodes. The NPPF discourages the development of housing within areas at the highest risk of flooding. However, development may be able to incorporate surface water management measures, such as sustainable drainage systems to address the existing flood risk, as well as that generated by new development. It is also likely that under **Option 7, 8 and 9** housing would be partly delivered through an increase in the density of existing urban areas including through an increase in the height of buildings within the existing urban footprint, and would therefore not cause a reduction in permeable surfaces.

E.68 **Options 8 and 9** support development of Green Belt land in the north west of the Borough, some of which comprises greenfield land. As such, development would reduce the amount of permeable surface available and potentially contribute to surface water run-off, increasing flood risk. Overall, **all options** are expected to have **minor negative but uncertain effects** in relation to **IIA17: Flooding**.

IIA objective 18: Minimise water use and protect water quality

E.69 The Borough is covered entirely by the London Water Resource Zone, with its potable water and waste water services supplied by Thames Water. Greater London is mostly supplied by surface water resources (80%), with the remainder delivered through groundwater abstractions. Availability of water resources is a key issue in the Borough, given that the Thames Water Supply is designated as "seriously water stressed" and that climate change may lead to limited water availability in the future, particularly in the summer. **All options** would place more pressure on water resources and water treatment capacity, this being greater for **options 8 and 9** that propose more development in total.

E.70 The Borough contains a fairly high proportion of land covered by Source Protection Zones 1 and 2, and it is therefore unlikely that development would be able to avoid these Source Protection Zones. Development in some locations could

therefore contaminate water supplies without mitigation. However, all options support development in existing built-up areas and therefore any effect on Source Protection Zones is likely to be limited.

E.71 Overall, minor negative but uncertain effects are expected for **Options 7, 8 and 9**.

Appendix F

IIA findings for the site options 2023

F.1 This section presents the IIA findings for the reasonable alternative site options considered by the Council for allocation in the Enfield Local Plan at Regulation 19 stage.

F.2 The Council's approach to identifying the reasonable alternatives site options to be subject to IIA is described in **Chapter 2 Methodology** within the section 'Stage B: Developing and refining options and assessing effects'. Overall, there were:

- 146 site options considered for residential use
- 104 site options considered for mixed-use including residential uses¹
- 59 site options considered for industrial or employment, involving some commercial, retail and town centre uses
- 14 site options considered for other uses (burial/crematorium, leisure/sports and recreation, nature recovery sites, education or green infrastructure)

F.3 A small number of sites were included twice because the proposed site boundary changed as the plan-making process progressed²; in these cases the site ID number for the revised (more recent) boundary version was suffixed with an "r" (e.g. CFS168_r) to differentiate the IIA findings from the original version of the site.

F.4 The broad distribution of the appraised site options across the Borough is illustrated in **Figure F.1**, which also indicates which of these options was taken forward as an allocation in the Regulation 19 Plan.

F.5 The full appraisal methodology for the site options is described in **Chapter 2 Methodology** within the section 'Appraisal methodology' and the site appraisal criteria against which the site options were assessed are set out in **Table B.1** of **Appendix B**. When interpreting these IIA results for the site options, the following key features of this methodology should be borne in mind:

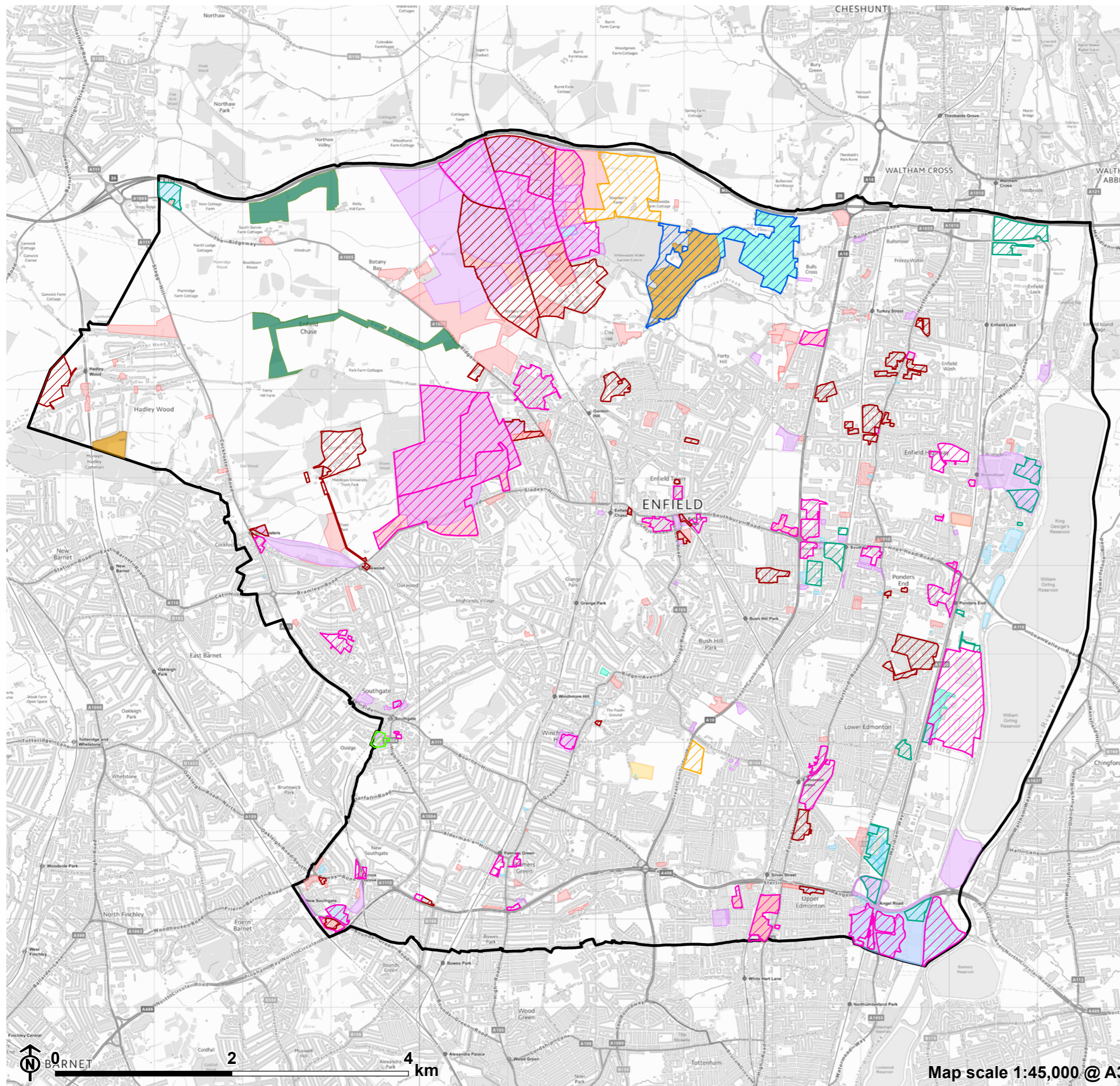
- Assessments were of the principle of a specified type of development (residential, employment etc) within a defined boundary; no account was taken of any detailed development proposals for the sites.
- Assessments were 'policy-off' i.e. before consideration of any mitigation that may be provided by Local Plan policies.
- Assessments were precautionary and intended to highlight the potential for significant negative effects to the Council for further investigation so that the need for avoidance (e.g. amendments to site boundaries) or mitigation (e.g. requirements within allocation policies) could be considered.

F.6 Table F.1 shows the effects of all reasonable alternative site options in relation to the IIA objectives, with the findings briefly described below the table.

¹ Does not include SS10 Broad Location and SA11 Broad Location

² In some cases, the differences between the site boundaries for the two versions were slight and may have been attributable to digitisation errors but both versions were included in the IIA results for completeness

Figure F.1: Reasonable alternative development site options



Enfield Borough

Site allocation

- Residential
- Mixed-use
- Industrial/ employment
- Natural burial/ burial/ crematorium
- Nature recovery / Sports, leisure and recreation
- Education

Reasonable alternative

- Residential
- Mixed-use
- Industrial
- Burial/ crematorium
- Leisure/ sports and recreation
- Green infrastructure
- Nature recovery

Map scale 1:45,000 @ A3

Table F.1: IIA findings for site options 2023

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	II4: Health and wellbeing	II5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water	
Residential site options																																								
16/01452/FUL	N/A	N/A	+	-	++	0	+	+	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	-	+	-	0	--	--	--	N/A	--?	--	0	--	+	0	+	0	--	--	0	
18/03508/FUL	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	-	++	+	0	-	-	--	N/A	--?	--	0	--	+	0	+	0	0	0	0	--
19/04385/FUL	N/A	N/A	+	-	+	--	-	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	--	--	--	N/A	--?	-	--	--	+	0	+	0	0	0	0	0
20/01815/FUL	N/A	N/A	+	-	++	0	+	+	+	N/A	N/A	++	--	N/A	0	0	-	0	-	-	--	+	-	0	0	0	--	N/A	--?	0	0	0	+	0	+	-	-	--	--	
20/02710/FUL	N/A	N/A	+	-	++	0	+	+	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	--	-	--	0	-	-	--	N/A	--?	-	0	-	+	0	+	0	0	0	0	0
20/03530/FUL	N/A	N/A	+	-	++	--	-	-	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	--	+	-	0	--	--	--	N/A	--?	-	--	--	+	0	+	0	0	0	0	--
BOC5	N/A	N/A	+	+	++	0	+	++	+	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	++	0	0	-	-	0	N/A	0?	-	0	-	+	0	+	0	--	--	--	
BOS2	N/A	N/A	+	+	++	--	+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	+	-	0	-	-	0	N/A	0?	-	--	--	-	0	-	-	--	--	--	
BUE32	N/A	N/A	+	++	++	0	++	+	0	N/A	N/A	++	0	N/A	+	0	--	-	-	-	-	+	0	0	0	0	--	N/A	--?	-	0	-	+	0	+	0	--	--	0	
BUP22	N/A	N/A	+	++	++	--	+	++	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	++	+	0	-	-	-	N/A	-?	-	--	--	+	0	+	0	--	--	--		
BUP6	N/A	N/A	+	+	++	--	+	++	0	N/A	N/A	-	0	N/A	-	0	--	-	-	-	++	+	0	0	0	--	N/A	--?	-	--	--	+	0	+	0	--	--	--		
CFS145	N/A	N/A	+	-	++	--	-	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	--	-	--	0	--	--	N/A	--	--?	N/A	N/A	--?	-	0	-	0	--	--	--		
CFS150	N/A	N/A	+	-	++	0	+	+	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	+	++	++	0	-	-	--	N/A	--?	0	0	0	+	0	+	0	0	0	0	
CFS159	N/A	N/A	++	-	++	0	+	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	--	--	--	0	-	-	--	N/A	--?	N/A	N/A	++?	+	0	+	0	--	--	0		
CFS162	N/A	N/A	+	+	++	--	+	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	--	-	--	0	--	--	N/A	--	--?	--	--	--	-	-	-	0	-	-	0		
CFS162_A	N/A	N/A	+	+	++	--	+	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	--	-	--	0	--	--	N/A	--	--?	--	--	--	-	-	-	0	-	-	0		
CFS162_B	N/A	N/A	+	-	++	--	-	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	--	-	--	0	--	--	N/A	--	--?	--	--	--	-	-	-	0	0	0	0		
CFS162_C	N/A	N/A	+	-	++	--	-	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	--	-	--	0	-	-	--	N/A	--?	--	--	--	+	0	+	0	0	0	0		
CFS165	N/A	N/A	++	++	++	0	++	++	0	N/A	N/A	++	0	N/A	+	0	-	-	-	0	+	+	-	-	-	N/A	-?	-	0	-	+	0	+	0	0	0	0	0		
CFS169	N/A	N/A	++	-	++	0	+	+	0	N/A	N/A	-	0	N/A	-	0	-	-	-	--	--	--	0	--	--	--	N/A	--?	-	0	-	--	-	--	0	0	0	--		

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority Habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
CFS174	N/A	N/A	+	-	++	--	-	+	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	--	--	N/A	--	--?	N/A	N/A	--?	+	0	+	0	--	--	0
CFS177	N/A	N/A	++	-	++	--	-	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	-	--	0	-	-	--	N/A	--?	--	--	--	-	0	-	0	0	0	0
CFS177_r	N/A	N/A	+	-	++	--	-	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	-	--	0	--	--	N/A	--	--?	--	--	--	+	0	+	0	0	0	0
CFS183	N/A	N/A	+	++	++	--	+	++	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	++	++	++	0	-	-	--	N/A	--?	-	--	--	+	0	+	0	-	-	--
CFS199-9	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	++	0	N/A	+	+	-	-	-	-	0	++	+	0	-	-	--	N/A	--?	-	0	-	+	0	+	0	0	0	--
CFS208	N/A	N/A	+	-	++	--	-	+	0	N/A	N/A	-	0	N/A	-	0	--	-	-	-	--	-	--	0	-	-	N/A	--	--?	-	0	-	--	-	--	0	--	--	0
CFS210	N/A	N/A	+	-	++	0	+	+	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	+	++	++	0	0	0	--	N/A	--?	0	0	0	+	0	+	0	-	-	0
CFS212	N/A	N/A	++	-	+	--	-	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	-	-	N/A	--	--?	N/A	N/A	--?	--	-	--	0	-	-	--
CFS213	N/A	N/A	+	-	++	--	-	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	--	--	0	--	--	-	N/A	-?	0	--	--	+	0	+	0	0	0	0
CFS214	N/A	N/A	+	-	+	--	-	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	-	--	N/A	--	--?	N/A	N/A	--?	-	-	-	0	0	0	0
CFS223	N/A	N/A	+	++	++	--	+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	+	0	0	0	--	--	--	N/A	--?	N/A	N/A	+	-	0	-	0	0	0	--
CFS224	N/A	N/A	+	-	++	--	-	+	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	++	0	0	0	--	--	--	N/A	--?	--	--	--	+	0	+	0	--	--	--
CFS225	N/A	N/A	+	-	++	--	-	+	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	+	-	0	--	--	-	N/A	-?	-	--	--	+	0	+	0	0	0	0	
CFS242	N/A	N/A	++	+	++	0	+	++	+	N/A	N/A	-	0	N/A	-	0	--	-	-	0	+	+	-	-	--	--	N/A	--?	0	0	0	+	0	+	0	--	--	0	
CFS253	N/A	N/A	++	++	++	0	++	++	0	N/A	N/A	-	0	N/A	-	+	-	0	-	-	++	+	-	0	-	--	N/A	--?	-	0	-	+	0	+	0	--	--	--	
CFS255	N/A	N/A	+	+	++	0	+	++	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	++	+	0	-	-	--	N/A	--?	-	0	-	+	0	+	0	-	-	--	
CFS263	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	++	+	0	0	0	-	N/A	-?	-	0	-	+	0	+	0	0	0	0	
CFS267	N/A	N/A	+	-	++	0	+	+	++	N/A	N/A	-	0	N/A	-	0	-	0	-	-	--	-	--	0	-	-	--	N/A	--?	-	0	-	+	0	+	0	0	0	--
CFS268	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	++	+	0	-	-	--	N/A	--?	-	0	-	+	0	+	0	--	--	0	
CFS269	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	N/A	-	+	-	0	-	-	++	+	0	0	0	0	N/A	0?	-	0	-	+	0	+	0	0	0	0	
CFS270	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	++	+	0	0	0	--	N/A	--?	-	0	-	+	0	+	0	-	-	--	
CFS271	N/A	N/A	+	+	++	--	+	+	+	N/A	N/A	++	0	N/A	+	0	--	-	-	-	--	+	-	0	-	--	N/A	--?	-	--	--	+	0	+	--	-	--	--	

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority Habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
CFS273	N/A	N/A	+	+	++	--	+	+	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	++	++	++	0	-	-	--	N/A	--?	-	0	-	+	0	+	0	-	-	0
CFS275	N/A	N/A	+	++	++	--	+	++	0	N/A	N/A	-	0	N/A	-	+	-	0	-	-	0	++	+	0	-	-	0	N/A	0?	-	--	--	+	0	+	0	0	0	0
CFS276	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	--	++	0	0	-	-	--	N/A	--?	-	0	-	+	0	+	0	--	--	0
CFS294	N/A	N/A	++	-	++	0	+	+	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	--	--	N/A	--?	N/A	N/A	+?	++	0	++	0	--	--	0	
CFS295	N/A	N/A	+	-	++	0	+	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	-	-	--	N/A	--?	N/A	N/A	+?	+	0	+	0	0	0	0
CFS304	N/A	N/A	+	++	++	--	+	++	+	N/A	N/A	++	0	N/A	+	+	--	-	-	-	-	++	+	0	-	-	--	N/A	--?	--	--	--	++	0	++	0	--	--	0
CFS307	N/A	N/A	+	-	++	--	-	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	--	--	--	N/A	--?	N/A	N/A	+?	+	0	+	0	--	--	0
CFS311	N/A	N/A	+	-	+	0	0	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	--	--	--	N/A	--?	N/A	N/A	+?	+	0	+	0	--	--	0
CFS313	N/A	N/A	++	-	+	0	0	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	--	--	N/A	--	--?	N/A	N/A	--?	-	-	-	0	0	0	0
CFS318	N/A	N/A	+	-	++	0	+	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	-	-	N/A	--	--?	N/A	N/A	--?	-	-	-	--	--	--	--
CFS319	N/A	N/A	+	-	+	0	0	-	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	--	--	--	0	-	-	N/A	--	--?	N/A	N/A	--?	-	-	-	--	--	--	--
CFS320	N/A	N/A	++	-	++	--	-	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	--	--	N/A	--	--?	-	--	--	--	-	--	0	--	--	--
CFS322	N/A	N/A	++	++	++	--	+	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	++	+	0	-	--	N/A	--	--?	N/A	N/A	--?	--	0	-	0	--	--	--	
CFS323	N/A	N/A	+	-	++	--	-	+	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	-	--	0	--	--	N/A	--	--?	N/A	N/A	--?	--	-	--	0	--	--	--
CHC1	N/A	N/A	++	-	++	--	-	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	-	-	--	N/A	--?	N/A	N/A	+?	++	0	++	0	--	--	--
CHC10	N/A	N/A	++	-	++	0	+	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	--	--	--	N/A	--?	N/A	N/A	+?	+	0	+	0	-	-	0
CHC11	N/A	N/A	++	-	++	0	+	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	--	--	--	-	-	--	N/A	--	--?	--	0	--	+	0	+	0	-	-	--
CHC12	N/A	N/A	++	-	++	--	-	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	--	--	--	0	--	--	N/A	--	--?	N/A	N/A	--?	+	0	+	0	0	0	--
CHC13	N/A	N/A	+	-	++	0	+	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	--	--	--	0	--	--	N/A	--	--?	--	0	--	-	-	-	0	0	0	--
CHC14	N/A	N/A	+	-	++	--	-	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	--	-	--	0	-	-	N/A	--	--?	--	--	--	+	0	+	0	--	--	--
CHC15	N/A	N/A	++	-	++	--	-	-	0	N/A	N/A	-	0	N/A	-	0	--	-	-	-	--	--	--	0	--	--	N/A	--	--?	N/A	N/A	--?	--	-	--	0	--	--	--
CHC17	N/A	N/A	++	-	++	0	+	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	-	-	--	N/A	--?	N/A	N/A	+?	+	0	+	0	--	--	0

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority Habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water	
CHC18	N/A	N/A	+	-	++	0	+	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	-	0	-	-	-	N/A	--?	N/A	N/A	+	+	0	+	0	-	-	0		
CHC19	N/A	N/A	+	-	++	0	+	+	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	-	-	0	-	-	-	N/A	--?	N/A	N/A	+	-	-	-	0	0	0	0	
CHC2	N/A	N/A	++	-	++	0	+	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	-	-	0	-	-	-	N/A	--?	N/A	N/A	+	+	0	+	0	0	0	-	
CHC21	N/A	N/A	++	-	++	0	+	+	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	-	-	0	-	-	-	N/A	--?	N/A	N/A	+	++	0	++	0	-	-	0	
CHC3	N/A	N/A	+	-	++	-	-	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	-	-	0	-	-	N/A	-	--?	N/A	N/A	--?	-	-	-	-	0	-	-	-
CHC5	N/A	N/A	++	-	++	-	-	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	-	-	-	-	-	N/A	-	--?	-	-	-	-	-	-	-	0	-	-	-
CHC7	N/A	N/A	++	-	++	-	-	+	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	-	-	0	-	-	N/A	-	--?	N/A	N/A	--?	-	-	-	-	0	-	-	-
CHC8	N/A	N/A	++	-	++	0	+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	-	-	0	-	-	N/A	-	--?	N/A	N/A	--?	-	-	-	-	0	0	0	0
CHC9	N/A	N/A	++	-	++	0	+	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	-	-	0	-	-	N/A	-	--?	N/A	N/A	+	-	-	-	0	-	-	-	
CHP12	N/A	N/A	+	-	++	0	+	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	-	-	0	-	-	N/A	-	--?	N/A	N/A	--?	-	-	-	-	0	0	0	0
CHP19	N/A	N/A	+	-	++	0	+	-	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	-	-	-	0	-	-	N/A	-	--?	N/A	N/A	--?	-	-	-	-	0	-	-	0
CHS16	N/A	N/A	++	-	++	-	-	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	++	0	-	-	N/A	-	--?	-	-	-	-	-	-	-	0	-	-	-	
COC1	N/A	N/A	+	++	++	-	+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	-	-	0	-	-	N/A	-?	N/A	N/A	+	-	0	-	0	0	0	0		
COC2	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	-	++	+	0	-	-	N/A	-?	-	0	-	+	0	+	0	0	0	0		
COC9a and COC9b	N/A	N/A	++	++	++	-	+	+	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	0	++	+	0	-	-	N/A	--?	-	-	-	+	0	+	0	-	-	0		
COP39	N/A	N/A	+	-	++	-	-	+	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	-	-	-	0	-	-	N/A	-	--?	-	-	-	+	0	+	0	0	0	0	
COP49	N/A	N/A	+	++	++	-	+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	0	++	+	0	-	-	N/A	-?	-	-	-	+	0	+	0	0	0	0		
COP70	N/A	N/A	+	-	++	0	+	+	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	-	-	-	0	-	-	N/A	--?	-	0	-	+	0	+	0	0	0	0		
GRC1	N/A	N/A	++	++	++	-	+	++	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	+	++	++	-	-	-	N/A	--?	-	-	-	+	0	+	0	-	-	-		
GRC10	N/A	N/A	+	-	++	0	+	-	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	-	-	-	0	-	-	N/A	--?	-	0	-	+	0	+	0	-	-	-		
GRC2	N/A	N/A	+	+	++	0	+	+	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	-	-	0	-	-	N/A	--?	-	0	-	+	0	+	0	0	0	-		
GRC9	N/A	N/A	+	-	++	0	+	-	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	-	+	-	0	-	-	N/A	--?	-	0	-	+	0	+	0	-	-	-		

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority Habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water	
GRD4	N/A	N/A	+	++	++	0	++	+	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	++	++	++	0	-	-	--	N/A	--?	--	0	--	+	0	+	0	-	-	--	
HIC10	N/A	N/A	+	++	++	--	+	++	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	-	++	+	0	--	--	N/A	--	--?	-	--	--	+	0	+	-	--	--	--	
HIC11	N/A	N/A	++	++	++	--	+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	+	-	0	--	--	N/A	--	--?	-	--	--	--	-	--	0	--	--	--	
HIC6	N/A	N/A	++	+	++	--	+	-	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	0	++	+	0	--	--	N/A	--	--?	N/A	--	--?	--	-	--	0	--	--	--	
HIC9	N/A	N/A	++	++	++	--	+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	+	-	0	--	--	N/A	--	--?	-	--	--	--	-	--	0	--	--	0	
HIP26	N/A	N/A	+	-	++	--	-	++	0	N/A	N/A	-	0	N/A	-	0	--	-	-	-	-	-	--	0	-	-	-	N/A	-?	-	--	--	+	0	+	0	0	0	0	
HIP27	N/A	N/A	+	+	++	0	+	++	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	+	++	++	0	-	-	-	N/A	-?	-	0	-	+	0	+	0	0	0	0	--
HIP5	N/A	N/A	+	-	++	--	-	++	0	N/A	N/A	-	0	N/A	-	0	--	-	-	-	-	--	--	0	-	-	-	N/A	-?	0	--	--	+	0	+	0	0	0	0	
LOP20	N/A	N/A	+	-	++	0	+	++	+	N/A	N/A	++	--	N/A	0	0	--	-	-	-	-	+	0	0	0	0	-	N/A	-?	0	0	0	+	0	+	-	0	-	0	
LOP9	N/A	N/A	+	+	++	0	+	+	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	+	++	++	0	0	0	--	N/A	--?	--	0	--	+	0	+	-	-	--	0	
LP637	N/A	N/A	+	-	++	--	-	++	0	N/A	N/A	-	0	N/A	-	0	-	0	-	-	--	-	--	0	-	-	N/A	--	--?	--	--	--	-	0	-	0	--	--	--	
PAP17	N/A	N/A	+	++	++	--	+	++	0	N/A	N/A	++	0	N/A	+	0	-	-	-	-	0	++	+	0	--	--	--	N/A	--?	0	--	--	+	0	+	0	-	-	--	
POC1	N/A	N/A	+	++	++	0	++	++	+	N/A	N/A	-	0	N/A	-	+	--	-	-	-	+	++	++	0	0	0	--	N/A	--?	-	0	-	+	0	+	0	--	--	--	
POC2	N/A	N/A	++	-	++	--	-	+	+	N/A	N/A	++	0	N/A	+	0	-	-	-	-	--	+	-	-	-	--	N/A	--?	-	--	--	-	0	-	0	--	--	--		
POC4	N/A	N/A	++	++	++	0	++	++	++	N/A	N/A	++	--	N/A	0	0	-	-	-	-	--	+	-	-	-	--	N/A	--?	--	0	--	+	0	+	0	0	0	0	--	
PP-08601612	N/A	N/A	+	+	++	0	+	+	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	++	++	++	0	0	0	-	N/A	-?	-	0	-	+	0	+	0	0	0	0	0
PP-08746655	N/A	N/A	+	-	++	0	+	-	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	-	--	0	-	-	--	N/A	--?	-	0	-	+	0	+	0	0	0	0	0
PP-08780079	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	0	++	+	0	-	-	--	N/A	--?	-	0	-	+	0	+	0	0	0	0	--
R.02	N/A	N/A	++	-	++	--	-	+	0	N/A	N/A	-	0	N/A	-	+	-	0	-	-	--	++	0	0	--	--	N/A	--	--?	--	--	--	--	--	-	--	0	--	--	--
SA.11.3	N/A	N/A	++	-	++	--	-	-	0	N/A	N/A	-	0	N/A	-	0	--	-	-	-	--	--	--	0	--	--	N/A	--	--?	N/A	N/A	--?	--	-	--	0	--	--	--	
SA1.2	N/A	N/A	++	++	++	--	+	++	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	++	++	++	-	-	--	N/A	--?	-	--	--	+	0	+	0	-	-	--		
SA1.5	N/A	N/A	++	+	++	0	+	++	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	+	++	++	-	-	--	N/A	--?	--	0	--	+	0	+	0	-	-	--		

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: international and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
SA1.6	N/A	N/A	+	++	++	--	+	++	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	++	++	++	0	--	--	--	N/A	--?	--	--	--	+	0	+	0	0	0	--
SA1.7	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	+	++	++	0	-	-	--	N/A	--?	-	0	-	+	0	+	0	--	--	--
SA10.2	N/A	N/A	+	+	++	--	+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	-	--	0	--	--	N/A	--	--?	--	--	--	-	--	0	--	--	0	
SA11.2	N/A	N/A	++	-	++	--	-	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	--	--	N/A	--	--?	-	--	--	-	--	0	--	--	--	
SA11.5	N/A	N/A	++	-	++	--	-	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	--	--	N/A	--	--?	-	--	--	-	--	0	--	--	--	
SA28	N/A	N/A	++	++	++	--	+	++	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	--	++	0	0	--	--	N/A	--	--?	-	--	--	++	0	++	0	--	--	--
SA4.2	N/A	N/A	++	++	++	--	+	+	+	N/A	N/A	-	0	N/A	-	0	--	--	-	--	+	++	++	-	-	--	-	N/A	-?	--	--	--	+	0	+	-	-	--	
SA7.2	N/A	N/A	++	+	++	0	+	+	+	N/A	N/A	++	0	N/A	+	0	--	-	-	-	+	-	0	0	-	-	0	N/A	0?	0	0	0	+	0	+	0	--	--	0
SA7.5	N/A	N/A	+	+	++	0	+	+	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	++	++	++	0	0	0	-	N/A	-?	0	0	0	+	0	+	0	0	0	0
SBP13	N/A	N/A	+	+	++	0	+	++	+	N/A	N/A	++	--	N/A	0	0	-	-	-	-	-	+	0	0	0	0	0	N/A	0?	0	0	0	+	0	+	0	-	-	0
SGC1	N/A	N/A	++	+	++	--	+	+	+	N/A	N/A	++	0	N/A	+	0	--	--	-	--	0	-	-	0	-	-	0	N/A	0?	-	0	-	+	0	+	0	-	-	0
SGC8	N/A	N/A	+	++	++	--	+	++	+	N/A	N/A	-	0	N/A	-	+	-	-	-	-	++	++	++	0	-	-	-	N/A	-?	-	--	--	+	0	+	0	-	-	0
SGS14	N/A	N/A	++	+	++	0	+	+	+	N/A	N/A	++	0	N/A	+	0	--	-	-	-	+	-	0	0	-	-	0	N/A	0?	0	0	0	+	0	+	0	--	--	0
TUC6a	N/A	N/A	+	-	++	0	+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	-	-	0	-	-	--	N/A	--?	0	0	0	+	0	+	0	--	--	--
TUC8	N/A	N/A	+	+	++	0	+	++	++	N/A	N/A	-	0	N/A	-	+	-	0	-	-	--	++	0	0	-	-	0	N/A	0?	-	0	-	+	0	+	0	0	0	--
TUE12a	N/A	N/A	+	+	++	0	+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	+	0	0	-	-	--	N/A	--?	0	0	0	+	0	+	0	--	--	--
U.02	N/A	N/A	++	++	++	--	+	+	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	0	++	+	0	--	--	--	N/A	--?	-	--	--	+	0	+	0	-	-	0
U.06	N/A	N/A	++	++	++	--	+	++	0	N/A	N/A	-	0	N/A	-	+	--	-	-	-	--	++	0	0	--	--	N/A	--	--?	--	--	--	++	0	++	0	--	--	--
U.08	N/A	N/A	++	++	++	--	+	++	+	N/A	N/A	-	0	N/A	-	+	--	-	-	-	-	++	+	-	0	-	--	N/A	--?	--	--	--	++	0	++	0	--	--	--
U.11	N/A	N/A	++	-	++	0	+	++	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	--	--	--	0	-	-	N/A	--	--?	-	0	-	+	0	+	0	0	0	0
U.13	N/A	N/A	++	++	++	--	+	++	++	N/A	N/A	-	0	N/A	-	+	--	-	-	-	-	++	+	-	0	-	--	N/A	--?	-	--	--	++	0	++	0	--	--	--
U.14	N/A	N/A	+	+	++	--	+	++	+	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	++	+	0	-	-	--	N/A	--?	-	--	--	++	0	++	0	--	--	0

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water	
U.15	N/A	N/A	+	++	++	-	+	++	++	N/A	N/A	-	0	N/A	-	+	-	-	-	-	0	++	+	0	-	-	-	N/A	--?	-	0	-	+	0	+	0	-	-	-	
U.17	N/A	N/A	+	++	++	-	+	++	+	N/A	N/A	-	0	N/A	-	+	-	-	-	-	-	-	++	+	0	-	-	-	N/A	--?	-	0	-	++	0	++	0	-	-	-
U.18	N/A	N/A	+	++	++	-	+	++	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	+	++	++	0	0	0	-	N/A	--?	-	-	-	+	0	+	0	0	0	-	
U.20	N/A	N/A	+	++	++	-	+	++	+	N/A	N/A	++	0	N/A	+	+	-	-	-	-	-	++	0	0	-	-	-	N/A	--?	-	-	-	++	0	++	0	-	-	0	
U.22	N/A	N/A	+	++	++	-	+	++	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	+	++	++	0	-	-	-	N/A	--?	-	-	-	+	0	+	0	0	0	0	
U.23	N/A	N/A	+	+	++	-	+	++	+	N/A	N/A	-	0	N/A	-	0	-	-	-	-	-	+	-	0	-	-	0	N/A	0?	-	0	-	++	0	++	0	-	-	-	
U.24	N/A	N/A	+	++	++	-	+	+	++	N/A	N/A	-	0	N/A	-	+	-	-	-	-	++	++	++	0	-	-	-	N/A	--?	-	-	-	++	0	++	0	-	-	-	
U.25	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	N/A	-	+	-	0	-	-	++	0	0	0	0	-	N/A	--?	-	0	-	+	0	+	0	-	-	-		
U.26	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	++	+	0	-	-	-	N/A	--?	-	0	-	+	0	+	0	0	0	-		
U.27	N/A	N/A	+	++	++	-	+	++	+	N/A	N/A	-	0	N/A	-	+	-	-	-	-	0	++	+	0	0	0	-	N/A	--?	-	-	-	+	0	+	0	0	0	-	
UPM1	N/A	N/A	++	++	++	-	+	+	++	N/A	N/A	++	-	N/A	0	+	-	-	-	-	0	++	+	-	-	-	N/A	--?	-	-	-	++	0	++	0	-	-	-		
UPM1_r	N/A	N/A	++	++	++	-	+	+	++	N/A	N/A	++	-	N/A	0	+	-	-	-	-	0	++	+	-	-	-	N/A	--?	-	-	-	++	0	++	0	-	-	-		
UPP7	N/A	N/A	+	++	++	0	++	+	0	N/A	N/A	-	0	N/A	-	0	-	-	-	-	++	++	++	0	-	-	-	N/A	--?	-	0	-	+	0	+	0	0	0	0	
UPS21	N/A	N/A	++	++	++	-	+	+	+	N/A	N/A	-	0	N/A	-	+	-	-	-	-	+	++	++	-	-	-	N/A	--?	-	-	-	+	0	+	-	-	-	-		
UPS21a	N/A	N/A	+	++	++	-	+	+	+	N/A	N/A	-	0	N/A	-	+	-	-	-	-	+	++	++	0	-	-	N/A	--?	-	-	-	+	0	+	-	-	-	-		
WIC23	N/A	N/A	+	+	++	0	+	+	0	N/A	N/A	-	0	N/A	-	+	-	-	-	-	-	++	+	0	-	-	-	N/A	--?	-	0	-	+	0	+	0	0	0	-	
Mixed-use (incl. residential uses) site options																																								
BL1	N/A	N/A	++	-	++	-	-	+	0	N/A	N/A	-	0	++	-	0	-	-	-	-	-	-	-	-	-	N/A	-	--?	-	-	-	-	-	-	-	0	-	-	-	
BL2	N/A	N/A	++	++	++	-	+	++	0	N/A	N/A	-	0	++	-	0	-	-	-	-	-	+	-	-	-	N/A	-	--?	-	-	-	-	-	-	-	-	0	-	-	-
BUS1	N/A	N/A	+	++	++	-	+	++	0	N/A	N/A	-	0	+	0	0	-	-	-	-	-	-	-	-	-	-	N/A	--?	-	-	-	+	0	+	0	-	-	-		
CFS139	N/A	N/A	++	-	++	-	-	+	+	N/A	N/A	++	-	++	0	0	-	-	-	-	-	-	-	-	-	N/A	--?	0	-	-	-	++	0	++	-	-	-	-		
CFS149	N/A	N/A	++	-	++	-	-	+	+	N/A	N/A	++	-	++	0	+	-	-	-	-	-	++	+	-	-	-	N/A	--?	0	-	-	-	++	0	++	0	-	-	-	

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority Habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
CFS158a	N/A	N/A	++	-	++	0	+	-	0	N/A	N/A	-	0	++	-	0	--	-	-	-	--	--	--	-	--	--	N/A	--	--?	N/A	N/A	--?	++	0	++	0	--	--	--
CFS158b	N/A	N/A	++	-	++	0	+	-	0	N/A	N/A	-	0	++	-	0	-	-	-	-	--	--	--	-	-	--	N/A	--	--?	N/A	N/A	--?	--	-	--	0	--	--	--
CFS160	N/A	N/A	++	-	++	--	-	+	0	N/A	N/A	-	0	++	-	0	--	-	-	-	--	--	--	-	--	N/A	--	--?	-	--	--	--	-	--	0	--	--	--	
CFS181	N/A	N/A	+	-	++	--	-	++	+	N/A	N/A	++	--	+	+	0	-	-	-	-	--	++	+	-	-	--	N/A	--?	-	--	--	+	0	+	0	0	0	0	--
CFS183	N/A	N/A	+	++	++	--	+	++	0	N/A	N/A	-	0	+	0	+	--	-	-	-	--	++	++	++	-	-	--	N/A	--?	-	--	--	+	0	+	0	-	-	--
CFS236	N/A	N/A	++	+	++	0	+	++	0	N/A	N/A	++	--	+	+	0	--	-	-	-	0	+	+	-	0	-	N/A	--?	0	0	0	+	0	+	0	0	0	0	0
CFS242	N/A	N/A	++	+	++	0	+	++	+	N/A	N/A	-	0	+	0	0	--	-	-	-	0	+	+	-	-	--	N/A	--?	0	0	0	+	0	+	0	--	--	0	
CFS249	N/A	N/A	+	-	++	--	-	++	+	N/A	N/A	-	0	+	0	+	--	-	-	-	--	++	0	-	-	--	N/A	--?	-	0	-	+	0	+	0	-	-	--	
CFS250	N/A	N/A	+	+	++	--	+	++	0	N/A	N/A	-	0	+	0	+	--	-	-	-	--	++	0	-	0	-	N/A	--?	-	--	--	+	0	+	0	0	0	0	
CFS251	N/A	N/A	++	+	++	--	+	++	0	N/A	N/A	-	0	+	0	+	--	-	-	-	--	++	+	-	--	--	N/A	--?	-	--	--	++	0	++	0	--	--	--	
CFS252	N/A	N/A	++	-	++	--	-	-	+	N/A	N/A	++	0	++	+	0	--	-	-	-	--	--	--	-	--	N/A	--	--?	N/A	N/A	--?	--	0	-	-	--	--	--	
CFS284	N/A	N/A	+	-	++	--	-	++	0	N/A	N/A	-	0	+	0	0	-	0	-	-	--	-	--	-	--	N/A	--	--?	N/A	N/A	--?	-	-	-	0	0	0	--	
CFS291	N/A	N/A	++	+	++	--	+	++	0	N/A	N/A	-	0	+	0	0	-	0	-	-	--	-	--	-	--	N/A	--	--?	--	--	--	--	-	--	0	--	--	0	
CFS315	N/A	N/A	++	-	++	--	-	++	0	N/A	N/A	-	0	++	-	0	-	-	-	-	--	--	--	-	--	N/A	--	--?	N/A	N/A	--?	--	-	--	0	--	--	--	
CFS327	N/A	N/A	++	-	++	--	-	++	++	N/A	N/A	++	0	+	+	0	--	-	-	-	--	+	-	-	--	N/A	--?	0	--	--	+	0	+	0	-	-	0		
CHC5	N/A	N/A	++	-	++	--	-	++	0	N/A	N/A	-	0	+	0	0	--	-	-	-	--	-	--	-	--	N/A	--	--?	-	--	--	--	-	--	0	--	--	--	
CHP22	N/A	N/A	+	-	++	--	-	+	0	N/A	N/A	-	0	+	0	0	-	0	-	-	--	-	--	-	--	N/A	--	--?	--	--	--	-	0	-	0	--	--	--	
COC10	N/A	N/A	+	++	++	--	+	++	0	N/A	N/A	-	0	++	-	+	--	-	-	-	0	++	+	-	--	--	N/A	--?	-	--	--	++	0	++	0	--	--	--	
COC9a	N/A	N/A	++	++	++	--	+	+	0	N/A	N/A	-	0	+	0	+	-	-	-	-	0	++	+	-	--	N/A	--?	-	--	--	+	0	+	0	-	-	0		
EDP9	N/A	N/A	+	++	++	0	++	++	+	N/A	N/A	-	0	+	0	0	-	-	-	-	-	+	0	-	0	-	N/A	--?	-	0	-	+	0	+	0	--	--	0	
ELC2	N/A	N/A	+	-	++	--	-	++	+	N/A	N/A	-	0	+	0	0	-	0	-	-	--	++	0	-	--	N/A	--?	--	--	--	+	0	+	--	0	--	--		
GRC13	N/A	N/A	+	++	++	--	+	++	0	N/A	N/A	-	0	+	0	+	--	-	-	-	++	++	++	-	-	--	N/A	--?	-	--	--	+	0	+	0	-	-	--	

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water	
GRD3	N/A	N/A	+	+	++	0	+	++	0	N/A	N/A	-	0	+	0	+	-	0	-	-	0	++	+	-	--	--	--	N/A	--?	0	0	0	+	0	+	0	--	--	--	
GRD6	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	+	0	+	--	-	-	-	-	++	++	++	-	-	--	--	N/A	--?	--	0	--	+	0	+	0	-	-	--
GRS7	N/A	N/A	+	+	++	0	+	-	0	N/A	N/A	-	0	+	0	+	-	-	-	-	0	++	+	-	--	--	--	N/A	--?	--	0	--	+	0	+	0	--	--	--	
GRS8	N/A	N/A	+	+	++	0	+	++	0	N/A	N/A	-	0	+	0	+	-	-	-	-	+	++	++	-	0	-	--	N/A	--?	--	0	--	+	0	+	0	-	-	--	
HIC11_r	N/A	N/A	++	++	++	--	+	++	0	N/A	N/A	-	0	++	-	0	-	-	-	-	-	+	-	-	--	--	N/A	--	--?	-	--	--	--	-	-	--	0	--	--	--
JUS5	N/A	N/A	++	++	++	0	++	++	0	N/A	N/A	++	--	+	+	0	--	-	-	-	-	+	0	-	0	-	--	N/A	--?	0	0	0	+	0	+	0	0	0	0	0
PAC39	N/A	N/A	++	++	++	0	++	++	0	N/A	N/A	-	0	+	0	+	--	-	-	-	-	++	+	-	--	--	--	N/A	--?	-	0	-	++	0	++	0	--	--	--	
PGG1	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	++	--	+	+	+	-	-	-	-	0	++	+	-	-	-	N/A	--?	-	0	-	+	0	+	-	--	--	--		
POS29	N/A	N/A	+	+	++	0	+	++	0	N/A	N/A	++	0	+	+	0	-	-	-	-	+	0	-	0	-	--	N/A	--?	-	0	-	+	0	+	0	--	--	0		
POS43	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	++	--	+	+	+	-	-	-	-	0	++	+	-	0	-	--	N/A	--?	--	0	--	+	0	+	0	--	--	0	
POS44	N/A	N/A	+	++	++	--	+	++	+	N/A	N/A	++	--	+	+	+	-	-	-	-	+	++	++	-	0	-	--	N/A	--?	-	--	--	+	0	+	0	-	-	--	
POS45	N/A	N/A	+	++	++	0	++	++	+	N/A	N/A	++	--	+	+	+	-	-	-	-	0	++	+	-	0	-	--	N/A	--?	-	0	-	+	0	+	0	0	0	0	
R.01	N/A	N/A	++	-	++	--	-	++	0	N/A	N/A	-	0	+	0	0	--	-	-	-	--	-	--	-	--	--	N/A	--	--?	-	--	--	--	-	0	-	0	--	--	--
SA.11.1	N/A	N/A	++	-	++	--	-	-	0	N/A	N/A	-	0	++	-	0	--	-	-	-	--	--	--	-	--	--	N/A	--	--?	N/A	N/A	--?	--	-	--	0	--	--	--	
SA.11.4	N/A	N/A	++	-	++	--	-	+	0	N/A	N/A	-	0	++	-	0	-	-	-	-	--	--	--	-	--	--	N/A	--	--?	-	--	--	--	-	--	0	--	--	--	
SA1.1	N/A	N/A	++	++	++	--	+	++	0	N/A	N/A	-	0	+	0	+	--	-	-	-	++	++	++	-	-	--	N/A	--?	--	0	--	++	0	++	0	--	--	--		
SA1.3	N/A	N/A	++	++	++	0	++	++	0	N/A	N/A	-	0	+	0	+	-	-	-	-	+	++	++	-	-	--	N/A	--?	-	0	-	+	0	+	0	-	-	--		
SA1.4	N/A	N/A	++	++	++	0	++	++	0	N/A	N/A	-	0	+	0	+	-	-	-	-	+	++	++	-	--	--	N/A	--?	-	0	-	+	0	+	0	--	--	--		
SA10.1	N/A	N/A	++	++	++	--	+	++	0	N/A	N/A	-	0	++	-	+	--	-	-	-	--	++	0	-	--	--	N/A	--	--?	-	--	--	--	-	--	0	--	--	--	
SA10.3	N/A	N/A	++	++	++	--	+	++	0	N/A	N/A	-	0	++	-	0	-	0	-	-	--	+	-	-	--	--	N/A	--	--?	-	--	--	--	-	--	0	--	--	--	
SA10.4	N/A	N/A	++	+	++	--	+	+	0	N/A	N/A	-	0	++	-	0	-	0	-	-	--	-	--	-	--	--	N/A	--	--?	N/A	N/A	--?	--	-	--	0	--	--	--	
SA11.6	N/A	N/A	++	-	++	--	-	+	0	N/A	N/A	-	0	++	-	0	-	-	-	-	--	--	--	-	--	--	N/A	--	--?	-	--	--	--	-	--	-	--	--	--	

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	II4: Health and wellbeing	II5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
SA19	N/A	N/A	++	+	++	--	+	+	++	N/A	N/A	++	0	++	+	+	--	-	-	-	-	++	+	-	--	--	--	N/A	--?	-	--	--	++	0	++	-	--	--	--
SA2.1	N/A	N/A	++	+	++	--	+	++	+	N/A	N/A	++	--	+	+	0	--	--	--	--	0	+	+	-	0	-	--	N/A	--?	0	0	0	++	0	++	0	--	--	0
SA2.3	N/A	N/A	++	++	++	0	++	++	0	N/A	N/A	++	0	+	+	0	--	-	-	-	0	+	+	-	0	-	--	N/A	--?	0	0	0	+	0	+	0	--	--	0
SA2.4	N/A	N/A	++	+	++	0	+	++	+	N/A	N/A	-	0	+	0	0	--	-	-	-	0	+	+	-	-	--	--	N/A	--?	0	0	0	+	0	+	0	--	--	0
SA2.5	N/A	N/A	++	++	++	0	++	++	+	N/A	N/A	++	--	+	+	+	--	-	-	-	+	++	++	-	0	-	--	N/A	--?	-	0	-	+	0	+	0	--	--	--
SA2.6	N/A	N/A	++	+	++	--	+	++	+	N/A	N/A	++	--	+	+	0	--	-	-	-	0	-	-	-	0	-	--	N/A	--?	0	0	0	++	0	++	0	--	--	0
SA3.1	N/A	N/A	++	++	++	--	+	+	++	N/A	N/A	-	0	+	0	+	--	-	-	-	++	++	++	-	-	--	N/A	--?	0	--	--	++	0	++	0	--	--	--	
SA3.2	N/A	N/A	++	++	++	--	+	+	++	N/A	N/A	-	0	+	0	+	--	-	-	-	++	++	++	-	0	-	--	N/A	--?	-	--	--	+	0	+	0	--	--	0
SA4.1	N/A	N/A	++	++	++	--	+	+	++	N/A	N/A	++	--	+	+	+	--	-	-	-	0	++	+	-	-	--	N/A	--?	--	--	--	++	0	++	0	--	--	--	
SA4.3	N/A	N/A	++	++	++	0	++	+	++	N/A	N/A	++	--	+	+	0	-	-	-	-	0	++	+	-	0	-	--	N/A	--?	0	0	0	+	0	+	0	0	0	0
SA4.4	N/A	N/A	++	++	++	0	++	++	0	N/A	N/A	++	0	+	+	0	-	-	-	-	+	++	++	-	-	--	N/A	--?	-	0	-	+	0	+	0	0	0	0	0
SA4.5	N/A	N/A	+	++	++	0	++	+	+	N/A	N/A	-	0	+	0	+	--	-	-	-	++	++	++	-	0	-	--	N/A	--?	-	0	-	+	0	+	0	0	0	--
SA5.1	N/A	N/A	++	+	++	--	+	+	++	N/A	N/A	++	0	+	+	+	--	-	-	-	-	++	+	-	-	--	N/A	--?	-	--	--	++	0	++	-	-	--	--	
SA5.2	N/A	N/A	++	-	++	--	-	+	+	N/A	N/A	-	0	+	0	0	--	-	-	-	-	+	0	-	-	--	N/A	--?	0	--	--	+	0	+	0	-	-	--	
SA5.3	N/A	N/A	++	-	++	--	-	+	++	N/A	N/A	++	0	+	+	0	--	-	-	-	-	+	0	-	-	--	N/A	--?	0	--	--	++	0	++	0	--	--	--	
SA5.4	N/A	N/A	++	-	++	0	+	+	+	N/A	N/A	++	0	+	+	0	--	-	-	-	-	+	0	-	-	--	N/A	--?	0	0	0	++	0	++	0	--	--	--	
SA5.5	N/A	N/A	++	-	++	--	-	+	+	N/A	N/A	-	0	+	0	0	--	-	-	-	-	+	0	-	-	--	N/A	--?	0	--	--	+	0	+	0	-	-	--	
SA5.6	N/A	N/A	++	-	++	--	-	+	++	N/A	N/A	++	--	++	0	0	-	-	-	-	--	--	--	-	--	--	N/A	--?	0	--	--	++	0	++	-	--	--	--	
SA6.1	N/A	N/A	++	-	++	0	+	+	0	N/A	N/A	-	0	+	0	+	-	-	-	-	+	++	++	-	-	--	N/A	--?	--	0	--	+	0	+	0	-	-	0	
SA6.3	N/A	N/A	+	-	++	0	+	+	0	N/A	N/A	-	0	+	0	+	-	-	-	-	+	++	++	-	-	--	N/A	--?	--	0	--	+	0	+	0	-	-	0	
SA7.1	N/A	N/A	++	+	++	--	+	+	+	N/A	N/A	++	0	+	+	0	--	--	-	--	0	-	-	-	-	0	N/A	0?	-	0	-	+	0	+	0	-	-	0	
SA7.3	N/A	N/A	++	+	++	--	+	++	+	N/A	N/A	++	--	+	+	0	--	-	-	-	++	+	++	-	--	--	N/A	--?	-	--	--	++	0	++	0	--	--	0	

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water	
SA7.4	N/A	N/A	++	++	++	--	+	++	0	N/A	N/A	-	0	+	0	+	--	-	-	-	++	++	++	-	--	--	--	N/A	--?	-	--	--	+	0	+	0	--	--	0	
SA8.1	N/A	N/A	++	++	++	0	++	++	0	N/A	N/A	-	0	+	0	+	-	-	-	-	0	++	+	-	-	--	--	--	N/A	--?	-	0	-	+	0	+	0	--	--	--
SA8.2	N/A	N/A	++	++	++	0	++	++	0	N/A	N/A	-	0	+	0	+	-	-	-	-	0	++	+	-	-	--	--	N/A	--?	-	0	-	+	0	+	0	-	-	--	
SA8.3	N/A	N/A	++	++	++	--	+	++	0	N/A	N/A	++	--	+	+	+	--	-	-	-	0	++	+	-	-	--	--	N/A	--?	-	0	-	+	0	+	-	--	--	--	
SA8.4	N/A	N/A	+	++	++	0	++	++	0	N/A	N/A	-	0	+	0	+	-	-	-	-	-	++	+	-	-	--	--	N/A	--?	0	0	0	+	0	+	0	--	--	--	
SBC3	N/A	N/A	+	+	++	0	+	++	+	N/A	N/A	++	--	+	+	0	-	-	-	-	0	+	+	-	0	-	-	N/A	-?	0	0	0	+	0	+	0	0	0	0	
SBC6	N/A	N/A	++	+	++	0	+	++	+	N/A	N/A	++	--	+	+	+	--	-	-	-	0	++	+	-	0	-	--	N/A	--?	0	0	0	+	0	+	0	0	0	0	
SGC1	N/A	N/A	++	+	++	--	+	+	+	N/A	N/A	++	0	+	+	0	--	--	-	--	0	-	-	-	-	--	0	N/A	0?	-	0	-	+	0	+	0	-	-	0	
SGC6	N/A	N/A	+	++	++	--	+	++	+	N/A	N/A	++	--	+	+	+	-	-	-	-	+	++	++	-	-	--	N/A	--?	-	--	--	+	0	+	0	--	--	--		
SGS13	N/A	N/A	+	+	++	0	+	+	+	N/A	N/A	-	0	+	0	0	--	-	-	-	+	++	++	-	-	--	N/A	-?	0	0	0	+	0	+	0	-	-	0		
SGS14	N/A	N/A	++	+	++	0	+	+	+	N/A	N/A	++	0	+	+	0	--	-	-	-	+	-	0	-	-	--	0	N/A	0?	0	0	0	+	0	+	0	--	--	0	
SOC8a	N/A	N/A	+	-	++	0	+	+	0	N/A	N/A	-	0	+	0	+	-	-	-	-	+	++	++	-	-	--	N/A	--?	0	0	0	+	0	+	0	--	--	0		
SOC8b	N/A	N/A	+	-	++	0	+	+	0	N/A	N/A	-	0	+	0	0	-	-	-	-	+	++	++	-	-	--	N/A	--?	--	0	--	+	0	+	0	0	0	0		
SOE9	N/A	N/A	++	-	++	--	-	+	0	N/A	N/A	-	0	+	0	+	--	-	-	-	+	++	++	-	0	-	N/A	--?	-	--	--	+	0	+	0	--	--	0		
SOS11	N/A	N/A	++	-	++	--	-	+	0	N/A	N/A	-	0	+	0	+	-	-	-	-	+	++	++	-	-	--	N/A	--?	0	0	0	+	0	+	0	-	-	0		
SOS19	N/A	N/A	+	-	++	0	+	+	0	N/A	N/A	-	0	+	0	+	-	-	-	-	+	++	++	-	0	-	N/A	--?	--	0	--	+	0	+	0	0	0	0		
TUS5	N/A	N/A	++	++	++	0	++	++	0	N/A	N/A	-	0	+	0	+	-	-	-	-	-	++	+	-	-	--	N/A	--?	-	0	-	+	0	+	0	-	-	--		
U.01	N/A	N/A	++	+	++	--	+	++	+	N/A	N/A	-	0	+	0	+	-	-	-	-	-	++	+	-	0	-	N/A	--?	-	--	--	++	0	++	0	--	--	0		
U.03	N/A	N/A	++	-	++	0	+	++	0	N/A	N/A	-	0	++	-	0	--	-	-	-	-	-	-	-	-	--	N/A	--?	-	0	-	++	0	++	0	--	--	0		
U.04	N/A	N/A	++	++	++	--	+	++	0	N/A	N/A	-	0	+	0	+	--	-	-	-	0	++	+	-	--	--	N/A	--?	-	0	-	+	0	+	0	0	0	0		
U.05	N/A	N/A	++	++	++	--	+	++	0	N/A	N/A	-	0	+	0	0	-	-	-	-	--	-	--	-	0	-	N/A	0?	-	--	--	++	0	++	0	--	--	0		
U.07	N/A	N/A	++	++	++	0	++	++	0	N/A	N/A	-	0	+	0	+	--	-	-	-	-	++	+	-	--	--	N/A	--?	0	0	0	+	0	+	0	--	--	--		

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: international and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
U.09	N/A	N/A	++	+	++	--	+	+	+	N/A	N/A	++	--	+	+	0	-	0	-	-	--	+	-	-	-	--	--	N/A	--?	-	--	--	+	0	+	0	0	0	--
U.10	N/A	N/A	++	++	++	--	+	++	++	N/A	N/A	++	0	+	+	+	-	-	-	-	--	+	+	-	-	--	--	N/A	--?	--	--	--	++	0	++	0	--	--	--
U.12	N/A	N/A	+	-	++	0	+	+	+	N/A	N/A	++	0	+	+	+	-	-	-	-	--	+	+	0	-	--	N/A	--?	0	0	0	+	0	+	-	--	--	--	
U.16	N/A	N/A	+	++	++	--	+	++	0	N/A	N/A	-	0	+	0	+	--	-	-	-	+	++	++	-	-	--	--	N/A	--?	--	--	--	+	0	+	0	--	--	--
U.19	N/A	N/A	+	++	++	--	+	++	+	N/A	N/A	-	0	+	0	+	--	-	-	-	-	++	+	-	-	--	-	N/A	-?	0	--	--	+	0	+	0	-	-	--
U.21	N/A	N/A	+	++	++	0	++	++	++	N/A	N/A	-	0	+	0	+	--	-	-	-	-	++	+	-	0	-	-	N/A	-?	-	0	-	+	0	+	0	--	--	--
UPC34	N/A	N/A	++	+	++	0	+	++	0	N/A	N/A	++	--	+	+	0	-	-	-	-	-	-	-	0	-	0	N/A	0?	0	0	0	+	0	+	0	--	--	0	
UPC6a	N/A	N/A	++	+	++	--	+	+	++	N/A	N/A	++	--	++	0	0	--	--	--	--	-	++	+	-	--	--	--	N/A	--?	-	--	--	++	0	++	--	--	--	--
UPP32	N/A	N/A	++	+	++	--	+	+	++	N/A	N/A	++	0	+	+	+	--	-	-	-	-	++	+	-	-	--	--	N/A	--?	-	--	--	++	0	++	-	-	--	--
UPS15	N/A	N/A	+	+	++	0	+	+	0	N/A	N/A	++	0	+	+	0	-	-	-	-	-	-	-	-	0	-	0	N/A	0?	-	0	-	+	0	+	0	0	0	0
Industrial/employment site options																																							
17/02543/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	--	-	--	-	0	-	--	N/A	--?	0	0	0	+	0	+	0	0	0	0
17/03059/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	--	-	--	-	--	--	--	N/A	--?	0	--	--	++	0	++	0	-	-	--
17/04671/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	+	0	-	-	--	--	N/A	--?	0	0	0	+	0	+	0	-	-	--
18/03760/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0	--	-	-	-	-	+	0	-	0	-	--	N/A	--?	0	0	0	+	0	+	0	-	-	0
19/00432/PRJ	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	0	++	+	-	0	-	--	N/A	--?	-	0	-	+	0	+	0	0	0	0
19/00986/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	+	0	-	0	-	-	N/A	-?	-	--	--	+	0	+	--	-	--	--
19/01505/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	0	++	+	-	--	--	-	N/A	-?	-	0	-	+	0	+	0	0	0	--
19/01706/PRJ	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	0	++	+	-	0	-	--	N/A	--?	-	0	-	+	0	+	0	0	0	0
19/01716/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	++	+	-	0	-	--	N/A	--?	-	0	-	+	0	+	0	-	-	--
19/02717/RE3	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	++	N/A	N/A	N/A	N/A	++	++	0	--	-	-	-	--	-	--	-	--	--	--	N/A	--?	0	--	--	++	0	++	--	--	--	--
19/02749/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	++	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	--	-	--	-	--	--	--	N/A	--?	0	--	--	++	0	++	--	-	--	--

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority Habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water
19/03036/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	--	-	-	-	--	-	--	-	-	--	--	N/A	--?	0	0	0	+	0	+	--	--	--	--
20/00926/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	--	-	-	-	--	+	-	-	-	--	--	N/A	--?	0	0	0	+	0	+	0	--	--	--
20/01003/PRJ	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	+	0	0	-	-	--	++	0	-	0	-	0	N/A	0?	-	0	-	+	0	+	0	0	0	0
20/01343/PRJ	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	--	-	-	-	0	+	+	-	0	-	N/A	-?	0	0	0	+	0	+	0	0	--	--	0
20/01568/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	--	-	-	-	0	++	+	-	-	--	--	N/A	--?	-	0	-	+	0	+	0	0	0	--
20/02083/CEA	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	0	++	+	-	-	0	N/A	0?	-	0	-	+	0	+	0	0	--	--	0
20/03914/PRJ	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	+	++	++	-	-	--	N/A	--?	0	0	0	+	0	+	0	-	-	0	
20/04196/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	0	++	+	-	-	--	N/A	--?	--	0	--	+	0	+	0	0	0	0	--
21/00811/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	0	-	-	-	++	+	-	0	-	N/A	-?	-	0	-	+	0	+	0	0	0	0	--
21/01220/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	+	0	-	0	-	N/A	--?	0	0	0	+	0	+	0	-	-	0	
21/01949/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	++	++	++	-	0	-	N/A	-?	0	0	0	+	0	+	0	0	0	0	0
21/02685/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	--	+	-	-	0	N/A	0?	N/A	N/A	-?	+	0	+	0	0	0	0	--	
21/02875/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	0	-	-	--	-	--	-	-	--	N/A	--?	0	0	0	+	0	+	-	-	--	--	
21/02881/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	++	+	-	-	-	N/A	-?	-	0	-	+	0	+	0	-	-	--		
21/03375/RE4	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	+	++	++	-	0	-	N/A	--?	0	0	0	+	0	+	0	0	0	0	0
21/03496/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	-	++	+	-	-	--	N/A	--?	--	0	--	+	0	+	0	0	0	0	0
21/03849/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	--	-	--	-	--	--	N/A	--?	0	--	--	++	0	++	0	-	-	--	
21/03947/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	0	++	+	-	-	--	N/A	--?	--	0	--	+	0	+	0	0	0	--	
21/04087/FUL	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0	-	0	-	-	+	-	-	-	-	N/A	-?	0	0	0	+	0	+	0	0	0	0	0	
21/04271/RE4	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	--	--	-	--	+	++	++	-	-	--	N/A	-?	--	--	--	+	0	+	-	-	--	--	
CFS132	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	--	--	--	-	-	--	N/A	--?	N/A	N/A	+	+	0	+	0	--	--	0	
CFS135	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	-	-	-	--	--	N/A	--?	0	--	--	+	0	+	-	0	-	--	

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water	
CFS144	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	-	-	-	-	-	N/A	-	--?	0	-	-	+	0	+	-	-	-	-	
CFS153_r	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	-	+	-	-	-	-	-	N/A	--?	-	0	-	++	0	++	-	-	-	-
CFS153	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	-	+	-	-	-	-	-	N/A	--?	-	0	-	++	0	++	-	-	-	-
CFS155	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	-	-	-	-	-	-	N/A	-	--?	N/A	N/A	--?	++	0	++	0	-	-	-
CFS257	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	++	++	0	-	-	-	-	-	-	-	-	-	-	-	N/A	--?	0	-	-	++	0	++	-	-	-	-	
CFS258	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	++	N/A	N/A	N/A	N/A	++	++	+	-	-	-	-	-	-	++	+	-	-	-	N/A	--?	-	-	-	++	0	++	-	-	-	-	
LP1146	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	++	++	0	-	-	-	-	-	-	-	-	-	-	N/A	-	--?	N/A	N/A	++	-	0	-	-	-	-	-	
LP662	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	-	-	++	+	-	-	-	N/A	--?	-	0	-	+	0	+	0	0	0	-	
NA001	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	-	-	-	-	-	-	N/A	--?	0	-	-	++	0	++	0	-	-	-	
P12-02202PLA	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	++	+	++	-	-	-	N/A	-?	-	-	-	++	0	++	0	-	-	0	
R.03	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	++	++	0	-	-	-	-	-	-	-	-	-	-	N/A	-	--?	0	-	-	++	0	++	-	-	-	-	
R.04	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	-	-	-	-	-	N/A	-	--?	N/A	N/A	--?	-	-	-	0	-	-	-	
R.05	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	-	-	-	-	-	N/A	-	--?	0	-	-	++	0	++	0	-	-	-	
SA2.2	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	+	-	-	-	-	0	++	+	-	0	-	-	N/A	--?	0	0	0	++	0	++	0	-	-	0	
SA2.7	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	0	++	+	-	0	-	-	N/A	--?	0	0	0	+	0	+	0	-	-	0	
SA2.8	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	0	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	+	0	-	0	-	-	N/A	--?	-	0	-	++	0	++	0	-	-	0	
SA5.7	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	-	-	-	-	-	N/A	--?	0	-	-	++	0	++	0	-	-	-		
SA5.8	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	+	0	-	-	-	N/A	--?	0	-	-	++	0	++	-	-	-	-		
U.28	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	+	-	-	-	-	N/A	--?	0	-	-	++	0	++	0	-	-	-		
U.29	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	0	-	-	-	-	-	-	-	-	N/A	--?	0	-	-	++	0	++	0	-	-	-		
U.30	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	+	-	-	-	-	N/A	--?	-	0	-	++	0	++	-	-	-	-		
U.31	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	-	+	0	-	-	-	N/A	--?	0	0	0	+	0	+	0	-	-	-		

Site ID	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	4a: GP surgeries	4b: Access to recreation	4c: Loss of recreation	II4: Health and wellbeing	II5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	9a: Access to employment	9b: Safeguarding employment land	9c: Employment provision	IIA9: Economy	IIA10: Town and local centres	11a: NO ₂ pollution	11b: PM ₁₀ pollution	11c: PM _{2.5} pollution	IIA11: Air pollution	12a: Sustainable transport	12b: Services and facilities	IIA12: Sustainable transport	13a: International and national biodiversity and geodiversity assets	13b: Locally designated wildlife sites, Priority habitats and Ancient Woodland	IIA13: Biodiversity	14a: Proximity to historic assets, sites within existing settlements	14b: Proximity to historic assets, sites outside of existing settlements	IIA14: Historic environment	15a: Landscape and townscape	15b: Open space	IIA15: Landscape and townscape	16a: Brownfield/greenfield land	16b: Agricultural Land Classification	IIA16: Efficient use of land and materials	17a: Flood zones	17b: Surface water flood risk	IIA17: Flooding	IIA18: Water	
U.32	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	--	-	-	-	--	+	-	-	-	--	--	N/A	--?	0	0	0	+	0	+	-	-	--	--	
U.33	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	++	N/A	N/A	N/A	N/A	+	+	0	-	-	-	-	--	-	--	-	-	--	--	N/A	--?	0	--	--	+	0	+	0	-	-	--	
U.34	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	++	N/A	N/A	N/A	N/A	+	+	0	--	-	-	-	--	+	-	-	-	--	N/A	--?	0	--	--	+	0	+	0	-	-	0		
U.35	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	+	N/A	N/A	N/A	N/A	+	+	0	-	0	-	-	--	-	--	-	-	--	N/A	--?	0	0	0	+	0	+	0	0	0	0	--	
Other site options																																								
CFS161	N/A	N/A	N/A	N/A	++	N/A	++	N/A	0	N/A	N/A	N/A	0	N/A	0	0	-	0	-	-	--	N/A	--	N/A	++	++	N/A	N/A	N/A	N/A	+	+	--	-	--	N/A	+	+	N/A	
CFS167	N/A	N/A	N/A	N/A	N/A	--	--	N/A	N/A	N/A	N/A	N/A	--	N/A	--	N/A	N/A	N/A	N/A	N/A	--	N/A	--	-	-	--	--	N/A	--?	N/A	N/A	+	-	0	-	0	--	--	--	
CFS168	N/A	N/A	N/A	N/A	N/A	--	--	N/A	N/A	N/A	N/A	N/A	0	N/A	0	N/A	N/A	N/A	N/A	N/A	--	N/A	--	-	--	--	-	N/A	--?	N/A	N/A	--?	--	0	-	0	-	-	--	
CFS188	N/A	N/A	N/A	N/A	++	N/A	++	N/A	0	N/A	N/A	N/A	0	N/A	0	0	-	0	-	-	--	N/A	--	N/A	++	++	N/A	N/A	N/A	N/A	+	+	--	0	-	N/A	+	+	N/A	
CFS218	N/A	N/A	N/A	N/A	++	N/A	++	N/A	0	N/A	N/A	N/A	0	N/A	0	0	--	-	-	-	--	N/A	--	-	--	--	N/A	--	--?	--	--	--	--	--	-	--	0	--	--	--
CFS279	N/A	N/A	N/A	N/A	++	N/A	++	N/A	0	N/A	N/A	N/A	0	N/A	0	0	-	-	-	-	--	N/A	--	N/A	++	++	N/A	N/A	N/A	N/A	+	+	--	-	--	N/A	+	+	N/A	
CFS280	N/A	N/A	N/A	N/A	++	N/A	++	N/A	0	N/A	N/A	N/A	0	N/A	0	0	--	-	-	-	--	N/A	--	N/A	++	++	N/A	N/A	N/A	N/A	+	+	--	-	--	N/A	+	+	N/A	
CFS326	N/A	N/A	N/A	N/A	++	N/A	++	N/A	0	N/A	N/A	N/A	0	N/A	0	+	-	-	-	-	--	N/A	-	-	-	--	-	N/A	--?	-	--	--	-	0	-	0	0	0	--	
LP675	N/A	N/A	N/A	N/A	++	N/A	++	N/A	++	N/A	N/A	N/A	0	N/A	0	0	--	-	-	-	--	N/A	--	-	--	--	N/A	--	--?	0	--	--	--	0	-	0	--	--	0	
R.06	N/A	N/A	N/A	N/A	++	N/A	++	N/A	++	N/A	N/A	N/A	--	N/A	--	0	--	-	-	-	--	N/A	--	-	--	--	N/A	--	--?	0	--	--	--	0	-	0	--	--	--	
R.07	N/A	N/A	N/A	N/A	++	N/A	++	N/A	0	N/A	N/A	N/A	0	N/A	0	0	--	-	-	-	--	N/A	--	-	++	++	N/A	--	--?	+	+	+	--	-	--	0	+	+	--	
R.08	N/A	N/A	N/A	N/A	N/A	--	--	N/A	N/A	N/A	N/A	N/A	0	N/A	0	N/A	N/A	N/A	N/A	N/A	--	N/A	--	-	--	--	N/A	--	--?	N/A	N/A	--?	--	-	--	0	--	--	--	
SA6.2	N/A	N/A	+	-	++	0	+	++	0	N/A	N/A	-	0	+	0	+	-	-	-	-	+	++	++	-	-	--	N/A	--?	+	+	+	+	0	+	0	--	--	0		
U.36	N/A	N/A	N/A	N/A	N/A	--	--	N/A	N/A	N/A	N/A	N/A	0	N/A	0	N/A	N/A	N/A	N/A	N/A	-	+	0	-	--	--	N/A	--?	-	--	--	--	0	-	0	0	0	0	--	

IIA objective 1: Ensure the Local Plan serves to minimise LBE's per capita CO2 emissions such that the Council will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040

F.7 The extent to which the location of development sites would facilitate the use of sustainable modes of transport in place of cars is considered separately under IIA objective 12 below. The location of development will not otherwise significantly affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage. Those policies in the Local Plan have been appraised separately to the site options. This IIA objective has therefore been scoped out of the site options assessment.

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

F.8 The extent to which flood risk can be managed and reduced is considered separately under IIA objective 17 below. The location of development will not otherwise significantly affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage. Those policies in the Local Plan have been appraised separately to the site options. This IIA objective has therefore been scoped out of the site options assessment.

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

Residential site options

F.9 All residential site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites will provide opportunities for the development of a larger number of homes and so have significant positive effects. Around one third of residential sites will deliver over 100 homes, and as such received a significant positive effect against IIA objective 3. The remaining sites will deliver under 100 homes, and as such received a minor positive effect.

Mixed-use site options

F.10 As above, all mixed-use site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites will provide opportunities for the development of a larger number of homes and so have significant positive effects. Around two thirds of mixed-use sites will deliver over 100 homes, and as such received a significant positive effect against IIA objective 3. The remaining sites will deliver under 100 homes, and as such receive a minor positive effect.

Industrial/employment site options

F.11 The location of industrial/employment sites is not considered likely to affect this objective; therefore this objective has been scoped out for industrial/employment sites.

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

F.12 Residential sites that are close to existing healthcare facilities (i.e. GP surgeries) will help to ensure that residents have good access to healthcare services. Other factors not captured by the assessment of site options include there being capacity at those healthcare facilities to accommodate new residents and whether new residential development supports the provision of additional healthcare capacity. Public health will also be influenced by the proximity of sites to open spaces, walking and cycling paths, easy access to which can encourage participation in active outdoor recreation. GP surgeries are evenly spread across the Borough providing good all-round access to formal healthcare facilities, however there is slightly more limited access in the north west. This is also apparent for some recreational opportunities and green space, with greater access to Metropolitan Open Land and the Lea Valley Regional Park in the centre and east of the Borough; Public Rights of Way and Local Green Space are more evenly distributed.

Residential site options

F.13 Roughly one tenth of residential sites received a significant positive effect in relation to IIA objective 4. This is because the residential sites are less than or equal to 400m from an existing healthcare facility, less than 800m from an area of open space and less than 400m from a walking or cycle path, without risking loss of any existing open space. Almost half of the sites received a minor positive effect in relation to IIA objective 4. This is because the sites are less than 800m from an area of open space and less than 400m from a walking or cycle path but are within 401-800m of an existing healthcare facility and/or contain existing open space, including Green Loops and Links. Some of the sites recorded as containing existing open space (negative effect vs. criterion 4c) may only intersect the open space by a very small proportion. This helps highlight the potential need to avoid development in that part of the site or to incorporate mitigation measures in the allocation policy to protect and potentially enhance existing open space. Just under half of the sites received a minor negative effect because they are both further than 400m from an existing healthcare facility and contain existing open space. Just under one quarter of the residential sites received a minor negative effect because they are both further than 400m from an existing healthcare facility and contain existing open space including Metropolitan Open Land and Green Chains.

Mixed-use site options

F.14 Roughly one fifth of mixed-use sites received a significant positive effect in relation to IIA objective 4. This is because the mixed-use sites are less than or equal to 400m from an existing healthcare facility, less than 800m from an area of open space and less than 400m from a walking or cycle path without risking loss of any existing open space. The majority of sites received a minor positive effect in relation to IIA objective 4. This is because the sites are less than 800m from an area of open space and less than 400m from a walking or cycle path but are within 401-800m from an existing healthcare facility and/or contain existing open space, including Green Loops and Links. Just under one quarter of the mixed-use sites received a minor negative effect because they are both further than 400m from an existing healthcare facility and contain existing open space including Metropolitan Open Land and Green Chains.

Industrial/employment site options

F.15 The location of industrial/employment sites is not considered likely to affect this objective therefore this objective has been scoped out for industrial/employment sites.

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

F.16 The effect of residential site options on the educational element of this objective was assessed on the basis of the access that they provide to existing educational facilities. Other factors not captured by the assessment of site options include there being capacity at those schools to accommodate new pupils and whether new residential development supports the provision of additional school places. Enfield has high coverage of educational facilities, with a number of primary and secondary schools throughout the Borough. Like healthcare facilities, access to school facilities is more limited towards the north west of the Borough, however.

Residential site options

F.17 Approximately half of the residential sites are within both 800m of at least one primary school and one secondary school, and as such as received a significant positive effect, whilst roughly one third are within 800m of either one primary school or one secondary school and received a minor positive effect. Just under a quarter of residential sites are further than 800m from at least one primary or secondary school, and as such received a minor negative effect.

Mixed-use site options

F.18 Approximately two thirds of the mixed-use sites are within 800m of at least one primary school and one secondary school, and as such as received a significant positive effect, whilst approximately one third are within 800m of either one primary school or one secondary school and received a minor positive effect. The remaining sites are further than 800m from at least one primary or secondary school, and as such received a minor negative effect.

Industrial/employment site options

F.19 The location of industrial/employment sites is not considered likely to affect this objective; therefore this objective has been scoped out for industrial/employment sites.

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

F.20 The London Borough of Enfield contains a number of Lower-Layer Super Output Areas (LSOAs) that fall within the most deprived areas in England. Site options that fall within the most deprived areas of the Borough offer the potential to help regenerate those areas through residential, industrial and mixed-use development and the delivery of supporting infrastructure. There is a strong east-west divide regarding deprivation in Enfield, with the incidence of deprived areas reducing from east to west.

Residential site options

F.21 Whilst the majority of sites do not fall within the most deprived areas of the Borough, scoring a negligible effect, under one tenth of the residential sites fall into the 10% most deprived areas in England, scoring a significant positive effect and a similar number fall into the 10-20% most deprived areas, scoring a minor positive effect.

Mixed-use site options

F.22 As above, whilst the majority of mixed-use sites do not fall within the most deprived areas of the Borough, scoring a negligible effect, approximately one tenth of the sites fall into the 10% most deprived areas in England, scoring a significant positive effect and roughly one third fall into the 10-20% most deprived areas, scoring a minor positive effect.

Industrial/employment site options

F.23 Whilst around one tenth of the industrial/employment sites fall into the 10% most deprived areas in England, scoring a significant positive effect, almost half of the industrial/employment sites fall into the 10-20% most deprived areas, scoring a minor positive effect. The remaining sites do not fall within the most deprived areas of the Borough, scoring a negligible effect.

IIA objective 7: Reduce crime and increase community safety

F.24 The effects of new development on levels of crime and fear of crime will depend on factors such as the incorporation of green space within development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of development sites; rather they will be determined through the policies in the Local Plan and detailed proposals for each site. This objective was therefore scoped out of the site options assessment.

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

F.25 The location of development will not significantly affect the achievement of this objective as effects will depend largely on the detailed proposals for sites, such as the incorporation of walking and cycling routes, which would be influenced by policies in the Local Plan and details submitted at the planning application stage. The policies in the Local Plan were appraised separately to the site options. This objective was therefore scoped out of the site assessment assumptions.

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

F.26 The location of residential sites will influence the achievement of this objective by affecting how easily residents would be able to access job opportunities in existing employment areas. Opportunities for employment are located towards the south and east of the Borough, with nine Strategic Industrial Locations along the east border of Enfield and eight Locally Significant Industrial Sites along the south border and towards the east of the Borough.

Residential site options

F.27 Approximately one tenth of the residential sites are located within 100m of a Strategic Industrial Location or Locally Significant Industrial Site, and as such received a minor positive effect in relation to IIA objective 9. The remaining sites are

located further than 100m from a Strategic Industrial Location or Locally Significant Industrial Site, and as such received a minor negative effect in relation to IIA objective 9.

Mixed-use site options

F.28 The location of mixed-use sites will affect how easily residents are able to access job opportunities in existing employment areas, in addition to ensuring new job opportunities are provided to match population growth that is being planned for within the Local Plan. Approximately one quarter of the mixed-use sites are located within 100m of a Strategic Industrial Location or Locally Significant Industrial Site, and as such received a minor positive effect in relation to IIA objective 9. The remaining sites are located further than 100m from a Strategic Industrial Location or Locally Significant Industrial Site, and as such received a minor negative effect in relation to IIA objective 9.

Industrial/employment site options

F.29 The provision of new industrial/employment sites in any location is likely to have a positive effect on this objective by ensuring that new job opportunities are provided to match the population growth that is being planned for within the Local Plan. Effects will be particularly positive where sites are large in size as they will result in more job creation. Roughly one tenth of the industrial/employment sites are larger than 10ha, and as such received a significant positive effect in relation to IIA objective 9. The remaining industrial/employment sites are smaller than 10ha, and as such, these sites received a minor positive effect in relation to IIA objective 9.

IIA objective 10: Support the vitality of the Borough's town and local centres

F.30 The London Borough of Enfield has identified a town centre hierarchy in the Regulation 19 Proposed Submission Local Plan. This classifies settlements in the Borough as Major Centres, District Centres and Local Centres. Enfield's Major Centre, Enfield Town, is located in the centre of the Borough, and is surrounded by smaller Local Centres that stretch out to the north, east, south and west. Enfield contains four District Centres, which are located along its southern border. New development located within or close to one of these centres has the potential contribute to the vitality of those centres. As each site is assessed individually, this contribution is considered to be minor rather than significant.

Residential site options

F.31 Approximately one third of the residential sites are located less than 100m from a Major, District or Local Centre, and as such received a minor positive effect in relation to IIA objective 10. The remaining sites received a negligible effect.

Mixed-use site options

F.32 Roughly half of the residential-led mixed use sites are located less than 100m from a Major, District or Local Centre, and as such received a minor positive effect in relation to IIA objective 10. The remaining sites received a negligible effect.

Industrial/employment site options

F.33 Roughly one third of the industrial/employment sites are located less than 100m from a Major, District or Local Centre, and as such received a minor positive effect in relation to IIA objective 10. The remaining sites received a negligible effect.

IIA objective 11: Minimise air pollution

F.34 The assessment of effects of site options in relation to air quality focuses on the variation across the Borough in baseline concentrations of key air pollutants and how residential development at different locations would result in different levels of exposure to these pollutants. Exposure to pollutants, notably NO₂, PM₁₀ and PM_{2.5} tends to be higher in the more built up areas of the Borough, notably Enfield Town and the District Centres, and along key transport routes such as the A10 and the A1010. Consideration is not given to whether a site is within or outside of an Air Quality Management Area (AQMA) under this objective, as the whole Borough has been declared an AQMA.

Residential site options

F.35 Almost all of the residential sites are in an area where the current baseline annual mean concentration of a pollutant (per London Atmospheric Emissions Inventory 'LAEI' 2019 data) exceeds 2021 WHO guidelines, meaning there is high exposure to at least one pollutant. As such, these sites received a minor negative effect in relation to IIA objective 11. The remaining few sites are in an area where current annual mean pollution exceeds both the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK's national air quality objectives. As such, these sites received a significant negative effect.

Mixed-use site options

F.36 Almost all mixed-use sites are in an area where the current baseline annual mean concentration of a pollutant (per LAEI 2019 data) exceeds 2021 WHO guidelines, meaning there is high exposure to at least one pollutant. As such, these sites received a minor negative effect in relation to IIA objective 11. The remaining few sites are in an area where current annual mean pollution exceeds both the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK's national air quality objectives. As such, these sites received a significant negative effect.

Industrial/employment site options

F.37 Almost all industrial/employment sites are in an area where the current baseline annual mean concentration of a pollutant (per LAEI 2019 data) exceeds 2021 WHO guidelines, meaning there is high exposure to at least one pollutant. As such, these sites received a minor negative effect in relation to IIA objective 11. The remaining few sites are in an area where current annual mean pollution exceeds both the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK's national air quality objectives. As such, these sites received a significant negative effect.

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

F.38 As identified in relation to IIA objective 10, Enfield's facilities and services are concentrated within the Borough's Major, District and Local Centres and sites located close to these will help to reduce the need to travel. In addition, the proximity of development sites to sustainable transport links will affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour. Public Transport Accessibility Levels (PTAL) provide a detailed and accurate measure of the accessibility of a point to the public transport network, taking into account walk access time and service availability. Access to public transport is highest in areas such as Enfield Town, New Southgate and Lower Edmonton, all of which benefit from a PTAL of 6a. Areas such as Hadley Wood, Botany Bay and Crews Hill in the north west are some of the least connected areas and the lowest PTALs in the Borough. It is possible that new services and facilities and transport links such as bus routes or cycle paths will be provided as part of new developments, particularly at larger sites, but this was not assumed in assessing site options.

Residential site options

F.39 Roughly one tenth of residential sites received a significant positive effect in relation to IIA objective 12. This was because the sites are less than 200m from Major, District or Local Centres, and are located in areas with high PTALs (4, 5 or 6a). Residential sites that received a minor positive effect (of which around one quarter received a minor positive effect) are also less than 200m from Major, District or Local Centres, but are located in areas with a lower PTAL (3 or 2). Roughly one tenth of residential sites received a minor negative effect in relation to IIA objective 12. This is because the residential sites are between 201-800m of Major, District or Local Centres and / or have a lower PTAL (0, 1a, 1b or 2). Just under half of sites have the poorest connectivity to Major, District or Local Centres (further than 800m) and have the lowest PTAL (0, 1a or 1b), and as such received a significant negative effect.

Mixed-use site options

F.40 Roughly one quarter of mixed-use sites received a significant positive effect in relation to IIA objective 12. This is because the sites are less than 200m from Major, District or Local Centres, and are located in areas with high PTALs (4, 5 or 6a). Mixed-use sites that received a minor positive effect (of which around one third receive a minor positive effect) are also less than 200m from Major, District or Local Centres, but are located in areas with a lower PTAL (3 or 2). Roughly one tenth of mixed-use sites received a minor negative effect in relation to IIA objective 12. This is because the mixed-use sites are between 201-800m of

Major, District or Local Centres and/or have a lower PTAL (0, 1a, 1b or 2). Approximately one quarter of sites have the poorest connectivity to Major, District or Local Centres (further than 800m) and have the lowest PTAL (0, 1a or 1b), and as such received a significant negative effect.

Industrial/employment site options

F.41 Roughly one tenth of industrial/employment use sites received a significant positive effect in relation to IIA objective 12. This is because the sites are less than 200m from Major, District or Local Centres, and are located in areas with high PTALs (4, 5 or 6a). Industrial/employment sites that received a minor positive effect (around one quarter) are also less than 200m from Major, District or Local Centres, but are located in areas with a lower PTAL (3 or 2). Roughly one tenth of industrial/employment sites received a minor negative effect in relation to IIA objective 12. This is because the industrial/employment sites are between 201-800m of Major, District or Local Centres and/or have a lower PTAL (0, 1a, 1b or 2). Approximately one third of sites have the poorest connectivity to Major, District or Local Centres (further than 800m) and have the lowest PTAL (0, 1a or 1b), and as such received a significant negative effect.

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

F.42 Sites that are close to internationally, nationally or locally designated conservation sites have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, or increased recreation pressure. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, it is generally not proportionate to attempt to identify the particular biodiversity assets present at different locations and their sensitivity to different types of development (although Impact Risk Zones defined by Natural England provide a useful proxy for this in relation to SSSIs and internationally designated sites). Instead, this would be determined once more specific proposals are developed and submitted as part of a planning application. Enfield boasts a wealth of biodiversity, having important populations of nationally and internationally scarce plant and animal species. It also has several important habitats including important grassland habitats and more than three hundred hectares of woodland. SSSI Impact Risk Zones extending into the Borough include those associated with Lea Valley to the north and east, Epping Forest to the east, and Wormley-Hoddesdonpark Woods to the north. There are SINCs throughout the Borough while areas of Priority Habitat Inventory and Ancient Woodland are more prevalent to the west and north.

Residential site options

F.43 Roughly just under half of residential sites received a significant negative effect in relation to IIA objective 13. This is because the sites intersect with a locally designated site, Priority Habitat or Ancient Woodland. Where sites that do not intersect with a locally designated site receive a significant negative effect, they are less than 250m from a locally designated site, Priority Habitat or Ancient Woodland and they intersect with 'all planning applications', 'residential' or 'rural residential' SSSI Impact Risk Zones (IRZ), though these residential sites are in the minority. Roughly one half of residential sites received a minor negative effect in relation to IIA objective 13. This is because the residential sites are less than 250m from a locally designated site, Priority Habitat or Ancient Woodland. Where sites that are not within 250m of a locally designated site receive a minor negative effect, they intersect with 'all planning applications', 'residential' or 'rural residential' IRZ, though these residential sites are in the minority. The remaining sites received a negligible effect as their proximity does not pose a threat to any biodiversity sites/features.

Mixed-use site options

F.44 Roughly four fifths of mixed-use sites received a significant negative effect in relation to IIA objective 13. This is because the sites intersect with a locally designated site, Priority Habitat or Ancient Woodland. Where sites that do not intersect with a locally designated site received a significant effect, they are less than 250m from a locally designated site, Priority Habitat or Ancient Woodland and intersect with 'all planning applications', 'residential', 'rural residential', 'air pollution' or 'water supply' IRZ, though these mixed-use sites are in the minority. Roughly one quarter of mixed-use sites received a minor negative effect in relation to IIA objective 13. This is because the mixed-use sites are less than 250m from a locally designated site, Priority Habitat or Ancient Woodland. Where sites that are not within 250m of a locally designated site receive a minor negative effect,

they intersect with 'all planning applications', 'residential', 'rural residential', 'air pollution' or 'water supply' IRZ, though these mixed-use sites are in the minority. The remaining sites received a negligible effect as their proximity does not pose a threat to any biodiversity sites/features.

Industrial/employment site options

F.45 Just over two thirds of industrial/employment sites received a significant negative effect in relation to IIA objective 13. This is because the sites intersect with a locally designated site, Priority Habitat or Ancient Woodland. Where sites that do not intersect with a locally designated site receive a significant negative effect, they are less than 250m from a locally designated site, Priority Habitat or Ancient Woodland and intersect with 'all planning applications', 'rural non-residential', 'air pollution' or 'water supply' IRZ, though these industrial/employment sites are in the minority. Roughly one quarter of industrial/employment sites received a minor negative effect in relation to IIA objective 13. This is because the development site options are less than 250m from a locally designated site, Priority Habitat or Ancient Woodland. Where sites that are not within 250m of a locally designated site receive a minor negative effect, they intersect with 'all planning applications', 'rural non-residential', 'air pollution' or 'water supply' IRZ, though these industrial/employment sites are in the minority. The remaining sites received a negligible effect as their proximity does not pose a threat to any biodiversity sites/features.

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

F.46 The NPPF states that the "significance [of a heritage asset] can be harmed or lost through alteration or destruction of the heritage asset or development within its setting". However, development could also enhance the significance of the asset, provided that the development preserves those elements of the setting that make a positive contribution to or better reveal the significance of the asset. In all cases, effects from a Local Plan site allocation will be subject to a degree of uncertainty as the actual effects on heritage assets will depend on the particular scale, design and layout of new development and opportunities which may exist to enhance the setting of heritage features, for example where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect.

F.47 Site options were assessed on the basis of proximity to historic assets. The findings were intended to provide a basis for screening for the potential for adverse effects on heritage assets but in the absence of a separately commissioned historic environment sensitivity study or similar of all reasonable alternative site options they are subject to a high degree of uncertainty. Distances used were based on professional judgement. Longer screening distances were used for site options outside of existing settlements to reflect typically longer sightlines in rural rather than urban areas.

F.48 Enfield contains a number of heritage assets that are spread across the Borough. This includes Local Heritage Assets and Listed Buildings as well as Conservation Areas, Scheduled Monuments and Registered Parks and Gardens. The largest Archaeological Priority Areas correlate with the Borough's Green Belt land, which is found to the north west and east.

Residential site options

F.49 Around eight tenths of residential sites received a significant negative in relation to IIA objective 14 as they have the closest proximity to heritage assets (within 100m for sites within existing settlements or 500m for sites outside of existing settlements). Approximately one tenth of sites received a minor negative effect as they are at a further distance (101-250m from a heritage asset for sites within existing settlements or 501-1,000m for sites outside of existing settlements). The remaining sites received a negligible effect as their proximity does not pose a threat to any heritage assets.

Mixed-use site options

F.50 Around one half of mixed-use sites received a significant negative in relation to IIA objective 14 as they have the closest proximity to heritage assets (within 100m for sites within existing settlements or 500m for sites outside of existing settlements). Less than one tenth of sites received a minor negative effect as they are at a further distance (101-250m from a heritage assets for sites within existing settlements or 501-1,000m for sites outside of existing settlements). The remaining sites received a negligible effect as their proximity does not pose a threat to any heritage assets.

Industrial/employment site options

F.51 Around one half of industrial/employment sites received a significant negative in relation to IIA objective 14 as they have the closest proximity to heritage assets (within 100m for sites within existing settlements or 500m for sites outside of existing

settlements). Just over one tenth of sites received a minor negative effect as they are at a further distance (101-250m from a heritage assets for sites within existing settlements or 501-1,000m for sites outside of existing settlements). The remaining sites received a negligible effect as their proximity does not pose a threat to any heritage assets.

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

F.52 Enfield's 'Character of Growth' study informed the IIA of most site options at Regulation 19 stage. The study provides recommendations on the acceptable level of development and change in landscape and townscape terms for different areas of the Borough. Much of the urban area of the Borough is identified as being able to accommodate medium change. Many of the areas able to accommodate the highest scale of change are concentrated along the eastern edge of the Borough while limited change is recommended in areas around Enfield Town and in other areas dispersed around the Borough. A minority of site options were located in parts of the Borough located outside of the Character of Growth Study's scope (broadly those in the Green Belt or open spaces). IIA of these site options in landscape/townscape terms fell back on the more simplistic appraisal method used at Regulation 18 stage, based on the size of sites and whether they are located in urban or more rural areas. Whichever approach was used, appraisals of site options also considered whether the site contains open space that could potentially be lost to development.

F.53 Actual effects on landscape and townscape will also depend on the design, scale and layout of development within the site, which may help mitigate and/or enhance effects on the existing townscape.

Residential site options

F.54 Around one quarter of residential sites fall into an area where 'medium change' can be accommodated and therefore received minor negative effects in relation to IIA objective 15. Just under half of sites fall into an area where 'medium change' can be accommodated but also contain an existing open space or fall into an area where 'limited change' can be accommodated and therefore received a significant negative effect.

F.55 The remaining sites do not fall into an area identified in Enfield's 'Character of Growth' study and as such were appraised separately. Around half of these residential sites were either larger than three hectares and on the edge of a settlement (and/or in a relatively undeveloped area) or located in the Green Belt and as such received a significant negative effect, however this is uncertain as the actual effect on this objective will also depend on the design, scale and layout of development within the site. The other half of these residential sites are located within a settlement, and as such received a minor positive effect, however this is also uncertain.

Mixed-use site options

F.56 Just under two tenths of mixed-use sites fall into an area where 'medium change' can be accommodated, and as such received a minor negative effect in relation to IIA objective 15. Just under two thirds of sites fall into an area where 'medium change' can be accommodated but also contain an existing open space or fall into an area where 'limited change' can be accommodated and therefore received a significant negative effect.

F.57 The remaining sites do not fall into an area identified in Enfield's 'Character of Growth' study and as such were appraised separately. Almost all these mixed-use sites were either larger than three hectares and on the edge of a settlement (and/or in a relatively undeveloped area) or located in the Green Belt, and as such received a significant negative effect, however this is uncertain as the actual effect on this objective will also depend on the design, scale and layout of development within the site. A small proportion of these mixed-use sites are located within a settlement, and as such received a minor positive effect, however this is also uncertain.

Industrial/employment site options

F.58 Around two tenths of industrial/employment sites fall into an area where 'medium change' can be accommodated, and as such received a minor negative effect in relation to IIA objective 15. Around half of sites fall into an area where 'medium change' can be accommodated but also contain an existing open space or fall into an area where 'limited change' can be accommodated and therefore received a significant negative effect.

F.59 The remaining sites do not fall into an area identified in Enfield's 'Character of Growth' study and as such were appraised separately. Around one third of these industrial/employment use sites were larger than three hectares and on the edge of a

settlement (and/or in a relatively undeveloped area) and as such received a significant negative effect, however this is uncertain as the actual effect on this objective will also depend on the design, scale and layout of development within the site. A small proportion were within a settlement but did not contain built development, and as such received a minor negative effect, however this is also uncertain. The remaining half of sites are located within a settlement, and as such received a minor positive effect, however this is also uncertain.

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

F.60 Appraisal of site options in relation to this IIA objective considered whether the site is greenfield or brownfield and also what quality of agricultural land it contains.

F.61 Development on brownfield land represents a more efficient use of land in comparison to the development of greenfield sites. Larger scale sites may also have more of an impact and therefore sites above three hectares have been used as an indication of larger scale development. The effects of development on waste generation will depend largely on residents' behaviour. However, where development takes place on previously developed land there may be opportunities to reuse onsite buildings and materials, thereby reducing waste generation. Although open spaces may contain a small number of buildings to maintain recreational use, they are largely undeveloped and considered greenfield land.

F.62 The majority of land in the Borough is classified by the Agricultural Land Classification (ALC) as urban, with further non-agricultural land to the east of the Borough and two smaller patches to the north west near Hadley Wood. The highest quality agricultural land is to the very north of the Borough, which contains a small patch of Grade 2 agricultural land, bordering on a large patch of Grade 3 agricultural land that correlates with the Borough's Green Belt land.

F.63 Furthermore, all new development will result in the increased consumption of minerals for construction but this will not be influenced by the location of the development. The location of development sites can influence the efficient use of minerals as development in Minerals Safeguarding Areas may sterilise mineral resources and restrict the availability of resources in the Borough. However, there are no Minerals Safeguarding Areas within LBE so this issue was scoped out of the IIA of site options.

Residential site options

F.64 Roughly one tenth of residential sites received a significant positive effect in relation to IIA objective 16. This is because the sites are larger than 3ha and are located on brownfield land. Smaller sites located on brownfield land and less than 3ha in size were expected to have a minor positive effect, which accounted for around two thirds of the sites. The largest sites on greenfield land (larger than 3ha) and those on Grade 1 or 2 agricultural land received a significant negative effect, which accounted for around one tenth of the sites. The remainder of residential sites received a minor negative effect in relation to IIA objective 16; the majority of these sites are less than 3ha and on greenfield land and/or are located on Grade 3 agricultural land.

Mixed-use site options

F.65 Roughly one quarter of mixed-use sites received a significant positive effect in relation to IIA objective 16. This is because the sites are larger than 3ha and are on brownfield land. Smaller sites on brownfield land less than 3ha were expected to have a minor positive effect, which accounts for around three quarters of the sites. The largest sites on greenfield land (larger than 3ha) and those on Grade 1 or 2 agricultural land received a significant negative effect, which accounted for around one quarter of the sites. Roughly one tenth of mixed-use sites received a minor negative effect in relation to IIA objective 16; most of these are less than 3ha on greenfield land and/or are located on greenfield land classed as Grade 3 agricultural land.

Industrial/employment site options

F.66 Roughly one third of industrial/employment sites received a significant positive effect in relation to IIA objective 16. This is because the sites are larger than 3ha and are on brownfield land. Smaller sites proposed on brownfield land less than 3ha were expected to have a minor positive effect, which accounted for around two thirds of the sites. A small number of sites on greenfield land (larger than 3ha) and those on Grade 1 or 2 agricultural land received a significant negative effect, which account for an acute minority of the sites. A small number of industrial/employment sites received a minor negative effect in relation to IIA objective 16; the majority of these sites are less than 3ha on greenfield land and/or are located on greenfield land classed as Grade 3 agricultural land.

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

F.67 Site options were assessed by reference to the distribution of flood risk areas in the Borough. Enfield is prone to fluvial flooding from the Borough's many waterbodies and watercourses, notably Lea Valley in the east of the Borough. As such, there are multiple areas along these water corridors that fall within Flood zones 2 or 3. Surface water flood risk is also a threat to Enfield, with multiple areas spread across the Borough with either a 1 in 100 year risk or 1 in 30 year risk of surface water flooding.

F.68 The effects of new development on this IIA objective will also depend to some extent on its design, for example whether it incorporates sustainable drainage systems (SuDS), which is unknown and cannot be addressed at this stage. Where site options are located in areas of high flood risk, it could increase the risk of flooding in those areas (particularly if the sites are not previously developed) and would increase the number of people and assets at risk from flooding. These factors are outside the scope of the site options appraisal.

Residential site options

F.69 Just under one quarter of the residential sites contain land with a 1 in 100 year risk of surface water flooding or are located partially within Flood Zone 2 and as such, received a minor negative effect. Almost half of the residential sites contain land with a 1 in 30 year risk of surface water flooding and as such received a significant negative effect. Where sites that do not contain land with a 1 in 30 year risk of surface water flooding received a significant negative effect, they are partially located within Flood Zone 3, or both contain land with a 1 in 100 year risk of surface water flooding and are partially located within Flood Zone 2, though these sites are in the minority. The remaining sites were not identified to be at risk of flooding, and as such received a negligible effect.

Mixed-use site options

F.70 Just under one quarter of the mixed-use sites contain land with a 1 in 100 year risk of surface water flooding or are located partially within Flood Zone 2 and as such, received a minor negative effect. Over two thirds of the mixed-use sites contain land with a 1 in 30 year risk of surface water flooding and as such received a significant negative effect. Where sites that do not contain land with a 1 in 30 year risk of surface water flooding received a significant negative effect, they are partially located within Flood Zone 3, or both contain land with a 1 in 100 year risk of surface water flooding and are partially located within Flood Zone 2, though these sites are in the minority. The remaining sites were not identified to be at risk of flooding, and as such received a negligible effect.

Industrial/employment site options

F.71 Roughly one quarter of the industrial/employment sites contain land with a 1 in 100 year risk of surface water flooding or are located partially within Flood Zone 2 and as such, received a minor negative effect. Around one half of the industrial/employment sites contain land with a 1 in 30 year risk of surface water flooding and as such received a significant negative effect. Where sites that do not contain land with a 1 in 30 year risk of surface water flooding received a significant negative effect, they are partially located within Flood Zone 3, or both contain land with a 1 in 100 year risk of surface water flooding and are partially located within Flood Zone 2, though these sites are in the minority. The remaining sites were not identified to be at risk of flooding, and as such received a negligible effect.

IIA objective 18: Minimise water use and protect water quality

F.72 Levels of water consumption within new development will be determined by its design and onsite practices, rather than the location of the site. However, the location of development could affect water quality during construction depending on its proximity to watercourses, water bodies and Source Protection Zones. There are multiple Source Protection Zones throughout Enfield, notably surrounding Lea Valley to the east, and through the centre of the Borough, corresponding with the waterbodies present. The extent to which water quality is affected would depend on construction techniques and the use of SuDS within the design.

Residential site options

F.73 Roughly half of the residential sites contain a watercourse, water body or fall within a Source Protection Zone, and as such received a significant negative effect. The remaining sites are not expected to negatively affect water quality, and as such received a negligible effect.

Mixed-use site options

F.74 Roughly two thirds of the mixed-use sites contain a watercourse, water body or fall within a Source Protection Zone, and as such received a significant negative effect. The remaining sites are not expected to negatively affect water quality, and as such received a negligible effect.

Industrial/employment site options

F.75 Roughly two thirds of the industrial/employment sites contain a watercourse, water body or fall within a Source Protection Zone, and as such received a significant negative effect. The remaining sites are not expected to negatively affect water quality, and as such received a negligible effect.

Summary of site options appraisals

F.76 The IIA of site options primarily seeks to identify the risk of significant negative effects from site options in relation to individual sustainability objectives. These potential effects can then be considered in more detail by plan makers and, if appropriate, action taken to avoid or mitigate them. For completeness, however, this section identifies those site options that performed best and worst in sustainability terms across the whole range of IIA objectives, noting that all such findings are 'policy-off', i.e. before consideration of mitigation.

Residential site options

F.77 Across all IIA objectives taken together, the most sustainable residential site options were: CFS269, CFS165, CFS263, SBP13, SA7.5, PP-08601612, LOP20, SGS14, TUC8, SGC8, SA7.2, CFS210, CFS150, CFS275, COC2, CFS199-9, UPP7 and HIP27.

F.78 Across all IIA objectives taken together, the least sustainable residential site options were: CHC3, CFS323, CHC15, SA.11.3, CHC7, CFS319, CHC5, CFS320, CFS318, CFS212, CFS145, SA11.2, SA11.5, CHC9, LP637, CFS214 and R.02.

Mixed-use site options

F.79 Across all IIA objectives taken together, the most sustainable mixed-use site options were: SA4.3, CFS236, SBC6, JUS5, POS45, SBC3, SA4.4, SA2.3, SA2.5 and SA7.3.

F.80 Across all IIA objectives taken together, the least sustainable mixed-use site options were: SA.11.1, BL1, CFS158b, CFS160, SA.11.4, SA11.6, CHP22, CFS315, SA10.4, CHC5 and CFS252.

Industrial/employment site options

F.81 Across all IIA objectives taken together, the most sustainable industrial/employment site options were: 21/01949/FUL, 21/03375/RE4, 20/01003/PRJ, 19/00432/PRJ, 19/01706/PRJ, 20/01343/PRJ, 20/03914/PRJ and SA2.7.

F.82 Across all IIA objectives taken together, the least sustainable industrial/employment site options were: R.04, CFS144, CFS155, R.05, U.29, NA001, LP1146, 21/02875/FUL, 19/03036/FUL and R.03.

Site options proposed for 'other' uses

F.83 14 site options were considered for 'other' uses as follows:

- **Burial site, cemetery, or crematorium:** CFS167; CFS168; R.08, U.36
- **Nature recovery site:** CFS161; CFS188
- **Green infrastructure site:** CFS279; CFS280

- **Leisure and/or sports and recreation site:** CFS218; CFS326; LP675; R.06
- **Education site:** SA6.2
- **Nature recovery and/or sports/leisure site:** R.07

F.84 In appraising sites for these uses it was assumed that any built development associated with nature recovery or green infrastructure use would be negligible but that the remaining uses could all include built development.

The location of sites proposed for 'other' uses is not considered likely to affect objectives **IIA1: Climate change mitigation** or **IIA2: Climate change adaptation**, therefore these three objectives have been scoped out for the assessment of 'other' use sites. **IIA3: Housing** has also been scoped out for the majority of 'other' use sites, however as the site for education (site SA6.2) may also allocate some housing, this received a minor positive effect.

F.85 Leisure and/or sports and recreation sites, nature recovery sites (R.07 is proposed for both leisure and nature recovery) and green infrastructure sites received a significant positive effect in relation to **IIA4: Health and Wellbeing** as they provide access to opportunities for sport and formal or informal recreation. Similarly, the site allocated for education (SA6.2) received a minor positive effect as this will provide publicly accessible buildings with enhanced landscaping and public realm which may provide similar opportunities. The burial, crematorium and cemetery sites received a significant negative effect in relation to IIA4 because they contain existing open space, including Metropolitan Open Land and Green Loops/Links or contain a walking or cycle path.

F.86 The location of 'other' use sites is not considered likely to affect **IIA5: Services and facilities**; therefore this objective has been scoped out of the assessment for all 'other' use sites apart from site SA6.2, which is allocated for education. This site received a significant positive effect in relation to IIA5, as this site will provide greater access to education in the Borough.

F.87 Leisure and/or sports and recreation sites, nature recovery sites (R.07 is proposed for both leisure and nature recovery), green infrastructure and education sites that fall within deprived areas of the Borough have the potential to have a positive effect in relation to **IIA6: Social inclusion** as they may help to regenerate those areas through providing supporting social infrastructure. As such, site LP675 received a significant positive effect. The remaining sites received a negligible effect. The remaining burial, crematorium and cemetery sites are not considered likely to affect objective and have therefore been scoped out of the assessment of 'other' use sites.

F.88 The location of sites proposed for 'other' uses is not considered likely to affect objectives **IIA7: Crime and community safety** and **IIA8: Road safety**. Therefore, these two objectives have been scoped out for the assessment of 'other' use sites.

F.89 All 'other' use sites except for site CFS167 received a negligible effect in relation to **IIA9: Economy**. Site CFS167 received a significant negative effect as the site is located partly within a Strategic Industrial Location or a Locally Significant Industrial Site.

F.90 Leisure and/or sports and recreation sites, nature recovery sites (R.07 is proposed for both leisure and nature recovery), green infrastructure and education sites that are located within 100m of a Major, District or Local Centre have the potential to receive a positive effect in relation to **IIA10: Town and local centres** as they may contribute to the vitality of those centres. As such, site CFS326 and SA6.2 received a minor positive effect. The remaining sites received a negligible effect. The remaining burial, crematorium and cemetery sites are not considered likely to affect objective IIA10 and have therefore been scoped out for the assessment of 'other' use sites.

F.91 All leisure and/or sports and recreation sites, nature recovery sites (R.07 is proposed for both leisure and nature recovery), green infrastructure and education sites are in areas with exposure to poor air quality and as such received a minor negative effect in relation to **IIA11: Air pollution**. The remaining burial, crematorium and cemetery sites are not considered likely to affect objective IIA11 and have therefore been scoped out for the assessment of 'other' use sites.

F.92 In relation to **IIA12: Sustainable transport**, 'other' use sites were assessed on the basis of their connectivity to public transport. Due to their poor connectivity, all but two sites received a significant negative effect. However, site CFS326 received a minor negative effect, site U.36 received a minor positive effect and site SA6.2 received a significant positive effect.

F.93 All leisure and/or sports and recreation sites, education sites, burial sites, crematorium sites and cemetery sites are in close proximity to an internationally, nationally or locally designated conservation site and as such received a significant negative effect in relation to **IIA13: Biodiversity**. Conversely, the sites considered for nature recovery (R.07 is proposed for

both leisure and nature recovery) or green infrastructure use provide an opportunity to improve biodiversity and therefore received a significant positive effect in relation to IIA13.

F.94 All leisure and/or sports and recreation sites (R.07 is proposed for both leisure and nature recovery), education sites, burial sites, crematorium sites and cemetery sites either are near a historic asset and as such received either a significant negative or minor negative effect in relation to **IIA14: Historic environment**, depending on proximity and whether they are within or outside existing settlements. The sites considered for nature recovery sites (excluding site R.07) or green use are not considered likely to affect objective IIA14 and have therefore been scoped out for the assessment of 'other' use sites.

F.95 All leisure and/or sports and recreation sites, burial sites, crematorium sites and cemetery sites were assessed in relation to **IIA15: Landscape and townscape** in the same way as residential and employment uses, as previously described. As such, the sites covered by the Character of Growth study area received a significant negative effect (predominantly because the site contains open space). The remaining sites for these uses that fall outside the 'Character of Growth' study area were appraised separately. All but one of these sites (site CFS167) received a significant negative effect as they are in more rural, undeveloped areas. Site CFS167 received a minor positive effect as it is located within a settlement and contains built development. All sites considered for nature recovery (R.07 is proposed for both leisure and nature recovery) or green infrastructure use received a minor positive effect as they were assumed to provide an opportunity to improve the landscape or townscape, although actual effects will be context-specific. Similarly, the site allocated for education (SA6.2) received a minor positive effect as it will include open space and landscaping.

F.96 All 'other' use sites other than site SA6.2 are located on greenfield land, and as such receive either a significant negative effect or a minor negative effect, depending on the size of the site and/or the quality of the agricultural land the site is within, in relation to **IIA16: Efficient use of land and materials**. Conversely, site SA6.2 is less than 3ha and located on brownfield land, and as such received a minor positive effect.

F.97 All sites considered for leisure and/or sports and recreation, education, burial, crematorium or cemetery sites were assessed in relation to **IIA17: Flooding** in the same way as residential and employment uses, as previously described. Most of these sites were in areas subject to surface water flood risk and received either a significant negative effect or minor negative effect depending on the severity of that risk. Those sites not affected (site CFS326 and site U.36) received a negligible effect. Site considered for nature recovery (R.07 is proposed for both leisure and nature recovery) or green infrastructure provide an opportunity to mitigate surface water flood risk and as such, received a minor positive effect.

F.98 All sites considered for leisure and/or sports and recreation (R.07 is proposed for both leisure and nature recovery), education, burial, crematorium or cemetery sites were assessed in relation to **IIA18: Water** in the same way as residential and employment uses, as previously described. All leisure and/or sports and recreation sites, education, burial sites, crematorium sites and cemetery sites have the potential to affect water quality. Most of these sites (besides site LP675) contain a watercourse, water body or fall within a Source Protection Zone and as such received a significant negative effect. Site LP675 received a negligible effect. The sites considered for nature recovery (excluding site R.07) or green infrastructure are not considered likely to affect objective IIA18 and were therefore scoped out.

Appendix G

IIA findings for the site options 2021

G.1 This section presents the IIA findings for the reasonable alternative site options considered by the Council for allocation in the Enfield Local Plan at Regulation 18 stage, as well as an appraisal of the sites that have been selected for allocation. Overall, there are 22 allocated housing sites, 23 allocated mixed-use sites, 10 allocated industrial sites, 2 allocated leisure/sports and recreation sites, 4 burial/crematorium sites and a nature recovery site. There are also 19 housing site options and 4 mixed-use site options that were appraised but have not been allocated. **Table G.1** contains a summary of the effects of all reasonable alternative site options in relation to the IIA objectives, with the findings summarised below the table.

G.2 Following this, are the separate appraisal matrices for each reasonable alternative site option. These matrices contain two columns that show the likely sustainability effect of the site option (and justification) *without* taking any mitigation into account. For those site options that were then selected for allocation in the 2021 Enfield Local Plan, the IIA appraisal matrix includes another two columns that show the likely effects of the site (and justification) *with* any mitigation provided in the Local Plan policies or site proformas taken into account. For site allocations where the proposed use changed from the initial reasonable alternative site option appraisal, an extra set of two columns are provided to show the appraisal of the site allocation with its revised use and *without* mitigation. Reasonable alternative site options that were not allocated by the Council, are shown in the section of this appendix entitled 'Site options appraised but not allocated'.

Table G.1: IIA findings for site options 2021

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
Housing sites																				
CHC1/LP031: Warmerdams Nursery, Cattlegate Road	3.04	345	0	0	++	++/-	-?	0	0	0	-	0	-?	++/-	--?	-?	+?	++	--	0
CHC10/LP179: Site at Oak Farm and Homestead Nursery, Cattlegate Road	2.62	340	0	0	++	+/-	-?	0	0	0	-	0	-?	--/+	--?	-?	-?	+	--	0
CHC11/LP472 – Parcel 1: Land to the rear of Jesus Christ Church, Parcel 1	1.70	160	0	0	++	++/-	++?	0	0	0	-	0	-?	--/+	--?	--?	-?	+	--	--?
CHC12/LP472 – Parcel 2: Land to the south of Forty Hill Church of England School, Forty Hill, Parcel 2	2.15	399	0	0	++	++/-	++?	0	0	0	-	0	-?	++/-	--?	--?	-?	+	-	--?
CHC14/LP637: Land north of Goat Lane	0.46	60	0	0	+	++/-	++?	0	0	0	-	0	-?	-	--?	-?	-?	+	-	--?
CHC17/LP645: Towneley Nurseries, Theobalds Park	1.70	113	0	0	++	++/-	-?	0	0	0	-	0	-?	++/-	--?	-?	+?	+	--	--?
CHC18/LP649: Brown's Garden Village, Theobalds Park Road	0.94	62	0	0	+	+/-	-?	0	0	0	-	0	-?	++/-	-?	-?	+?	+	--	0
CHC2/LP056: Wolden Garden Centre, Cattlegate Road	1.19	135	0	0	++	+/-	-?	0	0	0	-	0	-?	++/-	--?	-?	+?	+	--	0

Appendix G
IIA findings for the site options 2021

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Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
CHC3/LP107: Burton Farm Ride	2.47	97	0	0	+	+/-	-?	0	0	0	-	0	-?	++/-	-?	--?	-?	--?	-	--?
CHC5/LP1138: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road	4.07	270	0	0	++	++/-	++?	0	0	0	-	0	--?	++/-	--?	--?	--?	--?	--	--?
COC8/LP465: Land between Camlet Way and Crescent Way, Hadley	11.05	160	0	0	++	++/-	+?	0	0	0	-	+	-?	++/-	--?	--?	--?	--?	-	--?
COC9a and COC9b/LP608_1: Cockfosters Station Car Park, Cockfosters Road, Barnet	1.15	316	0	0	++	++	+?	0	0	0	-	+	-?	++	--?	--?	-?	+	0	0
COP10 (20/03200/PRJ): Blackhorse Tower, Holbrook House and Churchwood House, 116 Cockfosters Road	1.25	200	0	0	++	++	+?	0	0	0	-	+	-?	++	--?	--?	+?	+	--	0
GRC1/LP1105, LP652, CFS040, CFS060: St Anne's Catholic High School for Girls	1.76	236	0	0	++	++	++?	0	0	0	-	+	--?	++	--?	--?	+?	+	--	--?
GRC3/LP1117: 100 Church Street	0.28	56	0	0	+	++	++?	0	0	0	-	+	--?	++	--?	--?	+?	+	-	--?
HIC10/LP642: Land opposite Jolly Farmers	1.70	89	0	0	+	++	++?	0	0	0	-	0	-?	++	--?	0?	+?	+	--	--?
HIC11/LP707: Chase Park	140.56	1082	0	0	++	++	++?	0	0	0	-	0	-?	++	--?	--?	--?	--?	--	--?
HIC6/LP1153: Bramley Road	5.63	268	0	0	++	+	-?	0	0	0	-	+	-?	++	--?	--?	--?	--?	-	0

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HIC9/LP623: Land south of Enfield Road	13.28	494	0	0	++	++	++?	0	0	0	-	0	-?	++/-	-?	-?	+	-?	--	0
LOC1/LP1108: Chiswick Road Estate (Oswald and Newdales)	2.37	272	0	0	++	++/- -?	+	+	0	0	-	+	-?	++	0	-?	+	+	--	0
POC6/LP1196: Land at former Wessex Hall Building	0.38	110	0	0	++	-- ?/+	+	+	0	0	++	0	-?	++	-?	0?	--	+	--	-- ?
SBC2/LP1107: Main Avenue Site	4.49	82	0	0	+	++/- -?	++?	+	0	0	-	+	-?	++	-?	-?	+	++	--	0
SGC1/LP1145: Site between North Circular Road and Station Road	1.13	230	0	0	++	++	+	+	0	0	++	0	-?	++/- -	-?	-?	+	+	--	0
SGC4/LP608_2: Arnos Grove Station Car Park	1.08	162	0	0	++	++/- -?	++?	0	0	0	-	+	-?	++	-?	-?	--	+	--	0
SGP13 (18/00388/OUT): 188-200 Bowes Road	0.48	86	0	0	+	++	++?	0	0	0	-	+	-?	++	-?	-?	+	+	--	-- ?
SGS14/17100370: Station Road, New Southgate	1.37	203	0	0	++	++	+	+	0	0	++	0	-?	++/- -	-?	-?	+	+	--	0
CFS162_A: Land to the Rear of Arnold House (West)	0.90	36	0	0	+	+	-?	0	0	0	-	0	-?	++/- --	-?	0?	-?	-?	-	0
CFS162_B: Land to the Rear of Arnold House (East)	0.75	36	0	0	+	++/- -	-?	0	0	0	-	0	-?	++/- --	-?	0?	-?	-	0	0

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CFS162_C: Arnold House	0.60	36	0	0	+	++/-	-?	0	0	0	-	0	-?	++/-	--?	0?	-?	+	-	0
UPM1: Joyce Avenue and Snells Park Estate	9.94	1217	0	0	++	++/-	+?	0	0	0	++	+	--?	++	--?	--?	--	++	--	-?
UPP9 (18/00760/FUL): Public House, 50-56 Fore Street	0.19	68	0	0	+	++	+?	+	0	0	-	+	--?	++	-?	--?	+?	+	--	-?
UPS21/17100372: Upton Road and Raynham Road	1.92	198	0	0	++	++/-	+?	+	0	0	-	+	--?	++	-?	--?	+?	+	--	-?
CFS150 and CFS189: Minchenden Car Park and Alan Pullinger Centre	0.11	48	0	0	+	++/-	+?	0	0	0	-	+	--?	++	--?	-?	+?	+	0	0
CFS159: Wyevale Garden Centre, Cattlegate Road	2.00	260	0	0	++	++/-	-?	0	0	0	-	0	-?	++/-	--?	-?	+?	+	0	0
CFS165: South east corner of North Middlesex University Hospital Trust of Sterling Way	1.35	400	0	0	++	++	+?	0	0	0	++	0	--?	++	--?	-?	+?	+	--	0
CFS169: Kings Oak Equestrian Centre (Part)	4.23	127	0	0	++	++/-	+?	0	0	0	-	0	-?	++/-	--?	-?	-?	++	--	0
CFS178: Oak House, 43 Baker Street	0.26	55	0	0	+	++	++?	0	0	0	-	+	--?	++	--?	--?	+?	+	-	-?
CFS183: Enfield Town Station and Former Enfield Arms, Genotin Road	0.07	6	0	0	+	++	++?	0	0	0	-	+	-?	++	--?	--?	+?	+	--	-?

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CFS207: Albany Leisure Centre and Car Park, 55 Albany Road	0.63	30	0	0	+	++	+?	+	0	0	-	+	-?	++	0	-?	+?	+	--	-?
CFS210: Southgate Library, High Street, Southgate	0.15	9	0	0	+	++/-	+?	0	0	0	-	+	-?	++	-?	-?	+?	+	--	0
CFS223: Fords Grove Car Park	0.24	24	0	0	+	++	++?	0	0	0	-	+	-?	++	--?	-?	+?	+	0	--?
CFS226: Lodge Drive Car Park (Incl. Depot)	0.66	18	0	0	+	++	+?	0	0	0	-	+	--?	++	--?	-?	+?	+	-	--?
CFS253: Southbury Leisure Park	2.95	450	0	0	++	++/-	++?	+	0	0	-	0	--?	++	-?	0?	+?	+	--	0
SA27: Land at Crews Hill	83.00	3000	0	0	++	++/-	+?	0	0	0	-	0	-?	++/-	--?	--?	--	++/-	--	--?
SA28: Land at Chase Park	60.00	3000	0	0	++	++	++?	0	0	0	-	+	-?	++	--?	--?	--?	--?	--	--?
SA29: Arnold House	2.25	106	0	0	+	++/-	-?	0	0	0	-	0	-?	++/-	--?	0?	-?	--?	--	0
Industrial sites																				

Appendix G
IIA findings for the site options 2021

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Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
ELC3/LP606: Land West of Ramney Marsh	12.01	70,200 sq.m	0	0	0	0	0	0	0	0	++	0	--?	++/-	--?	--?	+	++	--	--?
POC5/LP694/CFS135: Car Park Site, Wharf Road	0.79	5,115 sq.m	0	0	0	0	0	+	0	0	+	0	0	++/-	--?	--?	-?	+	--	--?
CFS132: Land at 135 Theobalds Park Road	1.64	3,251 sq.m	0	0	0	0	0	0	0	0	+	0	-?	++/-	--?	-?	+	+	--	0
CFS136: 6 Morson Road	0.83	2,600 sq.m	0	0	0	0	0	+	0	0	+	0	0	++/-	--?	-?	-?	+	-	--?
CFS148: Land to the North West of Innova Park	3.46	16,445 sq.m	0	0	0	0	0	0	0	0	+	0	--?	++/-	--?	0?	+	++	--	--?
CFS151: Crown Road Lorry Park	0.71	4,530 sq.m	0	0	0	0	0	+	0	0	+	0	-?	++	0	-?	+	+	--	0
CFS153: Montagu Ind Estate	5.68	6,613 sq.m	0	0	0	0	0	+	0	0	+	0	--?	++	--?	--?	+	++	--	--?
CFS155: Land East of Junction 24	5.16	30,000 sq.m	0	0	0	0	0	0	0	0	+	0	-?	--/+	--?	0?	--?	--?	--	--?

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IIA findings for the site options 2021

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NA001: Ravenside Retail Park	3.99	21,645 sq.m	0	0	0	0	0	+	0	0	+	0	--?	++/-	--?	--?	+	++	--	--?
Mixed-use sites																				
GRC12/LP603, CFS197: Palace Gardens Shopping Centre	3.73	350	0	0	++	++	++?	0	0	0	+?/-	+	--?	++	--?	--?	+	++	0	--?
EDC2/LP1137: Edmonton Green Shopping Centre	10.00	1173	0	0	++	++/-	+?	++	0	0	+?/-	+	--?	++	--?	--?	+	++	--	--?
EHP34 (18/04935/FUL): 241 Green Street	0.45	92	0	0	+	++/-	+?	+	0	0	++?	+	--?	++	--?	0?	+	+	--	--?
PA39/LP654: Sainsburys Green Lanes	2.20	299	0	0	++	++/-	++?	0	0	0	+?/-	+	--?	++	--?	--?	+	+	--	--?
PAC8/LP656: Travis Perkins Palmers Green, Bridge Drive, Bloomfield Lane	0.62	76	0	0	+	++/-	+?	0	0	0	+?/-	+	--?	++	--?	--?	+	+	--	--?
SBC35/LP653: Sainsburys Baird Road	3.21	1041	0	0	++	++	++?	+	0	0	++?	0	--?	++/-	0	0?	+	++	0	0
SBC36/LP1104: Morrisons, Southbury Road	2.75	892	0	0	++	++	++?	0	0	0	++?	0	--?	++	0	--?	+	+	--	0
SBC4/LP1131: Southbury Road Superstore Area	1.74	291	0	0	++	++	++?	0	0	0	+?/-	+	--?	++	--?	--?	+	+	--	--?

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SBC7/LP659: Colosseum Retail Park	4.35	1587	0	0	++	++	++?	+	0	0	++?	0	--?	++	0	--?	+	++	--	0
SGC2/LP1159: Land at Ritz Parade	0.65	79	0	0	+	++	++?	0	0	0	+/-	+	--?	++	--?	--?	+	+	--	--?
SOP35 (19/01941/FUL): Southgate Office Village, 286 Chase Road	0.55	125	0	0	++	++/-	+	0	0	0	++?/-	+	--?	++	--?	--?	+	+	--	0
UPP24 (19/02718/RE3): Meridian Water Orbital Business Park (and adjoining land including Land South of Argon Road and Land Known as IKEA Clear and Gas Holder Leaside Road), 5 Argon Road	11.90	2300	0	0	++	--?	--?	+	0	0	++?	0	--?	++/-	--?	0?	--?	++	--	--?
UPP32 (16/01197/RE3): Meridian Water, Willoughby Lane and Meridian Way	8.13	725	0	0	++	++	+	+	0	0	++?	+	--?	++	--?	0?	+	++	--	--?
UPC2/LP1130: Tesco Extra, 1 Glover Drive	4.24	661	0	0	++	++/-	--?	+	0	0	++?	0	--?	++	--?	0?	+	++	--	--?
UPC1/LP1111: IKEA Meridian Water	8.43	854	0	0	++	++/-	--?	+	0	0	++?	0	--?	++	--?	0?	+	++	-	--?
CFS152: Claverings, Centre Way	2.41	587	0	0	++	++	++?	+	0	0	++?	0	--?	+	--?	0?	--?	++	--	--?
SOS11/CFS157: M&S Food	0.45	150	0	0	++	++/-	+	0	0	0	++?/-	+	--?	++	--?	--?	+	+	--	0

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CFS166: Tesco, Ponders End, 288 High Street	2.77	350	0	0	++	++	+?	+	0	0	++?	+	--?	++	0	--?	+?	+	-	--?
CFS191: Enfield Civic Centre	1.41	150	0	0	++	++	++?	0	0	0	+?/-	+	--?	++	--?	--?	--?	+	--	--?
CFS209: Asda Southgate, 130 Chase Side, Southgate	1.65	165	0	0	++	--?	+?	0	0	0	+?/-	+	--?	++	--?	--?	+?	+	-	0
CFS217: Land known as Brimsdown Sports Ground	8.08	50	0	0	+	--?/+	+?	+	0	0	+?/-	+	--?	++	--?	--?	+?	--	-	0
SA19: IKEA store; Tesco Extra, 1 Glover Drive; Meridian Water, Willoughby Lane and Meridian Way	37.00	5000	0	0	++	++/--?	+?	+	0	0	++?	+	--?	++	--?	0?	+?	++	--	--?
Other sites																				
LOC2/LP675: Picketts Lock/Lee Valley Leisure Centre	6.50	N/A	0	0	0	++	0	+	0	0	0	0	--?	+	--?	0?	--?	--	-	0
CFS161: Whitewebbs Golf Course, Beggar's Hollow	41.34	N/A	0	0	0	0	0	0	0	0	0	0	--?	0	++	0	+	0	-	0
CFS167: Alma Road Open Space	2.68	N/A	0	0	0	--?	0	0	0	0	0	0	--?	++/-	--?	0	0	0	-	--?
CFS168: Firs Farm Recreation Ground (Part)	3.67	N/A	0	0	0	--?	0	0	0	0	0	0	--?	+	--?	0?	--	--	--	--?
CFS171: Sloemans Farm	47.32	N/A	0	0	0	0	0	0	0	0	0	0	--?	++/-	--?	0	0	0	-	--?

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IIA findings for the site options 2021

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Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
CFS230: Church Street Recreation Ground	5.54	N/A	0	0	0	--?	0	0	0	0	0	0	--?	+	--?	0?	--	--	-	--?
CFS218: Tottenham Hotspur's training centre	42.25	N/A	0	0	0	++	0	0	0	0	0	0	--?	+/-	--?	-?	-?	--?	--	0

IIA objective 1: Ensure the Local Plan serves to minimise LBE's per capita CO2 emissions such that the Council will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040

Housing sites

G.3 All housing sites are expected to have negligible effects in relation to this objective. This is because the location of housing sites will not affect the achievement of this objective – effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

Industrial sites

G.4 All industrial sites are expected to have negligible effects in relation to this objective. This is because the location of industrial sites will not affect the achievement of this objective – effects will depend largely on the detailed proposal for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

Mixed use sites

G.5 All mixed use sites are expected to have negligible effects in relation to this objective. This is because the location of mixed use sites will not affect the achievement of this objective – effects will depend largely on the detailed proposal for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

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

Housing sites

G.6 All housing sites are expected to have negligible effects in relation to this objective. This is because the location of housing sites will not affect the achievement of this objective – effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

Industrial sites

G.7 All industrial sites are expected to have negligible effects in relation to this objective. This is because the location of industrial sites will not affect the achievement of this objective – effects will depend largely on the detailed proposal for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

Mixed use sites

G.8 All mixed use sites are expected to have negligible effects in relation to this objective. This is because the location of mixed use sites will not affect the achievement of this objective – effects will depend largely on the detailed proposal for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

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

Housing sites

G.9 Around two thirds of the housing site options are expected to have significant positive effects against this objective because they have the capacity to deliver more than 100 housing units. Therefore, they will contribute significantly to the total housing need. The remaining housing site options are expected to have minor positive effects in relation to this objective because they have capacity to deliver fewer than 100 housing units.

Industrial sites

G.10 The location of industrial sites is not considered likely to affect this objective; therefore the effects of all industrial site options are negligible.

Mixed use sites

G.11 Most of the mixed use sites are expected to have significant positive effects against this objective because they have capacity to deliver more than 100 housing units as part of the mixed use development. Therefore, they will contribute significantly to the total housing need. The remaining four sites are anticipated to have minor positive effects in relation to this objective because they have capacity to deliver fewer than 100 housing units.

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

Housing sites

G.12 Around 40% of the housing sites are expected to have significant positive effects in relation to this objective because they are all located within 800m of an area of open space, with some of them also located within 400m of a GP surgery. Some of the sites are also within 400m of a walking or cycle path. Development of these sites is therefore expected to help improve people's physical health and mental well-being because they will have access to open space and/or easy access to primary healthcare facilities (i.e. GP surgeries). Access to open space is particularly important in LBE as there is an identified imbalance in open space between the east and west and the COVID-19 pandemic has highlighted the importance of access to open space.

G.13 Just under one third of the housing sites are expected to have a mixed significant positive and minor negative effect in relation to this objective because although they are within 800m of an area of open space, they are not within 800m of a GP surgery. Seven of the sites are expected to have a mixed significant positive and significant negative effect in relation to this objective because although they are within 800m of an area of open space and some are also within 400m of a GP surgery, they contain a walking or cycle path which could be lost as a result of development, although this is uncertain. Two of these sites also contain an area of open space, which could be lost as a result of development: (1) Arnos Park Metropolitan Open Land which is within site SGC4/LP608_2: Arnos Grove Station Car Park; and (2) a number of areas of Amenity Green Space within site UPM1: Joyce Avenue and Snells Park Estate.

G.14 One of the site options, POC6/LP1196: Land at former Wessex Hall Building, is expected to have a mixed significant negative and minor positive effect against this objective because although it is within 400-800m of a GP surgery, it partially overlaps Durants Park Metropolitan Open Land and so this area could be lost to new development, although this is uncertain. Two sites are expected to have minor positive effects in relation to this objective because they are within 400-800m of a GP surgery and 800m of an area of open space but are not within 400m of a walking or cycling path. Four sites are expected to have a mixed minor positive and minor negative effect because they are either within 800m of open space or within 400m of a walking or cycle path but are not within 800m of a GP surgery.

Industrial sites

G.15 The location of industrial sites is not considered likely to affect this objective; therefore the effects for all industrial site options are negligible.

Mixed use sites

G.16 Just under half of the mixed use sites are expected to have significant positive effects in relation to this objective because they are all located within 800m of an area of open space, with some of them also located within 400m of a GP surgery, and a walking or cycle path. Development of these sites is therefore expected to help improve people's physical health and mental wellbeing because they will have access to open space and/or easy access to primary healthcare facilities. One quarter of the sites are expected to have mixed significant positive and minor negative effects in relation to this objective because they are within 800m of an area of open space but are not within 800m of a GP surgery. Just one site, CFS217: Land known as Brimsdown Sports Ground, has a potential but uncertain mixed significant negative and minor positive effect against this objective because it contains a walking path that could be lost as a result of new development. However, the site is located within 400-800m of a GP surgery.

G.17 Four of the mixed use sites have potential but uncertain mixed significant positive and significant negative effects in relation to this objective: (1) EDC2/LP1137: Edmonton Green Shopping Centre; (2) PA39/LP654: Sainsburys Green Lanes; (3) PAC8/LP656: Travis Perkins Palmers Green, Bridge Drive, Bloomfield Lane; and (4) SA19: IKEA store; Tesco Extra, 1 Glover Drive; Meridian Water, Willoughby Lane and Meridian Way. One of these sites (EDC2/LP1137: Edmonton Green Shopping

Centre) contains a walking path that could be lost as a result of development, whilst the other three contain cycling paths that could be lost as a result of development. However, all three mixed use site options fall within 400m of a GP surgery. These effects are recorded as uncertain because it is unknown whether these walking and cycling paths will definitely be lost as a result of development or not. Just two mixed use sites have potential but uncertain significant negative effects against this objective because they contain a walking or cycle path: (1) UPP24 (19/02718/RE3): Meridian Water Orbital Business Park, 5 Argon Road; and (2) CFS209: Asda Southgate.

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

Housing sites

G.18 Around two fifths of the housing site options could have significant positive effects in relation to this objective (although these are uncertain) because they are within 800m of an existing primary school and an existing secondary school. Development of these sites is therefore expected to improve people's access to education facilities which will support raising attainment and the development of a skilled workforce within the Borough. A similar number of the housing site options could have minor positive effects in relation to this objective (although these effects are again uncertain) because they are within 800m of either one existing primary school or one existing secondary school, but not both. All effects are recorded as uncertain because it is unknown whether the schools in question will have capacity to accommodate new pupils or not. The remaining housing site options may have minor negative effects in relation to this objective as they do not fall within 800m of a primary school or a secondary school. These effects are also recorded as uncertain because new residential development could potentially stimulate the provision of new schools/school places.

Industrial Sites

G.19 The location of industrial sites is not considered likely to affect this objective; therefore the effects for all industrial site options are negligible.

Mixed use sites

G.20 Around two fifths of the mixed use site options could have significant positive effects in relation to this objective because they are within 800m of an existing primary school and an existing secondary school. Development of these sites is therefore expected to improve people's access to education facilities which will support raising attainment and the development of a skilled workforce within the Borough. Just under half of the mixed use site options could have minor positive effects in relation to this objective because they are within 800m of either one existing primary school or one existing secondary school, but not both. As with the housing site options, all effects are recorded as uncertain because it is unknown whether the schools in question will have capacity to accommodate new pupils or not. The remaining mixed use site options could have minor negative effects in relation to this objective as they do not fall within 800m of a primary school or a secondary school. These effects are recorded as uncertain because new residential development as part of mixed use sites could potentially stimulate the provision of new schools/school places.

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

Housing sites

G.21 Only nine housing site options are expected to have minor positive effects in relation to this objective because they partially or entirely fall within one of the 20% most deprived areas in England. Although LBE contains ten Lower-Layer Super Output Areas (LSOAs) that fall within the 10% most deprived areas in England, none of the housing site options fall within them. Site options that fall within the most deprived areas of the Borough could help regenerate those areas through development and the delivery of supporting infrastructure. The remaining site options are expected to have negligible effects in relation to this objective as they do not fall within the 10% or 20% most deprived areas in England.

Industrial sites

G.22 Over half of the industrial sites are expected to have minor positive effects in relation to this objective because they are partially or entirely located within one of the 20% most deprived areas in England. Development of these sites would help to

regenerate the surrounding areas through the delivery of supporting infrastructure. Although LBE contains ten Lower-Layer Super Output Areas (LSOAs) that fall within the 10% most deprived areas in England, none of the industrial site options fall within them. The remaining industrial site options are expected to have negligible effects in relation to this objective as they do not fall within the 10% or 20% most deprived areas in England.

Mixed use sites

G.23 Just one mixed use site, EDC2/LP1137: Edmonton Green Shopping Centre, is expected to have a significant positive effect in relation to this objective because it is entirely located within one of the 10% most deprived areas in the Borough. Site options that fall within the most deprived areas of the Borough will help regenerate those areas through development and the delivery of supporting infrastructure. Just over half of the mixed use site options are expected to have minor positive effects in relation to this objective because they are partially or entirely located within one of the 20% most deprived areas within the Borough. The remaining sites are expected to have negligible effects in relation to this objective as they do not fall within the 10% or 20% most deprived areas in the England.

IIA objective 7: Reduce crime and increase community safety

Housing sites

G.24 All of the housing site options are expected to have negligible effects in relation to this objective. This is because the location of housing sites will not affect the achievement of this objective – effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

Industrial sites

G.25 All of the industrial site options are expected to have negligible effects in relation to this objective. This is because the location of industrial sites will not affect the achievement of this objective – effects will depend largely on the detailed proposal for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

Mixed use sites

G.26 All of the mixed use site options are expected to have negligible effects in relation to this objective. This is because the location of mixed use sites will not affect the achievement of this objective – effects will depend largely on the detailed proposal for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

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

Housing sites

G.27 All of the housing site options are expected to have negligible effects in relation to this objective. This is because the location of housing sites will not affect the achievement of this objective – effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

Industrial sites

G.28 All of the industrial site options are expected to have negligible effects in relation to this objective. This is because the location of industrial sites will not affect the achievement of this objective – effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

Mixed use sites

G.29 All of the mixed use site options are expected to have negligible effects in relation to this objective. This is because the location of mixed use sites will not affect the achievement of this objective – effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage.

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

Housing sites

G.30 Five of the housing site options are anticipated to have significant positive effects in relation to this objective as they are adjacent or close to (i.e. within 100m of) at least one Locally Significant Industrial Site. Therefore, these five sites provide easy access to job opportunities. The remaining site options are expected to have minor negative effects in relation to this objective because they are not adjacent or close to Strategic Industrial Locations or Locally Significant Industrial Sites. Development of these sites would therefore not provide good access to employment opportunities for local people, which could slow LBE's economic recovery from the COVID-19 pandemic.

Industrial sites

G.31 One of the industrial sites, ELC3/LP606: Land West of Ramney Marsh, is expected to have a significant positive effect in relation to this objective because it falls into the 'large sites' category (sites that are 10ha or larger). Development of this site would result in the creation of a significant number of new job opportunities, which would support the population growth that is being planned for within the Local Plan. The remaining industrial sites are expected to have minor positive effects in relation to the objective because they fall into the 'small sites' category (sites that are under 10ha) and so would provide a smaller number of new jobs.

Mixed use sites

G.32 Half of the mixed use site options could have significant positive effects in relation to this objective because they are next to Strategic Industrial Locations and/or Locally Significant Industrial Sites and would therefore provide easy access to employment opportunities. Two of these sites, UPC1/LP1111: IKEA Meridian Water and SA19: Meridian Water area, are also over 10ha in size and would therefore contribute significantly towards new employment opportunities. All of these effects are recorded as uncertain because it is unknown what proportion of each mixed use site would comprise employment development. The remaining sites, with the exception of SGC2/LP1159: Land at Ritz Parade, are expected to have mixed minor positive and minor negative effects in relation to this objective because they will contribute towards employment development (although are under 10ha in size) but are not located adjacent or close to Strategic Industrial Locations or Locally Significant Industrial Sites. Site SGC2/LP1159: Land at Ritz Parade is expected to have a mixed minor positive and minor negative effect with no uncertainty because it re-provides existing retail uses on site.

IIA objective 10: Support the vitality of the Borough's town and local centres

Housing sites

G.33 Just under half of the housing site options are anticipated to have minor positive effects in relation to this objective as they are within or adjacent to a Major, District or Local Centre. New development located within or next to these centres will contribute to their vitality through an increase in footfall, whilst also encouraging the retention and expansion of town and local centre commercial and retail uses. The remaining site options are expected to have negligible effects in relation to the objective because they are not within or adjacent to a Major, District or Local Centre.

Industrial sites

G.34 All of the industrial site options are expected to have negligible effects in relation to this objective because they are not within or adjacent to a Major, District or Local Centre.

Mixed use sites

G.35 Around two thirds of the mixed use site options are expected to have minor positive effects in relation to this objective as they are within or adjacent to a Major, District or Local Centre. New development located within these centres will contribute to their vitality through an increase in footfall, whilst also encouraging the retention and expansion of town and local centre commercial and retail uses. The remaining mixed use site options are expected to have negligible effects in relation to this objective because they are not within or adjacent to a Major, District or Local Centre.

IIA objective 11: Minimise air pollution

Housing sites

G.36 Around two fifths of the housing site options are expected to have significant negative effects in relation to this objective because they scored 2 in the air quality appraisal. The remaining housing site options are expected to have minor negative effects in relation to this objective because they scored 1 in the air quality appraisal. The air quality appraisal gave consideration to the estimated housing capacity of each of the housing site options and proximity to Air Quality Focus Areas (AQFAs)¹, in order to determine the potential future impact on the air quality of each site. The effects are recorded as uncertain because the air quality appraisal does not take into account measures that will improve future air quality, such as the expansion of the Ultra-low Emissions Zone to the North Circular Road in 2021 or the petrol and diesel car ban in 2030.

Industrial sites

G.37 Two fifths of industrial site options are expected to have significant negative effects in relation to this objective because they scored 2 in the air quality appraisal, whilst another two fifths of industrial site options are expected to have minor negative effects in relation to this objective because they scored 1 in the air quality appraisal. The air quality appraisal gave consideration to the area of each industrial site option and proximity to Air Quality Focus Areas (AQFAs), in order to determine the potential future impact on the air quality of each site. The effects are recorded as uncertain because the air quality appraisal does not take into account measures that will improve future air quality, such as the expansion of the Ultra-low Emissions Zone to the North Circular Road in 2021 or the petrol and diesel car ban in 2030. The remaining industrial sites are expected to have negligible effects in relation to this objective because they scored 0 in the air quality appraisal.

Mixed use sites

G.38 Around 85% of mixed use site options are expected to have a significant negative effect in relation to this objective because they scored 2 in the air quality appraisal. The remaining mixed use sites are expected to have a minor negative effect in relation to this objective because they scored 1 in the air quality appraisal. The air quality appraisal gave consideration to the estimated housing capacity of each of the mixed use site options and proximity to Air Quality Focus Areas (AQFAs), in order to determine the potential future impact on the air quality of each site. The effects are recorded as uncertain because the air quality appraisal does not take into account measures that will improve future air quality, such as the expansion of the Ultra-low Emissions Zone to the North Circular Road in 2021 or the petrol and diesel car ban in 2030.

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

Housing sites

G.39 Just over half of the housing site options are expected to have significant positive effects in relation to this objective because they are within 1km of a railway/tube station and 350m of at least one bus stop, and some of them fall within 200m of a Major, District or Local Centre. Development of these sites that are near to sustainable transport links will therefore help support a modal shift away from the private car. Just under one third of the housing site options are expected to have mixed significant positive and significant negative effects in relation to this objective, because although they are within 1km of a railway/tube station and 350m of a bus stop, they are more than 800m from a Major, District or Local Centre.

G.40 Four of the housing site options are anticipated to have mixed significant positive and minor negative effects in relation to this objective because, although they are all within 1km of a railway/tube station and 350m of at least one bus stop, they are

¹ An AQFA is a location that has been identified as having high levels of pollution and human exposure.

within 401-800m of a Major, District or Local Centre. A further two housing site options are anticipated to have mixed significant negative and minor positive effects against this objective because they are more than 800m from a Major, District or Local Centre but are within 1km of a railway station. Finally, one site, CHC14/LP637: Land north of Goat Lane, is expected to have a minor negative effect in relation to this objective because it is within 401-800m of a Local Centre, more than 1km from a railway/tube station and 350m from a bus stop with no existing cycle route passing the site.

Industrial sites

G.41 Just two industrial site options, CFS151: Crown Road Lorry Park and CFS153: Montagu Ind Estate are expected to have significant positive effects in relation to this objective as they are within 1km of a railway/tube station and 350m of a bus stop. Site CFS151 is also within 200m of a Local Centre. Development of these sites near sustainable transport links will therefore help support a modal shift away from the private car. Over half of the industrial site options are expected to have mixed significant positive and minor negative effects in relation to this objective because they are located within 1km of a railway station and 350m of at least one bus stop but are only within 401-800m of a Major, District or Local Centre. Just one site, CFS155: Land East of Junction 24, will have a mixed significant negative and minor positive effect as the site is more than 800m from a Major, District and Local Centre, but is within 350m of at least one bus stop. One site, CFS132: Land at 135 Theobalds Park Road, is expected to have a mixed significant positive and significant negative effect in relation to this objective because it is within 1km of a railway station and 350m of at least one bus stop, but is more than 800m from a Major, District and Local Centre.

Mixed Use

G.42 Over 80% of the mixed use site options are expected to have significant positive effects in relation to IIA12: Sustainable transport because they are within 1km of a railway/tube station and 350m of at least one bus stop. Development of these sites near to sustainable transport links will therefore help support a modal shift away from the private car. Just one site option, CFS152: Claverings, Centre Way, is expected to have a minor positive effect in relation to this objective because it is within 350m of a bus stop and 201-400m of a Local Centre. Similarly, just one site, SBC35/LP653: Sainsbury's Baird Road is expected to have a mixed significant positive and minor negative effect as it is within 1km of a railway station and 350m of a bus stop but is only within 401-800m of a Local Centre. Finally, one site, UPP24 (19/02718/RE3): Meridian Water Orbital Business Park, 5 Argon Road, is anticipated to have a mixed significant positive and significant negative effect in relation to this objective because it is within 1km of a railway station and 350m of at least one bus stop, but is more than 800m from a Major, District and Local Centre.

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

Housing sites

G.43 Over three quarters of the housing site options could have significant negative effects against this objective because they fall within 250m of one or more Sites of Special Scientific Interest or Sites of Importance for Nature Conservation and/or within 100m of a Priority Habitat or Ancient Woodland. Six of the residential site options contain a Priority Habitat: (1); COC9a and COC9b/LP608_1: Cockfosters Station Car Park (2); HIC10/LP642: Land opposite Jolly Farmers; (3) HIC11/LP707: Vicarage Farm, Land between Hadley Road and Enfield Road; (4) CFS162_B: Land to the Rear of Arnold House (East); (5) CFS162_C: Arnold House; and (6) SA29: Arnold House. Development of these sites will therefore place increased stress on the designated and non-designated biodiversity assets within the Borough which are already experiencing pressure from recreational use, as well as poor air quality. Eight of the housing site options could have minor negative effects against this objective, as they fall within 250-750m of a Sites of Special Scientific Interest or Sites of Importance for Nature Conservation and/or within 750m of a Local Nature Reserve, as well as 100-250m from a Priority Habitat or Ancient Woodland. All effects are recorded as uncertain because appropriate mitigation may avoid adverse effects and may even result in beneficial effects. The remaining site options, namely LOC1/LP1108: Chiswick Road Estate (Oswald and Newdales) and CFS207: Albany Leisure Centre and Car Park, 55 Albany Road, are expected to have negligible effects in relation to this objective because they do not fall within 750m of any of these biodiversity assets.

Industrial sites

G.44 Almost all of the industrial site options could have significant negative effects in relation to this objective because they fall within 250m of one or more Sites of Special Scientific Interest or Sites of Importance for Nature Conservation and/or within 100m of a Priority Habitat or Ancient Woodland. One of the industrial sites, ELC3/LP606: Ramney Marsh Mollison Avenue, contains a Priority Habitat. Development of these sites will therefore place increased stress on the designated and non-designated biodiversity assets within the Borough which are already experiencing pressure from recreational use, as well as poor air quality. The effects are uncertain because appropriate mitigation may avoid adverse effects and may even result in beneficial effects. The remaining site, CFS151: Crown Road Lorry Park is expected to have a negligible effect in relation to this objective because it does not fall within close proximity of a biodiversity asset.

Mixed use sites

G.45 Around two fifths of mixed use site options could have significant negative effects in relation to this objective because they fall within 250m of one or more Sites of Special Scientific Interest or Sites of Importance for Nature Conservation and/or within 100m of a Priority Habitat or Ancient Woodland. Three of the mixed use sites contain a Priority Habitat: (1) PA39/LP654: Sainsburys Green Lanes; (2) UPP32 (16/01197/RE3): Meridian Water; and (3) SA19: Meridian Water area. A further eight mixed use site options could have minor negative effects in relation to this objective because they fall within 250-750m of a Sites of Special Scientific Interest or Sites of Importance for Nature Conservation and/or within 750m of a Local Nature Reserve, as well as 100-250m from a Priority Habitat or Ancient Woodland. Development of these sites will therefore place increased stress on the designated and non-designated biodiversity assets within the Borough which are already experiencing pressure from recreational use, as well as poor air quality. The remaining sites are expected to have negligible effects in relation to this objective because they do not fall within 750m of any of these biodiversity assets.

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

Housing sites

G.46 Just over two fifths of the housing site options could have significant negative but uncertain effects against this objective because they have the potential to cause harm to heritage assets where it is unlikely that these can be adequately mitigated. Development of these sites will therefore place increased pressure on the LBE's rich variety of designated heritage assets which are already under stress from inappropriate development and activity affecting their setting and context. Another two fifths of housing site options could have minor negative but uncertain effects against this objective because they have the potential to cause harm to heritage assets, but this harm could potentially be mitigated. The remaining housing site options could have negligible but uncertain effects in relation to this objective as they are more than 500m from the nearest designated heritage asset but there is still some potential for impacts on non-designated heritage features and effects may extend beyond 500m in some cases.

Industrial sites

G.47 Three industrial site options, ELC3/LP606: Ramney Marsh Mollison Avenue, POC5/LP694/CFS135: Car Park Site and CFS153: Montagu Industrial Estate could have significant negative but uncertain effects against this objective because they have the potential to cause harm to heritage assets where it is unlikely that these can be adequately mitigated. Less than half of the industrial site options could have minor negative but uncertain effects in relation to this objective as they have the potential to cause harm to heritage assets, but this harm can potentially be mitigated. Development of these sites would therefore place increased pressure on the LBE's rich variety of designated heritage assets which are already under stress from inappropriate development and activity affecting their setting and context. The remaining three site options could have negligible but uncertain effects in relation to this objective as they are more than 500m from the nearest designated heritage asset but there is still some potential for impacts on non-designated heritage features and effects may extend beyond 500m in some cases.

Mixed use sites

G.48 Two fifths of mixed use site options could have significant negative but uncertain effects in relation to this objective because they have the potential to cause harm to heritage assets where it is unlikely that these can be adequately mitigated. Development of these sites will therefore place increased pressure on the LBE's rich variety of designated heritage assets which are already under stress from inappropriate development and activity affecting their setting and context. Approximately one

quarter of site options could have minor negative but uncertain effects in relation to this objective because they have the potential to cause harm to heritage assets, but this harm could potentially be mitigated. The remaining eight sites could have negligible effects in relation to this objective as they are more than 500m from the nearest designated heritage asset but there is still some potential for impacts on non-designated heritage features and effects may extend beyond 500m in some cases.

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

Housing sites

G.49 Just under two thirds of the housing site options could have minor positive but uncertain effects in relation to this objective because they are located within a settlement and contain built development. Development of these sites is therefore expected to help improve the quality of the landscape and/or townscape within LBE, including designated landscapes and extensive semi-rural landscape character areas, all of which need to be protected. Just over one fifth of the housing site options could have minor negative but uncertain effects in relation to this objective because they are either located within a settlement but do not contain built development, are not large in scale (i.e. <3ha), located on the edge of a settlement or within a relatively undeveloped area. Five of the housing site options could have significant negative but uncertain effects in relation to this objective because they are large in scale (i.e. >=3ha), located on the edge of a settlement or within a relatively undeveloped area. Three site options could have significant negative effects against this objective because they contain open space, including Metropolitan Open Land and/or Green Chains: (1) Durants Park Metropolitan Open Land in site POC6/LP1196: Land at former Wessex Hall Building; (2) Arnos Park Metropolitan Open Land in site SGC4/LP608_2: Arnos Grove Station Car Park; and (3) a number of areas of Amenity Green Space within site UPM1: Joyce Avenue and Snells Park Estate. Only one of the site options, SA27: Land at Crews Hill, is expected to have a mixed significant negative and minor positive effect in relation to this objective. This is because it is large in scale and although it is partially located within the settlement of Crews Hill and contains built development, it is also partially located in an undeveloped area.

Industrial sites

G.50 Around two thirds of industrial site options could have minor positive effects in relation to this objective because they are located within a settlement and contain built development. Two industrial site options, POC5/LP694/CFS135: Car Park Site, Wharf Road and CFS136: 6 Morson Road, could have minor negative effects against this objective because although they are not large in scale (i.e. <3ha), they are located on the edge of Ponders End. The remaining site option, CFS155: Land East of Junction 24, is expected to have a significant negative effect against this objective because it is large in scale (>=3ha) and located in an undeveloped area. In all cases, effects in relation to this objective are uncertain as the potential for negative or positive effects on landscape will depend on the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features.

Mixed use sites

G.51 Just under 90% of the mixed use site options could have minor positive effects in relation to this objective because they are located within a settlement and contain built development. Development of these sites is therefore expected to help improve the quality of the landscape and/or townscape within LBE, including designated landscapes and extensive semi-rural landscape character areas, all of which need to be protected. Just one site option could have a significant negative effect in relation to this objective: UPP24 (19/02718/RE3): Meridian Water Orbital Business Park, 5 Argon Road. This is because the site is large in scale (i.e. >=3ha) and located on the edge of Upper Edmonton. The two remaining sites, CFS152: Claverings, Centre Way and CFS191: Enfield Civic Centre, are expected to have minor negative effects in relation to this objective because they are not large in scale but located on the edge of settlements. In all cases, effects in relation to this objective are uncertain as the potential for negative or positive effects on landscape will depend on the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features.

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

Housing sites

G.52 Four of the housing site options are expected to have significant positive effects in relation to this objective because they are relatively large in size (i.e. >=3ha) and on brownfield land. Just under three quarters of the housing site options are

anticipated to have minor positive effects in relation to the objective because they are relatively small in size (i.e. <3ha) and on brownfield land. Therefore, development of these sites would be an efficient use of previously developed land. However, nine housing site options are anticipated to have significant negative effects in relation to this objective as they are relatively large in size (i.e. >=3ha) and on greenfield land, which is not an efficient use of land. The effects are recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land (Grade 3a is considered to be high quality, while Grade 3b is not). Just one housing site option, CFS162_B: Land to the Rear of Arnold House (East), is expected to have a minor negative effect as it is relatively small in size (i.e. <3ha) but is on greenfield land. One housing site option, SA27: Land at Crews Hill, is expected to have a mixed significant positive and significant negative effect in relation to this objective, as it is relatively large in size and is located on Grade 3 agricultural quality greenfield land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.

Industrial sites

G.53 Half of the industrial site options are expected to have significant positive effects in relation to this objective because they are relatively large in size (i.e. >=3ha) and on brownfield land. Four of the industrial site options are expected to have minor positive effects in relation to this objective because they are relatively small in size (i.e. <3ha) and on brownfield land; therefore development of these sites would be an efficient use of previously developed land. Just one industrial site option, CFS155: Land East of Junction 24, is expected to have a significant negative effect against this objective because it is on greenfield land classed as Grade 3. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land (Grade 3a is considered to be high quality, while Grade 3b is not).

Mixed use sites

G.54 Less than half of the mixed use site options are expected to have significant positive effects in relation to this objective because they are relatively large in size (i.e. >=3ha) and on brownfield land. Half of the sites are expected to have minor positive effects against this objective because they are relatively small in size (i.e. <3ha) and on brownfield land. However, one site, CFS217: Land known as Brimsdown Sports Ground, is expected to have a significant negative effect in relation to this objective as it is relatively large in size (i.e. >=3ha) and on greenfield land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land (Grade 3a is considered to be high quality, while Grade 3b is not).

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

Housing sites

G.55 Just over two thirds of housing site options are expected to have significant negative effects in relation to this objective because they have a predicted peak flood depth of greater than 300mm. About one fifth of the housing site options are expected to have minor negative effects in relation to this objective because they partially fall within Flood Zone 3, mainly fall within Flood Zone 2 or have a predicted peak flood depth of greater than 150mm, with some site options also located on greenfield land. The remaining five housing site options are expected to have negligible effects against this objective because they are on brownfield land, do not fall within Flood Zones 2 or 3 and are not at risk of surface water flooding.

Industrial sites

G.56 Almost all of the industrial site options are expected to have significant negative effects against this objective because they either fall mainly within Flood Zone 3 or have a predicted peak flood depth of greater than 300mm. Only one of the industrial site options, CFS136: 6 Morson Road, is expected to have a minor negative effect in relation to this objective because it partially falls within Flood Zone 3.

Mixed use sites

G.57 About three quarters of the mixed use site options are expected to have significant negative effects in relation to this objective because they either partially fall within Flood Zone 3 or have a predicted peak flood depth of greater than 300mm. The remaining two mixed use site options, namely GRC12/LP603, CFS197: Palace Gardens Shopping Centre and SBC35/LP653: Sainsburys Baird Road, are expected to have negligible effects against this objective because they are on brownfield land, do not fall within Flood Zones 2 or 3, and are not at risk of surface water flooding.

IIA objective 18: Minimise water use and protect water quality

Housing sites

G.58 Half of the housing site options could have significant negative but uncertain effects in relation to this objective because they contain a watercourse, water body or fall within Source Protection Zones 1 or 2². Development of these sites may therefore exacerbate water quality issues that currently impact the Borough, such as not meeting the Water Framework Directive (WFD) required ecological status of 'Good'. The remaining half of the housing site options are expected to have negligible effects in relation to this objective as they do not contain a watercourse, water body or fall within a Source Protection Zone.

Industrial sites

G.59 Four fifths of the industrial site options could have significant negative but uncertain effects in relation to this objective because they contain a watercourse, water body or fall within Source Protection Zones 1 or 2. Development of these sites may therefore exacerbate water quality issues that currently impact the Borough, such as not meeting the WFD required ecological status of 'Good'. The remaining two industrial sites, CFS132: Land at 135 Theobalds Park Road and CFS151: Crown Road Lorry Park are expected to have negligible effects in relation to this objective as they do not contain a watercourse, water body or fall within a Source Protection Zone.

Mixed use sites

G.60 Just under three quarters of the mixed use site options could have significant negative but effects in relation to this objective because they contain a watercourse, water body or fall within Source Protection Zones 1 or 2. Development of these sites may therefore exacerbate water quality issues that currently impact the Borough, such as not meeting the WFD required ecological status of 'Good'. The remaining mixed use site options are expected to have negligible effects in relation to this objective as they do not contain a watercourse, water body or fall within a Source Protection Zone.

Other sites

G.61 There are seven 'Other' sites and their uses are as follows:

- **LOC2/LP675: Picketts Lock/Lee Valley Leisure Centre:** leisure uses site.
- **CFS161: Whitewebbs Golf Course, Beggar's Hollow:** nature recovery site.
- **CFS167: Alma Road Open Space:** cemetery.
- **CFS168: Firs Farm Recreation Ground (Part):** crematorium.
- **CFS171: Sloemans Farm:** natural burial site.
- **CFS230: Church Street Recreation Ground:** crematorium.
- **CFS218: Land at and within the vicinity of Tottenham Hotspur Football Club Training Ground:** sport and recreation site.

G.62 Two of these sites, LOC2/LP675: Picketts Lock/Lee Valley Leisure Centre and CFS218: Tottenham Hotspur's training centre, are expected to have significant positive effects in relation to **IIA4: Health and wellbeing** because the development of a leisure uses and sport and recreation site, respectively, would have beneficial effects on people's health and wellbeing. Three of the sites are expected to have significant negative effects in relation to this objective as they contain an area of open space that could be lost to the proposed site use: (1) Durants Park Metropolitan Open Land at site CFS167: Alma Road Open Space; (2) Firs Farm & Clowes Sportsgrounds Metropolitan Open Land at site CFS168: Firs Farm Recreation Ground (Part); and (3) Church Street Recreation Ground Metropolitan Open Land at site CFS230: Church Street Recreation Ground.

G.63 Three of these sites, (1) CFS168: Firs Farm Recreation Ground (Part); (2) CFS230: Church Street Recreation Ground; and (3) CFS218: Tottenham Hotspur's training centre, are expected to have a significant negative effect in relation to **IIA11: Air pollution** because they scored 2 in the air quality appraisal. The remaining four sites are expected to have minor negative

² Source Protection Zone 3 is present within LBE.

effects against this objective because they scored 1 in the air quality appraisal. The air quality appraisal gave consideration to the area of each site and proximity to Air Quality Focus Areas (AQFAs), in order to determine the potential future impact on the air quality of each site. The effects are recorded as uncertain because the air quality appraisal does not take into account measures that will improve future air quality, such as the expansion of the Ultra-low Emissions Zone to the North Circular Road in 2021 or the petrol and diesel car ban in 2030.

G.64 Site CFS171: Sloemans Farm is expected to have a mixed significant positive and significant negative effect in relation to **IIA12: Sustainable transport** because although it is within 1km of a railway station and 350m of at least one bus stop, it is more than 800m from a Major, District and Local Centre. Site CFS167: Alma Road Open Space is expected to have a mixed significant positive and minor negative effect against this objective because it is located within 1km of a railway station and 350m of at least one bus stop but is only within 401-800m of a Local Centre. Site CFS218: Tottenham Hotspur's training centre is expected to have a mixed minor positive and minor negative effect in relation to this objective because it is within 1km of a railway station but not within 350m of a bus stop and only within 401-800m of a Local Centre. Three of the sites are expected to have minor positive effects in relation to IIA12 because they are all within 350m of at least one bus stop and 201-400m of a Local Centre. One site, CFS161: Whitewebbs Golf Course, Beggar's Hollow, is expected to have a negligible effect against this objective because the development of a nature recovery site will not affect the achievement of this objective.

G.65 All but one of the sites could have significant negative effects in relation to **IIA13: Biodiversity** because they are within 250m of one or more Sites of Special Scientific Interest or Sites of Importance for Nature Conservation and/or less than 100m from a Priority Habitat or Ancient Woodland. Three of the sites contain a Priority Habitat: (1) CFS171: Sloemans Farm; (2) CFS230: Church Street Recreation Ground; and (3) CFS218: Tottenham Hotspur's training centre. The effects are recorded as uncertain because appropriate mitigation may avoid any adverse effects and may even result in beneficial effects. Site CFS161: Whitewebbs Golf Course is expected to have a significant positive effect in relation to this objective because it is proposed as a nature recovery site and would therefore have beneficial effects on biodiversity.

G.66 Site CFS218: Tottenham Hotspur's training centre could have a minor negative but uncertain effect in relation to **IIA14: Historic environment** because over half of the site falls within Forty Hill Conservation Area, which contains a number of listed buildings, as well as Myddelton House Registered Park and Garden which falls partially within the site. Due to the fact this site is allocated as a sport and recreation site, future development could potentially take place with an adverse effect on the historic environment. Three of the sites could have negligible but uncertain effects in relation to this objective because although they are more than 500m from a designated heritage asset, they may have some potential for impacts on non-designated heritage features and effects may extend beyond the 500m distance threshold. The remaining sites are expected to have negligible effects against this objective as their development would not affect the achievement of this objective.

G.67 Two of the sites are expected to have significant negative effects against **IIA15: Landscape and townscape**, whilst one of the sites could have a significant negative effect but this is uncertain. The two sites that are expected to have significant negative effects against this objective contain an area of open space, that could be lost as a result of development: (1) Firs Farm & Clowes Sportsgrounds Metropolitan Open Land at site CFS168: Firs Farm Recreation Ground (Part); and (2) Church Street Recreation Ground Metropolitan Open Land at site CFS230: Church Street Recreation Ground. Although site CFS167: Alma Road Open Space also contains an open space, the development of a cemetery is not considered to have an adverse effect on the landscape. Site LOC2/LP675: Picketts Lock/Lee Valley Leisure Centre is expected to have a significant negative but uncertain effect against this objective because it is large in scale and located on the edge of Lower Edmonton. Therefore, the potential future development of this site could result in an adverse effect on the landscape. Site CFS161: Whitewebbs Golf Course is expected to have a minor positive effect in relation to this objective because the development of a nature recovery site is expected to have beneficial effects on the landscape. Site CFS218: Tottenham Hotspur's training centre is expected to have a minor negative but uncertain effect in relation to this objective because it is large in scale and located in a relatively undeveloped area. Due to the fact the site is allocated as a sport and recreation site which could contain built development in the future, its development could affect the landscape.

G.68 Three of the sites are expected to have significant negative effects in relation to **IIA16: Efficient use of land and materials** because they are relatively large and on greenfield land, classed as Urban land. Therefore, if development were to take place on these sites, it would not be an efficient use of previously developed land. One of the sites could have a significant negative effect in relation to this objective because it is relatively large and on greenfield land which is classed as Grade 3 agricultural land. This effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.

G.69 Two of the sites, CFS168: Firs Farm Recreation Ground (Part) and CFS218: Tottenham Hotspur's training centre, are expected to have significant negative effects in relation to **IIA17: Flooding** because they both have a predicted peak flood depth of greater than 300mm. The remaining five site options are expected to have minor negative effects in relation to IIA17 because they partially within Flood Zone 3, have a predicted peak flood depth of greater than 150m and are on greenfield land. Four of the sites could have significant negative effects in relation to **IIA18: Water** because they contain a watercourse, water body or fall within Source Protection Zones 1 or 2.

G.70 All eight sites are expected to have negligible effects against the remaining IIA objectives.

Allocated Site Appraisal Matrices

Enfield Town (SP PL1)

SA1: St Anne's Catholic High School for Girls (housing site) – formerly referred to as GRC1/LP1105, LP652, CFS040 and CFS060

IIA objective	SA1 (without mitigation)	Justification text	SA1 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, Bush Hill Park and the New River Green Chain, in addition to falling within 400m of a walking and cycle path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, Bush Hill Park and the New River Green Chain, in addition to falling within 400m of a walking and cycle path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Enfield Town Major Centre.	+	Site is adjacent to Enfield Town Major Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.

IIA objective	SA1 (without mitigation)	Justification text	SA1 (with mitigation)	Justification text
IIA12: Sustainable transport	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also next to Enfield Town Major Centre and within 200m of Lincoln Court, London Road Local Centre.	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also next to Enfield Town Major Centre and within 200m of Lincoln Court, London Road Local Centre.
IIA13: Biodiversity	--?	Site is located within 250m from Enfield Loop of the New River SINC and the New River SINC.	--?	Site is located within 250m from Enfield Loop of the New River SINC and the New River SINC.
IIA14: Historic environment	--?	Site is adjacent to Enfield Town Conservation Area and is within 500m of two Grade II* listed buildings (Church of St Andrew Enfield Parish Church and North east Building of Enfield Grammar School) and a number of Grade II listed buildings. Due to the fact the site is adjacent to Enfield Town Conservation Area, its development could affect the setting of the heritage asset.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Town and contains built development.	+?	Site is located within the settlement of Enfield Town and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zones 2 and its northern eastern boundary falls within Source Protection Zone 1.	--?	Site falls within Source Protection Zones 2 and its northern eastern boundary falls within Source Protection Zone 1.

SA2: Palace Gardens Shopping Centre (mixed-use site) – formerly referred to as GRC12/LP603 and CFS197

IIA objective	SA2 (without mitigation)	Justification text	SA2 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Town Park, Bush Hill Park, and the New River Green Chain Corridor, in addition to falling within 400m of a walking path and a cycle path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Town Park, Bush Hill Park, and the New River Green Chain Corridor, in addition to falling within 400m of a walking path and a cycle path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of town centre and commercial floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of town centre and commercial floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Enfield Town Major Centre.	+	Site is within Enfield Town Major Centre.

IIA objective	SA2 (without mitigation)	Justification text	SA2 (with mitigation)	Justification text
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.
IIA13: Biodiversity	--?	Site is located within 250m from Enfield Loop SINC.	--?	Site is located within 250m from Enfield Loop SINC.
IIA14: Historic environment	--?	Site is within Enfield Town Conservation Area and within 500m of three Grade II* listed buildings (Clarendon Cottage, north east building of Enfield Grammar School, and Church of St Andrew Enfield Parish Church) and of a number of Grade II listed buildings. Although the site contains built development, its redevelopment could affect the setting of the Conservation Area and listed buildings.	--?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Town and contains built development.	+?	Site is located within the settlement of Enfield Town and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.
IIA18: Water	--?	Site falls within Source Protection Zone 2.	--?	Site falls within Source Protection Zone 2.

SA3: 100 Church Street (housing site) – formerly referred to as GRC3/LP1117

IIA objective	SA3 (without mitigation)	Justification text	SA3 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA3 (without mitigation)	Justification text	SA3 (with mitigation)	Justification text
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Chase Green, Town Park, Bush Hill Park, and Cheyne Walk Open Space, in addition to falling within 400m of a walking and cycling path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Chase Green, Town Park, Bush Hill Park, and Cheyne Walk Open Space, in addition to falling within 400m of a walking and cycling path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Enfield Town Major Centre.	+	Site is adjacent to Enfield Town Major Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Enfield Chase railway station and 350m of at least one bus stop. The site is also within 200m of Enfield Town Major Centre.	++	Site is located within 1km of Enfield Chase railway station and 350m of at least one bus stop. The site is also within 200m of Enfield Town Major Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and within 250m from Enfield Loop of the New River SINC and Crews	--?	Site is located within 100m of a Priority Habitat and within 250m from Enfield Loop of the New River SINC and Crews

IIA objective	SA3 (without mitigation)	Justification text	SA3 (with mitigation)	Justification text
		Hill to Bowes Park Railsides SINC.		Hill to Bowes Park Railsides SINC.
IIA14: Historic environment	--?	Site is within Enfield Town Conservation Area and within 500m of three Grade II* listed buildings (Clarendon Cottage, North East Building of Enfield Grammar School, and Church of St Andrew Enfield Parish Church) and a number of Grade II listed buildings. Although the site contains built development, its redevelopment could affect the setting of the Conservation Area and listed buildings.	--?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Town and contains built development.	+?	Site is located within the settlement of Enfield Town and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zone 2.	--?	Site falls within Source Protection Zone 2.

SA4: Enfield Town Station and Former Enfield Arms, Genotin Road (mixed-use site) – formerly referred to as CFS183³

I/A objective	CFS183 (without mitigation)	Justification text	SA4 (without mitigation)	Justification text	SA4 (with mitigation)	Justification text
I/A1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
I/A2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
I/A3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
I/A4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, New River Gardens, Town Park and Chase Green, in addition to falling within 400m of a walking and cycle path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, New River Gardens, Town Park and Chase Green, in addition to falling within 400m of a walking and cycle path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, New River Gardens, Town Park and Chase Green, in addition to falling within 400m of a walking and cycle path.
I/A5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
I/A6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.

³ Enfield Town Station and Former Enfield Arms, Genotin Road was previously appraised as a housing site (CFS253). It has now been appraised as a mixed use site (SA4).

IIA objective	CFS183 (without mitigation)	Justification text	SA4 (without mitigation)	Justification text	SA4 (with mitigation)	Justification text
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Enfield Town Major Centre.	+	Site is within Enfield Town Major Centre.	+	Site is within Enfield Town Major Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.
IIA13: Biodiversity	--?	Site is located within 250m of the Enfield Loop of the New River SINC and New River SINC.	--?	Site is located within 250m of the Enfield Loop of the New River SINC and New River SINC.	--?	Site is located within 250m of the Enfield Loop of the New River SINC and New River SINC.
IIA14: Historic environment	--?	Site is adjacent to Enfield Town Conservation Area and within 500m of Bush Hill Park Conservation Area, two Grade	--?	Site is adjacent to Enfield Town Conservation Area and within 500m of Bush Hill Park Conservation Area, two Grade II* listed buildings (Church of St	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a

IIA objective	CFS183 (without mitigation)	Justification text	SA4 (without mitigation)	Justification text	SA4 (with mitigation)	Justification text
		II* listed buildings (Church of St Andrew Enfield Parish Church, and North East Building of Enfield Grammar School) and a number of Grade II listed buildings. Due to the fact that the site is adjacent to the Enfield Town Conservation Area (the western boundary of the site) which contains a number of listed buildings, its redevelopment could affect the setting of these heritage assets.		Andrew Enfield Parish Church, and North East Building of Enfield Grammar School) and a number of Grade II listed buildings. Due to the fact that the site is adjacent to the Enfield Town Conservation Area (the western boundary of the site) which contains a number of listed buildings, its redevelopment could affect the setting of these heritage assets.		Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Town and contains built development.	+?	Site is located within the settlement of Enfield Town and contains built development.	+?	Site is located within the settlement of Enfield Town and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zones 1 and 2.	--?	Site falls within Source Protection Zones 1 and 2.	--?	Site falls within Source Protection Zones 1 and 2.

SA5: Enfield Civic Centre (mixed-use site) – formerly referred to as CFS191

IIA objective	SA5 (without mitigation)	Justification text	SA5 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, Town Park and the New River Green Chain , in addition to falling within 400m of a walking and cycle path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, Town Park and the New River Green Chain , in addition to falling within 400m of a walking and cycle path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of office floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of office floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Enfield Town Major Centre.	+	Site is within Enfield Town Major Centre.

IIA objective	SA5 (without mitigation)	Justification text	SA5 (with mitigation)	Justification text
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.
IIA13: Biodiversity	--?	Site is located within 250m of the Enfield Loop of the New River SINC and New River SINC.	--?	Site is located within 250m of the Enfield Loop of the New River SINC and New River SINC.
IIA14: Historic environment	--?	Site is adjacent to Enfield Town Conservation Area, and within 500m from three Grade II* listed buildings (Church of St Andrew Enfield Parish Church, North east building of Enfield Grammar School, and Clarendon Cottage) and a number of Grade II listed buildings. Due to its location adjacent to Enfield Town Conservation Area and a number of Grade II listed buildings, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	-?	Site not large in scale but is located on the edge of Enfield Town.	-?	Site not large in scale but is located on the edge of Enfield Town.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zone 2.	--?	Site falls within Source Protection Zone 2.

SA6: Southbury Road Superstore Area (mixed-use site) – formerly referred to as SBC4/LP1131

IIA objective	SA6 (without mitigation)	Justification text	SA6 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Town Park, Bush Hill Park and the New River Green Chain, in addition to falling within 400m of a walking and cycle path. The site is also located within 400m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Town Park, Bush Hill Park and the New River Green Chain, in addition to falling within 400m of a walking and cycle path. The site is also located within 400m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of town centre and commercial floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of town centre and commercial floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Enfield Town Major Centre and is adjacent	+	Site is within Enfield Town Major Centre and is adjacent

IIA objective	SA6 (without mitigation)	Justification text	SA6 (with mitigation)	Justification text
		to Southbury Road Local Centre.		to Southbury Road Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also within Enfield Town Major Centre.
IIA13: Biodiversity	--?	Site is located within 250m of the Enfield Loop of the River SINC and New River SINC.	--?	Site is located within 250m of the Enfield Loop of the River SINC and New River SINC.
IIA14: Historic environment	--?	Site is adjacent to Enfield Town Conservation Area and within 500m from two Grade II* listed buildings (North east building from Enfield Grammar School, and Church of St Andrew Enfield Parish Church) and a number of Grade II listed buildings. Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Town and contains built development.	+?	Site is located within the settlement of Enfield Town and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zone 1.	--?	Site falls within Source Protection Zone 1.

SA7: Oak House, 43 Baker Street (housing site) – formerly referred to as CFS178

IIA objective	SA7 (without mitigation)	Justification text	SA7 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, New River Gardens, Town Park and Chase Green, in addition to falling within 400m of a walking path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Enfield Playing Fields, New River Gardens, Town Park and Chase Green, in addition to falling within 400m of a walking path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is partially within (southern edge of the site) Enfield Town Major Centre.	+	Site is partially within (southern edge of the site) Enfield Town Major Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also next to Enfield Town Major Centre.	++	Site is located within 1km of Enfield Town railway station and 350m of at least one bus stop. The site is also next to Enfield Town Major Centre.

IIA objective	SA7 (without mitigation)	Justification text	SA7 (with mitigation)	Justification text
IIA13: Biodiversity	--?	Site is located within 250m of the Enfield Loop of the New River SINC.	--?	Site is located within 250m of the Enfield Loop of the New River SINC.
IIA14: Historic environment	--?	Site is adjacent to Enfield Town Conservation Area which contains three Grade II* listed buildings (Church of St Andrew Enfield Parish Church, North East Building of Enfield Grammar School, and Clarendon Cottage) and a number of Grade II listed buildings. Due to the fact that the site is adjacent to Enfield Town Conservation Area (the western boundary of the site) and some listed buildings, its redevelopment could affect the setting of these heritage assets.	--?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Town and contains built development.	+?	Site is located within the settlement of Enfield Town and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zone 2.	--?	Site falls within Source Protection Zone 2.

Southbury (SP PL2)

SA8: Sainsburys Baird Road (mixed-use site) – formerly referred to as SBC35/LP653

IIA objective	SA8 (without mitigation)	Justification text	SA8 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA8 (without mitigation)	Justification text	SA8 (with mitigation)	Justification text
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Enfield Playing Fields, Bush Hill Park and the New River Green Chain, in addition to falling within 400m of a cycle path. The site is also located within 400-800m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Enfield Playing Fields, Bush Hill Park and the New River Green Chain, in addition to falling within 400m of a cycle path. The site is also located within 400-800m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is next to a Strategic Industrial Location. The site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development.	++?	Site is next to a Strategic Industrial Location. The site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Southbury Road & Kingsdown, which is a Local Centre.	++/-	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Southbury Road & Kingsdown, which is a Local Centre.

IIA objective	SA8 (without mitigation)	Justification text	SA8 (with mitigation)	Justification text
IIA13: Biodiversity	0	Site is not located within close proximity of any biodiversity assets.	0	Site is not located within close proximity of any biodiversity assets.
IIA14: Historic environment	0?	Although the site is located within 500m of a Grade II listed building (Enfield Technical College), it is unlikely to affect the setting of this heritage asset because there is a lot of built development between the two. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	-?	The Council's assessment of impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southbury and contains built development.	+?	Site is located within the settlement of Southbury and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

SA9: Colosseum Retail Park (mixed-use site) – formerly referred to as SBC7/LP659

IIA objective	SA9 (without mitigation)	Justification text	SA9 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Enfield Playing Fields and Bush Hill	++	Site is within 800m of a number of areas of open space, including Enfield Playing Fields and Bush Hill

IIA objective	SA9 (without mitigation)	Justification text	SA9 (with mitigation)	Justification text
		Park, in addition to falling within 400m of a cycle path. The site is also located within 400-800m of a GP surgery.		Park, in addition to falling within 400m of a cycle path. The site is also located within 400-800m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is next to a Strategic Industrial Location. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of commercial floorspace. However, it is unknown what proportion of the site will comprise employment development.	++?	Site is next to a Strategic Industrial Location. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of commercial floorspace. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within 201-400m of Southbury Road & Kingsway, which is a Local Centre.	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within 201-400m of Southbury Road & Kingsway, which is a Local Centre.
IIA13: Biodiversity	0	Site is not located within close proximity of any biodiversity assets.	0	Site is not located within close proximity of any biodiversity assets.
IIA14: Historic environment	-?	Site is within 500m of two Grade II listed buildings (Enfield Technical College, and Ripaults Factory). Although the site contains built	-?	The Council's assessment of impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment

IIA objective	SA9 (without mitigation)	Justification text	SA9 (with mitigation)	Justification text
		development, its redevelopment could affect the setting of these heritage assets.		should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southbury and contains built development.	+?	Site is located within the settlement of Southbury and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

SA10: Morrisons, Southbury Road (mixed-use site) – formerly referred to as SBC36/LP1104

IIA objective	SA10 (without mitigation)	Justification text	SA10 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Enfield Playing Fields and Bush Hill Park, in addition to falling within 400m of a walking path. The site is also located within 400m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Enfield Playing Fields and Bush Hill Park, in addition to falling within 400m of a walking path. The site is also located within 400m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.

IIA objective	SA10 (without mitigation)	Justification text	SA10 (with mitigation)	Justification text
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is close to Strategic Industrial Locations. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of commercial floorspace. However, it is unknown what proportion of the site will comprise employment development.	++?	Site is close to Strategic Industrial Locations. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of commercial floorspace. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within 201-400m of Percival Road Enfield, which is a Local Centre.	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within 201-400m of Percival Road Enfield, which is a Local Centre.
IIA13: Biodiversity	0	Site is not located within close proximity of any biodiversity assets.	0	Site is not located within close proximity of any biodiversity assets.
IIA14: Historic environment	-?	Site is within 500m from two Grade II listed buildings (Enfield Technical College, and Ripaults Factory). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southbury and contains built development.	+?	Site is located within the settlement of Southbury and contains built development.

IIA objective	SA10 (without mitigation)	Justification text	SA10 (with mitigation)	Justification text
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

SA11: Southbury Leisure Park (mixed-use site) – formerly referred to as CFS253⁴

IIA objective	CFS253 (without mitigation)	Justification text	SA11 (without mitigation)	Justification text	SA11 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Enfield Playing Fields and Bush Hill Park, in addition to falling within 400m of a cycle route. the site is not located within 800m of a GP surgery.	++/-	Site is within 800m of a number of areas of open space, including Enfield Playing Fields and Bush Hill Park, in addition to falling within 400m of a cycle route. the site is not located within 800m of a GP surgery.	++/-	Site is within 800m of a number of areas of open space, including Enfield Playing Fields and Bush Hill Park, in addition to falling within 400m of a cycle route. the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

⁴ Southbury Leisure Park was previously appraised as a housing site (CFS253). It has now been appraised as a mixed use site (SA11).

IIA objective	CFS253 (without mitigation)	Justification text	SA11 (without mitigation)	Justification text	SA11 (with mitigation)	Justification text
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of commercial floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of commercial floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within 201-400m of Percival Road Enfield, which is a Local Centre.	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within 201-400m of Percival Road Enfield, which is a Local Centre.	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within 201-400m of Percival Road Enfield, which is a Local Centre.
IIA13: Biodiversity	-?	Site is located within 250-750m of New River SINC and 100-250m of a Priority Habitat.	-?	Site is located within 250-750m of New River SINC and 100-250m of a Priority Habitat.	-?	Site is located within 250-750m of New River SINC and 100-250m of a Priority Habitat.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage	0?	Site is more than 500m from the nearest designated heritage asset.	-?	The Council's assessment of impacts on Archaeological Priority Areas

IIA objective	CFS253 (without mitigation)	Justification text	SA11 (without mitigation)	Justification text	SA11 (with mitigation)	Justification text
		asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.		However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.		records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+	Site is located within the settlement of Enfield Town and contains built development.	+	Site is located within the settlement of Enfield Town and contains built development.	+	Site is located within the settlement of Enfield Town and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

SA12: Tesco, Ponders End, 288 High Street (mixed-use site) – formerly referred to as CFS166

IIA objective	SA12 (without mitigation)	Justification text	SA12 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Durants Park and Ponders End Recreation Ground, in addition to falling within 400m of a walking and cycle path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Durants Park and Ponders End Recreation Ground, in addition to falling within 400m of a walking and cycle path.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is next to a Locally Significant Industrial Site. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of town centre and commercial floorspace. However, it is unknown what proportion of the site will comprise employment development.	++?	Site is next to a Locally Significant Industrial Site. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of town centre and commercial floorspace. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	+	Site is partially within (northern eastern part of the site) Ponders End Local Centre.	+	Site is partially within (northern eastern part of the site) Ponders End Local Centre.

IIA objective	SA12 (without mitigation)	Justification text	SA12 (with mitigation)	Justification text
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within Ponders End, which is a Local Centre.	++	Site is located within 1km of Southbury railway station and 350m of at least one bus stop. The site is also within Ponders End, which is a Local Centre.
IIA13: Biodiversity	0	Site is not located within close proximity of any biodiversity assets.	0	Site is not located within close proximity of any biodiversity assets.
IIA14: Historic environment	-?	Site is within 500m from two Grade II listed buildings (Enfield Technical College, and Ripaults Factory). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	0?	The Council's assessment of impacts on Archaeological Priority Areas records this site as 'Green' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southbury and contains built development.	+?	Site is located within the settlement of Southbury and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site partially falls within Source Protection Zone 2.	--?	Site partially falls within Source Protection Zone 2.

SA46: Crown Road Lorry Park (industrial site) – formerly referred to as CFS151

IIA objective	SA46 (without mitigation)	Justification text	SA46 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA46 (without mitigation)	Justification text	SA46 (with mitigation)	Justification text
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+	The site is under 10ha in size.	+	The site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also next to Southbury Road & Kingsway, which is a Local Centre.	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also next to Southbury Road & Kingsway, which is a Local Centre.
IIA13: Biodiversity	0	Site is not located within close proximity of any biodiversity assets.	0	Site is not located within close proximity of any biodiversity assets.
IIA14: Historic environment	-?	Site is within 500m from two Grade II listed buildings (Ripaults Factory and Enfield Technical Collage). Although the site contains built development, its redevelopment could affect	-?	The Council's assessment of impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.

IIA objective	SA46 (without mitigation)	Justification text	SA46 (with mitigation)	Justification text
		the setting of these heritage assets		
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southbury and contains built development.	+?	Site is located within the settlement of Southbury and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

Edmonton Green (SP PL3)

SA13: Edmonton Green Shopping Centre (mixed-use site) – formerly referred to as EDC2/LP1137

IIA objective	SA13 (without mitigation)	Justification text	SA13 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/--?	Site is located within 400m of a GP surgery. However, the site contains a walking path which could be lost as a result of new development.	++/--?	Site is located within 400m of a GP surgery. However, the site contains a walking path which could be lost as a result of new development.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	++	Site falls within the 10% most deprived areas within England.	++	Site falls within the 10% most deprived areas within England.

IIA objective	SA13 (without mitigation)	Justification text	SA13 (with mitigation)	Justification text
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will contribute towards employment opportunities through the provision of town centre and commercial floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will contribute towards employment opportunities through the provision of town centre and commercial floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Edmonton Green District Centre.	+	Site is within Edmonton Green District Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Edmonton Green railway station and 350m of at least one bus stop. The site is also within Edmonton Green, which is a District Centre.	++	Site is located within 1km of Edmonton Green railway station and 350m of at least one bus stop. The site is also within Edmonton Green, which is a District Centre.
IIA13: Biodiversity	-?	Site is located within 250-750m of Pymme's Park SINC.	-?	Site is located within 250-750m of Pymme's Park SINC.
IIA14: Historic environment	--?	Site is adjacent to four Conservation Areas (Montagu Cemeteries, Fore Street North, The Crescent, and Church Street Edmonton) and within 500m of two Grade II* listed buildings (Lamb's cottage and Church of All Saints Edmonton Parish Church) and a number of Grade II listed buildings. Although the site contains built development, its redevelopment could affect	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.

IIA objective	SA13 (without mitigation)	Justification text	SA13 (with mitigation)	Justification text
		the setting of all four conservation areas, in addition to the Grade II listed buildings.		
IIA15: Landscape and townscape	+	Site is located within the settlement of Edmonton Green and contains built development.	+	Site is located within the settlement of Edmonton Green and contains built development.
IIA16: Efficient use of land and materials	++	The site is relatively large in size and on brownfield land.	++	The site is relatively large in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.
IIA18: Water	--?	Site partially falls within Source Protection Zone 2.	--?	Site partially falls within Source Protection Zone 2.

SA14: Chiswick Road Estate (Oswald and Newdales) (housing site) – formerly referred to as LOC1/LP1108

IIA objective	SA14 (without mitigation)	Justification text	SA14 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/--?	Site is located within 400m of a GP surgery. The site is also located within 800m of a number of open spaces, including Edmonton Green Pocket Park. However, the site contains a walking path which could be lost as a result of new development.	++/--?	Site is located within 400m of a GP surgery. The site is also located within 800m of a number of open spaces, including Edmonton Green Pocket Park. However, the site contains a walking path which could be lost as a result of new development.
IIA5: Services and facilities	+	Site is within 800m of a primary school.	+	Site is within 800m of a primary school.

IIA objective	SA14 (without mitigation)	Justification text	SA14 (with mitigation)	Justification text
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Edmonton Green District Centre.	+	Site is adjacent to Edmonton Green District Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Edmonton Green railway station and 350m of at least one bus stop. The site is also next to Edmonton Green, which is a District Centre.	++	Site is located within 1km of Edmonton Green railway station and 350m of at least one bus stop. The site is also next to Edmonton Green, which is a District Centre.
IIA13: Biodiversity	0	Site is not located within close proximity of any biodiversity assets.	0	Site is not located within close proximity of any biodiversity assets.
IIA14: Historic environment	--?	Site is adjacent to The Crescent Conservation Area and is also within 500m of three Conservation Areas (Church Street Edmonton, Fore Street North, and Montagu Cemeteries). The site is also within 500m of two Grade II* listed buildings (Lamb's Cottage and Church of All Saints Edmonton Parish Church) and a number of Grade II listed buildings. Due to the fact that the site is adjacent to the Crescent Conservation Area (the east boundary), its redevelopment could affect	--?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.

IIA objective	SA14 (without mitigation)	Justification text	SA14 (with mitigation)	Justification text
		the setting of the heritage asset.		
IIA15: Landscape and townscape	+?	Site is located within the settlement of Edmonton and contains built development.	+?	Site is located within the settlement of Edmonton and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site partially falls within Flood Zone 3 and has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land.	--	Site partially falls within Flood Zone 3 and has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

Angel Edmonton (SP PL4)

SA15: Joyce Avenue and Snells Park Estate (housing site) – formerly referred to as UPM1

IIA objective	SA15 (without mitigation)	Justification text	SA15 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/--?	Site is located within 400m of a GP surgery. However, the site contains many areas of Amenity Green Space and a walking path, all of which could be lost as a result of new development.	++/--?	Site is located within 400m of a GP surgery. However, the site contains many areas of Amenity Green Space and a walking path, all of which could be lost as a result of new development.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.

IIA objective	SA15 (without mitigation)	Justification text	SA15 (with mitigation)	Justification text
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++	Site is located close to a Locally Significant Industrial Site.	++	Site is located close to a Locally Significant Industrial Site.
IIA10: Town and local centres	+	Site is partially within (northern eastern part of the site) Angel Edmonton District Centre.	+	Site is partially within (northern eastern part of the site) Angel Edmonton District Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Silver Street railway station and 350m of at least one bus stop. The site is also within and next to Angel Edmonton, which is a District Centre.	++	Site is located within 1km of Silver Street railway station and 350m of at least one bus stop. The site is also within and next to Angel Edmonton, which is a District Centre.
IIA13: Biodiversity	--?	Site is located within 250m of Pymme's Park SINC.	--?	Site is located within 250m of Pymme's Park SINC.
IIA14: Historic environment	--?	Site is adjacent to two Conservation Areas (Fore Street South, and Fore Street Angel) and is within 500m from four Grade II* listed buildings (808 and 810 High Road N17, Percy House, Forecourt walls and railings to Number 796 (Percy House), and Dial House) and a number of Grade II listed buildings. Due to the fact that the site is adjacent to two Conservation Areas and large in scale, its redevelopment could affect the setting of these heritage assets.	--?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.

IIA objective	SA15 (without mitigation)	Justification text	SA15 (with mitigation)	Justification text
IIA15: Landscape and townscape	--	Development of this site would result in the loss of a number of areas of Amenity Green Space.	--	Development of this site would result in the loss of a number of areas of Amenity Green Space.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site partially falls within Source Protection Zone 2 (the northern eastern part of the site).	--?	Site partially falls within Source Protection Zone 2 (the northern eastern part of the site).

SA16: Public House, 50-56 Fore Street (housing site) – formerly referred to as UPP9 (10/00760/FUL)

IIA objective	SA16 (without mitigation)	Justification text	SA16 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Pymnes Park, Craig Park, Joyce Avenue Amenity Space and St James Open Space, in addition to falling within 400m of a walking path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Pymnes Park, Craig Park, Joyce Avenue Amenity Space and St James Open Space, in addition to falling within 400m of a walking path.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.

IIA objective	SA16 (without mitigation)	Justification text	SA16 (with mitigation)	Justification text
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Angel Edmonton District Centre.	+	Site is within Angel Edmonton District Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Silver Street railway station and 350m of at least one bus stop. The site is also within Angel Edmonton, which is a District Centre.	++	Site is located within 1km of Silver Street railway station and 350m of at least one bus stop. The site is also within Angel Edmonton, which is a District Centre.
IIA13: Biodiversity	-?	Site located is within 250-750m of Pymme's Park SINC.	-?	Site located is within 250-750m of Pymme's Park SINC.
IIA14: Historic environment	--?	Site is adjacent to Fore Street South Conservation Area and within 500m of another Conservation Area (Fore Street Angel), one Grade II* listed building (808 and 801 High Road N17) and a number of Grade II listed buildings. Due to the fact the site is adjacent to Fore Street South Conservation Area (the northern boundary of the site), its redevelopment could affect the setting of this heritage asset.	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Upper	+?	Site is located within the settlement of Upper

IIA objective	SA16 (without mitigation)	Justification text	SA16 (with mitigation)	Justification text
		Edmonton and contains built development.		Edmonton and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zone 2.	--?	Site falls within Source Protection Zone 2.

SA17: Upton Road and Raynham Road (housing site) – formerly referred to as UPS21/17100372

IIA objective	SA17 (without mitigation)	Justification text	SA17 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/--?	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Craig Local Park. However, the site contains a walking path which could be lost as a result of new development.	++/--?	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Craig Local Park. However, the site contains a walking path which could be lost as a result of new development.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA17 (without mitigation)	Justification text	SA17 (with mitigation)	Justification text
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is partially within (western part of the site) Angel Edmonton District Centre.	+	Site is partially within (western part of the site) Angel Edmonton District Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Silver Street railway station and 350m of at least one bus stop. The site is also within and next to Angel Edmonton, which is a District Centre.	++	Site is located within 1km of Silver Street railway station and 350m of at least one bus stop. The site is also within and next to Angel Edmonton, which is a District Centre.
IIA13: Biodiversity	-?	Site is located within 250-750m of Pymme's Park SINC.	-?	Site is located within 250-750m of Pymme's Park SINC.
IIA14: Historic environment	--?	Site partially falls within the Fore Street Angel Conservation Area, which contains a number of listed buildings. The site is also within 500m of the Fore Street South Conservation Area. Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Upper Edmonton and contains built development.	+?	Site is located within the settlement of Upper Edmonton and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3.	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3.300mm.

IIA objective	SA17 (without mitigation)	Justification text	SA17 (with mitigation)	Justification text
		However, the site is on brownfield land.		However, the site is on brownfield land.
IIA18: Water	--?	Site falls within Source Protection Zone 2.	--?	Site falls within Source Protection Zone 2.

SA18: South east corner of North Middlesex University Hospital Trust of Sterling Way (housing site) – formerly referred to as CFS165

IIA objective	SA18 (without mitigation)	Justification text	SA18 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Pymnes Park, St Davids Park and St James Open Space, in addition to falling within 400m of a walking path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Pymnes Park, St Davids Park and St James Open Space, in addition to falling within 400m of a walking path.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA18 (without mitigation)	Justification text	SA18 (with mitigation)	Justification text
IIA9: Economy	++	Site is located close to Locally Significant Industrial Sites.	++	Site is located close to Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Silver Street railway station and 350m of at least one bus stop. The site is also within 201-400m of Silver Street Edmonton, which is a Local Centre, and Angel Edmonton, which is a District Centre.	++	Site is located within 1km of Silver Street railway station and 350m of at least one bus stop. The site is also within 201-400m of Silver Street Edmonton, which is a Local Centre, and Angel Edmonton, which is a District Centre.
IIA13: Biodiversity	--?	Site is located within 250m of Pymme's Park SINC.	--?	Site is located within 250m of Pymme's Park SINC.
IIA14: Historic environment	-?	Site is within 500m of two Conservation Areas (Fore Street South and Fore Street Angel) and two Grade II listed buildings (Former Garden Walls in Pymme's Park, and Angel Place). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Upper Edmonton and contains built development.	+?	Site is located within the settlement of Upper Edmonton and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

Meridian Water (SP PL5)

SA19: IKEA store; Tesco Extra, 1 Glover Drive; Meridian Water, Willoughby Lane and Meridian Way (mixed-use site) – formerly referred to as UPP32, UPC2, UPC1 and UPP24

IIA objective	SA19 (without mitigation)	Justification text	SA19 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/--?	Site is within 800m of a number of areas of open space, including Kenninghall Amenity Green Space and Craig Local Park, in addition to falling within 400m of a walking and cycle path. The site is also located within 400-800m of a GP surgery. However, the site contains a cycle path which could be lost as a result of new development.	++/--?	Site is within 800m of a number of areas of open space, including Kenninghall Amenity Green Space and Craig Local Park, in addition to falling within 400m of a walking and cycle path. The site is also located within 400-800m of a GP surgery. However, the site contains a cycle path which could be lost as a result of new development.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England	+	Site falls within the 20% most deprived areas within England
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is next to Strategic Industrial Locations and close to a Locally Significant Industrial Site, in addition to being over 10ha in size. The site will make a limited contribution towards employment opportunities	++?	Site is next to Strategic Industrial Locations and close to a Locally Significant Industrial Site, in addition to being over 10ha in size. The site will make a limited contribution towards employment opportunities

IIA objective	SA19 (without mitigation)	Justification text	SA19 (with mitigation)	Justification text
		through the provision of non-residential uses including social and community infrastructure. However, it is unknown what proportion of the site will comprise employment development.		through the provision of non-residential uses including social and community infrastructure. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	+	Site is adjacent to Dysons Road Edmonton Local Centre.	+	Site is adjacent to Dysons Road Edmonton Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. The site is also next to Dysons Road Edmonton, which is a Local Centre.	++	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. The site is also next to Dysons Road Edmonton, which is a Local Centre.
IIA13: Biodiversity	--?	Site contains a Priority Habitat and is within 250m of the Lea Valley SINC.	--?	Site contains a Priority Habitat and is within 250m of the Lea Valley SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	-?	The Council's assessment of impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Upper Edmonton and contains built development.	+?	Site is located within the settlement of Upper Edmonton and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300m and partially falls within Flood Zone 3. However, the site is on brownfield land.	--	Site has a predicted peak flood depth of greater than 300m and partially falls within Flood Zone 3. However, the site is on brownfield land.
IIA18: Water	--?	Site falls within Source Protection Zone 2 and partially within Source Protection Zone 1 (northern part of the site). The site also contains watercourses.	--?	Site falls within Source Protection Zone 2 and partially within Source Protection Zone 1 (northern part of the site). The site also contains watercourses.

SA47: Ravenside Retail Park (industrial site) – formerly referred to as NA001

IIA objective	SA47 (without mitigation)	Justification text	SA47 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+	The site is under 10ha in size.	+	The site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Dysons Road Edmonton, which is a Local Centre.	++/-	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Dysons Road Edmonton, which is a Local Centre.

IIA objective	SA47 (without mitigation)	Justification text	SA47 (with mitigation)	Justification text
IIA13: Biodiversity	--?	Site is located within 250m of the Lea Valley SINC.	--?	Site is located within 250m of the Lea Valley SINC.
IIA14: Historic environment	-?	Site is within 500m from a Grade II listed building (Water Turbine House, Chingford Pumping Station). Although the site contains built development, its redevelopment could affect the setting of the heritage asset.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Upper Edmonton and contains built development.	+?	Site is located within the settlement of Upper Edmonton and contains built development.
IIA16: Efficient use of land and materials	++	The site is relatively large in size and on brownfield land.	++	The site is relatively large in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3300mm. However, the site is on brownfield land.
IIA18: Water	--?	Site falls within Source Protection Zones 1 and 2 and there is a waterbody, as well as some brooks, within the boundary of the site.	--?	Site falls within Source Protection Zones 1 and 2 and there is a waterbody, as well as some brooks, within the boundary of the site.

Southgate (SP PL6)

SA20: Asda Southgate, 130 Chase Side, Southgate (mixed-use site) – formerly referred to as CFS209

IIA objective	SA20 (without mitigation)	Justification text	SA20 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.

IIA objective	SA20 (without mitigation)	Justification text	SA20 (with mitigation)	Justification text
IIA4: Health and wellbeing	--?	Site contains a walking path which could be lost as a result of new development. In addition, the site is not located within 800m of a GP surgery.	--?	Site contains a walking path which could be lost as a result of new development. In addition, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of town centre floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of town centre floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is partially (southern part of the site) within Southgate District Centre.	+	Site is partially (southern part of the site) within Southgate District Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also within Southgate, which is a District Centre.	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also within Southgate, which is a District Centre.
IIA13: Biodiversity	-?	Site is located within 250-750m of the Grovelands	-?	Site is located within 250-750m of the Grovelands Park

IIA objective	SA20 (without mitigation)	Justification text	SA20 (with mitigation)	Justification text
		Park & Priory Hospital SINC and Oakwood Park SINC.		& Priory Hospital SINC and Oakwood Park SINC.
IIA14: Historic environment	--?	Site is adjacent to a Grade II listed building (Church of St Andrew) and within 500m of Southgate Circus Conservation Area, two Grade II* listed buildings (Southgate Underground Station, and Station Pylons to north and south of Southgate Station) and a number of Grade II listed buildings. Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	--?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southgate and contains built development.	+?	Site is located within the settlement of Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

SA21: Southgate Office Village, 286 Chase Road (mixed-use site) – formerly referred to as SPO35 (19/01941/FUL)

IIA objective	SA21 (without mitigation)	Justification text	SA21 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA21 (without mitigation)	Justification text	SA21 (with mitigation)	Justification text
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Grovelands Park and Ivy Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.	++/-	Site is within 800m of a number of areas of open space, including Grovelands Park and Ivy Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the re-provision of office floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the re-provision office floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Southgate District Centre.	+	Site is adjacent to Southgate District Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also next to	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also next to

IIA objective	SA21 (without mitigation)	Justification text	SA21 (with mitigation)	Justification text
		Southgate, which is a District Centre.		Southgate, which is a District Centre.
IIA13: Biodiversity	-?	Site is located within 250-750m of Park & Priory Hospital SINC and Oakwood Park SINC.	-?	Site is located within 250-750m of Park & Priory Hospital SINC and Oakwood Park SINC.
IIA14: Historic environment	--?	Site is adjacent to Southgate Circus Conservation Area (along the southern boundary of the site) and within 500m of Grovelands Registered Park and Garden, which contains a number of Grade I and Grade II listed buildings. The site is also within 500m of Meadway Conservation Area, three Grade II* listed buildings (Southgate House, Southgate Underground Station, and Station Pylons to north and south of Southgate Station) and a number of Grade II listed buildings. Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southgate and contains built development.	+?	Site is located within the settlement of Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

SA22: M&S Food (mixed-use site) – formerly referred to as SOS11/CFS157

IIA objective	SA22 (without mitigation)	Justification text	SA22 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Grovelands Park and Ivy Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.	++/-	Site is within 800m of a number of areas of open space, including Grovelands Park and Ivy Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of non-residential floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of non-residential floorspace. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.

IIA objective	SA22 (without mitigation)	Justification text	SA22 (with mitigation)	Justification text
IIA10: Town and local centres	+	Site is partially (southern eastern part of the site) within Southgate District Centre.	+	Site is partially (southern eastern part of the site) within Southgate District Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also within Southgate, which is a District Centre.	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also within Southgate, which is a District Centre.
IIA13: Biodiversity	--?	Site is located within 250m of the Grovelands Park & Priory Hospital SINC and 250-750m of the Oakwood Park SINC.	--?	Site is located within 250m of the Grovelands Park & Priory Hospital SINC and 250-750m of the Oakwood Park SINC.
IIA14: Historic environment	--?	Site is adjacent to Southgate Circus Conservation Area and within 500m of Grovelands Registered Park and Garden, Meadway Conservation Area, three Grade II* listed buildings (Southgate House, Southgate Underground Station, and Station Pylons to north and south of Southgate Station) and a number of Grade II listed buildings. Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	--?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southgate and contains built development.	+?	Site is located within the settlement of Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or	0	Site does not fall within a Source Protection Zone or

IIA objective	SA22 (without mitigation)	Justification text	SA22 (with mitigation)	Justification text
		contain a watercourse or water body.		contain a watercourse or water body.

SA23: Minchenden Car Park and Alan Pullinger Centre (housing site) – formerly referred to as CFS150 and CFS189

IIA objective	SA23 (without mitigation)	Justification text	SA23 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Grovelands Park and Ivy Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.	++/-	Site is within 800m of a number of areas of open space, including Grovelands Park and Ivy Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.

IIA objective	SA23 (without mitigation)	Justification text	SA23 (with mitigation)	Justification text
IIA10: Town and local centres	+	Site is adjacent to Southgate District Centre.	+	Site is adjacent to Southgate District Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also next to Southgate, which is a District Centre.	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also next to Southgate, which is a District Centre.
IIA13: Biodiversity	--?	Site is located within 250m of the Grovelands and Priory Hospital SINC.	--?	Site is located within 250m of the Grovelands and Priory Hospital SINC.
IIA14: Historic environment	-?	Site is within 500m of three Conservation Areas (Southgate Circus, Meadway, and Southgate Green), Grovelands Registered Park and Garden, three Grade II* listed buildings (Southgate House, Southgate Underground Station, and Station pylons to the north and south of Southgate Station), and a number of Grade II listed buildings. Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southgate and contains built development.	+?	Site is located within the settlement of Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	0	Site is located on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.	0	Site is located on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

New Southgate (SP PL7)

SA24: Arnos Grove Station Car Park (housing site) – formerly referred to as SGC4/LP608_2

IIA objective	SA24 (without mitigation)	Justification text	SA24 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/--?	Site is located within 400m of a GP surgery. However, the site partially overlaps Arnos Park Metropolitan Open Land and contains a walking path, both of which could be lost as a result of new development.	++/--?	Site is located within 400m of a GP surgery. However, the site partially overlaps Arnos Park Metropolitan Open Land and contains a walking path, both of which could be lost as a result of new development.
IIA5: Services and facilities	+++?	Site is within 800m of a primary school and a secondary school.	+++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within the Borough.	0	Site does not fall within the 10% or 20% most deprived areas within the Borough.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is partially within (southern part of the site) Arnos Grove Local Centre.	+	Site is partially within (southern part of the site) Arnos Grove Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.

IIA objective	SA24 (without mitigation)	Justification text	SA24 (with mitigation)	Justification text
IIA12: Sustainable transport	++	Site is located within 1km of Arnos Grove railway station and 350m of at least one bus stop. The site is also next to Arnos Grove, which is a Local Centre.	++	Site is located within 1km of Arnos Grove railway station and 350m of at least one bus stop. The site is also next to Arnos Grove, which is a Local Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and 250m of Arnos Park SINC.	--?	Site is located within 100m of a Priority Habitat and 250m of Arnos Park SINC.
IIA14: Historic environment	--?	Site is adjacent to a Grade II* listed building (Arnos Grove Underground Station) and within 500m from Abbotshall Avenue Conservation Area, as well as two Grade II listed buildings (Bowes Road Clinic and Bowes Road Library and Arnos Pool). Due to the fact the site is adjacent to a Grade II* listed building (Arnos Grove Underground Station), its development could affect the setting of this heritage asset.	--?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	--	Development of this site would result in the partial loss of Arnos Park Metropolitan Open Land.	--	Development of this site would result in the partial loss of Arnos Park Metropolitan Open Land.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

SA25: Site between North Circular Road and Station Road (mixed-use site) – formerly referred to as SGC1/LP1145⁵

IIA objective	SGC1/LP1 145 (without mitigation)	Justification text	SA25 (without mitigation)	Justification text	SA25 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Arnos Park, Millenium Green New Southgate and High Road Open Space, in addition to falling within 400m of a walking path. The site is also located within 400-800m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Arnos Park, Millenium Green New Southgate and High Road Open Space, in addition to falling within 400m of a walking path. The site is also located within 400-800m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Arnos Park, Millenium Green New Southgate and High Road Open Space, in addition to falling within 400m of a walking path. The site is also located within 400-800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.

⁵ Site between North Circular Road and Station Road was previously appraised as a housing site (SGC1/LP1145). It has now been appraised as a mixed use site (SA25).

IIA objective	SGC1/LP1 145 (without mitigation)	Justification text	SA25 (without mitigation)	Justification text	SA25 (with mitigation)	Justification text
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++	Site is located close to a Locally Significant Industrial Site.	++?	Site is close to a Locally Significant Industrial Site. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of non-residential floorspace. However, it is unknown what proportion of the site will comprise employment development.	++?	Site is close to a Locally Significant Industrial Site. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of non-residential floorspace. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Arnos Grove tube station and 350m of at least one bus stop. However, the site is only within 401-800m of Arnos Grove, Bowes Road West and New Southgate Barnet Road, which are Local Centres.	++/-	Site is located within 1km of Arnos Grove tube station and 350m of at least one bus stop. However, the site is only within 401-800m of Arnos Grove, Bowes Road West and New Southgate Barnet Road, which are Local Centres.	++/-	Site is located within 1km of Arnos Grove tube station and 350m of at least one bus stop. However, the site is only within 401-800m of Arnos Grove, Bowes Road West and New Southgate Barnet Road, which are Local Centres.

IIA objective	SGC1/LP1 145 (without mitigation)	Justification text	SA25 (without mitigation)	Justification text	SA25 (with mitigation)	Justification text
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat.	--?	Site is located within 100m of a Priority Habitat.	--?	Site is located within 100m of a Priority Habitat.
IIA14: Historic environment	-?	Site is within 500m of two Grade II listed buildings (Friern Hospital and Garden House of Friern Hospital). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	Site is within 500m of two Grade II listed buildings (Friern Hospital and Garden House of Friern Hospital). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of New Southgate and contains built development.	+?	Site is located within the settlement of New Southgate and contains built development.	+?	Site is located within the settlement of New Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. 300mm. However, the site is on brownfield land.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

SA26: Station Road, New Southgate (mixed-use site) – formerly referred to as SGS14/17100370⁶

IJA objective	SGS14/17100370	Justification text	SA26 (without mitigation)	Justification text	SA26 (with mitigation)	Justification text
IJA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IJA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IJA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IJA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Arnos Park, Millennium Green New Southgate and High Road Open Space, in addition to falling within 400m of a walking path. The site is also located within 400-800m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Arnos Park, Millennium Green New Southgate and High Road Open Space, in addition to falling within 400m of a walking path. The site is also located within 400-800m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Arnos Park, Millennium Green New Southgate and High Road Open Space, in addition to falling within 400m of a walking path. The site is also located within 400-800m of a GP surgery.
IJA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IJA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IJA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

⁶ Station Road, New Southgate was previously appraised as a housing site (SGS14/17100370). It has now been appraised as a mixed use site (SA26).

IIA objective	SGS14/1 7100370	Justification text	SA26 (without mitigation)	Justification text	SA26 (with mitigation)	Justification text
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++	Site is located close to a Locally Significant Industrial Site.	++	Site is close to a Locally Significant Industrial Site. The site is under 10ha in size and will re-provide the existing store on site.	++	Site is close to a Locally Significant Industrial Site. The site is under 10ha in size and will re-provide the existing store on site.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Arnos Grove tube station and 350m of at least one bus stop. However, the site is only within 401-800m of Arnos Grove, Bowes Road West and New Southgate Road, which are Local Centres.	++/-	Site is located within 1km of Arnos Grove tube station and 350m of at least one bus stop. However, the site is only within 401-800m of Arnos Grove, Bowes Road West and New Southgate Road, which are Local Centres.	++/-	Site is located within 1km of Arnos Grove tube station and 350m of at least one bus stop. However, the site is only within 401-800m of Arnos Grove, Bowes Road West and New Southgate Road, which are Local Centres.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and within 250-750m of Arnos Park SINC.	--?	Site is located within 100m of a Priority Habitat and within 250-750m of Arnos Park SINC.	--?	Site is located within 100m of a Priority Habitat and within 250-750m of Arnos Park SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything..

IIA objective	SGS14/1 7100370	Justification text	SA26 (without mitigation)	Justification text	SA26 (with mitigation)	Justification text
		heritage features and effects may extend beyond 500m.				
IIA15: Landscape and townscape	+?	Site is located within the settlement of New Southgate and contains built development.	+?	Site is located within the settlement of New Southgate and contains built development.	+?	Site is located within the settlement of New Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

Crews Hill (SP PL9)

SA27: Land at Crews Hill (housing site) – formerly referred to as CHC2, CHC10, CHC17, CHC1, CFS159, CFS169, CFS132 and CHC18

IIA objective	SA27 (without mitigation)	Justification text	SA27 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/--	Site is within 800m of a number of areas of open space, including Whitewebbs Metropolitan Park, Blay Hill Fields Natural and Semi-Natural Urban Greenspace and Hilly Fields District Park. However, the site is not located within 800m of a GP surgery and contains a walking path, which could be lost as a result of development.	++/--	Site is within 800m of a number of areas of open space, including Whitewebbs Metropolitan Park, Blay Hill Fields Natural and Semi-Natural Urban Greenspace and Hilly Fields District Park. However, the site is not located within 800m of a GP surgery and contains a walking path, which could be lost as a result of development.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.

IIA objective	SA27 (without mitigation)	Justification text	SA27 (with mitigation)	Justification text
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/--	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.	++/--	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	--?	Site contains Priority Habitats, an area of Ancient Woodland, Crews Hill Golf Course SINC and Crews Hill Bowes Park Railsides SINC. The site is also located within 250m of Hily Fields Country Park SINC and Whitewebbs Wood SINC.	--?	Site contains Priority Habitats, an area of Ancient Woodland, Crews Hill Golf Course SINC and Crews Hill Bowes Park Railsides SINC. The site is also located within 250m of Hily Fields Country Park SINC and Whitewebbs Wood SINC.
IIA14: Historic environment	--?	Site contains a Grade II* listed building (The Paddocks) and two Grade II listed buildings (2 Barns North West of Farmhouse at The Paddocks and Owls Hall). The site is also located within 500m of Clay Hill Conservation Area and further Grade II listed buildings. Due to the fact the site contains listed buildings, its development could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	--?/+?	Site is large in scale and although it is partially located within the settlement of Crews Hill and contains built development, it is also partially located in an undeveloped area.	--?/+?	Site is large in scale and although it is partially located within the settlement of Crews Hill and contains built development, it is also partially located in an undeveloped area.
IIA16: Efficient use of land and materials	++/--?	Site is relatively large in size and partially located on brownfield land and greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not	++/--?	Site is relatively large in size and partially located on brownfield land and greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish

IIA objective	SA27 (without mitigation)	Justification text	SA27 (with mitigation)	Justification text
		distinguish between Grades 3a and 3b agricultural land.		between Grades 3a and 3b agricultural land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site contains Turkey Brook within its boundary.	--?	Site contains Turkey Brook within its boundary.

SA48: Land at 135 Theobalds Park Road (industrial site) – formerly referred to as CFS132

IIA objective	SA48 (without mitigation)	Justification text	SA48 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA48 (without mitigation)	Justification text	SA48 (with mitigation)	Justification text
IIA9: Economy	+	The site is under 10ha in size.	+	The site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/--	Site is within 1km of Turkey Street railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.	++/--	Site is within 1km of Turkey Street railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	--?	Site is located within 250m of the Whitewebbs SINC.	--?	Site is located within 250m of the Whitewebbs SINC.
IIA14: Historic environment	-?	Site is within 500m from two Grade II listed buildings (Bridge at West End of Lane, Whitewebbs Wood, and Glasgow Stud Farmhouse). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.		The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Crews Hill and contains built development.	+?	Site is located within the settlement of Crews Hill and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small and on brownfield land.	+	Site is relatively small and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

Chase Park (SP PL10)

SA28: Land at Chase Park (housing site) – formerly referred to as HIC10, HIC11, HIC6 and HIC9

IIA objective	SA28 (without mitigation)	Justification text	SA28 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Trent Metropolitan Park, Lakeside Natural and Semi-Natural Urban Greenspace and Hilly Fields District Park, in addition to falling within 400m of a walking and cycle path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Trent Metropolitan Park, Lakeside Natural and Semi-Natural Urban Greenspace and Hilly Fields District Park, in addition to falling within 400m of a walking and cycle path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is close to Oakwood Local Centre.	+	Site is close to Oakwood Local Centre.

IIA objective	SA28 (without mitigation)	Justification text	SA28 (with mitigation)	Justification text
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Gordon Hill railway station and Oakwood tube station and 350m of at least one bus stop. The site is also next to Oakwood, which is a Local Centre.	++	Site is located within 1km of Gordon Hill railway station and Oakwood tube station and 350m of at least one bus stop. The site is also next to Oakwood, which is a Local Centre.
IIA13: Biodiversity	--?	Site is located within 250m of Trent Park SINC, Trent Park Golf Course SINC, Lakeside SINC and Boxer's Lane & Lonsdale Drive Woods SINC, in addition to falling within 100m of Priority Habitats.	--?	Site is located within 250m of Trent Park SINC, Trent Park Golf Course SINC, Lakeside SINC and Boxer's Lane & Lonsdale Drive Woods SINC, in addition to falling within 100m of Priority Habitats.
IIA14: Historic environment	--?	Site partially falls within Trent Park Conservation Area, which contains a number of Grade II listed buildings, Trent Park Registered Park and Garden and a Scheduled Monument (Moated site, Camlet Moat, Moat Wood). There is no built development between the site and the Conservation Area, listed buildings and Scheduled Monument. Its development could therefore adversely affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	--?	Site is large in scale and located on the edge of World's End.	--?	Site is large in scale and located on the edge of World's End.
IIA16: Efficient use of land and materials	--?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.	--?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3.	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3.

IIA objective	SA28 (without mitigation)	Justification text	SA28 (with mitigation)	Justification text
		However, the site is on brownfield land.		However, the site is on brownfield land.
IIA18: Water	--?	Site contains a number of brooks within its boundary, including Merryhills Brook, Salmon's Brook and Leeing Beach Gutter.	--?	Site contains a number of brooks within its boundary, including Merryhills Brook, Salmon's Brook and Leeing Beach Gutter.

SA29: Arnold House (housing site) – formerly referred to as CFS162_B and CFS162_C

IIA objective	SA29 (without mitigation)	Justification text	SA29 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is located within 800m of a number of areas of open space, including West Enfield Parklands Metropolitan Open Land and Lee View Amenity Space, in addition to falling within 400m of a walking path. However, the site is more than 800m from a GP surgery.	++/-	Site is located within 800m of a number of areas of open space, including West Enfield Parklands Metropolitan Open Land and Lee View Amenity Space, in addition to falling within 400m of a walking path. However, the site is more than 800m from a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA29 (without mitigation)	Justification text	SA29 (with mitigation)	Justification text
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored poorly in the air quality assessment.	-?	Site scored poorly in the air quality assessment.
IIA12: Sustainable transport	++/--	Site is located within 1km of Gordon Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.	++/--	Site is located within 1km of Gordon Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	--?	Site contains a Priority Habitat and is within 250-750m of Crews Hill to Bowes Park RAILSIDES SINC.	--?	Site contains a Priority Habitat and is within 250-750m of Crews Hill to Bowes Park RAILSIDES SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of World's End.	-?	Site is not large in scale but is located on the edge of World's End.
IIA16: Efficient use of land and materials	--?	Site is relatively small in size and partially located on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.	--?	Site is relatively small in size and partially located on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.

IIA objective	SA29 (without mitigation)	Justification text	SA29 (with mitigation)	Justification text
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

Other proposed site allocations outside of the place making areas (urban areas)

SA30: Claverings, Centre Way (mixed-use site) – formerly referred to as CFS152

IIA objective	SA30 (without mitigation)	Justification text	SA30 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Montagu Recreation Ground, in addition to falling within 400m of a walking path. The site is also located within 400-800m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Montagu Recreation Ground, in addition to falling within 400m of a walking path. The site is also located within 400-800m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England	+	Site falls within the 20% most deprived areas within England
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Although the site falls within a Locally Significant	++?	Although the site falls within a Locally Significant Industrial

IIA objective	SA30 (without mitigation)	Justification text	SA30 (with mitigation)	Justification text
		Industrial Site, it is unlikely to result in any loss of this existing employment area because it makes provision for employment development. It is under 10ha in size but as mentioned already, will contribute towards employment development. It is unknown what proportion of the site will comprise employment development.		Site, it is unlikely to result in any loss of this existing employment area because it makes provision for employment development. It is under 10ha in size but as mentioned already, will contribute towards employment development. It is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 2 in the air quality appraisal.	-?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	+	Site is located within 350m of at least one bus stop. The site is also within 201-400m of Nightingale Road, Edmonton, which is a Local Centre.	+	Site is located within 350m of at least one bus stop. The site is also within 201-400m of Nightingale Road, Edmonton, which is a Local Centre.
IIA13: Biodiversity	-?	Site is located within 250-750m of the Chingford Reservoirs SSSI and Lea Valley SINC.	-?	Site is located within 250-750m of the Chingford Reservoirs SSSI and Lea Valley SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of Lower Edmonton.	-?	Site is not large in scale but is located on the edge of Lower Edmonton.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and falls mainly within Flood Zone 2. However, the site is on brownfield land.	--	Site has a predicted peak flood depth of greater than 300mm and falls mainly within Flood Zone 2. However, the site is on brownfield land.

IIA objective	SA30 (without mitigation)	Justification text	SA30 (with mitigation)	Justification text
IIA18: Water	--?	Southern edge of the site falls within Source Protection Zone 2.	--?	Southern edge of the site falls within Source Protection Zone 2.

SA31: Cockfosters Station Car Park (Parcels a and b), Cockfosters Road, Barnet (housing site) – formerly referred to as COC9a and COC9b/LP608_1

IIA objective	SA31 (without mitigation)	Justification text	SA31 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Trent Park, Cockfosters Sports Ground and Belmont Close, in addition to falling within 400m of a walking path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Trent Park, Cockfosters Sports Ground and Belmont Close, in addition to falling within 400m of a walking path.
IIA5: Services and facilities	+?	Site is within 800m of a secondary school.	+?	Site is within 800m of a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.

IIA objective	SA31 (without mitigation)	Justification text	SA31 (with mitigation)	Justification text
		Locally Significant Industrial Sites.		
IIA10: Town and local centres	+	Site is within Cockfosters Local Centre.	+	Site is within Cockfosters Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Cockfosters tube station and 350m of at least one bus stop. The site is also within Cockfosters, which is a Local Centre.	++	Site is located within 1km of Cockfosters tube station and 350m of at least one bus stop. The site is also within Cockfosters, which is a Local Centre.
IIA13: Biodiversity	--?	Site contains a Priority Habitat and is within 250m of Trent Park SINC.	--?	Site contains a Priority Habitat and is within 250m of Trent Park SINC.
IIA14: Historic environment	--?	Site is within Trent Park Conservation Area and is within 500m of a number of Grade II listed buildings. Due to the fact the site is within the Conservation Area and adjacent to one of the Grade II listed buildings (Cockfosters London Regional Transport Station including platforms and platform canopies), its development could affect the setting of these heritage assets.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Green' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	-?	Site is not large in scale and located on the edge of Cockfosters.	-?	Site is not large in scale and located on the edge of Cockfosters.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

SA32: Sainsburys Green Lanes (mixed-use site) – formerly referred to as PA39/LP654

IIA objective	SA32 (without mitigation)	Justification text	SA32 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/--?	Site is located within 400m of a GP surgery. However, a cycle path crosses through the site, which could be lost as a result of development.	++/--?	Site is located within 400m of a GP surgery. However, a cycle path crosses through the site, which could be lost as a result of development.
IIA5: Services and facilities	+++?	Site is within 800m of a primary school and a secondary school.	+++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Winchmore Hill Broadway Local Centre.	+	Site is adjacent to Winchmore Hill Broadway Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.

IIA objective	SA32 (without mitigation)	Justification text	SA32 (with mitigation)	Justification text
IIA12: Sustainable transport	++	Site is located within 1km of Winchmore Hill railway station and 350m of at least one bus stop. The site is also next to Winchmore Hill Broadway, which is a Local Centre.	++	Site is located within 1km of Winchmore Hill railway station and 350m of at least one bus stop. The site is also next to Winchmore Hill Broadway, which is a Local Centre.
IIA13: Biodiversity	--?	Site contains a Priority Habitat and falls within 250m of New River SINC.	--?	Site contains a Priority Habitat and falls within 250m of New River SINC.
IIA14: Historic environment	--?	Site is within 500m of Winchmore Hill Green Conservation Area, which contains a number of Grade II listed buildings. The site is also located directly adjacent to another Grade II listed building (Police Station). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	0?	The Council's assessment of heritage considerations records this site as 'Green' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Winchmore Hill and contains built development.	+?	Site is located within the settlement of Winchmore Hill and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small and on brownfield land.	+	Site is relatively small and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zone 1.	--?	Site falls within Source Protection Zone 1.

SA33: Blackhorse Tower, Holbrook House and Churchwood House, 116 Cockfosters Road (housing site) – formerly referred to as COP10 (20/03200/PRJ)

IIA objective	SA33 (without mitigation)	Justification text	SA33 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA33 (without mitigation)	Justification text	SA33 (with mitigation)	Justification text
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Trent Park, Bramley Road Sports Ground and Cockfosters Sports Ground, but is not within 400m of a walking or cycling path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Trent Park, Bramley Road Sports Ground and Cockfosters Sports Ground, but is not within 400m of a walking or cycling path.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Cockfosters Local Centre.	+	Site is within Cockfosters Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Cockfosters tube station and 350m of at least one bus stop. The site is also within Cockfosters, which is a Local Centre.	++	Site is located within 1km of Cockfosters tube station and 350m of at least one bus stop. The site is also within Cockfosters, which is a Local Centre.

IIA objective	SA33 (without mitigation)	Justification text	SA33 (with mitigation)	Justification text
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and within 250m from Trent Park SINC.	--?	Site is located within 100m of a Priority Habitat and within 250m from Trent Park SINC.
IIA14: Historic environment	--?	Site is within 500m of Trent Park Conservation Area and five Grade II listed buildings (Cockfosters London Regional Transport Station including platforms and platform canopies, West entrance gateway to Trent Park at Front Lodge, Bollards at entrance gateway to Trent Park, Front Lodge at Trent Park, and Cockfosters War Memorial). Due to the fact the site is adjacent to one of the Grade II listed buildings (Cockfosters London Regional Transport Station including platforms and platform canopies), its development could affect the setting of this heritage asset.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Green' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Cockfosters and contains built development.	+?	Site is located within the settlement of Cockfosters and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

SA34: 241 Green Street (mixed-use site) – formerly referred to as EHP34 (18/04935/FUL)⁷

I/A objective	EHP34 (18/04935/FUL) (without mitigation)	Justification text	SA34 (without mitigation)	Justification text	SA34 (with mitigation)	Justification text
I/A1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
I/A2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
I/A3: Housing	+	Site has capacity for fewer than 100 housing units.	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
I/A4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Durants Park and Alma Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.	++/-	Site is within 800m of a number of areas of open space, including Durants Park and Alma Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.	++/-	Site is within 800m of a number of areas of open space, including Durants Park and Alma Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
I/A5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
I/A6: Social inclusion	+	Site falls within 20% most deprived areas within England.	+	Site falls within 20% most deprived areas within England.	+	Site falls within 20% most deprived areas within England.

⁷ Green Street was previously appraised as delivering 92 housing units (EHP34 (18/04935/FUL)). It has now been appraised as delivering 148 housing units (SA34).

IIA objective	EHP34 (18/04935/ FUL) (without mitigation)	Justification text	SA34 (without mitigation)	Justification text	SA34 (with mitigation)	Justification text
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is close to Strategic Industrial Locations. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of replacement employment floorspace. However, it is unknown what proportion of the site will comprise the replacement floorspace.	++?	Site is close to Strategic Industrial Locations. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of replacement employment floorspace. However, it is unknown what proportion of the site will comprise the replacement floorspace.	++?	Site is close to Strategic Industrial Locations. The site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of replacement employment floorspace. However, it is unknown what proportion of the site will comprise the replacement floorspace.
IIA10: Town and local centres	+	Site is adjacent to Brimsdown (Brimsdown Avenue) Local Centre.	+	Site is adjacent to Brimsdown (Brimsdown Avenue) Local Centre.	+	Site is adjacent to Brimsdown (Brimsdown Avenue) Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. The site is also next to	++	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. The site is also next to Brimsdown Avenue, which is a Local Centre.	++	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. The site is also next to Brimsdown Avenue, which is a Local Centre.

IIA objective	EHP34 (18/04935/ FUL) (without mitigation)	Justification text	SA34 (without mitigation)	Justification text	SA34 (with mitigation)	Justification text
		Brimsdown Avenue, which is a Local Centre.				
IIA13: Biodiversity	-?	Site is located within 250-750m of the Lea Valley SINC.	-?	Site is located within 250-750m of the Lea Valley SINC.	-?	Site is located within 250-750m of the Lea Valley SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Brimsdown and contains built development.	+?	Site is located within the settlement of Brimsdown and contains built development.	+?	Site is located within the settlement of Brimsdown and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.
IIA18: Water	--?	Site falls within Source Protection Zone 2.	--?	Site falls within Source Protection Zone 2.	--?	Site falls within Source Protection Zone 2.

SA35: Land at former Wessex Hall Building (housing site) – formerly referred to as POC6/LP1196

IIA objective	SA35 (without mitigation)	Justification text	SA35 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	--?/+	Site partially overlaps Durants Park Metropolitan Open Land, which could be lost as a result of new development. However, the site is located within 400-800m of a GP surgery.	--?/+	Site partially overlaps Durants Park Metropolitan Open Land, which could be lost as a result of new development. However, the site is located within 400-800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++	Site is located adjacent to a Locally Significant Industrial Site.	++	Site is located adjacent to a Locally Significant Industrial Site.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. The site is also within 201-400m of Durants	++	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. The site is also within

IIA objective	SA35 (without mitigation)	Justification text	SA35 (with mitigation)	Justification text
		Road, which is a Local Centre.		201-400m of Durants Road, which is a Local Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat.	--?	Site is located within 100m of a Priority Habitat.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	--	Development of this site would result in the partial loss of Durants Park Metropolitan Open Land.	--	Development of this site would result in the partial loss of Durants Park Metropolitan Open Land.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zone 2.	--?	Site falls within Source Protection Zone 2.

SA36: 188-200 Bowes Road (housing site) – formerly referred to as SGP13 (18/00388/OUT)

IIA objective	SA36 (without mitigation)	Justification text	SA36 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 units.	+	Site has capacity for fewer than 100 units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. Site is also within 800m of a number of areas of open space,	++	Site is located within 400m of a GP surgery. Site is also within 800m of a number of areas of open space,

IIA objective	SA36 (without mitigation)	Justification text	SA36 (with mitigation)	Justification text
		including Arnos Park, Broomfield Park, a Green Chain Corridor, and the New River, in addition to falling within 400m of a walking path.		including Arnos Park, Broomfield Park, a Green Chain Corridor, and the New River, in addition to falling within 400m of a walking path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Bowes Road Local Centre.	+	Site is within Bowes Road Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Arnos Grove tube station and Palmers Green railway station, and 350m of at least one bus stop. The site is also next to Bowes Road, which is a Local Centre.	++	Site is located within 1km of Arnos Grove tube station and Palmers Green railway station, and 350m of at least one bus stop. The site is also next to Bowes Road, which is a Local Centre.
IIA13: Biodiversity	-?	Site is located within 250-750m of Arnos Park SINC, Broomfield Park SINC and New River SINC.	-?	Site is located within 250-750m of Arnos Park SINC, Broomfield Park SINC and New River SINC.
IIA14: Historic environment	-?	Site is within 500m of Broomfield House Registered Park and Garden, in addition to a Grade II* listed building (East Wall of Broomfield Park including attached		The Council's assessment of heritage considerations and impacts on Archaeological

IIA objective	SA36 (without mitigation)	Justification text	SA36 (with mitigation)	Justification text
		garden house and stable block) and four Grade II listed buildings (Junior and Infant School, Bowes Road Library, Bowes Road Clinic, South Walls of Broomfield Park and inner garden walls). Although there is built development between the site and the Registered Park and Garden and listed buildings, its development could affect the setting of these heritage assets.		Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of New Southgate and contains built development.	+?	Site is located within the settlement of New Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.
IIA18: Water	--?	Site falls within Source Protection Zone 2.	--?	Site falls within Source Protection Zone 2.

SA37: Main Avenue Site (housing site) – formerly referred to as SBC2/LP1107

IIA objective	SA37 (without mitigation)	Justification text	SA37 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++/--?	Site is located within 400m of a GP surgery. The site is also located within 800m of a number of open spaces,	++/--?	Site is located within 400m of a GP surgery. The site is also located within 800m of a number of open spaces,

IIA objective	SA37 (without mitigation)	Justification text	SA37 (with mitigation)	Justification text
		including Bush Hill Local Park. However, the site contains some walking paths which could be lost as a result of new development.		including Bush Hill Local Park. However, the site contains some walking paths which could be lost as a result of new development.
IIA5: Services and facilities	+++	Site is within 800m of a primary school and a secondary school.	+++	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Main Avenue Bush Hill Park Local Centre and Percival Road Enfield Local Centre.	+	Site is adjacent to Main Avenue Bush Hill Park Local Centre and Percival Road Enfield Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Enfield Town railway station, Bush Hill Park railway station and Southbury railway station, and 350m of at least one bus stop. The site is also next to Main Avenue Bush Hill Park and Percival Road Enfield, which are Local Centres.	++	Site is located within 1km of Enfield Town railway station, Bush Hill Park railway station and Southbury railway station, and 350m of at least one bus stop. The site is also next to Main Avenue Bush Hill Park and Percival Road Enfield, which are Local Centres.
IIA13: Biodiversity	-?	Site is within 250m of a Priority Habitat.	-?	Site is within 250m of a Priority Habitat.
IIA14: Historic environment	-?	Site is within 500m of Bush Hill Park Conservation Area, which contains a Grade II listed building (2 Queen Anne's Place). Although the	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a

IIA objective	SA37 (without mitigation)	Justification text	SA37 (with mitigation)	Justification text
		site contains built development, its redevelopment could affect the setting of these heritage assets.		Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+	Site is located within the settlement of Bush Hill Park and contains built development.	+	Site is located within the settlement of Bush Hill Park and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

SA38: Land at Ritz Parade (mixed-use site) – formerly referred to as SGC2/LP1159

IIA objective	SA38 (without mitigation)	Justification text	SA38 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Arnos Park, Broomhill Park and the New River Green Chain, in addition to falling within 400m of a walking path. The site is also located within 400m of a GP surgery.	++	Site is within 800m of a number of areas of open space, including Arnos Park, Broomhill Park and the New River Green Chain, in addition to falling within 400m of a walking path. The site is also located within 400m of a GP surgery.

IIA objective	SA38 (without mitigation)	Justification text	SA38 (with mitigation)	Justification text
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the re-provision of existing retail uses on site. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the re-provision of existing retail uses on site. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Bowes Road Local Centre.	+	Site is within Bowes Road Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Arnos Grove tube station and Palmers Green railway station, and 350m of at least one bus stop. The site is also within Bowes Road, which is a Local Centre.	++	Site is located within 1km of Arnos Grove tube station and Palmers Green railway station, and 350m of at least one bus stop. The site is also within Bowes Road, which is a Local Centre.
IIA13: Biodiversity	-?	Site is located within 250-750m of the Arnos Park SINC, Broomfield Park SINC and New River SINC.	-?	Site is located within 250-750m of the Arnos Park SINC, Broomfield Park SINC and New River SINC.
IIA14: Historic environment	-?	Site is within 500m of Broomfield House Registered Park and Garden, which contains a number of Grade II* and Grade II listed buildings. The site is also within 500m of a two Grade II listed buildings	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.

IIA objective	SA38 (without mitigation)	Justification text	SA38 (with mitigation)	Justification text
		(Junior and Infant School, and Bowes Road Library and Arnos Pool). Although there is built development between the site, Conservation Area and listed buildings, its development could affect the setting of these heritage assets.		
IIA15: Landscape and townscape	+?	Site is located within the settlement of New Southgate and contains built development.	+?	Site is located within the settlement of New Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.
IIA18: Water	--?	Site falls within Source Protection Zone 2.	--?	Site falls within Source Protection Zone 2.

SA39: Travis Perkins Palmers Green, Bridge Drive, Bloomfield Lane (mixed-use site) – formerly referred to as PAC8/LP656

IIA objective	SA39 (without mitigation)	Justification text	SA39 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++/--?	Site is located within 400m of a GP surgery. However, a cycle path crosses through the site, which could be lost as a result of development.	++/--?	Site is located within 400m of a GP surgery. However, a cycle path crosses through the site, which could be lost as a result of development.

IIA objective	SA39 (without mitigation)	Justification text	SA39 (with mitigation)	Justification text
IIA5: Services and facilities	+	Site is within 800m of a primary school.	+	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Palmers Green District Centre.	+	Site is adjacent to Palmers Green District Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Palmers Green railway station and 350m of at least one bus stop. The site is also next to Palmers Green, which is a District Centre.	++	Site is located within 1km of Palmers Green railway station and 350m of at least one bus stop. The site is also next to Palmers Green, which is a District Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and within 250m of Broomfield Park SINC and New River SINC.	--?	Site is located within 100m of a Priority Habitat and within 250m of Broomfield Park SINC and New River SINC.
IIA14: Historic environment	--?	Site is adjacent to The Lakes Estate Conservation Area and within 500m of Broomfield House Registered Park and Garden which contains a number of Grade II* and Grade II listed buildings and four Grade II listed buildings (Wall to the	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.

IIA objective	SA39 (without mitigation)	Justification text	SA39 (with mitigation)	Justification text
		north of number 176, Truro House, Front wall and gate piers to west of number 176, and National Westminster Bank). The site is also within 500m of some Grade II listed buildings outside of the Registered Park and Garden. Although the site contains built development, its redevelopment could affect the setting of these heritage assets.		
IIA15: Landscape and townscape	+?	Site is located within the settlement of Palmers Green and contains built development.	+?	Site is located within the settlement of Palmers Green and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zone 1.	--?	Site falls within Source Protection Zone 1.

SA40: Land known as Brimsdown Sports Ground (mixed-use site) – formerly referred to as CFS217

IIA objective	SA40 (without mitigation)	Justification text	SA40 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	--?/+	Site contains a walking path which could be lost as a result of new development. However, the site is located	--?/+	Site contains a walking path which could be lost as a result of new development. However, the site is located

IIA objective	SA40 (without mitigation)	Justification text	SA40 (with mitigation)	Justification text
		within 400-800m of a GP surgery.		within 400-800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of social and community infrastructure. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of social and community infrastructure. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Green Street & Mayfield Road Local Centre.	+	Site is adjacent to Green Street & Mayfield Road Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. The site is also next to Brimsdown Avenue and Green Street & Mayfield Road, which are Local Centres.	++	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. The site is also next to Brimsdown Avenue and Green Street & Mayfield Road, which are Local Centres.
IIA13: Biodiversity	-?	Site is located within 250-750m of the Lea Valley SINC.	-?	Site is located within 250-750m of the Lea Valley SINC.

IIA objective	SA40 (without mitigation)	Justification text	SA40 (with mitigation)	Justification text
IIA14: Historic environment	-?	Site is within 500m from two Grade II listed buildings (The White Horse Public House, and 98 and 100 Green Street). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Highway and contains built development.	+?	Site is located within the settlement of Enfield Highway and contains built development.
IIA16: Efficient use of land and materials	--	Site is relatively large in size and on greenfield land classed as Urban land.	--	Site is relatively large in size and on greenfield land classed as Urban land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm and partially falls within Flood Zone 2. The site is also on greenfield land.	-	Site has a predicted peak flood depth of greater than 150mm and partially falls within Flood Zone 2. The site is also on greenfield land.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

SA41: Albany Leisure Centre and Car Park, 55 Albany Road (housing site) – formerly referred to as CFS207

IIA objective	SA41 (without mitigation)	Justification text	SA41 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Albany Park and a number of amenity green spaces, in addition to	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Albany Park and a number of amenity green

IIA objective	SA41 (without mitigation)	Justification text	SA41 (with mitigation)	Justification text
		falling within 400m of a cycle path.		spaces, in addition to falling within 400m of a cycle path.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is within Enfield Wash Local Centre.	+	Site is within Enfield Wash Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Turkey Street railway station and Enfield Lock railway station, and 350m of at least one bus stop. The site is also within Enfield Wash, which is a Local Centre.	++	Site is located within 1km of Turkey Street railway station and Enfield Lock railway station, and 350m of at least one bus stop. The site is also within Enfield Wash, which is a Local Centre.
IIA13: Biodiversity	0	Site is not located within close proximity of any biodiversity assets.	0	Site is not located within close proximity of any biodiversity assets.
IIA14: Historic environment	-?	Site is within 500m of Turkey Street Conservation Area and two Grade II listed buildings (The Bell Inn, and 472-474 Hertford Road). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	0?	The Council's assessment of heritage considerations records this site as 'Green' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Wash	+?	Site is located within the settlement of Enfield Wash

I/A objective	SA41 (without mitigation)	Justification text	SA41 (with mitigation)	Justification text
		and contains built development.		and contains built development.
I/A16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
I/A17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
I/A18: Water	--?	Site falls within Source Protection Zone 2.	--?	Site falls within Source Protection Zone 2.

SA42: Fords Grove Car Park (housing site) – formerly referred to as CFS223

I/A objective	SA42 (without mitigation)	Justification text	SA42 (with mitigation)	Justification text
I/A1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
I/A2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
I/A3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
I/A4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Paulin Ground and the New River Green Chain Corridor, in addition to falling within 400m of a walking and cycle path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Paulin Ground and the New River Green Chain Corridor, in addition to falling within 400m of a walking and cycle path.
I/A5: Services and facilities	+++?	Site is within 800m of a primary school and a secondary school.	+++?	Site is within 800m of a primary school and a secondary school.
I/A6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.

IIA objective	SA42 (without mitigation)	Justification text	SA42 (with mitigation)	Justification text
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Winchmore Hill Broadway Local Centre.	+	Site is adjacent to Winchmore Hill Broadway Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located 1km of Winchmore Hill railway station and 350m of at least one bus stop. The site is also next to Winchmore Hill Broadway, which is a Local Centre.	++	Site is located 1km of Winchmore Hill railway station and 350m of at least one bus stop. The site is also next to Winchmore Hill Broadway, which is a Local Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and within 250m of the Paulin Ground Woods and New River SINC.	--?	Site is located within 100m of a Priority Habitat and within 250m of the Paulin Ground Woods and New River SINC.
IIA14: Historic environment	-?	Site is within 500m of Winchmore Hill Green Conservation Area and three Grade II listed buildings (Police Station, Post Office Sorting Office, and forecourt railings to Post Office Sorting Office). Although there is built development between the site and the Conservation Area and the listed buildings, its development could affect the setting of these heritage assets.	0?	The Council's assessment of heritage considerations records this site as 'Green' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+	Site is located within the settlement of Winchmore Hill	+	Site is located within the settlement of Winchmore Hill

IIA objective	SA42 (without mitigation)	Justification text	SA42 (with mitigation)	Justification text
		and contains built development.		and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.
IIA18: Water	--?	Site falls within Source Protection Zone 1.	--?	Site falls within Source Protection Zone 1.

SA43: Lodge Drive Car Park (incl. Depot) (housing site) – formerly referred to as CFS226

IIA objective	SA43 (without mitigation)	Justification text	SA43 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Broomfield Park, Hazelwood Sports Ground and the New River Green Chain Corridor, in addition to falling within 400m of a walking and cycle path.	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Broomfield Park, Hazelwood Sports Ground and the New River Green Chain Corridor, in addition to falling within 400m of a walking and cycle path.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the	0	The location of development will not affect the achievement of this objective.

IIA objective	SA43 (without mitigation)	Justification text	SA43 (with mitigation)	Justification text
		achievement of this objective.		
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Palmers Green District Centre.	+	Site is adjacent to Palmers Green District Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Palmers Green railway station and 350m of at least one bus stop. The site is also next to Palmers Green, which is a District Centre.	++	Site is located within 1km of Palmers Green railway station and 350m of at least one bus stop. The site is also next to Palmers Green, which is a District Centre.
IIA13: Biodiversity	--?	Site is located within 250m of the New River SINC.	--?	Site is located within 250m of the New River SINC.
IIA14: Historic environment	-?	Site is within 500m of The Lakes Estate Conservation Area, Broomfield House Registered Park and Garden and four Grade II listed buildings (Wall to North of Number 176, Truro House, Front Wall and Gate Piers to West of No 176, and National Westminster Bank). Although there is built development between the site, Conservation Area, Registered Park and Garden and listed buildings, its development could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Palmers Green and contains built development.	+?	Site is located within the settlement of Palmers Green and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.	+	Site is relatively small in size and on brownfield land.

IIA objective	SA43 (without mitigation)	Justification text	SA43 (with mitigation)	Justification text
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zone 1.	--?	Site falls within Source Protection Zone 1.

Other proposed site allocations outside of the place making areas (outside urban areas)

SA44: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road (mixed-use site) – formerly referred to as CHC5/LP1138⁸

IIA objective	CHC5/LP1 138 (without mitigation)	Justification text	SA44 (without mitigation)	Justification text	SA44 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/--?	Site is within 800m of a number of areas of open space, including Forty Hall Park & Estate, The Dell, and the New River Green Chain. However, the site contains a cycle path which could be lost as a result of new development. Additionally, the site is not located within 800m of a GP surgery.	++/--?	Site is within 800m of a number of areas of open space, including Forty Hall Park & Estate, The Dell, and the New River Green Chain. However, the site contains a cycle path which could be lost as a result of new development. Additionally, the site is not located within 800m of a GP surgery.	++/--?	Site is within 800m of a number of areas of open space, including Forty Hall Park & Estate, The Dell, and the New River Green Chain. However, the site contains a cycle path which could be lost as a result of new development. Additionally, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.	++?	Site is within 800m of a primary school and a secondary school.

⁸ Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road was previously appraised as a housing site (CHC5/LP1138). It has now been appraised as a mixed use site (SA45).

IIA objective	CHC5/LP1 138 (without mitigation)	Justification text	SA44 (without mitigation)	Justification text	SA44 (with mitigation)	Justification text
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of social and community infrastructure. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	+?/-	Site is under 10ha in size but will make a limited contribution towards employment opportunities through the provision of social and community infrastructure. However, it is unknown what proportion of the site will comprise employment development. The site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Turkey Street railway station and 350m of at least one bus stop.	++/-	Site is located within 1km of Turkey Street railway station and 350m of at least one bus stop. However, the site is	++/-	Site is located within 1km of Turkey Street railway station and 350m of at least one bus stop. However, the site

IIA objective	CHC5/LP1 138 (without mitigation)	Justification text	SA44 (without mitigation)	Justification text	SA44 (with mitigation)	Justification text
		stop. However, the site is only within 401-800m of Kemp Road Freezywater, which is a Local Centre.		only within 401-800m of Kemp Road Freezywater, which is a Local Centre.		is only within 401-800m of Kemp Road Freezywater, which is a Local Centre.
IIA13: Biodiversity	--?	Site is located within 250m of the New River SINC and Forty Hall Park & Estate SINC, and 100m of a Priority Habitat.	--?	Site is located within 250m of the New River SINC and Forty Hall Park & Estate SINC, and 100m of a Priority Habitat.	--?	Site is located within 250m of the New River SINC and Forty Hall Park & Estate SINC, and 100m of a Priority Habitat.
IIA14: Historic environment	--?	Site is adjacent to the Forty Hill Conservation Area, which contains a number of Grade II listed buildings. There is limited built development between the site and the Conservation Area and its development could adversely affect the setting of these heritage assets.	--?	Site is adjacent to the Forty Hill Conservation Area, which contains a number of Grade II listed buildings. There is limited built development between the site and the Conservation Area and its development could adversely affect the setting of these heritage assets.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	--?	Site is large in scale and located on the edge of Forty Hill.	--?	Site is large in scale and located on the edge of Forty Hill.	--?	Site is large in scale and located on the edge of Forty Hill.
IIA16: Efficient use of land and materials	--?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.	--?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.	--?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site	--	Site has a predicted peak flood depth of greater than 300mm. However, the

IIA objective	CHC5/LP1 138 (without mitigation)	Justification text	SA44 (without mitigation)	Justification text	SA44 (with mitigation)	Justification text
		However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.		is on brownfield land and does not fall within Flood Zones 2 or 3.		site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zone 1 and New River runs along its western boundary.	--?	Site falls within Source Protection Zone 1 and New River runs along its western boundary.	--?	Site falls within Source Protection Zone 1 and New River runs along its western boundary.

SA45: Land between Camlet Way and Crescent Way, Hadley (housing site) – formerly referred to as COC8/LP465

IIA objective	SA45 (without mitigation)	Justification text	SA45 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Hadley Wood and Camlet Way Railway Embankment, in addition to falling within 400m of a cycle path. However, the site is not located within 800m of a GP surgery.	++/-	Site is within 800m of a number of areas of open space, including Hadley Wood and Camlet Way Railway Embankment, in addition to falling within 400m of a cycle path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Hadely Wood Local Centre.	+	Site is adjacent to Hadely Wood Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Hadley Wood railway station	++/-	Site is located within 1km of Hadley Wood railway station

IIA objective	SA45 (without mitigation)	Justification text	SA45 (with mitigation)	Justification text
		and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.		and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and within 250m from Broadgates Pastures SINC.	--?	Site is located within 100m of a Priority Habitat and within 250m from Broadgates Pastures SINC.
IIA14: Historic environment	--?	Site overlaps Hadley Wood Conservation Area and is within 500m of a Grade II* listed building (St Martha's Convent (the Mount House) with attached Stable Block) and three Grade II listed buildings (Number 83 and attached wall, gate pier and gate, Number 87 and attached wall, gate pier and gate, and Pegasus). The site is located on the edge of Hadley Wood and its large-scale development could adversely affect the setting of these heritage assets.	--?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	--?	Site is large in scale and located on the edge of Hadley Wood.	--?	Site is large in scale and located on the edge of Hadley Wood.
IIA16: Efficient use of land and materials	--?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.	--?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding	-	Site partially falls within Flood Zone 3. However, the site is on brownfield land and is not at risk of surface water flooding.	-	Site partially falls within Flood Zone 3. However, the site is on brownfield land and is not at risk of surface water flooding.
IIA18: Water	--?	Site contains Monken Mead Brook within its boundary, as well as other brooks.	--?	Site contains Monken Mead Brook within its boundary, as well as other brooks.

Employment and growth site allocations outside of the placemaking areas (SP E1)

SA49: Land to the south of Millmarsh Lane, Brimsdown Industrial Estate (industrial site) – formerly referred to as CFS134

IIA objective	SA49 (without mitigation)	Justification text	SA49 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+	Site is under 10ha in size.	+	Site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. However, the site is within 401-800m of	++/-	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. However, the site is within 401-800m of Brimsdown

IIA objective	SA49 (without mitigation)	Justification text	SA49 (with mitigation)	Justification text
		Brimsdown (Brimsdown Avenue) Local Centre.		(Brimsdown Avenue) Local Centre.
IIA13: Biodiversity	--?	Site is located within 250m of the Chingford Reservoirs SSSI and SINC and Lea Valley SINC.	--?	Site is located within 250m of the Chingford Reservoirs SSSI and SINC and Lea Valley SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Brimsdown and contains built development.	+?	Site is located within the settlement of Brimsdown and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.
IIA18: Water	--?	Site falls within Source Protection Zone 2 and a watercourse runs along its eastern edge.	--?	Site falls within Source Protection Zone 2 and a watercourse runs along its eastern edge.

SA50: 6 Morson Road (industrial site) – formerly referred to as CFS136

IIA objective	SA50 (without mitigation)	Justification text	SA50 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.

IIA objective	SA50 (without mitigation)	Justification text	SA50 (with mitigation)	Justification text
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	+	Site falls within the 10% and 20% most deprived areas within England.	+	Site falls within the 10% and 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+	The site is under 10ha in size.	+	The site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	0	Site scored 0 in the air quality appraisal.	0	Site scored 0 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Ponders End railway station and 350m of at least one bus stop. However, the site is only within 401-800m of South Street Ponders End, which is a Local Centre.	++/-	Site is located within 1km of Ponders End railway station and 350m of at least one bus stop. However, the site is only within 401-800m of South Street Ponders End, which is a Local Centre.
IIA13: Biodiversity	--?	Site is located within 250m of the Chingford Reservoirs SSSI and SINC and Lea Valley SINC and is within 100m of a Priority Habitat.	--?	Site is located within 250m of the Chingford Reservoirs SSSI and SINC and Lea Valley SINC and is within 100m of a Priority Habitat.
IIA14: Historic environment	-?	Site is within 500m from Ponders End Flour Mills Conservation Area and four Grade II listed buildings (House to East of Old Mill Building now used as offices, Old Mill Building, Mill Owner's House, Barn to South of Mill Owner's House). Although the site	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.

IIA objective	SA50 (without mitigation)	Justification text	SA50 (with mitigation)	Justification text
		contains built development, its redevelopment could affect the setting of these heritage assets.		
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of Ponders End.	-?	Site is not large in scale but is located on the edge of Ponders End.
IIA16: Efficient use of land and materials	+	Site is relatively small and on brownfield land.	+	Site is relatively small and on brownfield land.
IIA17: Flooding	-	Site partially falls within Flood Zone 3. However, the site is on brownfield land and is not at risk of surface water flooding.	-	Site partially falls within Flood Zone 3. However, the site is on brownfield land and is not at risk of surface water flooding.
IIA18: Water	--?	Site is adjacent to a watercourse that runs along the eastern edge of the site.	--?	Site is adjacent to a watercourse that runs along the eastern edge of the site.

SA51: Montagu Ind Estate (industrial site) – formerly referred to as CFS153

IIA objective	SA51 (without mitigation)	Justification text	SA51 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.

IIA objective	SA51 (without mitigation)	Justification text	SA51 (with mitigation)	Justification text
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+	The site is under 10ha in size.	+	The site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. The site is also within 201-400m of Craig Park Road, which is a Local Centre.	++	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. The site is also within 201-400m of Craig Park Road, which is a Local Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and is 250m-750m within the Lea Valley SINC.	--?	Site is located within 100m of a Priority Habitat and is 250m-750m within the Lea Valley SINC.
IIA14: Historic environment	--?	Site is adjacent to Montagu Cemeteries Conservation Area. Although the site contains built development, its redevelopment could affect the setting of the heritage asset.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Edmonton Green and contains built development.	+?	Site is located within the settlement of Edmonton Green and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and falls mainly within Flood Zone 3. However, the site is on brownfield land.	--	Site has a predicted peak flood depth of greater than 300mm and falls mainly within Flood Zone 3. However, the site is on brownfield land.

IIA objective	SA51 (without mitigation)	Justification text	SA51 (with mitigation)	Justification text
IIA18: Water	--?	Site falls within Source Protection Zones 1 and 2.	--?	Site falls within Source Protection Zones 1 and 2.

SA52: Land West of Ramney Marsh (industrial site) – formerly referred to as ELC3/LP606

IIA objective	SA52 (without mitigation)	Justification text	SA52 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++	Site is over 10ha in size.	++	Site is over 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.

IIA objective	SA52 (without mitigation)	Justification text	SA52 (with mitigation)	Justification text
IIA12: Sustainable transport	++/-	Site is located within 1km of Enfield Lock railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Freezywater (Hertford Road), which is a Local Centre.	++/-	Site is located within 1km of Enfield Lock railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Freezywater (Hertford Road), which is a Local Centre.
IIA13: Biodiversity	--?	Site contains a Priority Habitat and within 250m of the Lea Valley SINIC.	--?	Site contains a Priority Habitat and within 250m of the Lea Valley SINIC.
IIA14: Historic environment	--?	Site is within 500m of a Grade II listed building (Bridge at Ramney Lock). There is no built development between the site and listed building and therefore its development could have an adverse effect on the heritage asset and its setting.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Lock and contains built development.	+?	Site is located within the settlement of Enfield Lock and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large and on brownfield land.	++	Site is relatively large and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.
IIA18: Water	--?	Site falls within Source Protection Zones 1 and 2 and a watercourse runs along the eastern edge of the site.	--?	Site falls within Source Protection Zones 1 and 2 and a watercourse runs along the eastern edge of the site.

SA53: Car Park Site, Wharf Road (industrial site) – formerly referred to as POC5/LP694/CFS135

IIA objective	SA53 (without mitigation)	Justification text	SA53 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA53 (without mitigation)	Justification text	SA53 (with mitigation)	Justification text
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+	Site is under 10ha in size.	+	Site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	0	Site scored 0 in the air quality appraisal.	0	Site scored 0 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Ponders End railway station and 350m of at least one bus stop. However, the site is only within 401-800m of South Street Ponders End, which is a Local Centre.	++/-	Site is located within 1km of Ponders End railway station and 350m of at least one bus stop. However, the site is only within 401-800m of South Street Ponders End, which is a Local Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and is within 250m of the Chingford Reservoirs SSSI, Chingford Reservoirs SSSI and Lea Valley SINC.	--?	Site is located within 100m of a Priority Habitat and is within 250m of the Chingford Reservoirs SSSI, Chingford Reservoirs SSSI and Lea Valley SINC.

IIA objective	SA53 (without mitigation)	Justification text	SA53 (with mitigation)	Justification text
IIA14: Historic environment	--?	Site is within 500m from Ponders End Flour Mills Conservation Area and five Grade II listed buildings (Barn to South of Mill Owner's House, Mill Owner's House, Old Mill Building, House to East of Old Mill building now used as offices, and Former Well Station of Thames Water Authority). There is limited built development between the site and the Conservation Areas and the listed buildings, therefore its development could affect the setting of these heritage assets.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of Ponders End.	-?	Site is not large in scale but is located on the edge of Ponders End.
IIA16: Efficient use of land and materials	+	Site is relatively small and on brownfield land.	+	Site is relatively small and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.
IIA18: Water	--?	Site falls within Source Protection Zones 1 and 2 and a watercourse runs along the southern and eastern edges of the site.	--?	Site falls within Source Protection Zones 1 and 2 and a watercourse runs along the southern and eastern edges of the site.

SA54: Land East of Junction 24 (industrial site) – formerly referred to as CFS155

IIA objective	SA54 (without mitigation)	Justification text	SA54 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA54 (without mitigation)	Justification text	SA54 (with mitigation)	Justification text
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+	The site is under 10ha in size.	+	The site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	--/+	Site is more than 800m from a Major, District and Local Centre. However, the site is located within 350m of at least one bus stop.	--/+	Site is more than 800m from a Major, District and Local Centre. However, the site is located within 350m of at least one bus stop.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and is 250m-750m within Plumridge, Vault Hill & Little Beechill Woods SINC.	--?	Site is located within 100m of a Priority Habitat and is 250m-750m within Plumridge, Vault Hill & Little Beechill Woods SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and	-?	The Council's assessment of impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment

IIA objective	SA54 (without mitigation)	Justification text	SA54 (with mitigation)	Justification text
		effects may extend beyond 500m.		should be undertaken and mitigation provided.
IIA15: Landscape and townscape	--?	Site is large in scale and located in an undeveloped area.	--?	Site is large in scale and located in an undeveloped area.
IIA16: Efficient use of land and materials	--?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.	--?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zone 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zone 2 or 3.
IIA18: Water	--?	Site contains a water body and a brook runs along its eastern edge.	--?	Site contains a water body and a brook runs along its eastern edge.

SA55: Land to the North West of Innova Park (industrial site) – formerly referred to as CFS148

IIA objective	SA55 (without mitigation)	Justification text	SA55 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA4: Health and wellbeing	0	The location of industrial development will not affect the achievement of this objective.	0	The location of industrial development will not affect the achievement of this objective.

IIA objective	SA55 (without mitigation)	Justification text	SA55 (with mitigation)	Justification text
IIA5: Services and facilities	0	Industrial development is not considered likely to affect this objective.	0	Industrial development is not considered likely to affect this objective.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	+	The site is under 10ha in size.	+	The site is under 10ha in size.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Enfield Lock railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Freezywater (Hertford Road), which is a Local Centre.	++/-	Site is located within 1km of Enfield Lock railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Freezywater (Hertford Road), which is a Local Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and is within 250m of the Lea Valley SINC.	--?	Site is located within 100m of a Priority Habitat and is within 250m of the Lea Valley SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Lock	+?	Site is located within the settlement of Enfield Lock and contains built development.

IIA objective	SA55 (without mitigation)	Justification text	SA55 (with mitigation)	Justification text
		and contains built development.		
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. However, the site is on brownfield land.
IIA18: Water	--?	Site falls within Source Protection Zones 1 and 2 and a brook runs along the northern and southern edges of the site.	--?	Site falls within Source Protection Zones 1 and 2 and a brook runs along the northern and southern edges of the site.

Policy SP CL4: Promoting sporting excellence

SA56: Picketts Lock/Lee Valley Leisure Centre (leisure uses site) – formerly referred to as LOC2/LP675

IIA objective	SA56 (without mitigation)	Justification text	SA56 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	The development of a leisure uses site will not affect the achievement of this objective.	0	The development of a leisure uses site will not affect the achievement of this objective.
IIA4: Health and wellbeing	++	The development of a leisure uses site would have beneficial effects on people's health and wellbeing.	++	The development of a leisure uses site would have beneficial effects on people's health and wellbeing.
IIA5: Services and facilities	0	The development of a leisure uses site will not affect the achievement of this objective.	0	The development of a leisure uses site will not affect the achievement of this objective.

IIA objective	SA56 (without mitigation)	Justification text	SA56 (with mitigation)	Justification text
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	0	The development of a leisure uses site will not affect the achievement of this objective.	0	The development of a leisure uses site will not affect the achievement of this objective.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	+	Site is located within 350m of at least one bus stop. The site is also within 201-400m of Nightingale Road, Edmonton, which is a Local Centre.	+	Site is located within 350m of at least one bus stop. The site is also within 201-400m of Nightingale Road, Edmonton, which is a Local Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and is within 250m of the Lea Valley SINC.	--?	Site is located within 100m of a Priority Habitat and is within 250m of the Lea Valley SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	--?	Site is large in scale and located on the edge of Lower Edmonton.	--?	Site is large in scale and located on the edge of Lower Edmonton.
IIA16: Efficient use of land and materials	--	Site is relatively large and on greenfield land classed as Urban land.	--	Site is relatively large and on greenfield land classed as Urban land.

IIA objective	SA56 (without mitigation)	Justification text	SA56 (with mitigation)	Justification text
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm and partially falls within Flood Zone 2. The site is also on greenfield land.	-	Site has a predicted peak flood depth of greater than 150mm and partially falls within Flood Zone 2. The site is also on greenfield land.
IIA18: Water	0	The development of a leisure uses site will not affect the achievement of this objective.	0	The development of a leisure uses site will not affect the achievement of this objective.

SA62: Tottenham Hotspur's training centre (sport and recreation site) – formerly referred to as CFS218

IIA objective	SA62 (without mitigation)	Justification text	SA62 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	The development of a sport and recreation site will not affect the achievement of this objective.	0	The development of a sport and recreation site will not affect the achievement of this objective.
IIA4: Health and wellbeing	++	The development of a sport and recreation site would have beneficial effects on people's health and wellbeing.	++	The development of a sport and recreation site would have beneficial effects on people's health and wellbeing.
IIA5: Services and facilities	0	The development of a sport and recreation site will not affect the achievement of this objective.	0	The development of a sport and recreation site will not affect the achievement of this objective.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.

IIA objective	SA62 (without mitigation)	Justification text	SA62 (with mitigation)	Justification text
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	0	The development of a sport and recreation site will not affect the achievement of this objective.	0	The development of a sport and recreation site will not affect the achievement of this objective.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	+/-	Site is within 1km of Turkey Street railway station but not within 350m of a bus stop. The site is only within 401-800m of Bullsmoor Lane/A10, which is a Local Centre.	+/-	Site is within 1km of Turkey Street railway station but not within 350m of a bus stop. The site is only within 401-800m of Bullsmoor Lane/A10, which is a Local Centre.
IIA13: Biodiversity	--?	Site contains a Priority Habitat and is located within 250m of the New River SINC and Forty Hall Park & Estate SINC.	--?	Site contains a Priority Habitat and is located within 250m of the New River SINC and Forty Hall Park & Estate SINC.
IIA14: Historic environment	-?	Over half of the site falls within Forty Hill Conservation Area, which contains a number of listed buildings as well as Myddelton House Registered Park and Garden. Myddelton House Registered Park and Garden falls partially within the site and the site is adjacent to a number of Grade II listed buildings. Due to the fact this site is allocated as a sport and recreation site which could contain limited development, its development could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	-?	Site is large in scale and located in a relatively undeveloped area. Due to	-?	Site is large in scale and located in a relatively undeveloped area. Due to the

IIA objective	SA62 (without mitigation)	Justification text	SA62 (with mitigation)	Justification text
		the fact the site is allocated as a sport and recreation site which could contain limited development, its development could affect the landscape.		fact the site is allocated as a sport and recreation site which could contain limited development, its development could affect the landscape.
IIA16: Efficient use of land and materials	--?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.	--?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. The site is also on greenfield land.	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 2. The site is also on greenfield land.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

Policy DM BG19: Burial and crematorium spaces

SA58: Alma Road Open Space (cemetery) – formerly referred to as CFS167

IIA objective	SA58 (without mitigation)	Justification text	SA58 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	The development of a cemetery will not affect the achievement of this objective.	0	The development of a cemetery will not affect the achievement of this objective.
IIA4: Health and wellbeing	--?	Site contains an area of open space, Durants Park	--?	Site contains an area of open space, Durants Park

IIA objective	SA58 (without mitigation)	Justification text	SA58 (with mitigation)	Justification text
		Metropolitan Open Land, which would be lost to the cemetery.		Metropolitan Open Land, which would be lost to the cemetery.
IIA5: Services and facilities	0	The development of a cemetery will not affect the achievement of this objective.	0	The development of a cemetery will not affect the achievement of this objective.
IIA6: Social inclusion	0	The development of a cemetery will not affect the achievement of this objective.	0	The development of a cemetery will not affect the achievement of this objective.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	0	The development of a cemetery will not affect the achievement of this objective.	0	The development of a cemetery will not affect the achievement of this objective.
IIA10: Town and local centres	0	The development of a cemetery will not affect the achievement of this objective.	0	The development of a cemetery will not affect the achievement of this objective.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal. Site scored 0 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal. Site scored 0 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Brimsdown Avenue, which is a Local Centre.	++/-	Site is located within 1km of Brimsdown railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Brimsdown Avenue, which is a Local Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and is 250-750m of the Lea Valley SINC and Chingford Reservoirs SSSI.	--?	Site is located within 100m of a Priority Habitat and is 250-750m of the Lea Valley SINC and Chingford Reservoirs SSSI.
IIA14: Historic environment	0	The development of a cemetery will not affect the	0	The Council's assessment of heritage considerations and impacts on Archaeological

IIA objective	SA58 (without mitigation)	Justification text	SA58 (with mitigation)	Justification text
		achievement of this objective.		Priority Areas has not recorded anything.
IIA15: Landscape and townscape	0	The development of a cemetery will not affect the achievement of this objective.	0	The development of a cemetery will not affect the achievement of this objective.
IIA16: Efficient use of land and materials	0	The development of a cemetery will not affect the achievement of this objective.	0	The development of a cemetery will not affect the achievement of this objective.
IIA17: Flooding	-	Site is on greenfield land. However, the site does not fall within Flood Zones 2 or 3 and is not at risk of surface water flooding.	-	Site is on greenfield land. However, the site does not fall within Flood Zones 2 or 3 and is not at risk of surface water flooding.
IIA18: Water	--?	Site falls within Source Protection Zone 2.	--?	Site falls within Source Protection Zone 2.

SA59: Firs Farm Recreation Ground (Part) (crematorium) – formerly referred to as CFS168

IIA objective	SA59 (without mitigation)	Justification text	SA59 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.
IIA4: Health and wellbeing	--?	Site contains an area of open space, Firs Farm & Clowes Sportsgrounds Metropolitan Open Land, and a cycle path, both of which could be lost to the crematorium.	--?	Site contains an area of open space, Firs Farm & Clowes Sportsgrounds Metropolitan Open Land, and a cycle path, both of which could be lost to the crematorium.
IIA5: Services and facilities	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.

IIA objective	SA59 (without mitigation)	Justification text	SA59 (with mitigation)	Justification text
IIA6: Social inclusion	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.
IIA10: Town and local centres	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	+	Site is located within 350m of at least one bus stop. The site is also within 201-400m of Firs Lane, which is a Local Centre.	+	Site is located within 350m of at least one bus stop. The site is also within 201-400m of Firs Lane, which is a Local Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and is 250-750m of the Paulin Ground Woods SINC, Tatem Park SINC and New River SINC.	--?	Site is located within 100m of a Priority Habitat and is 250-750m of the Paulin Ground Woods SINC, Tatem Park SINC and New River SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	--	Development of this site would result in the loss of Firs Farm & Clowes Sportsgrounds Metropolitan Open Land.	--	Development of this site would result in the loss of Firs Farm & Clowes Sportsgrounds Metropolitan Open Land.

IIA objective	SA59 (without mitigation)	Justification text	SA59 (with mitigation)	Justification text
IIA16: Efficient use of land and materials	--	Site is relatively large and on greenfield land classed as Urban land.	--	Site is relatively large and on greenfield land classed as Urban land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and is on greenfield land. However, the site does not fall within Flood Zones 2 or 3.	--	Site has a predicted peak flood depth of greater than 300mm and is on greenfield land. However, the site does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zone 1.	--?	Site falls within Source Protection Zone 1.

SA60: Sloemans Farm (natural burial site) – formerly referred to as CFS171

IIA objective	SA60 (without mitigation)	Justification text	SA60 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	The development of a natural burial site will not affect the achievement of this objective.	0	The development of a natural burial site will not affect the achievement of this objective.
IIA4: Health and wellbeing	0	Site does not comprise an open space.	0	Site does not comprise an open space.
IIA5: Services and facilities	0	The development of a natural burial site will not affect the achievement of this objective.	0	The development of a natural burial site will not affect the achievement of this objective.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect	0	The location of development will not affect the achievement of this objective.

IIA objective	SA60 (without mitigation)	Justification text	SA60 (with mitigation)	Justification text
		the achievement of this objective.		
IIA9: Economy	0	The development of a natural burial site will not affect the achievement of this objective.	0	The development of a natural burial site will not affect the achievement of this objective.
IIA10: Town and local centres	0	The development of a natural burial site will not affect the achievement of this objective.	0	The development of a natural burial site will not affect the achievement of this objective.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/--	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.	++/--	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	--?	Site contains a Priority Habitat and is 250m of the Crews Hill to Bowes Park RAILSIDES SINC and Forty Hall Park & Estate SINC.	--?	Site contains a Priority Habitat and is 250m of the Crews Hill to Bowes Park RAILSIDES SINC and Forty Hall Park & Estate SINC.
IIA14: Historic environment	0	The development of a natural burial site will not affect the achievement of this objective.	0	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided. However, it is assumed that the development of a natural burial site will not affect the achievement of this objective.
IIA15: Landscape and townscape	0	The development of a natural burial site will not affect the achievement of this objective.	0	The development of a natural burial site will not affect the achievement of this objective.
IIA16: Efficient use of land and materials	0	The development of a natural burial site will not affect the achievement of this objective.	0	The development of a natural burial site will not affect the achievement of this objective.
IIA17: Flooding	-	Site partially falls within Flood Zone 3 and is on greenfield land. However,	-	Site partially falls within Flood Zone 3 and is on greenfield land. However, the site is not

IIA objective	SA60 (without mitigation)	Justification text	SA60 (with mitigation)	Justification text
		the site is not at risk of surface water flooding.		at risk of surface water flooding.
IIA18: Water	--?	Site contains three brooks within its boundary.	--?	Site contains three brooks within its boundary.

SA61: Church Street Recreation Ground (crematorium) – formerly referred to as CFS230

IIA objective	SA61 (without mitigation)	Justification text	SA61 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.
IIA4: Health and wellbeing	--?	Site falls within Church Street Recreation Ground Metropolitan Open Land, which would be lost to the crematorium.	--?	Site falls within Church Street Recreation Ground Metropolitan Open Land, which would be lost to the crematorium.
IIA5: Services and facilities	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.

IIA objective	SA61 (without mitigation)	Justification text	SA61 (with mitigation)	Justification text
IIA10: Town and local centres	0	The development of a crematorium will not affect the achievement of this objective.	0	The development of a crematorium will not affect the achievement of this objective.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	+	Site is located within 350m of at least one bus stop. The site is also within 201-400m of Hazelbury Road Edmonton, which is a Local Centre.	+	Site is located within 350m of at least one bus stop. The site is also within 201-400m of Hazelbury Road Edmonton, which is a Local Centre.
IIA13: Biodiversity	--?	Site contains a Priority Habitat and is 250-750m of the Pymme's Park SINC.	--?	Site contains a Priority Habitat and is 250-750m of the Pymme's Park SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.	0?	The Council's assessment of heritage considerations and impacts on Archaeological Priority Areas has not recorded anything.
IIA15: Landscape and townscape	--	Development of this site would result in the loss of Church Street Recreation Ground Metropolitan Open Land.	--	Development of this site would result in the loss of Church Street Recreation Ground Metropolitan Open Land.
IIA16: Efficient use of land and materials	--	Site is relatively large in size and on greenfield land, classed as Urban land.	--	Site is relatively large in size and on greenfield land, classed as Urban land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 300mm and is on greenfield land. However, the site does not fall within Flood Zones 2 or 3.	-	Site has a predicted peak flood depth of greater than 300mm and is on greenfield land. However, the site does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zone 2.	--?	Site falls within Source Protection Zone 2.

Nature recovery site

SA57: Whitewebbs Golf Course, Beggar's Hollow (nature recovery site) – formerly referred to as CFS161

IIA objective	SA57 (without mitigation)	Justification text	SA57 (with mitigation)	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.
IIA4: Health and wellbeing	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.
IIA5: Services and facilities	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.
IIA6: Social inclusion	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.
IIA10: Town and local centres	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.	-?	Site scored 1 in the air quality appraisal.

IIA objective	SA57 (without mitigation)	Justification text	SA57 (with mitigation)	Justification text
IIA12: Sustainable transport	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.
IIA13: Biodiversity	++	The development of a nature recovery site would have a significant positive effect on biodiversity.	++	The development of a nature recovery site would have a significant positive effect on biodiversity.
IIA14: Historic environment	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The Council's assessment of heritage considerations records this site as 'Red' and states that a Heritage Impact Assessment should be undertaken and mitigation provided. However, it is assumed that the development of a nature recovery site will not affect the achievement of this objective.
IIA15: Landscape and townscape	+	The development of a nature recovery site would have a positive effect on the landscape.	+	The development of a nature recovery site would have a positive effect on the landscape.
IIA16: Efficient use of land and materials	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150m, partially falls within Flood Zone 3 and is on greenfield land.	-	Site has a predicted peak flood depth of greater than 150m, partially falls within Flood Zone 3 and is on greenfield land.
IIA18: Water	0	The development of a nature recovery site will not affect the achievement of this objective.	0	The development of a nature recovery site will not affect the achievement of this objective.

Site options appraised but not allocated

Housing sites

CHC1/LP031: Warmerdams Nursery, Cattlegate Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of Whitewebbs Park and 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	--?	Site is located within 250m of Crews Hill Golf Course SINC and Crews Hill Bowes Park Railsides SINC, and 100m of a Priority Habitat.
IIA14: Historic environment	-?	Site is within 500m of a Grade II* listed building (The Paddocks) and a Grade II listed building (Glasgow Stud Farmhouse). Although there is built development between the site and the listed buildings, its development could affect the setting of both heritage assets.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Crews Hill and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.

IIA objective	Effect	Justification text
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

CHC10/LP179: Site at Oak Farm and Homestead Nursery, Cattlegate Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	+/-	Site is within 400m of a walking path but not within 800m of an area of open space. The site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	--/+	Site is more than 800m from a Major, District and Local Centre. However, the site is within 1km of Crews Hill railway station.
IIA13: Biodiversity	--?	Site is located within 250m of Crews Hill Golf Course SINC and Crews Hill Bowes Park Railsides SINC, and 100m of a Priority Habitat.
IIA14: Historic environment	-?	Site is within 500m of a Grade II* listed building (The Paddocks) and two Grade II listed buildings (2 Barns North West of Farmhouse at the Paddocks and Glasgow Stud Farmhouse). There is limited built development between the site and the listed buildings to the north west (The Paddocks and 2 Barns North West of Farmhouse at the Paddocks). Its development could therefore affect the setting of these heritage assets.
IIA15: Landscape and townscape	-?	Site is located within the settlement of Crews Hill but does not contain built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.

IIA objective	Effect	Justification text
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

CHC11/LP472 – Parcel 1: Land to the rear of Jesus Christ Church, Parcel 1

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is next to Forty Hall Park & Estate and within 800m of a number of other open spaces, in addition to falling within 400m of a walking path and cycle path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	--/+	Site is more than 800m from a Major, District and Local Centre. However, the site is within 1km of Turkey Street railway station.
IIA13: Biodiversity	--?	Site is located within 250m of Forty Hall Park & Estate SINC and New River SINC, and 100m of a Priority Habitat.
IIA14: Historic environment	--?	Site is within 500m two Grade I listed buildings (Screen Wall, Gateway and North Pavilions to West of Forty Hall and Forty Hall) and a number of Grade II listed buildings. Due to the proximity of the site to these listed buildings, its development could affect the setting of these heritage assets.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of Forty Hill.

IIA objective	Effect	Justification text
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zone 1.

CHC12/LP472 – Parcel 2: Land to the south of Forty Hill Church of England School, Forty Hill, Parcel 2

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of Forty Hall Park & Estate and a number of other open spaces, in addition to falling within 400m of a walking path and cycle path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is within 1km of Turkey Street railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	--?	Site is located within 250m of New River SINC and Forty Hall Park & Estate SINC, and 100m of a Priority Habitat.
IIA14: Historic environment	--?	Site is within 500m of two Grade I listed buildings (Screen Wall, Gateway, and North Pavilions to West of Forty Hall and Forty Hall) and a number of Grade II listed buildings. Due to the proximity of the site to these listed buildings, its development could affect the setting of these heritage assets.

IIA objective	Effect	Justification text
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of Forty Hill.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zone 1 and there is a brook along its south eastern boundary.

CHC14/LP637: Land north of Goat Lane

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Forty Hall Park & Estate and the New River Green Chain, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	-	Site is within 401-800m of Carterhatch Lane/A10, which is a Local Centre. The site is more than 1km from a railway station and 350m from a bus stop and does not have an existing cycle route passing the site.
IIA13: Biodiversity	--?	Site is located within 250m of New River SINC and 100-250m of a Priority Habitat (deciduous woodland).
IIA14: Historic environment	-?	Site is within 500m of the Forty Hill Conservation Area (to the north west of the site), which contains a number of Grade II listed buildings. Although there is built development between the site and the

IIA objective	Effect	Justification text
		Conservation Area, its development could affect the setting of these heritage assets.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of Forty Hill.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zone 1 and New River runs along its eastern boundary.

CHC17/LP645: Towneley Nurseries, Theobalds Park

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of Whitewebbs Park and 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and 250m-750m of Crews Hill Golfcourse SINC, Crews Hill to Bowes Park Railsides SINC and Whitewebbs Wood SINC.
IIA14: Historic environment	-?	Site is within 500m of a Grade II listed building (Glasgow Stud Farmhouse). Although there is built development between the site and

IIA objective	Effect	Justification text
		the listed building, its development could affect the setting of the heritage asset.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Crews Hill and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.
IIA18: Water	--?	Site contains a brook within the western part of its boundary.

CHC18/LP649: Brown's Garden Village, Theobalds Park Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	+/-	Site is within 800m of Whitewebbs Park but not within 400m of a walking or cycling path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/--	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	-?	Site is located within 250m-750m of Crews Hill Golfcourse SINC, Crews Hill to Bowes Park RAILSIDES SINC, Whitewebbs Wood SINC and 100-250m of a Priority Habitat.

IIA objective	Effect	Justification text
IIA14: Historic environment	-?	Site is within 500m of a Grade II listed building (Glasgow Stud Farmhouse). Although there is built development between the site and the listed building, its development could affect the setting of the heritage asset.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Crews Hill and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

CHC2/LP056: Wolden Garden Centre, Cattlegate Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	+/-	Site is within 400m of a walking path but not within 800m of an area of open space. The site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/--	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	--?	Site is located within 250m of Crews Hill Golf Course SINC and Crews Hill to Bowes Park RAILSIDES SINC, and 100m of a Priority Habitat.

IIA objective	Effect	Justification text
IIA14: Historic environment	-?	Site is within 500m of a Grade II* listed building (The Paddocks) and a Grade II listed building (Glasgow Stud Farmhouse). Although there is built development between the site and the listed buildings, its development could affect the setting of these heritage assets.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Crews Hill and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall with Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

CHC3/LP107: Burton Farm Ride

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	+/-	Site is within 800m of Whitewebbs Park but not within 400m of a walking or cycling path. The site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/--	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	-?	Site is located within 250-750m of Whitewebbs Wood SINC.

IIA objective	Effect	Justification text
IIA14: Historic environment	--?	Site is within 500m of a Grade II listed building (Glasgow Stud Farmhouse). Due to the fact the site is adjacent to the listed building, its development could affect the setting of this heritage asset.
IIA15: Landscape and townscape	-?	Site is not large in scale and located on the edge of Crews Hill.
IIA16: Efficient use of land and materials	--?	Site is relatively small in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150m, partially falls within Flood Zone 3 and is on greenfield land.
IIA18: Water	--?	A brook runs along the eastern edge of the site.

HIC10/LP642: Land opposite Jolly Farmers

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including West Enfield Parklands and Worlds End Lane Open Space, in addition to falling within 400m of a walking path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is within 200m of Enfield Road/Linkside, which is a Local Centre. The site is also within 350m of at least one bus stop.

IIA objective	Effect	Justification text
IIA13: Biodiversity	--?	Site contains a Priority Habitat and within 250-750m from Boxer's Lake and Lonsdale Drive Woods SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.
IIA15: Landscape and townscape	+?	Site is located within the settlement of World's End and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.
IIA18: Water	--?	Site contains a brook along its eastern boundary and another one cutting the site across from east to west.

HIC11/LP707: Vicarage Farm, Land between Hadley Road and Enfield Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including West Enfield Parklands, Trent Park and Lakeside, in addition to falling within 400m of a walking path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.

IIA objective	Effect	Justification text
IIA12: Sustainable transport	++	Site is located within 1km of Oakwood tube station and Gordon Hill railway station, and 350m of at least one bus stop. The site is also within 201-400m of Oakwood, which is a Local Centre.
IIA13: Biodiversity	--?	Site contains a Priority Habitat and within 250m of Trent Park Golf Course, Lakeside and Trent Park SINC.
IIA14: Historic environment	--?	Site is adjacent to Trent Park Conservation Area, which contains a number of Grade II listed buildings, Trent Park Registered Park and Garden and a Scheduled Monument (Moated site, Camlet Moat, Moat Wood). There is no built development between the site and the Conservation Area, listed buildings and Scheduled Monument. Its development could therefore adversely affect the setting of these heritage assets.
IIA15: Landscape and townscape	--?	Site is large in scale and located on the edge of World's End.
IIA16: Efficient use of land and materials	--?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm, partially falls within Flood Zone 3 and is on greenfield land.
IIA18: Water	--?	Site contains a number of brooks within its boundary, including Merryhills Brooks and Legging Beech Gutter.

HIC6/LP1153: Bramley Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	+	Site is located within 400-800m of a GP surgery. The site is also within 800m of a number of areas of open space, including Trent Park, Lakeside and Broxers Lake Open Space, but is not within 400m of a walking or cycle path.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.

IIA objective	Effect	Justification text
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Oakwood Local Centre.
IIA11: Air pollution	--?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Oakwood tube station and 350m of at least one bus stop. The site is also next to Oakwood, which is a Local Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and within 250m of Trent Park Golf Course and Lakeside SINC.
IIA14: Historic environment	--?	Site is within Trent Park Conservation Area and within 500m of a Grade II* listed building (Oakwood Underground Station) and a Grade II listed building (Station Sign to North of Oakwood Station). Due to the fact that the site is within the Trent Park Conservation Area, its development could affect the setting of these heritage assets.
IIA15: Landscape and townscape	--?	Site is large in scale and located on the edge of World's End.
IIA16: Efficient use of land and materials	--?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm and is on greenfield land. However, the site does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

HIC9/LP623: Land south of Enfield Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is located within 400m of a GP surgery. The site is also within 800m of a number of areas of open space, including Trent Park, Lakeside and West Enfield Parklands, in addition to falling within 400m of a walking path.
IIA5: Services and facilities	++?	Site is within 800m of a primary school and a secondary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.

IIA objective	Effect	Justification text
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Gordon Hill railway station and 350m of at least one bus stop. However, the site is only within 401-800m of Highlands Village Grange Park, which is a Local Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and within 250m of Boxer's Lake and Lonsdale Drive Woods SINC and Lakeside SINC.
IIA14: Historic environment	-?	Site is within 500m of Highlands Conservation , which contains a Grade II listed building (Former Ambulance Station at Highlands Hospital). Although there is built development between the Conservation Areas and the site, its development could affect the setting of these heritage assets.
IIA15: Landscape and townscape	+?	Site is located within the settlement of World's End and contains built development.
IIA16: Efficient use of land and materials	--?	Site is relatively large in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and is on greenfield land. However, the site does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

CFS162_A: Land to the Rear of Arnold House (West)

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 units.

IIA objective	Effect	Justification text
IIA4: Health and wellbeing	+	Site is located within 400-800m of a GP surgery. The site is also within 800m of an area of open space, Lee View Amenity Space, but not within 400m of a walking or cycle path.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/--	Site is located within 1km of Gordon Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and is within 250-750m of Crews Hill to Bowes Park RAILSIDES SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of World's End.
IIA16: Efficient use of land and materials	--?	Site is relatively small in size and on greenfield land, classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm and is on greenfield land. However, the site does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

CFS162_B: Land to the Rear of Arnold House (East)

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.

IIA objective	Effect	Justification text
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Lee View Amenity Green Space and Slades Close, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/--	Site is located within 1km of Gordon Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	--?	Site contains a Priority Habitat and is within 250-750m of Crews Hill to Bowes Park Railsides SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of World's End.
IIA16: Efficient use of land and materials	-	Site is relatively small in size and on greenfield land classed as Urban land.
IIA17: Flooding	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

CFS162_C: Arnold House

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Lee View Amenity Space and Slades Close, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/--	Site is located within 1km of Gordon Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	--?	Site contains a Priority Habitat and is within 250-750m of Crews Hill to Bowes Park Railsides SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of World's End.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

CFS159: Wyevale Garden Centre, Cattlegate Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of an area of open space, Whitewebbs Park, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/-	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District, and Local Centre.
IIA13: Biodiversity	--?	Site is located within 250m of Crews Hill Golf Course SINC and Crews Hill to Bowes Park RAILSIDES SINC.
IIA14: Historic environment	-?	Site is within 500m of a Grade II* listed building (The Paddocks) and two Grade II listed buildings (2 Barns North West of Farmhouse at the Paddocks, and Glasgow Stud Farmhouse). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Crews Hill and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	0	Site is on brownfield land and does not fall within Flood Zones 2 or 3. It is also not at risk of surface water flooding.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

CFS169: Kings Oak Equestrian Centre (Part)

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of Whitewebbs Park and Hilly Fields, in addition to falling within 400m of a walking and cycle path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++/--	Site is located within 1km of Crews Hill railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and is within 250-750m of Crews Hill Golf Course and Crews Hill to Bowes Park Railsides SINC.
IIA14: Historic environment	-?	Site is within 500m of Clay Hill Conservation Area and a Grade II listed building (Bridge at West End of Lane, Whitewebbs Wood). Although the site contains built development, its redevelopment could affect the setting of these heritage assets.
IIA15: Landscape and townscape	-?	Site is not large in scale but is located on the edge of Crews Hill.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

CFS210: Southgate Library, High Street, Southgate

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	+	Site has capacity for fewer than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Grovelands Park, Oakwood Park and Ivy Road Open Space, in addition to falling within 400m of a walking path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	0	Site does not fall within the 10% or 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	-	Site is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites.
IIA10: Town and local centres	+	Site is adjacent to Southgate District Centre.
IIA11: Air pollution	-?	Site scored 1 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Southgate tube station and 350m of at least one bus stop. The site is also next to Southgate, which is a District Centre.
IIA13: Biodiversity	-?	Site is located within 250-750m of the Grovelands Park and Priory Hospital SINC.
IIA14: Historic environment	-?	Site is adjacent to a Grade II listed building (Avington Cottage) and within 500m of three Conservation Areas (Southgate Circus, Southgate Green, and Meadway), two Grade II* listed buildings (Southgate Underground Station and station pylons to north and south of Southgate Station) and a number of Grade II Listed buildings. Although the site contains built development, its redevelopment could affect the setting of these heritage assets.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Southgate and contains built development.
IIA16: Efficient use of land and materials	+	Site is relatively small in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.

IIA objective	Effect	Justification text
IIA18: Water	0	Site does not fall within a Source Protection Zone or contain a watercourse or water body.

Mixed-use sites

UPP24 (19/02718/RE3): Meridian Water Orbital Business Park (and adjoining land including Land South of Argon Road and Land Known as IKEA Clear and Gas Holder Leaside Road), 5 Argon Road

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	--?	Site contains a cycle path which could be lost as a result of new development. In addition, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is next to a Strategic Industrial Location and over 10ha in size. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++/--	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. However, the site is more than 800m from a Major, District and Local Centre.
IIA13: Biodiversity	--?	Site is located within 100m of a Priority Habitat and 250m of the Lea Valley SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.
IIA15: Landscape and townscape	--?	Site is large in scale and located on the edge of Upper Edmonton.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.

IIA objective	Effect	Justification text
IIA17: Flooding	--	Site mainly falls within Flood Zone 3 and has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land.
IIA18: Water	--?	Site falls within Source Protection Zone 2 and partially within Source Protection Zone 1 (northern part of the site). The site also contains watercourses and waterbodies along its eastern and western boundaries.

UPP32 (16/01197/RE3): Meridian Water, Willoughby Lane and Meridian Way

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++	Site is within 800m of a number of areas of open space, including Kenninghall Open Space and Craig Park, in addition to falling within 400m of a walking and cycle path. The site is also located within 400-800m of a GP surgery.
IIA5: Services and facilities	+?	Site is within 800m of a primary school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is close to Strategic Industrial Locations and Locally Significant Industrial Sites. The site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	+	Site is adjacent to Dysons Road Edmonton Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. The site is also next to Dysons Road Edmonton, which is a Local Centre.
IIA13: Biodiversity	--?	Site contains a Priority Habitat and is between 250-750m of the Lea Valley SINC.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.

IIA objective	Effect	Justification text
IIA15: Landscape and townscape	+	Site is located within the settlement of Upper Edmonton and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm and partially falls within Flood Zone 3. However, the site is on brownfield land.
IIA18: Water	--?	Site falls within Source Protection Zones 1 and 2 and is located adjacent to a brook along its northern boundary.

UPC2/LP1130: Tesco Extra, 1 Glover Drive

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of a number of areas of open space, including Kenninghall Open Space and Craig Park, in addition to falling within 400m of a walking and cycle path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England.
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is close to Strategic Industrial Locations and Locally Significant Industrial Sites. The site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. The site is also within 201-400m of Dysons Road Edmonton, which is a Local Centre.
IIA13: Biodiversity	-?	Site is located within 250-750m of the Lea Valley SINC.

IIA objective	Effect	Justification text
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.
IIA15: Landscape and townscape	+	Site is located within the settlement of Upper Edmonton and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	--	Site has a predicted peak flood depth of greater than 300mm. However, the site is on brownfield land and does not fall within Flood Zones 2 or 3.
IIA18: Water	--?	Site falls within Source Protection Zone 1 and 2.

UPC1/LP1111: IKEA Meridian Water

IIA objective	Effect	Justification text
IIA1: Climate change mitigation	0	The location of development will not affect the achievement of this objective.
IIA2: Climate change adaptation	0	The location of development will not affect the achievement of this objective.
IIA3: Housing	++	Site has capacity for more than 100 housing units.
IIA4: Health and wellbeing	++/-	Site is within 800m of Kenninghall Open Space and Ladysmith Road Open Space. In addition, the site is within 400m of a walking and cycle path. However, the site is not located within 800m of a GP surgery.
IIA5: Services and facilities	-?	Site is not within 800m of an existing school.
IIA6: Social inclusion	+	Site falls within the 20% most deprived areas within England
IIA7: Crime and community safety	0	The location of development will not affect the achievement of this objective.
IIA8: Road safety	0	The location of development will not affect the achievement of this objective.
IIA9: Economy	++?	Site is close to a Strategic Industrial Location. The site is under 10ha in size but will contribute towards employment development. However, it is unknown what proportion of the site will comprise employment development.
IIA10: Town and local centres	0	Site is not within or adjacent to a Major, District and Local Centre.
IIA11: Air pollution	--?	Site scored 2 in the air quality appraisal.
IIA12: Sustainable transport	++	Site is located within 1km of Meridian Water Station railway station and 350m of at least one bus stop. The site is also within 201-400m of Dysons Road Edmonton, which is a Local Centre.

IIA objective	Effect	Justification text
IIA13: Biodiversity	--?	Site is located within 250m of the Lea Valley SINC and between 250-750m of the Walthamstow Reservoirs SSSI.
IIA14: Historic environment	0?	Site is more than 500m from the nearest designated heritage asset. However, the site could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Upper Edmonton and contains built development.
IIA16: Efficient use of land and materials	++	Site is relatively large in size and on brownfield land.
IIA17: Flooding	-	Site has a predicted peak flood depth of greater than 150mm and partially falls within Flood Zone 2. However, the site is on brownfield land.
IIA18: Water	--?	Site falls within Source Protection Zone 2 and the northern part of the site falls within Source Protection Zone 1. Some brooks are also located within the site boundary

Appendix H

IIA findings for the Issues and Options Local Plan 2018

H.1 This appendix sets out the IIA findings for the plan options that were presented in the 2018 Issues and Options consultation document for the Enfield Local Plan. The options in that document comprised the draft vision and growth objectives, a set of seven growth (spatial distribution) options and a number of policy approaches presented under nine themes:

- Historic environment
- Design
- Housing
- Economy
- Town centre
- Social infrastructure
- Green infrastructure
- Transport
- Sustainable infrastructure

H.2 The options in the 2018 Issues and Options document have been appraised against the current IIA framework and the IIA findings presented in this IIA Report to help meet the SEA Regulations, which require the likely effects of the plan and 'reasonable alternatives' to be assessed and described. The IIA findings for the 2018 draft vision and growth objectives are discussed first, followed by the findings for the seven growth (or spatial distribution) options, and then the findings for each set of policy options in the order of the nine themes listed above.

IIA findings for the 2018 draft vision and growth objectives

H.3 The draft vision in the 2018 Issues and Options document was as follows:

A Place for Affordability & Accessibility

By 2036, Enfield will be a borough that provides for its residents with a choice of homes and public services to meet actual need and affordability through the successful delivery of thriving neighbourhoods that are environmentally conscious and embrace active, resilient and healthy lifestyles.

A Place of Opportunity & Enterprise

New economies are secured to bring competitiveness of the borough's employment areas to attract regional, national and international investors across all sectors to successfully deliver new jobs and assist in securing the provision of employment training opportunities for local residents.

Enfield will be a place of local entrepreneurs and 'makers' of craft and creativity where people want to innovate and do business; where levels of educational attainment, economic activity and entrepreneurship are the greatest in London; where people have access to jobs in sectors that enjoy prosperity and long-term growth; and where high-speed communications and smart technologies will lead the way in accommodating and being part of London's growth sectors.

A Place for Diversity & Equality

Prosperity is shared across the whole borough to enable people to reach their potential through access to high quality schools and learning. Enfield residents will enjoy an opportunity for active and attractive places to live and work in healthy environments. Our youth and most vulnerable residents will be supported through improved health, education and skill levels to enable everyone to fulfil their potential.

New and regenerated neighbourhoods will be safe and defined by the highest standards of well designed, affordable, accessible and eco-friendly homes and with access to public spaces.

Residents will have improved health and wellbeing and quality of life, improvements to open spaces, as well as new employment opportunities, ensuring that the benefits of growth, regeneration and investment reach everyone in the borough.

A Place that Delivers

Enfield will be an exemplar borough of how joined up partnerships, approaches to regeneration and investment can maximise opportunities to deliver for local people. The Council will deliver on several key regeneration schemes including our flagship Meridian Water project.

New transport infrastructure projects for rail, road and cycling will deliver reduced congestion and improved air quality. The early delivery of Four Tracking of the West Anglia Mainline as an early stage of Crossrail 2 will increase rail capacity, unlock and begin the accelerated regeneration of the eastern corridor and prepare for Crossrail 2.

H.4 The Council then set out a series of growth objectives to achieve the draft vision, under four overarching objectives:

1. Promoting and managing growth

- To promote growth and help achieve sustainable patterns of development by focusing new development in the borough's main town centres and areas around all stations, transport corridors, housing estate renewal and regeneration programmes, the eastern corridor and low density industrial areas, and through a strategic plan-led approach to the release of Green Belt land where they are accessible and sustainable;
- To meet locally assessed housing need across the borough through the creation of high quality developments in a phased programme to help meet existing and future housing needs;
- To build strong and inclusive communities by providing diversity of type, size and tenure of housing including affordable homes to meet local housing needs, tackle homelessness and to deliver as a minimum the annual housing target of at least 1,876 new homes as set out by the draft new London Plan;
- Respect and enhance the character of the borough's cultural, built heritage and neighbourhoods;
- Encourage and maintain a mixture of town centre uses in Enfield Town, Angel Edmonton, Edmonton Green, Palmers Green and Southgate, and the borough's local centres and local parades;
- To improve the health and wellbeing of Enfield's population and reduce health inequalities through promoting good growth and spatial planning, supporting healthier lifestyles and environmental improvements, as well as ensuring appropriate access to health facilities; and
- To enhance the quantity, quality and density of the borough's Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), including the possibility for substitution and consolidation, to enable new and emerging businesses in sectors, whilst supporting opportunities for a mixture of uses and co-location.

2. Achieving design excellence

- To promote high quality, safe and sustainable designed buildings, places and streets; and
- To promote and protect high levels of amenity and quality of life to make Enfield an attractive, successful and vibrant place for all – residents, workers and people visiting.

3. Enhancing Enfield's assets

- To enhance the unique historic environment of Enfield and the character, distinctiveness of the borough's conservation areas and other historic and valued buildings, cultural spaces and places;
- To improve access to existing open spaces and manage open space deficiency; and
- To protect conditions for biodiversity.

4. Promoting a green environment

- To provide a strategic spatial planning strategy for growth aligned with, and able to secure the regeneration benefits of, planned new and improved strategic and major transport infrastructure;
- To drive investment in rail, roads and cycling infrastructure to improve connectivity and support economic development;
- To encourage cleaner air;
- To promote low carbon living and working;
- To support the delivery of sustainable infrastructure in the emerging growth areas to enable sustainable mixed-use developments; and
- To manage flood risk.

H.5 Table H.1 below summarises the sustainability effects for the 2018 draft vision and growth objectives in relation to the IIA objectives, and the findings are described below the table.

Table H.1: IIA findings for the 2018 draft vision and growth objectives

IIA objective	Draft vision	1. Promoting and managing growth	2. Achieving design excellence	3. Enhancing Enfield's assets	4. Promoting a green environment
IIA1: Climate change mitigation	+?/-?	+?/-?	+	0	+?/-?
IIA2: Climate change adaptation	0	0	+	0	0
IIA3: Housing	+?	++	0	0	0
IIA4: Health and wellbeing	+?	+	+	+	0
IIA5: Services and facilities	+?	0	0	0	0
IIA6: Social inclusion	+?	+	0	0	0
IIA7: Crime and community safety	0	0	0	0	0
IIA8: Road safety	0	0	0	0	0
IIA9: Economy	+?	0	+	0	+
IIA10: Town and local centres	0	++	0	0	0
IIA11: Air pollution	+?/-?	+?/-?	0	0	+?/-?
IIA12: Sustainable transport	+?/-?	+?/-?	0	0	+?/-?
IIA13: Biodiversity	0	0	0	+?	0
IIA14: Historic environment	0	+	0	+	0
IIA15: Landscape and townscape	0	0	0	0	0
IIA16: Efficient use of land and materials	+/-	0	0	0	0

IIA objective	Draft vision	1. Promoting and managing growth	2. Achieving design excellence	3. Enhancing Enfield's assets	4. Promoting a green environment
IIA17: Flooding	0	0	0	0	+?
IIA18: Water	0	0	0	0	0

Explanation of IIA findings for the 2018 draft vision and growth objectives

Draft vision

H.6 The draft vision sets out a general ambition for development to take place in a sustainable way, embracing a mix of social, economic and environmental aspirations. This will enable the Borough to be an attractive place to live, work and invest.

H.7 If the draft vision is achieved, it can be expected to lead to minor positive effects against the following IIA objectives. All effects are recorded as minor because the vision is aspirational and specifics are provided on the exact ways in which the vision will be achieved through the supporting growth objectives (see next section).

- **IIA3: Housing**, because the draft vision embraces growth which provides a choice of homes to meet actual need and affordability.
- **IIA4: Health and wellbeing**, because it seeks to improve residents' health and wellbeing and quality of life, in addition to improvements to open spaces. The draft vision also seeks to deliver neighbourhoods that embrace active, resilient and healthy lifestyles.
- **IIA5: Services and facilities**, because the provision of education and skills training, in addition to other services, is specifically mentioned in the draft vision.
- **IIA6: Social inclusion**, because the draft vision seeks to make LBE a diverse and equal place, where prosperity is shared across the Borough.
- **IIA9: Economy**, because the vision embraces growth by securing new economies that bring competitiveness to the Borough's employment areas, to attract regional, national and international investors across all sectors to successfully deliver new jobs and assist in securing the provision of employment training opportunities for local residents.

H.8 The draft vision is also expected to lead to mixed minor positive and minor negative effects against the following IIA objectives:

- **IIA1: Climate change mitigation**, because although new transport infrastructure projects for rail, road and cycling will help minimise CO₂ emissions, improvements to roads may also encourage use of the private car and an associated increase in emissions.
- **IIA11: Air pollution**, because although improvements to roads will reduce congestion and minimise air pollution, the improvements could also promote use of the private car and exacerbate existing air pollution problems.
- **IIA12: Sustainable transport**, because although new transport infrastructure projects for rail, road and cycling will be delivered and encourage more sustainable and active travel choices, improving roads could encourage use of the private car.

H.9 Due to the fact they are not specifically mentioned, the vision's contribution to the achievement of the following objectives is likely to be negligible: **IIA2: Climate change adaptation**, **IIA7: Crime and community safety**, **IIA8: Road safety**, **IIA10:**

Town and local centres, IIA13: Biodiversity, IIA14: Historic environment, IIA15: Landscape and townscape, IIA16: Efficient use of land and materials, IIA17: Flooding and IIA18: Water.

H.10 All of the effects of the draft vision are subject to some uncertainty since their achievement will depend on the details of the Local Plan policies and site allocations which are designed to implement it.

Growth objectives

1. Promoting and managing growth

H.11 Growth objective 1 is expected to have a significant positive effect in relation to **IIA3: Housing** because it seeks to meet locally assessed housing needs across the Borough by providing a diversity of type, size and tenure of housing including affordable homes, in addition to tackling homelessness. For this reason, a minor positive effect is also expected in relation to **IIA6: Social inclusion**. A significant positive effect is expected against **IIA10: Town and local centres** because the objective focuses growth in the Borough's main town centres, whilst also maintaining a mixture of town centre uses in Enfield Town, Angel Edmonton, Edmonton Green, Palmers Green and Southgate, as well as the Borough's local centres and local parades.

H.12 Minor positive effects are expected in relation to **IIA4: Health and wellbeing** because the objective seeks to improve the health and wellbeing of Enfield's population and reduce health inequalities through promoting good growth and spatial planning, supporting healthier lifestyles and access to health facilities. A minor positive effect is expected against **IIA14: Historic environment** because the objective sets out that all development must respect and enhance the character of the Borough's cultural and built heritage. Mixed minor positive and minor negative but uncertain effects are expected in relation to **IIA1: Climate change mitigation, IIA11: Air pollution and IIA12: Sustainable transport** because although this objective supports growth at town centres and areas around stations, which may reduce use of the private car and associated emissions, it also promotes growth along transport corridors, namely Great Cambridge Road (A10) and North Circular Road (A406). Therefore, it may also encourage use of the private car and exacerbate existing air quality issues. Lastly, growth objective 1 is expected to have a mixed minor positive and minor negative effect in relation to **IIA16: Efficient use of land and materials** because although it supports development of previously developed land at town centres and areas around stations, it also supports development in the Green Belt, much of which is undeveloped.

2. Achieving design excellence

H.13 Growth objective 2 promotes sustainably designed buildings and may therefore help to mitigate the effects of climate change through reductions in CO₂ emissions, whilst also adapting to climate change. Therefore, minor positive effects are expected in relation to **IIA1: Climate change mitigation and IIA2: Climate change adaptation**. This growth objective also seeks to protect amenity and quality of life, by making LBE an attractive, successful and vibrant place to be. Therefore, minor positive effects are also expected in relation to **IIA4: Health and wellbeing and IIA9: Economy**.

3. Enhancing Enfield's assets

H.14 Minor positive effects are expected in relation to **IIA4: Health and wellbeing, IIA13: Biodiversity and IIA14: Historic environment** because this objective seeks to enhance the historic environment in LBE, whilst also improving access to existing open spaces and managing open space deficiency, in addition to protecting conditions for biodiversity. The effect against IIA14 is recorded as uncertain because the objective does not specify in what ways biodiversity will be protected.

4. Promoting a green environment

H.15 Growth objective 4 supports the delivery of rail, road and cycling infrastructure improvements, which will support economic development. Therefore a minor positive effect is expected in relation to **IIA9: Economy**. However, due to the fact improvements will be made to roads so as to reduce congestion, people may be more inclined to use the car. Therefore, mixed minor positive and minor negative but uncertain effects are expected in relation to **IIA1: Climate change mitigation, IIA11: Air pollution and IIA12: Sustainable transport**. A minor positive but uncertain effect is expected in relation to **IIA17: Flooding** because the objective seeks to manage flood risk but does not set out in what ways this will be achieved.

H.16 It is noted that none of the growth objectives explicitly address **IIA7: Crime and community safety, IIA8: Road safety, IIA15: Landscape and townscape and IIA18: Water**.

IIA findings for the growth options considered in the 2018 Issues and Options consultation document

H.17 This section presents the IIA findings for the 'growth' (or spatial distribution) options that are set out in the Local Plan Issues and Options consultation document. Seven broad options for where new housing, employment and other land uses should go to meet the growth being planned for at the time (i.e. the draft London Plan target of 1,876 homes a year for the next 10 years from 2018), as follows:

- Option 1: Main town centres and areas around all stations;
- Option 2: Transport corridors;
- Option 3; Existing estate renewal and regeneration programmes;
- Option 4: Eastern corridor and low density industrial areas;
- Option 5: Future Crossrail 2 Growth Corridor;
- Option 6: The New Southgate and Upper Lee Valley Opportunity Areas; and
- Option 7: Strategic plan-led approach to Green Belt.

H.18 It should be noted that these spatial distribution options are not mutually exclusive, and the Issues and Options consultation document recognised that individually they would not be able to deliver the overall growth required for the Borough, therefore choices would need to be made about which elements of these options would form the spatial strategy in the Enfield Local Plan. However, based on the potential development locations associated with each option as shown on the Strategic Growth Options diagram at Figure 2.2 in the Issues and Options consultation document, the IIA has assumed that more development would be able to be delivered under Options 1 and 2 than the remaining five options. In addition, it is noted that Option 5: Future Crossrail 2 Growth Corridor is no longer a reasonable alternative due to the Government's decision in November 2020 and notice to Transport for London to end spending on Crossrail 2. However, it has been appraised and presented for completeness to reflect the point in time at which it was being considered as a growth option for the Enfield Local Plan.

H.19 Table H.2 summarises the IIA effects of the seven spatial distribution options and the findings are described below the table. Given the 'mix and match' nature of these spatial distribution options, there are sustainability pros and cons with each of them, and no one option comes out as performing the 'best' in sustainability terms. However, Option 1: Main town centres and areas around all stations has the most potentially significant positive effects, because it would provide the most opportunities for new residents to reach employment, education, services and facilities via active and/or sustainable transport modes, which has multiple benefits in terms of health, inclusivity, reducing inequalities, reducing car travel and CO₂ emissions and maximising efficient use of land. This option would still have some potential negative effects on the more environmental IIA objectives in particular. Option 7: Strategic plan-led approach to Green Belt has the most potentially significant negative effects as although some are on the same IIA objectives as for Option 1 (e.g. biodiversity and historic environment), unlike Option 1, it would not provide new development in proximity to sustainable transport opportunities or existing services and facilities, resulting in negative effects on health, access to services, reducing car travel, CO₂ emissions and also efficient use of land (due to the necessary reliance on greenfield sites).

Table H.2: Summary of IIA effects for the growth options considered in the 2018 Issues and Options document

IIA objective	1. Main town centres and areas around all stations	2. Transport corridors	3. Existing estate renewal and regeneration programmes	4. Eastern corridor and low density industrial areas	5. Future Crossrail 2 Growth Corridor	6. New Southgate and Upper Lee Valley Opportunity Areas	7. Strategic planned approach to Green Belt
IIA1: Climate change mitigation	++?	--/+?	+	+?/-	++?	+	--?/+?
IIA2: Climate change adaptation	0	0	0	0	0	0	0
IIA3: Housing	++?/-	++?/-	-	+	+	+	+
IIA4: Health and wellbeing	++/--?	--/+	+/-	+/-	+/-	+/-	--/+
IIA5: Services and facilities	++/--?	+/-?	+	+	+	+	--
IIA6: Social inclusion	+/-	++/-	++	++	++	++	+
IIA7: Crime and community safety	-?	-?	+	-?	-?	-?	-?
IIA8: Road safety	0	0	0	0	0	0	0
IIA9: Economy	++	++/-	+	++/--?	++/--?	+/-?	--?/+?
IIA10: Town and local centres	++	--/+	+	+	+	+	0
IIA11: Air pollution	++?/--	--/+?	+?/-	--/+?	++?/--	+?/-	--/+?
IIA12: Sustainable transport	++?	--/+?	+	+?/-	++?	+	--/+?
IIA13: Biodiversity	--?	--?	--?	--?	--?	--?	--?
IIA14: Historic environment	--?	-?	0?	-?	-?	-?	--?
IIA15: Landscape and townscape	--	--	+	--/+?	--/+?	--/+?	--

IIA objective	1. Main town centres and areas around all stations	2. Transport corridors	3. Existing estate renewal and regeneration programmes	4. Eastern corridor and low density industrial areas	5. Future Crossrail 2 Growth Corridor	6. New Southgate and Upper Lee Valley Opportunity Areas	7. Strategic planned approach to Green Belt
IIA16: Efficient use of land and materials	++	++	++	++	++	++	-
IIA17: Flooding	-?	-?	-?	-?	-?	-?	-?
IIA18: Water	-?	-?	-?	-?	-?	-?	-?

IIA objective 1: Ensure the Local Plan serves to minimise LBE's per capita CO₂ emissions such that the Council will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040

H.20 Options 1: Main town centres and areas around all stations and 5: Future Crossrail 2 Growth Corridor promote development around tube and railway stations, with Option 1 also supporting development at town centres where everyday services and facilities are located within walking distance of one another. The town centres are highly accessible and also contain multiple bus routes, whilst Crossrail 2 would provide a four train per hour service into the new Meridian Water, Ponders End, Brimsdown and Enfield Lock stations from 2028. These two options are therefore likely to reduce use of the private car and associated CO₂ emissions, with significant positive effects expected in relation to IIA1: Climate change mitigation. However, the effects are recorded as uncertain because levels of walking and cycling within the Borough are not very high and in the case of Option 5, which promotes development along the proposed Crossrail 2 route, delivery of this strategic infrastructure project had not been confirmed at the time of the 2018 Issues and Options consultation. It is also unknown whether people will choose public transport in place of the private car, as this will depend on a number of factors such as cost, timing of services and proximity to their final destination. Options 3: Existing estate renewal and regeneration programmes and 6: New Southgate and Upper Lee Valley Opportunity Areas are expected to have minor positive effects in relation to this objective because the estates proposed for renewal/regeneration and Opportunity Areas are located within close proximity of some tube and railway stations and may therefore encourage use of public transport. These effects are recorded as uncertain because it is unknown whether people will choose public transport as a replacement to the private car, particularly because Census data from 2011 indicates that the majority of residents use a private car to get work instead of public transport.

H.21 Option 2: Transport corridors is expected to have a mixed significant negative and minor positive effect against IIA1 because it supports development along the transport corridors and partially falls within the built-up urban areas where a number of services and facilities are present. People can therefore easily walk to various amenities. However, the transport corridors comprise Great Cambridge Road (A10) and North Circular Road (A406) and this option would therefore support use of the private car, generating associated CO₂ emissions. The positive effect is recorded as uncertain because levels of walking and cycling within the Borough are not very high, in addition to public transport use. Option 7: Strategic plan-led approach to Green Belt is also expected to have a mixed significant negative and minor positive effect in relation to this objective because the Green Belt in LBE is not located within close proximity to public transport, apart from the area around Crews Hill railway station. Therefore, depending on where development is located, this option would be likely to increase reliance on the private car. However, emphasis is placed on the Crews Hill area in the supporting text to this option, which would potentially reduce reliance on the private car and associated CO₂ emissions. The effect is recorded as uncertain because it is unknown whether people would choose public transport in place of the private car and whether some areas within the Green Belt that are not close to the Crews Hill railway stations would be developed or not. Option 4: Eastern Corridor and low density industrial areas is expected to have a mixed minor positive and minor negative effect against IIA1: Climate change mitigation because although it supports development in the eastern corridor, which contains a number of railway stations and would be within close proximity of the proposed Crossrail 2 infrastructure project, it also contains some areas that are not within close proximity of public transport infrastructure, in addition to everyday services and facilities. Conversely, including industrial land in this growth option provides the opportunity for greater variety in employment, housing and density, reducing distances between homes, schools, the workplace, community and town centres. The positive effect for Option 4 is recorded as uncertain because it is unknown whether people will choose public transport in place of the private car.

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

H.22 Given the high-level nature of these seven options, it is not possible to distinguish between them with respect to climate change adaptation. The distribution of development is not likely to influence sustainable design and construction techniques in development or respond to extreme weather effects as a result of climate change, which will be dealt with through other policies in the plan. Flood risk is dealt with separately under IIA objective 17. All growth options are expected to have negligible effects in relation to this objective.

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

H.23 Options 1: Main town centres and areas around all stations and 2: Transport corridors are expected to deliver the highest amount of growth when compared to the other five options and would include a mix of housing and employment development, in

addition to healthcare, schools, open space and social and community infrastructure. Options 1 and 2 would be achieved by increasing densities and building heights of new development. However, this would not provide the range of housing types needed in the Borough and instead deliver a high proportion of flats, studios and 1-bedroom apartments. This could discriminate against certain groups of people, such as large families or those with specialist housing requirements. For this reason, Options 1 and 2 are both expected to have a mixed significant positive and minor negative effect in relation to this objective. The positive effect is recorded as uncertain because it is unknown what number of new homes would be delivered. Options 4: Eastern corridor and low density industrial areas, 5: Future Crossrail 2 Growth Corridor, 6: New Southgate and Upper Lee Valley Opportunity Areas and 7: Strategic plan-led approach to the Green Belt are expected to have minor positive effects in relation to this objective because although they are not likely to deliver as much growth as Options 1 and 2, they are still expected to deliver a considerable number of new homes. The effects are recorded as uncertain because it is unknown exactly how many new homes will be provided under these four options. The Issues and Options document noted that the Council is currently running a programme of estate renewal and under Option 3: Existing estate renewal and regeneration programmes, would deliver 3,000 new homes in New Southgate, Ponders End and Edmonton. Therefore, although this option would deliver 3,000 new homes, it would not provide the total number of new homes required across the Borough. Option 3 is therefore expected to have a minor negative effect against this objective.

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

H.24 In LBE, there is an east-west divide in terms of inequality and this correlates with health indicators. According to ONS, LBE is the fifth worst Borough in England for obesity, with significantly high levels of obesity in the east when compared to the west. Option 1: Main town centres and areas around all stations focuses growth around tube and railway stations, as well as town centres, where a number of services and facilities are available, including primary healthcare facilities. Therefore, people would be within walking distance of a number of amenities, which may encourage more active travel choices. This would have beneficial effects on people's physical health and mental wellbeing. However, the amount of development that would be delivered under Option 1 would place a significant amount of pressure on existing services, particularly GP surgeries. Further to this, the supporting text to Option 1 states that the amount of development delivered under this option could potentially require a relaxation in standards for open space provision. This is particularly concerning following the COVID-19 pandemic which has highlighted significant inequalities in access to open space. For these reasons, Option 1 is expected to have a mixed significant positive and significant negative effect against this objective. The negative effect is recorded as uncertain because it is unknown whether open space would be lost or not.

H.25 Option 2: Transport corridors supports development along Great Cambridge Road (A10) and North Circular Road (A406), which partially fall within built up urban areas where a number of services and facilities are present. However, both corridors also include areas where a range of services are not available, which may limit access to healthcare and also discourage more active travel choices (i.e. walking and cycling). Locating development along these A roads is also problematic in that residents would be located adjacent to sources of air pollution, which can have adverse effects on people's health, particularly those who suffer from asthma. Therefore, Option 2 is expected to have a mixed significant negative and minor positive effect in relation to this objective. Option 7: Strategic plan-led approach to Green Belt is also expected to have a mixed significant negative and minor positive effect against IIA4: Health and wellbeing. This is due to the fact there are no GP surgeries located within the Green Belt in the north-west of the Borough and therefore residents would not have easy access to healthcare. However, large-scale development under this option offers an opportunity to provide new GP surgeries.

H.26 According to the IIA Scoping Report, there are very few GP surgeries on the estates within LBE. As such, the delivery of 3,000 new homes under Option 3: Existing estate renewal and regeneration programmes could place a considerable amount of pressure on the limited number of surgeries available. Therefore, Option 3 is expected to have a minor negative effect in relation to this objective. However, this is mixed with a minor positive effect because regenerating estates within the Borough offers an opportunity to deliver new healthcare facilities and improve quality of life through improved housing stock. Options 4: Eastern Corridor and low density industrial areas and 5: Future Crossrail 2 Growth Corridor are expected to have mixed minor positive and minor negative effects against this objective because both options contain areas that are located within close proximity of a number of services and facilities (e.g. primary healthcare facilities) and others that are not. Option 6 focuses development in the Opportunity Areas only and may therefore result in an increase in pressure on existing healthcare facilities in those areas, which are likely to experience considerable population growth. However, it is likely that development of these Opportunity Areas will provide an opportunity to deliver new healthcare facilities in order to meet the needs of a growing population. Therefore, Option 6 is expected to have a mixed minor positive and minor negative effect in relation to this objective.

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

H.27 Option 1 is expected to have a significant positive effect against IIA5: Services and facilities because it supports development in main town centres and around tube and railway stations, which are built up urban areas where a number of existing services and facilities are present. New residents would therefore not be required to travel far to reach these services, as they would be within walking distance of them. For example, there are a number of primary and secondary schools located within close proximity of most of the tube and railway stations. However, the amount of development likely to be delivered under this option would place increasing strain on services, such as schools, although this is uncertain. Therefore, Option 1 is also expected to have a minor negative but uncertain effect against this objective.

H.28 Option 7 is expected to have a significant negative effect in relation to IIA5 because the Green Belt in the north west of the Borough contains a very small number of schools which are located on the very edge of the Green Belt and not within close proximity of the Crews Hill area.

H.29 Options 2: Transport corridors, 3: Existing estate renewal and regeneration programmes, 4: Eastern corridor and low density industrial areas, 5: Future Crossrail 2 Growth Corridor and 6: New Southgate and Upper Lee Valley Opportunity Areas are expected to have minor positive effects in relation to this objective because although they tend to be located within built up urban areas where services and facilities are present, these options also contain areas that are not within close proximity of services (e.g. schools). For example, all five options propose development near Angel Road, where only one existing primary school is present and no secondary schools. Option 2 is also expected to have a minor negative effect in relation to this objective because the volume of development would place a lot of pressure on existing services, such as primary and secondary school places, although this is uncertain.

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

H.30 In LBE, there is an east-west divide in terms of inequality and deprivation. The eastern part of the Borough contains ten Lower Super Output Areas that fall within the 10% most deprived nationally. Options 3: Existing estate renewal and regeneration programmes, 4: Eastern corridor and low density industrial areas, 5: Future Crossrail 2 Growth Corridor and 6: New Southgate and Upper Lee Valley Opportunity Areas are expected to have significant positive effects in relation to IIA6: Social inclusion because they focus growth in the east of the Borough in some of the most deprived areas, including through estate renewal/regeneration and redevelopment of the Upper Lee Valley Opportunity Area. Option 2: Transport corridors is also expected to have a significant positive effect in relation to this objective because one of two transport corridors, Great Cambridge Road (A10), is located in the east of the Borough, and North Circular Road (A406) runs from east to west, also falling within some of the most deprived areas within the Borough. However, the effect is mixed with a minor negative effect because focusing growth along the transport corridors may exclude those who do not have access to a private car. Option 7: Strategic plan-led approach to Green Belt is expected to have a minor positive effect in relation to this objective because it focuses development in the Green Belt located in the north west of the Borough, and therefore does not address the east-west divide. However, this area of Metropolitan Green Belt does fall within the 30% most deprived areas nationally and is therefore still likely to address poverty and social exclusion to some extent. Option 1: Main town centres and areas around all stations is expected to have a mixed minor positive and minor negative effect against IIA6 because it supports development in the town centres and areas surrounding tube and railway stations, but due to the fact the town centres and tube/railway stations are spread fairly evenly across the majority of the Borough, development would not be directed solely into the more deprived areas. Therefore, although this option would, to an extent, help regenerate the more deprived areas of the Borough, it would also enhance the least deprived areas and not specifically address the gap in inequality between the east and west.

IIA objective 7: Reduce crime and increase community safety

H.31 The spatial distribution of development is not likely to influence levels of crime, anti-social behaviour, fear of crime and perceptions of safety, which will be more influenced by policies which seek to deliver inclusive design. As set out in the IIA Scoping Report, crime is generally concentrated in the east of LBE and at Southgate, Palmers Green and the boundary LBE shares with Haringey Council, in addition to around public transport nodes. Crime levels have been rising in the area, partly due to the fact LBE has the largest youth population in Greater London, with some of the highest levels of crime recorded in the school-transport corridors. Option 3: Existing estate renewal and regeneration programmes supports the renewal and regeneration of existing estates across the Borough and may therefore help reduce levels of crime, anti-social behaviour and fear of crime at these estates. Therefore, Option 3 is expected to have a minor positive but uncertain effect against IIA7: Crime

and community safety. Options 4: Eastern corridor and low density industrial areas, 5: Future Crossrail 2 Growth Corridor and 6: New Southgate and Upper Lee Valley Opportunity Areas focus development in the east of the Borough, with Option 6 also supporting development of the New Southgate Opportunity Area in the south west of the Borough. Option 2: Transport corridors promotes growth along the transport corridors and Option 1: Main town centres and areas around all stations promotes a more even spread of development across the Borough, including around the tube and railway stations of Southgate and Palmers Green, respectively. Option 7: Strategic plan-led approach to Green Belt, on the other hand, focuses development in the Green Belt in the north west of the Borough. These options are expected to have minor negative but uncertain effects in relation to IIA7: Crime and community safety, unless there are policies in place to support high quality development, in addition to a high quality public realm that supports the integration of communities and natural surveillance including through the co-location of shops, services, community centres and green spaces. Options 1 and 2 are expected to provide the largest amount of new development and may therefore have more of an adverse effect than others because the increase in population could result in higher levels of crime.

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

H.32 The distribution of development will not affect the achievement of this objective, which relates to healthy streets principles that encourage walking and cycling, and these could be encouraged through design policies. Therefore, all of the spatial distribution/growth options are likely to have negligible effects in relation to IIA8: Road safety.

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

H.33 Option 1: Main town centres and areas around all stations promotes growth at the town centres within LBE, in addition to the tube and railway stations. The town centres offer job opportunities and locating growth around tube and railway stations ensures that people have good access to job opportunities elsewhere within and outside the Borough. Development under this option would not result in any loss of existing commercial and industrial floorspace and would instead provide more employment floorspace. According to the supporting text to this option, employment uses are often accommodated in single storey structures and with good design, most employment uses can be located alongside or below homes. Therefore, Option 1 is expected to have a significant positive effect in relation to this objective.

H.34 Options 4: Eastern corridor and low density industrial areas and 5: Future Crossrail 2 Growth Corridor support development within the east of the Borough, where most of Enfield's industrial land is located. A large amount of businesses are concentrated on the older low density industrial sites but due to the proximity of these sites to the proposed Crossrail 2 strategic infrastructure project, their future use may need to be reconsidered so as to make the best use of this land. Therefore, development under this option could potentially result in the loss of some industrial land, although this is uncertain. Conversely, the London Plan identifies LBE as a location where strategic demand for industrial logistics and related uses are anticipated to be strongest and a large number of jobs are expected to be provided under these options. As set out in the supporting text to these options, existing industrial land can be used more efficiently through the introduction of mezzanines, basements and smaller infill units. The proposed Crossrail 2 infrastructure project could also accelerate delivery of new development sites which would in turn deliver much-needed new homes, jobs and economic growth, whilst also improving connectivity into Central London. Therefore, both options are expected to have a mixed significant positive and significant negative effect, with uncertainty recorded against the negative effect.

H.35 Under Option 2: Transport corridors, development would be delivered in similar ways to those described under Option 1. There are likely to be opportunities for intensification of large retail and employment uses, as well as highways land. However, not all of the available sites along the transport corridors are within close proximity of public transport. Therefore, people would not have as easy access to employment opportunities elsewhere within the Borough, unless they have access to a car. For this reason, Option 2 is expected to have a mixed significant positive and minor negative effect in relation to this objective.

H.36 Option 7: Strategic plan-led approach to the Green Belt is expected to have a mixed significant negative and minor positive but uncertain effect in relation to this objective because there is only one railway station located in the Green Belt in the north west of the Borough, at Crews Hill. Therefore, depending on where development would be located, residents may not have easy access to employment opportunities elsewhere within the Borough. The north west of the Borough is fairly isolated and not within walking distance of many workplaces. However, some job opportunities may be provided alongside housing development and support the rural economy, although this is uncertain.

H.37 Option 3: Estate renewal and regeneration programmes is expected to have a minor positive but uncertain effect in relation to this objective because the renewal and intensification of housing estates could contribute to new job opportunities, in addition to supporting the local economy by ensuring homes are available to working age people.

H.38 Option 6: New Southgate and Upper Lee Valley Opportunity Areas is expected to have a mixed minor positive and minor negative effect in relation to this objective, with uncertainty recorded against the negative effect. According to the supporting text to this option, the Upper Lee Valley Opportunity Area will require the reconfiguration, relocation, consolidation, intensification and optimisation of Strategic Industrial Land (SIL). Therefore, although not stated, this option could potentially result in some loss of SIL. However, both the Upper Lee Valley and New Southgate and Opportunity Areas are expected to deliver new employment opportunities, in addition to supporting the local economy through the provision of new homes. The Upper Lee Valley Opportunity Area will also be located within close proximity to Crossrail 2, which will drive economic growth.

IIA objective 10: Support the vitality of the Borough's town and local centres

H.39 Concentrating development at the town centres will increase footfall and enhance the vitality and vibrancy of LBE's Town, District and Local Centres. Option 1: Main town centres and areas around all stations is therefore expected to have a significant positive effect in relation to this objective. Option 3: Existing estate renewal and regeneration programmes is expected to have a minor positive effect against this objective because one of the estates proposed for regeneration is located around the Ponders End Local Centre. Therefore, the development of new homes would increase footfall, enhancing the vitality and vibrancy of this local centre. Options 4: Eastern Corridor and low density industrial areas, 5: Future Crossrail 2 Growth Corridor and 6: New Southgate and Upper Lee Valley Opportunity Areas focus development in the east of the Borough, with Option 6 also supporting development of the New Southgate Opportunity Area in the south west of the Borough. These three options contain areas that only fall within close proximity of Edmonton Green District Centre and Ponders End Local Centre. Therefore, Options 4, 5 and 6 are expected to have minor positive effects in relation to this objective. Option 2: Transport corridors supports development along Great Cambridge Road (A10) and North Circular Road (A406), and therefore only falls within close proximity of Palmers Green District Centre and Bush Hill Park Local Centre. According to the supporting text to this option, there may be an opportunity to intensify Colosseum Retail Park and Enfield Retail Park. However, this would take business away from the town centres. Therefore, Option 2 is also expected to have a mixed significant negative and minor positive effect in relation to this objective. Option 7: Strategic plan-led approach to Green Belt focuses growth away from the town centres, instead supporting growth in a more rural and isolated area. Therefore, Option 7 is expected to have a negligible effect against this objective.

IIA objective 11: Minimise air pollution

H.40 Options 1: Main town centres and areas around all stations and 5: Future Crossrail 2 Growth Corridor promote development around tube and railway stations, with Option 1 also supporting development at town centres where everyday services and facilities are located within walking distance of one another. The town centres are highly accessible and also contain multiple bus routes, whilst Crossrail 2 would provide a four train per hour service from 2028. These two options are therefore likely to reduce reliance on the private car, which could help minimise air pollution. However, the actual use of more active and sustainable modes of travel will depend on people's behaviour and Crossrail 2 had not been confirmed at the time of the 2018 Issues and Options consultation. The positive effects are therefore recorded as uncertain. Further to this, LBE experiences severe problems with air quality, especially between the east and west of the Borough, with the entire Borough being declared an Air Quality Management Area (AQMA). Therefore, although both options focus development within close proximity to sustainable travel modes, where services and facilities are within walking and cycling distance of one another, the amount of development that would be delivered under both options would have significant adverse effects on air quality through population increase and a higher presence of cars. However, walking and cycling could be encouraged through the design of new development and incorporation of Healthy Streets principles. Overall, both options are expected to have a mixed significant positive and significant negative effect.

H.41 Option 7: Strategic plan-led approach to Green Belt supports development within the Green Belt in the north west of the Borough, where only one railway station is located in the Crews Hill area. Bus services are less frequent and services and facilities are not within easy walking distance of one another. Therefore, new residents would be more reliant on the private car, contributing towards air pollution. The amount of development delivered under this option is also expected to increase the number of cars on the road. However, the supporting text to Option 7 focuses on the Crews Hill area, which is accessible via public transport. Overall, therefore, Option 7 is expected to have a mixed significant negative and minor positive effect against IIA11: Air pollution. Although Option 2: Transport corridors contains some areas that fall within the urban area where everyday

amenities are available and within walking distance of one another, supporting development along Great Cambridge Road (A10) and North Circular Road (A406) would encourage use of the private car and result in an increase in air pollution, particularly if there are more cars on the road as a result of population increase. Option 2 is therefore also expected to have a mixed significant negative and minor positive effect in relation to this objective. Option 4: Eastern corridor and low density industrial areas is expected to have a mixed significant negative and minor positive effect against IIA11 because although it supports development in the eastern corridor where a number of railway stations are located, including the proposed Crossrail 2 infrastructure project, it also includes some areas that are not within close proximity of public transport infrastructure, in addition to everyday facilities. The development delivered under this option would also contribute to the number of cars on the road. All positive effects are recorded as uncertain because the actual use of more active and sustainable modes of travel will depend on people's behaviour.

H.42 Options 3: Existing estate renewal and regeneration programmes is expected to have a mixed minor positive and minor negative effect in relation to this objective because the estates proposed for redevelopment are located within close proximity of some tube and railway stations and may therefore reduce reliance on the private car. However, the provision of 3,000 new homes may increase the number of cars on the road, with adverse effects on air quality. Option 6: New Southgate and Upper Lee Valley Opportunity Areas also supports development in areas within close proximity of tube and railway stations and would also not result in as large amount of development as that proposed by the other options. Therefore, it is also expected to have a mixed minor positive and minor negative effect in relation to this objective. All positive effects are recorded as uncertain because the actual use of more active and sustainable modes of travel will depend on people's behaviour.

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

H.43 Options 1: Main town centres and areas around all stations and 5: Future Crossrail 2 Growth Corridor promote development around tube and railway stations, with Option 1 also supporting development at town centres where everyday services and facilities are located within walking distance of one another. The town centres are highly accessible and also contain multiple bus routes, whilst Crossrail 2 would provide a four train per hour service from 2028. These two options are therefore likely to reduce reliance on the private car and increase more sustainable modes of transport. However, the use of more active and sustainable modes of transport will depend on people's behaviour, especially following the COVID-19 pandemic where there has been a significant reduction in people using public transport. The Crossrail 2 strategic infrastructure project had also not been confirmed at the time of the 2018 Issues and Options consultation. These two options are therefore expected to have a significant positive but uncertain effect in relation to this objective.

H.44 Option 2: Transport corridors contains some areas that fall within the urban area where everyday amenities are available and within walking distance of one another. However, it also supports development along Great Cambridge Road (A10) and North Circular Road (A406), which would encourage use of the private car. Option 2 is therefore expected to have a mixed significant negative and minor positive effect in relation to this objective. Option 7: Strategic plan-led approach to Green Belt supports development within the Green Belt in the north west of the Borough, where only one railway station is located in the Crews Hill area. Bus services are less frequent and services and facilities are not within easy walking distance. Therefore, new residents would be more reliant on the private car, which would prevent a modal shift away from the private car. However, the supporting text to Option 7 focuses on the Crews Hill area, which is accessible via public transport. Overall, Option 7 is expected to have a mixed minor positive and minor negative effect against this objective.

H.45 Options 3: Existing estate renewal and regeneration programmes and 6: New Southgate and Upper Lee Valley Opportunity Areas are expected to have minor positive but uncertain effects in relation to this objective because they are both located within close proximity of some tube and railway stations and may therefore reduce reliance on the private car, although this is dependent on people's travel behaviour. Option 4: Eastern corridor and low density industrial areas is expected to have a mixed minor positive and minor negative effect against IIA12 because although it supports development in the eastern corridor where a number of railway stations are located, including the proposed Crossrail 2 infrastructure project, it also includes some areas that are not within close proximity of public transport infrastructure, in addition to everyday facilities. All positive effects are recorded as uncertain because the actual use of more active and sustainable modes of travel will depend on people's behaviour.

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

H.46 LBE does not contain a Special Protection Area (SPA), Special Area of Conservation (SAC) or a Ramsar site. However, it is located within close proximity to the Lee Valley SPA and Ramsar site which is located to the north and south of the Borough in Lee Valley Regional Park, which runs along the eastern edge of LBE. The Epping Forest SAC is also located just outside of the Borough, to its east. The Chingford Reservoir Site of Special Scientific Interest (SSSI) is located within the Borough, along its eastern edge. There is also one Local Nature Reserve (LNR) within the Borough, known as Covert Way, located just south of Hadley Wood in the south west of the Borough. A large number of Sites of Importance in Nature Conservation (SINC) are spread across the Borough.

H.47 Options 4: Eastern corridors and low density industrial areas, 5: Future Crossrail 2 Growth Corridor and 6: New Southgate and Upper Lee Valley Opportunity Areas promote development within the east of the Borough, where the Chingford Reservoir SSSI is located, in addition to three SINC. Therefore, all three options could potentially result in a significant negative but uncertain effect in relation to IIA13: Biodiversity due to the potential for new development to cause disturbance to species, habitat loss or fragmentation and other effects such as air pollution. Option 3: Existing estate renewal and regeneration programmes also supports development within the east of the Borough, in addition to around Arnos Grove tube station, where some additional SINC are located. For this reason, Option 3 is also expected to have a significant negative but uncertain effect in relation to this objective. As mentioned already, SINC are spread across the Borough and therefore Option 1: Main town centres and areas around all stations, which supports fairly even development across the Borough, is also expected to have a significant negative but uncertain effect. This is particularly due to the fact most SINC contain or are located adjacent to a railway station, where development is supported under this option. The largest proportion of SINC are located in the north west of the Borough, within the Green Belt, whilst the strategic transport corridors about a number of SINC. Options 2: Transport corridors and 7: Strategic plan-led approach to Green Belt and therefore also expected to have significant negative but uncertain effects in relation to this objective.

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

H.48 The northern edge of LBE does not contain a large proportion of heritage assets whereas the remainder of the Borough does, especially the more built-up areas such as Enfield Town. A number of Conservation Areas are located along the periphery of the built-up area within the edge of the Green Belt, the largest being Trent Park which is also a Registered Park and Garden. Option 1: Main town centres and areas around all stations supports development within the main town centres and around tube and railway stations, which tend to be located within close proximity of a large number of Listed Buildings, whilst also falling within or close to Conservation Areas. Therefore, Option 1 is expected to have a significant negative but uncertain effect in relation to IIA14: Historic environment. Option 7: Strategic plan-led approach to Green Belt supports development within the Green Belt in the north west of the Borough, where a number of Conservation Areas, Listed Buildings, Scheduled Monuments and Registered Parks and Gardens are present. Option 7 is therefore also expected to have a significant negative but uncertain effect against this objective. Options 2: Transport corridors, 4: Eastern corridor and low density industrial areas, 5: Future Crossrail 2 Growth Corridor and 6: New Southgate and Upper Lee Valley Opportunity Areas are expected to have minor negative but uncertain effects in relation to this objective because they do not contain as many heritage assets as the other two options, and there are no Scheduled Monuments or Registered Parks and Gardens present. Option 3: Existing estate renewal and regeneration programmes is expected to have a negligible but uncertain effect in relation to this objective because it seeks to regenerate existing estates, with no adverse effects on the historic environment expected. However, the effect is recorded as uncertain because the actual effect will depend on the regeneration of the estate, such as the design, scale and layout of development.

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

H.49 Options 1: Main town centres and areas around all stations and 2: Transport corridors are expected to deliver the highest amount of growth compared to the other five options by increasing density and the building heights of new development, which would significantly alter the character of the urban area. Options 1 and 2 are therefore expected to have a significant negative effect in relation to this objective. Option 7: Strategic plan-led approach to Green Belt supports development within the Green Belt, which could potentially alter the landscape in the north west of the Borough. Therefore, Option 7 is also expected to have a significant negative effect in relation to this objective.

H.50 Options 4: Eastern corridor and low density industrial areas, 5: Future Crossrail 2 Growth Corridor and 6: New Southgate and Upper Lee Valley Opportunity Areas support development within the east of the Borough, with Option 6 also supporting development of the New Southgate Opportunity Area in the south west of the Borough. The east of the Borough contains a lot of Enfield's industrial land, most of which is low density. According to the Issues and Options document, if the Crossrail 2 strategic infrastructure project is confirmed, Enfield would need to provide a further 40,000 plus new homes out of the 200,000 homes to be realised through land released by Crossrail 2. However, LBE cannot meet this requirement without the strategic reconfiguration of land within the eastern corridor. Therefore, a significant amount of redevelopment would need to take place if Crossrail 2 were to be confirmed. This redevelopment would fundamentally alter the character of the area but could also potentially enhance any disused previously developed land. Options 4, 5 and 6 are therefore expected to have a mixed significant negative and minor positive effect against this objective, with uncertainty recorded against the positive effect.

H.51 Option 3 would deliver 3,000 new homes through the regeneration of existing estates within the Borough, which could potentially enhance the townscape. Therefore, Option 3 is expected to have a minor positive but uncertain effect in relation to this objective. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development.

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

H.52 All options with the exception of one (Option 7) support development on previously developed land that is classified under the best and most versatile agricultural land system as land predominantly in urban use. All six options are therefore expected to have significant positive effects in relation to IIA16: Efficient use of land and materials. Option 7: Strategic plan-led approach to Green Belt promotes development within the Green Belt in the north west of the Borough, which comprises a mixture of both greenfield and brownfield sites, all of which are classified as Grade 3 agricultural land. Therefore, although this option would promote the development of previously developed land, it would also promote the development of greenfield land, which is not an efficient use of land. Therefore, Option 7 is expected to have a minor negative effect in relation to this objective.

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

H.53 The River Lee, in addition to King George's Reservoir and William Girling Reservoir located along the eastern edge of LBE create a flood risk. The immediate area surrounding these waterbodies falls within Flood Zones 3a and 3b, as well as Flood Zone 2. The NPPF discourages the development of housing within areas at the highest risk of flooding and major development should incorporate surface water management measures, such as sustainable drainage systems. Option 2: Transport corridors supports development along two transport corridors, one of which is the North Circular Road (A406). However, Pymme's Brook runs along this road, making it an area of high flood risk. Options 4: Eastern corridor and low density industrial areas, 5: Future Crossrail 2 Growth Corridor and 6: New Southgate and Upper Lee Valley Opportunity Areas focus development in the east of the Borough, whilst Option 3: Existing estate renewal and regeneration programmes supports the regeneration of existing estates. Option 7: Strategic plan-led approach to Green Belt supports development of Green Belt land in the north west of the Borough, some of which comprises greenfield land. As such, development would reduce the amount of permeable surface available and potentially contribute to surface water run-off, increasing flood risk. Option 1: Main town centres and areas around all stations promotes development within town centres and at tube and railway stations, some of which are located in the east of the Borough. The aforementioned flood zones also stretch to the west of the Borough along New River (Old Course) and a number of brooks, most of which are located within close proximity to tube and railway stations. Overall, all options are expected to have minor negative but uncertain effects in relation to IIA7: Flooding.

IIA objective 18: Minimise water use and protect water quality

H.54 LBE is covered entirely by the London Water Resource Zone, with its potable water and waste water services supplied by Thames Water. Greater London is mostly supplied by surface water resources (80%), with the remainder delivered through groundwater abstractions. Given the high-level nature of these options, it is not possible to distinguish between them with respect to water resources, water quality and wastewater treatment capacity. Water resources is a key issue in LBE, given that the Thames Water Supply is designated as "seriously water stressed" and that climate change may lead to limited water availability in the future, particularly in the summer. The Borough contains a fairly high proportion of land covered by Source Protection Zones 1 and 2²⁸⁸, and it is therefore unlikely that development would be able to avoid these Source Protection Zones.

²⁸⁸ There is no land in LBE covered by Source Protection Zone 3.

Development in some locations could therefore contaminate water supplies without mitigation. All options with the exception of one (Option 7) support development in existing built-up areas and therefore any effect on Source Protection Zones is likely to be limited. Due to the fact these options contain land that falls within Source Protection Zones 1 and 2 but already contain built development, minor negative but uncertain effects are expected. Although a large proportion of Green Belt land under Option 7: Strategic plan-led approach to Green Belt does not contain built development, only a very small proportion of Green Belt land falls within Source Protection Zones 1 and 2. For this reason, Option 7 is also expected to have a minor negative but uncertain effect in relation to this objective.

IIA findings for the policy approaches considered in the 2018 Issues and Options document

H.55 This section presents the IIA findings for the reasonable alternative policy approaches that are set out in the 2018 Local Plan Issues and Options consultation document, under the same headings used within the consultation document.

Historic environment policy options

H.56 The likely sustainability effects of the historic environment policy approaches are set out in **Table H.3** and described below the table.

Table H.3: IIA results for the 2018 historic environment policy options

IIA objective	HE1: Design quality and local character	HE2: Designated heritage assets, their setting and archaeology	HE3: Locally listed and undesignated heritage assets and cultural practices	HE4: Views
IIA1: Climate change mitigation	0	0	0	0
IIA2: Climate change adaptation	0	0	0	0
IIA3: Housing	0	0	0	0
IIA4: Health and wellbeing	0	0	0	0
IIA5: Services and facilities	0	0	0	0
IIA6: Social inclusion	0	0	0	0
IIA7: Crime and community safety	0	0	0	0
IIA8: Road safety	0	0	0	0
IIA9: Economy	0	0	0	0
IIA10: Town and local centres	0	0	0	0
IIA11: Air pollution	0	0	0	0
IIA12: Sustainable transport	0	0	0	0
IIA13: Biodiversity	0	0	0	0

IIA objective	HE1: Design quality and local character	HE2: Designated heritage assets, their setting and archaeology	HE3: Locally listed and undesignated heritage assets and cultural practices	HE4: Views
IIA14: Historic environment	++	++	++	++
IIA15: Landscape and townscape	+	0	+	++
IIA16: Efficient use of land and materials	0	0	0	0
IIA17: Flooding	0	0	0	0
IIA18: Water	0	0	0	0

H.57 These four policies seek to preserve, protect and enhance the London Borough of Enfield's historic environment. Policy HE1 addresses design quality and local character, Policy HE2 examines designated heritage assets, their setting and archaeology, Policy HE3 promotes locally listed and undesignated heritage assets and cultural practices and Policy HE4 covers views. These policies have a specific focus and as a result are unlikely to affect the majority of IIA objectives.

H.58 All four policies are anticipated to have significant positive effects in relation to **IIA14: Historic environment**. The policies all support the integrity, special interest, character, appearance and historic setting of heritage assets, both designated and non-designated. Policy HE2: Designated heritage assets, their setting and archaeology requires development proposals affecting a designated heritage asset, its setting or a property within a conservation area, to submit a Heritage Statement. Policies HE1: Design quality and local character and HE3: Locally listed and undesignated heritage assets and cultural practices also promote increasing access to and understanding of heritage, both in areas where heritage is underrepresented and with the general public. Furthermore, minor positive effects are anticipated for policies HE1: design quality and local character and HE3: Locally listed and undesignated heritage assets and cultural practices in relation to **IIA15: Landscape and townscape** as they both highlight the role that heritage assets play in forming and reinforcing a sense of local distinctiveness and character in Enfield Borough. A significant positive effect is also expected for Policy HE4: Views in relation to this objective as the policy seeks to protect strategic and local views. This is key as the view to and from natural or built assets enhances local distinctiveness and character.

H.59 Negligible effects are expected in relation to IIA1: Climate change mitigation, IIA2: Climate change adaptation, IIA3: Housing, IIA4: Health and wellbeing, IIA5: Services and facilities, IIA6: Social inclusion, IIA7: Crime and community safety, IIA8: Road safety, IIA9: Economy, IIA10: Town and local centres, IIA11: Air pollution, IIA12: Sustainable transport, IIA13: Biodiversity, IIA16: Efficient use of land and materials, IIA17: Flooding and IIA18: Water.

Design policy options

H.60 The likely sustainability effects of the design Policy approaches are set out in **Table H.4** and described below the table.

Table H.4: : IIA results for the 2018 design policy options

IIA objective	D1: Achieving design excellence	D2: Character and density	D3: Design for co-location and mixed use development	D4: Designing for a sustainable, safe and inclusive Borough
IIA1: Climate change mitigation	+	0	+	++
IIA2: Climate change adaptation	0	0	0	++
IIA3: Housing	++	0	++	0
IIA4: Health and wellbeing	+	0	+	++
IIA5: Services and facilities	0	0	+	0
IIA6: Social inclusion	+	0	0	0
IIA7: Crime and community safety	+	+	0	+
IIA8: Road safety	0	+	0	0
IIA9: Economy	0	0	0	0
IIA10: Town and local centres	0	0	0	0
IIA11: Air pollution	+	0	+	0
IIA12: Sustainable transport	++	0	++	0
IIA13: Biodiversity	0	0	0	0
IIA14: Historic environment	0	+	0	0
IIA15: Landscape and townscape	++	++	0	0
IIA16: Efficient use of land and materials	+	++	++	++
IIA17: Flooding	0	0	0	+
IIA18: Water	0	0	0	0

H.61 These four policies seek to address good design in new developments. Policy D1 relates to achieving design excellence, Policy D2 covers character and density, Policy D3 addresses design for co-location and mixed use development and Policy D4 promotes design for a sustainable, safe, and inclusive Borough. These policies have a narrow focus and as a result are unlikely to adversely affect the IIA objectives.

H.62 Policy D4: Designing for a safe and inclusive Borough is expected to have significant positive effects in relation to **IIA1: Climate change mitigation** and **IIA2: Climate change adaptation** because it encourages use of the BRE Home Quality Mark, which could help reduce CO₂ emissions associated with residential development, whilst directly promoting sustainable design and resilience to climate change environmental hazards and emergencies.

H.63 Policy D1: Achieving design excellence states that affordable homes must be designed to the same or higher standards as the private housing element of new developments, whilst also advocating the successful integration of different tenure types in new development. A significant positive effect is therefore expected for this policy in relation to **IIA3: Housing**. Further to this, the policy requires developments across the Borough to meet space standards, which will have beneficial effects on people's health and wellbeing. A minor positive effect is therefore expected in relation to **IIA4: Health and wellbeing**. Policy D3: Design for co-location and mixed use development promotes mixed use development and the co-location of different uses, which is an efficient use of space and also enables new homes to be built. A significant positive is therefore also expected for this policy in relation to **IIA3: Housing**. Policy D3: Design for co-location and mixed use development is also expected to have a minor positive effect in relation to **IIA4: Health and wellbeing** because when co-locating residential development or social infrastructure with industrial uses, consideration will be given to health and residential amenity. With the promotion of mixed use development, Policy D3: Design for co-location and mixed use development is also expected to have a minor positive effect in relation to **IIA5: Services and facilities**.

H.64 A minor positive effect is anticipated for Policy D1: Achieving design excellence in relation to IIA6: Social inclusion. Both the policy and its supporting text seek to improve design quality across all types of development and across all tenures, ensuring that affordable homes are designed to the same or higher standards as the private housing element of new developments. Through improving design quality in the Borough, it is anticipated that living standards will be improved for those in more deprived areas. Further to this, Policy D1: Achieving design excellence promotes pepper potting tenure mixes across housing sites to provide choice and opportunity for all. Policies D1: Achieving design excellence, D2: Character and density and D4: Designing for a safe and inclusive Borough are expected to have minor positive effects in relation to **IIA7: Crime and community safety**. This is because both policies D1 and D4 make reference to the role that design can play in creating sustainable and safe environments, whilst the supporting text to Policy D2 highlights the importance of ensuring tall, high rise buildings are safe from fire risk.

H.65 Significant positive effects are expected in relation to **IIA12: Sustainable transport** because policies D1: Achieving design excellence and D3: Design for co-location promote sustainable modes of transport. Policy D1 states that all developments must facilitate local movement, public access through sites, sustainable transport and easy way-finding, whilst Policy D3 and its supporting text promote mixed use development and co-location, as they can encourage healthier lifestyles through walking and cycling. Furthermore, encouraging more sustainable transport choices will help minimise air pollution and greenhouse gas emissions associated with use of the private car. As such, minor positive effects are expected for policies D1: Achieving design excellence and D3: Design for co-location and mixed use development in relation to **IIA1: Climate change mitigation** and **IIA11: Air pollution**. A minor positive effect is also anticipated with Policy D2: Character and density against **IIA8: Road safety**, as the policy states that the Council will refuse proposals which negatively impact road and pedestrian safety or traffic flow.

H.66 A significant positive is anticipated in relation to policies D1: Achieving design excellence and D2: Character and density in relation to **IIA15: Landscape and townscape** as both enhance the landscape and townscape in Enfield Borough. The supporting text of Policy D1: Achieving design excellence recognises the role that tall buildings play in generating a strong sense of place in the Borough, whilst Policy D2: Character and density states that the Council will seek to protect and build on the existing positive character and individual context of the Borough. Furthermore, Policy D2: Character and density also makes reference to protect Enfield Borough's areas of historic value, therefore a minor positive is also expected in relation to Policy D2: Character and density and to **IIA14: Historic Environment**.

H.67 All four policies are expected to have positive effects in relation to **IIA16: Efficient use of land and materials**. Significant positive effects are expected for policies D2: Character and density, D3: Design for co-location and mixed use development and D4: Designing for a safe and inclusive Borough in relation to this objective, as all three policies promote efficient use of land. Policy D2: Character and density promotes small scale infill and extension developments, whilst Policy D3: Design for co-location and mixed use development promotes mixed use development, as well as the co-location of different uses. Policy D4: Designing for a safe and inclusive Borough encourages sustainable design policies and standards in development proposals, by maximising possibilities for the reuse of materials and minimise waste generated during the construction of development. The supporting text to Policy D1: Achieving design excellence states that brownfield land must be used efficiently through infill and extension development. A minor positive effect is therefore expected for Policy D1: Achieving design excellence in relation to **IIA16: Efficient use of land and materials**.

H.68 Finally, whilst the topic of flooding is not directly referenced in Policy D4: Designing for a safe and inclusive Borough, the promotion of sustainable and resilient design is likely to positively affect **IIA17: Flooding**. A minor positive is therefore expected in relation to this objective.

H.69 Negligible effects are expected in relation to IIA9: Economy, IIA10: Town and local centres, IIA13: Biodiversity and IIA18: Water.

Housing policy options

H.70 The likely sustainability effects of the housing policy approaches are set out in **Table H.5** and described below the table.

Table H.5: IIA results for the 2018 housing policy options

IIA objective	H1: Housing growth and quality	H2: Affordable housing	H3: Small sites	H4: Housing mix	H5: Private rented sector and build-to-rent	H6: Custom and self-build housing	H7: Supported and specialist housing	H8: Gypsy and traveller accommodation
IIA1: Climate change mitigation	+	0	+	0	0	0	+	0
IIA2: Climate change adaptation	0	0	0	0	0	0	0	0
IIA3: Housing	++	++	++	++	++	++	++	++
IIA4: Health and wellbeing	0	0	0	0	0	0	0	0
IIA5: Services and facilities	0	0	0	0	0	0	+	+
IIA6: Social inclusion	0	+	0	0	0	+	+	0
IIA7: Crime and community safety	0	0	0	0	0	0	0	0
IIA8: Road safety	0	0	0	0	0	0	0	0
IIA9: Economy	+	+	+	+	+	+	+	+
IIA10: Town and local centres	0	0	0	0	0	0	0	0
IIA11: Air pollution	+	0	+	0	0	0	+	0
IIA12: Sustainable transport	+	0	+	0	0	0	+	0
IIA13: Biodiversity	+	0	0	0	0	0	0	0
IIA14: Historic environment	+	0	0	0	0	0	0	0
IIA15: Landscape and townscape	+	0	0	0	0	+?/-?	0	0
IIA16: Efficient use of land and materials	++	0	++	0	0	0	0	0
IIA17: Flooding	0	0	0	0	0	0	0	+
IIA18: Water	0	0	0	0	0	0	0	0

H.71 All housing policy options will contribute to a sufficient supply of homes in the Borough and seek to ensure that the mixed demands of a growing population are met by a variety of housing sizes, types, tenures, and specialist accommodation. These policies would directly address the identified key sustainability issues of a deficiency in housing supply and availability of affordable housing across LBE and, therefore, significant positive effects are expected in relation to **IIA3: Housing**. These policies will also support the local economy by ensuring that opportunities for housing development and therefore commerce and employment are secured. Therefore, minor positive effects are expected in relation to **IIA9: Economy**.

H.72 Policy H7: Supported and specialist housing will ensure that development contributes to the creation of inclusive and sustainable neighbourhoods and offers easy access to community facilities, public transport, and other services and facilities. Therefore, minor positive effects are expected against **IIA5: Services and facilities** and **IIA6: Social inclusion** in relation to this policy. A minor positive effect is also expected against **IIA6: Social inclusion** in relation to Policy H2: Affordable housing, as the policy is likely to improve social inclusion through mixed residential schemes that include both market and affordable housing. The provision of affordable housing will also help to address inequalities between different groups of people in the Borough, particularly in regard to the divide between the east and west of the Borough, which has been identified as a key sustainability issue. Policy H6: Custom and self-build housing is expected to have a minor positive effect in relation to **IIA6: Social inclusion** because it enables people to design a home to suit their needs, which may include specialist needs.

H.73 Policy H8: Gypsy and traveller accommodation will ensure that the development of new or existing gypsy and traveller accommodation has good access to services and facilities and supports development of these sites within Flood Zone 1, thereby reducing the risk of damage to people and property, resulting in minor positive effects against **II5: Services and facilities** and **IIA17: Flooding**.

H.74 Policy H1: Housing growth and quality seeks to prioritise the delivery of new homes around the emerging growth and investment areas outlined in Chapter 2 of the Issues and Options Local Plan. Therefore, the policy promotes more compact development where people will be located closer to other development including employment centres and may be able to walk or cycle to local services/facilities and workplaces. Policy H3: Small sites will encourage housing delivery and intensification on small sites with good accessibility to public transport and the Borough's town centres. In addition, Policy H7: Supported and specialist housing sets out the Council's approach to meeting the specialist needs of more vulnerable people such as the elderly. The policy seeks to ensure that development proposals are accessible to public transport, workplaces, shops, and other services and facilities. This is likely to reduce the reliance on private vehicles and encourage the use of public transport. These policies would therefore promote and facilitate the use of more sustainable modes of transport, including walking, cycling, and public transport, and reduce vehicular emissions in the Borough. As such, minor positive effects are expected against **IIA1: Climate change mitigation**, **IIA11: Air pollution** and **IIA12: Sustainable transport** in relation to these policies.

H.75 Individuals wishing to self/custom build their home rather than buy it from a traditional housebuilder are likely to be motivated by a desire to have greater influence on the design and layout, and to have the ability to create a home to suit their individual needs and aspirations. In seeking to provide the flexibility for this to happen, there is a risk that Policy H6: Custom and self-build housing, which facilitates provision of new homes via self and custom build, could result in inappropriate design and layout (e.g. inconsistent with surrounding landscape and townscape) with potential minor negative effects in relation to **IIA15: Landscape and townscape**. On the other hand, the variations in design may enhance the landscape and townscape. It is noted that these developments would also be subject to the requirements of the Design policies, which seek to avoid adverse impacts. Therefore, the effect is mixed with a minor positive effect and recorded as uncertain.

H.76 Policy H1: Housing growth and quality seeks to promote higher density development in suitable, accessible locations as well as ensure that vacant and new homes are occupied, while Policy H3: Small sites will encourage infill development on vacant or underused sites as well as the redevelopment of flats and non-residential buildings in order to deliver additional housing. As such, significant positive effects are expected against **IIA16: Efficient use of land and materials**.

H.77 Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA4: Health and wellbeing, IIA7: Crime and community safety, IIA8: Road safety, IIA10: Town and local centres and IIA18: Water.

Economy policy options

H.78 The likely sustainability effects of the economy policy approaches are set out in **Table H.6** and described below the table.

Table H.6: IIA results for the 2018 economy policy options

IIA objective	E1: Business and job growth	E2: Approach to employment land	E3: Office	E4: Supporting small business	E5: Skills and access to employment	E6: Digital infrastructure	E7: Creative Enterprise Zone
IIA1: Climate change mitigation	+/-?	+/-?	+	+	0	+	0
IIA2: Climate change adaptation	0	0	0	0	0	0	0
IIA3: Housing	0	+	0	0	0	0	0
IIA4: Health and wellbeing	0	0	0	0	0	0	0
IIA5: Services and facilities	0	0	0	0	++	0	0
IIA6: Social inclusion	0	0	0	0	+	+	0
IIA7: Crime and community safety	0	0	0	0	0	0	0
IIA8: Road safety	0	0	0	0	0	0	0
IIA9: Economy	++	++	++	++	++	++	++
IIA10: Town and local centres	+	+	+	+	0	0	+
IIA11: Air pollution	+	+/-?	+	+	0	+	0
IIA12: Sustainable transport	+	+/-?	+	+	0	+	0
IIA13: Biodiversity	0	0	0	0	0	0	0
IIA14: Historic environment	0	0	0	0	0	0	+
IIA15: Landscape and townscape	0	0	0	0	0	0	0
IIA16: Efficient use of land and materials	++	++/-	++/-	++	0	0	++
IIA17: Flooding	0	0	0	0	0	0	0
IIA18: Water	0	0	0	0	0	0	0

H.79 All economy policy options will contribute to the protection and enhancement of the local economy by aiming to attract and retain investment from existing and emerging growth sectors in order to ensure that opportunities for commerce and employment within the Borough of Enfield are secured. Policy E1: Business and job growth in particular, seeks to promote employment, industry and logistics. All policy options are therefore expected to have significant positive effects in relation to **IIA9: Economy**.

H.80 Policies E1: Business and job growth, E2: Approach to employment land and E3: Office will ensure that employment growth is focused on emerging growth and investment areas including town centres, as well as intensified at Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) in order to support economic growth and a higher job density and to achieve more efficient use of employment land. In addition, Policy E4: Supporting small business will support existing and new

businesses in the Borough through the provision of new business floorspace in mixed use or commercial schemes with particular consideration for development within town centres, and Policy E7: Creative Enterprise Zone will encourage the temporary use of vacant buildings and sites for creative workspace and industries. These policies would therefore promote more compact development patterns and encourage the efficient use of land within the Borough, including within the town centres. As such, minor positive effects are expected against **IIA10: Town and local centres** and significant positive effects are expected against **IIA16: Efficient use of land and materials**. By supporting more compact development and proposals for mixed-use development, policies E1 to E4 would also reduce the need to travel within the Borough and are therefore likely to result in minor positive effects in relation to **IIA1: Climate change mitigation** and **IIA11: Air pollution**, as well as **IIA12: Sustainable transport**.

H.81 Policies E2: Approach to employment land and E3: Office state that they will support floorspace for new purpose built office and business accommodation throughout the Borough. Although this will be focused within growth and investment areas and other land previously identified for employment purposes, these policies may result in the use of previously unused land. As such, minor negative effects are expected in relation to **IIA16: Efficient use of land and materials**, resulting in mixed significant positive and minor negative effects for policies E2: Approach to employment land and E3: Office.

H.82 Policy E2: Approach to employment will support mixed-use, employment-led schemes which include housing, as long as the uses are compatible. As such, a minor positive effect is expected against **IIA3: Housing** in relation to this policy.

H.83 Policy E5: Skills and access to employment will seek to enhance the employability and long-term employment prospects for all residents, regardless of health or disability. The policy states that it will provide support for improvements to skills and educational attainment, as well as childcare and training provision. The policy also seeks to increase the proportion of under-represented groups within the construction industry workforce. In addition, the policy supports the development of educational facilities and the provision of new training opportunities, skills development and apprenticeships. Therefore, this policy is likely to provide a higher number of residents with access to services in the District, with a significant positive effect is expected against **IIA5: Services and facilities** in relation to this policy. In addition, Policy E6: Digital infrastructure sets out the approach of the Council to promote the development of high quality communications infrastructure in order to support economic growth and more accessible and inclusive communities. The policy is therefore likely to reduce social exclusion in the Borough, resulting in minor positive effects in relation to **IIA6: Social inclusion**.

H.84 In addition, Policy E5: Skills and access to employment states that the Council will work with their partners to enhance the employability and long-term employment prospects for all residents within Enfield, regardless of health or disability status. As such, a minor positive effect is expected against **IIA6: Social inclusion** in relation to this policy.

H.85 Policy E2: Approach to employment land states that the Council will support further development of Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), as well as development at new locations that are accessible to the strategic road network. This could result in increased pressure on the transport system and potential traffic congestion, as well as potential impacts on air pollution which has been identified as a key sustainability issue in the Borough. As such, minor negative effects are expected against **IIA1: Climate change mitigation**, **IIA11: Air pollution**, and **IIA12: Sustainable transport**. However, the policy will also seek to ensure that impacts on the transport network as a result of development within LSIS are mitigated. As such, these effects are uncertain as the potential negative impacts are dependent on the implementation of mitigation measures. As a result, uncertain mixed minor positive and minor negative effects are expected against **IIA1: Climate change mitigation**, **IIA11: Air pollution** and **IIA12: Sustainable transport** in relation to Policy E2: Approach to employment land.

H.86 In addition, Policy E6: Digital infrastructure sets out the Council's approach to promoting the development of high quality communications infrastructure and will improve digital connectivity. The policy is therefore likely to encourage people to work from home, reducing the need to travel and the use of private vehicles. As such, minor positive effects are expected in relation to **IIA1: Climate change mitigation**, **IIA11: Air pollution** and **IIA12: Sustainable transport**.

H.87 Policy E7: Creative Enterprise Zone outlines how the Council will promote Meridian Water as a creative enterprise zone, which will build upon the heritage of the area. The policy will therefore help to foster heritage-led regeneration within the Borough and is likely to have a minor positive effect in relation to **IIA14: Historic environment**.

H.88 Negligible effects are expected in relation to **IIA2: Climate change adaptation**, **IIA4: Health and wellbeing**, **IIA7: Crime and community safety**, **IIA8: Road safety**, **IIA13: Biodiversity**, **IIA15: Landscape and townscape**, **IIA17: Flooding** and **IIA18: Water**.

Town centre policy options

H.89 The likely sustainability effects of the town centre policy approaches are set out in **Table H.7** and described below the table.

Table H.7: IIA results for the 2018 town centre policy options

IIA objective	TC1: Town centres	TC2: Successful town centres	TC3: Meanwhile uses	TC4: Evening and night time economy
IIA1: Climate change mitigation	+	+	0	0
IIA2: Climate change adaptation	0	0	0	0
IIA3: Housing	0	+	0	0
IIA4: Health and wellbeing	0	+	0	+/-
IIA5: Services and facilities	+	+	+	+
IIA6: Social inclusion	0	+	0	+
IIA7: Crime and community safety	0	+	0	0
IIA8: Road safety	0	0	0	0
IIA9: Economy	++	++	+	++
IIA10: Town and local centres	++	++	++	++
IIA11: Air pollution	+	+	0	0
IIA12: Sustainable transport	+	+	0	0
IIA13: Biodiversity	0	0	0	0
IIA14: Historic environment	0	0	0	0
IIA15: Landscape and townscape	0	+	+	0
IIA16: Efficient use of land and materials	0	+	0	0
IIA17: Flooding	0	+	0	0
IIA18: Water	0	0	0	0

H.90 All town centre policy options will contribute to the maintenance, enhancement and regeneration of the vitality and viability of the town and local centres in the Borough of Enfield's town centre hierarchy through appropriate development, and would therefore all have significant positive effects against **IIA10: Town and local centres**. By encouraging and focusing development within town centre locations, all of these policies are likely to increase the provision of and improve access to, services and facilities within the Borough. As such, minor positive effects are expected against **IIA5: Services and facilities**.

H.91 These policies will also support the local economy by ensuring that opportunities for town and local centre development and therefore commerce and employment are secured. Therefore, significant positive effects are expected in relation to **IIA9: Economy** in relation to policies TC1: Town centres, TC2: Successful town centres and TC4: Evening and night time economy, while the effect is likely to be less significant in relation to Policy TC3: Meanwhile uses and so a minor positive effect is expected.

H.92 In order to support and avoid significant impacts to the role and function of town centres in the Borough, Policy TC1: Town centres will support proposals for town centre uses within the emerging growth and investment areas identified in the Issues and Options Local Plan. Policy TC2: Successful town centres also seeks to ensure that the Council works with key stakeholders to support improvements to public transport and access to transport, services and facilities. This is likely to reduce the need to travel as well as promote and facilitate the use of more sustainable modes of transport, including walking and cycling. Therefore, these policies are expected to have minor positive effects against **IIA1: Climate change mitigation** and **IIA12: Sustainable transport**. By supporting development within existing town and local centres, these policies avoid the creation of new air pollution hotspots and help to address the identified key issues relating to air quality in the Borough. Therefore, minor positive effects are also expected against **IIA11: Air pollution** in relation to these policies.

H.93 Policy TC2: Successful town centres will encourage the redevelopment of underused space in the Borough's centres, including car parks, for residential use, in order to promote a better use of available land. This policy would directly address the key sustainability issue of a housing supply deficiency and ensure the efficient use of land. As such, minor positive effects are expected against **IIA3: Housing** and **IIA16: Efficient use of land and materials**.

H.94 Policies TC2: Successful town centres and TC4: Evening and night time economy will also seek to ensure that public and residential amenity in the Borough's centres is protected, for example by requiring that development proposals provide appropriate attenuation measures in locations with high levels of noise. In addition, Policy TC2: Successful town centres states that the Council will support uses in town centres that have a positive impact on health and well-being and would therefore help to address the identified key sustainability issue of health deficiencies in Enfield. Therefore, minor positive effects are expected for both policies against **IIA4: Health and wellbeing**.

H.95 Policy TC4: Evening and night time economy outlines the Council's approach to food and drink establishments, as well as arts, culture and leisure uses. It will support improvements to green spaces in the Borough, specifically to the west of Church Street/Windmill Hill and the entrances to the town centre in order to create attractive public areas and will also promote the use of empty shop units as community use hubs. This will result in the provision of, and improved access to, open spaces and community facilities within town centres in the Borough, as well as contribute to an attractive and safe public realm. Therefore, minor positive effects are expected against **IIA5: Services and facilities** and **IIA6: Social inclusion** in relation to this policy. However, as the policy supports the provision of developments including fast food establishments, public houses and nightclubs, this may encourage residents and visitors to lead unhealthy lifestyles. As such, the effect expected against **IIA4: Health and wellbeing** is mixed with a minor negative effect.

H.96 Policy TC2: Successful town centres will seek to review town centre boundaries and ensure that travel routes and nodes across the Borough are convenient, attractive, and safe. Therefore, this policy is likely to increase the perception of safety from crime and reduce the fear of crime, as well as promote the public realm as a safe and attractive place to use by pedestrians. As such, minor positive effects are expected against **IIA6: Social inclusion** and **IIA7: Crime and community safety**.

H.97 Policy TC2: Successful town centres will seek to protect the role and character of centres in the Borough and so will contribute to the conservation of local distinctiveness and sense of place. In addition, this policy will aim to prevent development in areas that are at risk of flooding. As such, minor positive effects are expected in relation to **IIA15: Landscape and townscape** and **IIA17: Flooding**. In addition, Policy TC3: Meanwhile uses will ensure that proposals for meanwhile uses will be supported where they contribute to the regeneration and enhancement of the area's character. As such, a minor positive effect is expected against **IIA15: Landscape and townscape** in relation to this policy.

H.98 Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA8: Road safety, IIA13: Biodiversity, IIA14: Historic environment and IIA18: Water.

Social infrastructure policy options

H.99 The likely sustainability effects of the social infrastructure policy approaches are set out in **Table H.8** and described below the table.

Table H.8: IIA results for the 2018 social infrastructure policy options

IIA objective	SI1: Social and community infrastructure	SI2: Health and wellbeing	SI3: Arts and cultural facilities
IIA1: Climate change mitigation	+	+	0
IIA2: Climate change adaptation	0	0	0
IIA3: Housing	+	+	0
IIA4: Health and wellbeing	++	++	0
IIA5: Services and facilities	++	++	++
IIA6: Social inclusion	+	++	+
IIA7: Crime and community safety	0	++	0
IIA8: Road safety	0	++	0
IIA9: Economy	+	+	+
IIA10: Town and local centres	++	0	+
IIA11: Air pollution	+	++	0
IIA12: Sustainable transport	++	+	0
IIA13: Biodiversity	0	+	0
IIA14: Historic environment	0	0	0
IIA15: Landscape and townscape	+	0	0
IIA16: Efficient use of land and materials	+	0	0
IIA17: Flooding	0	0	0
IIA18: Water	0	0	0

H.100 These three policies seek to increase the provision of social infrastructure in the Borough. Policy SI1 relates to social and community infrastructure, Policy SI2 covers health and wellbeing and Policy SI3 addresses arts and cultural facilities.

H.101 Policies SI1: Social and community infrastructure and SI2: Health and wellbeing are expected to have minor positive effects in relation to **IIA3: Housing**. This is because Policy SI1 encourages mixed use development, including housing to support viability, security and efficient land use, whilst Policy SI2 states that future development proposals must include measures to improve housing quality. Whilst this is in the context of improving health outcomes, it is thought that this policy will improve the general condition of housing stock in the Borough.

H.102 Policies SI1: Social and community infrastructure and SI2: Health and wellbeing are expected to have significant positive effects in relation to **IIA4: Health and wellbeing**. Policy SI1 seeks to prioritise the provision of community health

facilities and services, whilst Policy SI2 states that development proposals must incorporate measures to improve public health i.e. promote healthy eating and create new/improved health facilities. Significant positive effects are also expected in relation to policies SI1: Social and community infrastructure, SI2: Health and wellbeing and SI3: Arts and cultural facilities in relation to **IIA5: Services and facilities**, as all three policies support improved access to services, facilities and wider community infrastructure. Policy SI1: Social and community infrastructure encourages development and modernisation of new and existing social infrastructure in the Borough, including educational facilities, as well as supporting the investment plans of educational bodies to expand and enhance their operations within the Borough. Policy SI2: Health and wellbeing highlights the key role that development proposals must play in recognising and promoting access to community facilities. Policy SI3: Arts and cultural facilities seeks to enhance existing arts, cultural, entertainment, leisure, recreation and sport uses in venues across the Borough.

H.103 A minor positive effect is anticipated for policies SI1: Social and community infrastructure and SI3: Arts and cultural facilities in relation to **IIA6: Social inclusion**, as they both promote the need for community facilities to be accessible, welcoming, inclusive and open and available to all members of the local community. Policy SI2: Health and wellbeing is also expected to have a significant positive effect in relation to this objective because it requires development proposals to directly respond to issues surrounding poverty and inequality in the Borough. The policy also references the need for new or improved, or access to inclusive open space for local communities. Policy SI2: Health and wellbeing is also expected to have a significant positive in relation to **IIA7: Crime and community safety** because it highlights the role that development proposals must have in responding to issues surrounding crime through better urban design and housing mix.

H.104 Policy SI1: Social and community infrastructure and its supporting text highlight the need for community facilities to be located in places that are or will be accessible by a range of sustainable means of transport, including walking and cycling. They also promote the co-location of facilities and services, encouraging journeys to be undertaken by sustainable modes of transport. A significant positive effect is therefore expected in relation to **IIA12: Sustainable transport**. Similarly, Policy SI2: Health and wellbeing states that development proposals must recognise the importance of facilitating and promoting walking and cycling in future developments. As this policy promotes sustainable modes of transport in new developments, a minor positive effect is also expected in relation to **IIA12: Sustainable transport**. Furthermore, encouraging more sustainable transport choices will help minimise air pollution and greenhouse gas emissions associated with use of the private car. As such, minor positive effects can be expected for both policies in relation to **IIA1: Climate change mitigation** and for Policy SI1: Social and community infrastructure in relation to **IIA11: Air pollution**. Policy SI2: Health and wellbeing is anticipated to have a significant positive effect in relation to **IIA11: Air pollution** as the policy also includes reference to improving Enfield Borough's air quality and reducing exposure to airborne pollutants.

H.105 Minor positive effects are anticipated for all policies in relation to **IIA9: Economy**. Policy SI1: Social and community infrastructure promotes the development and retention of educational community facilities, which will help produce a skilled workforce with greater access to employment opportunities. Likewise, Policy SI2: Health and wellbeing states that development proposals must respond to issues surrounding improving employment in the Borough. This may subsequently result in the generation of new local employment. Further to this, Policy SI1: Social and community infrastructure states that town centres and areas with good accessibility will be prioritised for the location of community facilities, where they will help to promote access to services across the Borough. A significant positive effect is therefore expected for Policy SI1: Social and community infrastructure in relation to **IIA10: Town and local centres**. Policy SI3: Arts and cultural facilities also directly supports the development of arts, cultural, entertainment, leisure and sport uses in the Borough, which could have beneficial effects on the economy by attracting more visitors to the area. For this reason, a minor positive effect is expected in relation to **IIA10: Town and local centres**, as the policy promotes the protection and enhancement of locations for cultural activities in the Borough, which tend to be located within the town and local centres.

H.106 Whilst in the context of improving health outcomes, Policy SI2: Health and wellbeing encourages access to food growing and blue and green spaces in the Borough. The provision of such spaces would increase and strengthen LBE's ecological/green infrastructure networks. A minor positive is therefore expected in relation to **IIA13: Biodiversity**.

H.107 Policy SI1: Social and community infrastructure states that development proposals must be outwardly looking, address the street and neighbourhood in their design. A minor positive effect is therefore expected in relation to **IIA15: Landscape and townscape**, as the policy seeks to enhance the landscape and townscape of the Borough through appropriate layout and design. Finally, a minor positive effect is anticipated in relation to Policy SI1: Social and community infrastructure and **IIA16: Efficient use of land and materials**, as it supports the co-location of facilities and services in the Borough and encourages mixed use formats to support the viability, security and efficient use of land.

H.108 Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA14: Historic environment, IIA17: Flooding and IIA18: Water.

Green infrastructure policy options

H.109 The likely sustainability effects of the green infrastructure policy approaches are set out in **Table H.9** and described below the table.

Table H.9: : IIA results for the 2018 green infrastructure policy options

IIA objective	GI1: Green and blue spaces	GI2: Green Belt and Metropolitan Open Land	GI3: Greening the Borough	GI4: Biodiversity and Sites of Importance for Nature Conservation	GI5: Blue Ribbon Network	GI6: Burial space and crematorium
IIA1: Climate change mitigation	0	0	+	+	0	0
IIA2: Climate change adaptation	0	0	+	0	0	0
IIA3: Housing	0	0	0	0	0	0
IIA4: Health and wellbeing	++	++	+	+	++	0
IIA5: Services and facilities	++	++	0	0	0	+
IIA6: Social inclusion	+	0	+	0	0	0
IIA7: Crime and community safety	0	0	0	0	0	0
IIA8: Road safety	0	0	0	0	0	0
IIA9: Economy	0	0	0	0	0	0
IIA10: Town and local centres	0	0	0	0	0	0
IIA11: Air pollution	0	0	+	+	0	0
IIA12: Sustainable transport	0	0	+	0	+	0
IIA13: Biodiversity	+	-	++	++	++	+
IIA14: Historic environment	0	0	0	0	0	0
IIA15: Landscape and townscape	+	+/-	0	0	0	+
IIA16: Efficient use of land and materials	0	0	0	0	0	0
IIA17: Flooding	0	0	+	0	++	0
IIA18: Water	0	0	0	0	0	+

H.110 The green infrastructure policy options set out the Council's approach to the network of green, blue and open spaces within Enfield Borough and the provision of this infrastructure to ensure that it is sufficient to meet the identified growth and demand in the Borough. Policies GI1: Green and blue spaces and GI2: Green Belt and Metropolitan Open Land seek to protect

and enhance the quality and quantity of green infrastructure such as open space in the Borough and improve access to these spaces for the Borough's residents in order to meet the needs of future and existing residents, particularly within areas of identified deficiency, as well as emerging growth and investment areas. In addition, policies G11: Green and blue spaces and G12: Green Belt and Metropolitan Open Land will seek to promote the multifunctional and shared use of open space and the provision of new outdoor leisure facilities, whilst also supporting development that improves access to the Green Belt for beneficial uses including outdoor sport and recreation. These policies would therefore promote sports, active recreation and more healthy lifestyles, and would enable development in the Borough to address identified key sustainability issues including the imbalance of green space availability between the east and west of the Borough and health issues relating to access to green spaces and obesity. As a result, these policies are expected to have significant positive effects against **IIA4: Health and wellbeing** and **IIA5: Services and facilities**. Policy G11: Green and blue spaces also has the potential to increase spontaneous social interaction between members of the public in areas of public open space, with a minor positive effect expected against **IIA6: Social inclusion**.

H.111 Policies G13: Greening the borough and G14: Biodiversity and Sites of Importance for Nature Conservation outline the Council's approach to the protection and enhancement of the Borough's natural environment and will seek to enhance biodiversity through the retention and provision of trees, greening of the public realm, as well as improvements to access, connectivity and creation of new habitats. An increase in the quality and quantity of green infrastructure and vegetation would contribute to the improvement of local air quality in the Borough, bringing both physical and mental health benefits to residents. As such, minor positive effects are expected against **IIA1: Climate change mitigation**, **IIA4: Health and wellbeing** and **IIA11: Air pollution**, while significant positive effects are expected against **IIA13: Biodiversity** in relation to these policies. Policy G11: Green and blue spaces is also expected to have a significant positive effect in relation to **IIA13: Biodiversity** because it seeks to enhance the quality of open space, which includes green open space. Policy G12: Green Belt and Metropolitan Open Land, on the other hand, may have a minor negative effect in relation to **IIA13: Biodiversity** because supporting development which improves access to Green Belt areas could result in adverse effects on biodiversity as a result of increased recreational activity. The provision of green infrastructure such as trees, particularly at the roadside as set out within Policy G13: Greening the borough, would contribute to the creation of attractive streets that encourage residents to walk and cycle. The supporting text to Policy G13: Greening the borough also makes reference to softer landscaping and states that increasing the number of trees can help to reduce the impact of higher summer temperatures and reduce rainfall run-off rates, which will contribute to reducing the risk of surface water flooding. This policy will also maximise the provision of gardens and garden space, with the supporting text making a particular reference to community gardens and allotments, which play an important role in social cohesion. Therefore, minor positive effects are expected against **IIA2: Climate change adaptation**, **IIA6: Social inclusion**, **IIA12: Sustainable transport** and **IIA17: Flooding** in relation to Policy G13: Greening the borough.

H.112 The Council's approach to the protection and enhancement of the Boroughs 'Blue Ribbon Network' is set out within Policy G15: Blue Ribbon Network, which recognises the importance of the multi-functional role that rivers and waterways play and contribute to the Borough. The policy will seek to promote the enhancement of waterways and improve access to them through the provision of infrastructure that supports walking, cycling, leisure and recreation, as well as river-based transport, providing alternative modes of transport that may contribute to the alleviation of road traffic congestion. This policy is therefore likely to have a significant positive effect in relation to **IIA4: Health and wellbeing** and a minor positive effect in relation to **IIA12: Sustainable transport**. Policy G15: Blue Ribbon Network recognises the role that the Blue Ribbon Network of waterbodies in the Borough plays in flood and surface water management by seeking to safeguard access to flood defences and promoting the use of sustainable drainage systems in new developments. The policy also recognises the importance of the network to biodiversity and will ensure that habitats in the network are protected and that adverse impacts on waterside environments and waterbodies in the Borough. As such, significant positive effects are expected in relation to **IIA13: Biodiversity** and **IIA17: Flooding**.

H.113 Policy G16: Burial space and crematorium will seek to identify and meet the requirements of religious groups in regard to burial provision and ensure that burial space shortages are addressed where they are identified. The supporting text highlights the importance of these spaces in providing green, quiet areas for people, and in contributing to biodiversity within the Borough. Through the protection of existing land and the provision of new land for burial grounds and crematoriums, this policy will maintain and improve access to key facilities and religious places as well as provide opportunities for biodiversity enhancement in LBE. Therefore, minor positive effects are expected against **IIA5: Services and facilities** and **IIA13: Biodiversity**. A minor positive effect is also expected in relation to **IIA15: Landscapes and townscapes** because the policy seeks to maintain the landscape when providing new burial space.

H.114 Policy GI1: Green and blue spaces is expected to have a minor positive effect in relation to **IIA15: Landscape and townscape** because protecting existing open spaces from development would protect the landscape/townscape. As Policy GI2: Green Belt and Metropolitan Open Land would support particular development of land within the Green Belt, the policy may result in the fragmentation of valued landscapes in the Borough. As such, a minor negative effect is expected against **IIA15: Landscapes and townscapes**. However, this is mixed with a minor positive effect because the policy also resists development in the Green Belt, which would help protect the landscape.

H.115 Policy GI5: Blue Ribbon Network states that the Council will work with the Environment Agency and other partners in order to promote the improvement of water quality within the Blue Ribbon Network. The policy also seeks to ensure that where a development proposal is likely to have a significant adverse impact, assessment of the impact of the proposal on the status of the waterbody is provided. The policy will therefore contribute to the improvement of water quality in Enfield and help to address the water quality issues that impact the Borough. As such, a minor positive effect is expected against **IIA18: Water**.

H.116 Negligible effects are expected in relation to IIA3: Housing, IIA7: Crime and community safety, IIA8: Road safety, IIA9: Economy, IIA10: Town and local centres, IIA14: Historic environment and IIA16: Efficient use of land and materials.

Transport policy options

H.117 The likely sustainability effects of the transport policy approaches are set out in **Table H.10** and described below the table.

Table H.10: IIA results for the 2018 transport policy options

IIA objective	T1: Making the public transport more accessible and the natural choice for longer trips	T2: Reducing the impact of private vehicles on our streets	T3: Making active travel the natural choice	T4: Making more school trips safe, sustainable and healthy
IIA1: Climate change mitigation	++/-	++	++	++
IIA2: Climate change adaptation	0	+	0	0
IIA3: Housing	0	0	0	0
IIA4: Health and wellbeing	++/-	++	++	++
IIA5: Services and facilities	+	+	+	+
IIA6: Social inclusion	+	+	+	+
IIA7: Crime and community safety	0	0	0	0
IIA8: Road safety	++	++	++	++
IIA9: Economy	+	0	0	0
IIA10: Town and local centres	0	0	0	0
IIA11: Air pollution	++/-	++	++	++
IIA12: Sustainable transport	++/-	++	++	++

IIA objective	T1: Making the public transport more accessible and the natural choice for longer trips	T2: Reducing the impact of private vehicles on our streets	T3: Making active travel the natural choice	T4: Making more school trips safe, sustainable and healthy
IIA13: Biodiversity	0	0	0	0
IIA14: Historic environment	0	0	0	0
IIA15: Landscape and townscape	-	0	0	0
IIA16: Efficient use of land and materials	0	0	0	0
IIA17: Flooding	0	+	0	0
IIA18: Water	0	0	0	0

H.118 All transport policy options will contribute to the improvement of access and movement in the Borough, particularly in regard to sustainable transport modes. As the reliance on private vehicles has been identified as a key sustainability issue in the Borough, the support of improvements to transport infrastructure and the promotion of more sustainable modes of transport set out within these policies will directly address this issue. In particular, Policy T1: Making the public transport more accessible and the natural choice for longer trips will support improvements to public transport infrastructure and the road network in order to reduce traffic congestion and improve connectivity between the east and west of the Borough. This will help to address the transport severance between these areas.

H.119 All of these policy options seek to directly address the use of more active and sustainable modes of transport including walking and cycling. Policies T1: Making the public transport more accessible and the natural choice for longer trips and T2: Reducing the impact of private vehicles on our streets both seek to promote and maximise opportunities for cycling and walking by creating well connected, high-quality and convenient, safe cycle and walking routes to support alternative, more sustainable modes of transport for access to employment, education and services. Policy T3: Making active travel the natural choice sets out the Council's approach to encouraging more sustainable and active modes of transport, including the facilitation of walking and increasing the use of bicycles. The policy seeks to enable and encourage more active modes of transport by requiring that developments protect and enhance existing footpaths and cycleways and make provision for the provision of new routes which are accessible, inclusive, safe, and linked to town centres, public transport infrastructure and green spaces. Policy T4: Making more school trips safe, sustainable and healthy seeks to ensure that new residential development includes the provision of convenient, safe and well connected cycle and walking routes that link to local schools in order to provide safe, sustainable and healthy school trips. Policies T1 and T2 will also seek to promote the use of public transport in the Borough through the enhancement and development of transport infrastructure that is accessible and well-connected, particularly between the eastern and western areas of the Borough. As a result, these policies are likely to reduce the use of private vehicles via the promotion of alternative transport methods that are more sustainable, active and safe, thereby reducing traffic congestion and associated emissions and contributing to the improvement of air quality, as well as physical and mental health in the Borough. Therefore, significant positive effects are expected against **IIA1: Climate change mitigation, IIA4: Health and wellbeing, IIA8: Road safety, IIA11: Air pollution** and **IIA12: Sustainable transport** in relation to these policies. Due to the fact Policy T1 will promote the development of strategic and major road network enhancements as well as localised improvements to the highway network, the policy may encourage the use of private cars. The effects against **IIA1: Climate change mitigation, IIA4: Health and wellbeing, IIA11: Air pollution** and **IIA12: Sustainable transport** are therefore mixed with minor negative effects. In addition, accessibility within the Borough of Enfield is likely to be improved through these policies by the development of transport routes that are well connected to local services and facilities. As such, minor positive effects are expected against **IIA5: Services and facilities** and **IIA6: Social inclusion**.

H.120 In addition to outlining the Council's approach to tackling climate change, Policy T2: Reducing the impact of private vehicles on our streets also sets out measures to mitigate and adapt to climate change in the Borough. Although the construction of transport infrastructure, which is supported by several policies, could result in a larger area of land covered in impermeable surfaces, Policy T2 seeks to ensure that development proposals within Enfield are sensitively designed to reduce the impact of expected changes in climate, including permeable surfaces that reduce surface water runoff. As such, minor positive effects are expected against **IIA2: Climate change adaptation** and **IIA17: Flooding**.

H.121 An improved transport system, including enhanced access throughout the Borough may improve accessibility to employment opportunities, and as such Policy T1: Making the public transport more accessible and the natural choice for longer trips may have a minor positive effect in relation to **IIA9: Employment opportunities**. The development of new transport infrastructure associated with these improvements may also result in the fragmentation of landscapes within the Borough. Therefore, a minor negative effect is expected against **IIA15: Landscapes and townscapes**. However, this depends on the location and extent of improvements and so the effect is uncertain.

H.122 Negligible effects are expected in relation to IIA3: Housing, IIA7: Crime and community safety, IIA10: Town and local centres, IIA13: Biodiversity, IIA14: Historic environment, IIA16: Efficient use of land and materials and IIA18: Water.

Sustainable infrastructure policy options

H.123 The likely sustainability effects of the sustainable infrastructure policy approaches are set out in **Table H.11** and described below the table.

Table H.11: IIA results for the 2018 sustainable infrastructure policy options

IIA objective	SUS1: Sustainable building	SUS2: Sustainable living and working	SUS3: Sustainable infrastructure	SUS4: Minimising flood risk	SUS5: Surface water management
IIA1: Climate change mitigation	+	++	++	0	0
IIA2: Climate change adaptation	++	0	++	++	++
IIA3: Housing	0	0	0	0	0
IIA4: Health and wellbeing	0	+	0	0	+
IIA5: Services and facilities	0	0	0	0	0
IIA6: Social inclusion	0	0	+	0	0
IIA7: Crime and community safety	0	0	0	0	0
IIA8: Road safety	0	0	0	0	0
IIA9: Economy	0	0	++	0	0
IIA10: Town and local centres	0	0	0	0	0
IIA11: Air pollution	0	++	+	0	+
IIA12: Sustainable transport	0	++	++	0	0

IIA objective	SUS1: Sustainable building	SUS2: Sustainable living and working	SUS3: Sustainable infrastructure	SUS4: Minimising flood risk	SUS5: Surface water management
IIA13: Biodiversity	++	+	0	+	+
IIA14: Historic environment	0	0	0	0	0
IIA15: Landscape and townscape	0	0	0	0	0
IIA16: Efficient use of land and materials	+	0	0	0	0
IIA17: Flooding	0	0	0	++	++
IIA18: Water	++	++	++	0	++

H.124 These five policies seek to implement sustainable infrastructure networks in the Borough. Policy SUS1 relates to sustainable building, Policy SUS2 covers sustainable living and working, Policy SUS3 addresses sustainable infrastructure, Policy SUS4 covers minimising flood risk and policy SUS5 looks at surface water management.

H.125 Policy SUS1: Sustainable building promotes the use of existing and emerging standards and assessment methods such as BREEAM, Home Quality Mark One (HQM1) and Environmental Impact Assessments in climate change mitigation, which are expected to help reduce emissions associated with built development. As such, a minor positive effect is expected in relation to **IIA1: Climate change mitigation**. Policy SUS2: Sustainable living and working seeks to minimise energy demand and carbon emissions in new and refurbished buildings, with reference made to BREEAM, while Policy SUS3: Sustainable infrastructure promotes sustainable and reduced resource consumption relating to energy. A significant positive effect is therefore likely for both policies against **IIA1: Climate change mitigation**. Significant positive effects are largely expected against **IIA2: Climate change adaptation** in relation to policies SUS1: Sustainable building, SUS3: Sustainable infrastructure, SUS4: Minimising flood risk and SUS5: Surface water management. Policy SUS1: Sustainable building directly commits to higher standards of environmental sustainability in building practices, by minimising construction and operations waste, sourcing sustainable new materials and maximising reuse of recovered materials in line with circular economy principals. Policy SUS3: Sustainable infrastructure similarly promotes sustainable and reduced resource consumption in the Borough. Policy SUS4: Minimising flood risk requires developments to minimise current and future risk of flooding to people and property, whilst Policy SUS5: Surface water management states that development should be designed in a way that minimises flood risk and incorporates surface water drainage measures. All policies therefore promote the incorporation of sustainable design and construction techniques in development.

H.126 Minor positive effects are anticipated for both SUS2: Sustainable living and working and SUS5: Surface water management in relation to **IIA4: Health and wellbeing**. The supporting text of SUS2: Sustainable living and working outlines the crucial role that sustainable transport (i.e. walking and cycling) plays in increasing health and wellbeing in the Borough. Additionally, the policy seeks to reduce air pollution, which would have beneficial effects on people's health. Likewise, the supporting text to Policy SUS5: Surface water management promotes the use of Sustainable Drainage Systems (SuDS) in relation to the improved health and wellbeing of residents. The policy states that SuDS improve air quality, increase amenity space and create aesthetic improvements to the public realm, subsequently contributing to an increased quality of life for residents in the Borough. A minor positive effect can therefore be expected in relation to **IIA4: Health and wellbeing**.

H.127 A significant positive effect is also expected in relation to SUS3: Sustainable infrastructure against **IIA9: Economy** as the policy states that with respect to waste management facilities, development proposals will be expected to provide job creation and social value benefits, including skills, training and apprenticeship opportunities. This will subsequently promote

socio-economic growth in Borough. The policy also notes that in areas of high deprivation, employers must match or exceed the London Living Wage. This will have a subsequent minor positive effect in relation to **IIA6: Social inclusion**, as it would work to reduce poverty and social exclusion in deprived areas.

H.128 Policy SUS2: Sustainable living and working seeks to address issues of air quality by monitoring and improving air quality and reducing congestion, with a focus on enabling use of sustainable, particularly active, modes of transport such as walking and cycling. A significant positive effect is therefore likely in relation to **IIA11: Air pollution**. As per above, the supporting text to Policy SUS5: Surface water management supports the incorporation of living roofs into new development, which would help improve air quality. This is therefore anticipated to result in a minor positive effect in relation to **IIA11: Air pollution**.

H.129 Policies SUS2: Sustainable living and working and SUS3: Sustainable infrastructure are anticipated to have a significant positive effect in relation to **IIA12: Sustainable transport**. This is because Policy SUS2: Sustainable living and working promotes the use of sustainable and particularly active modes of transport, whilst Policy SUS3 states that development proposals must provide access to high quality digital connectivity services from a range of providers. This would therefore reduce the need to travel and support smart city concepts. Policy SUS3 also states that development proposals must be supported by and connected to sufficient, up to date and distributed sustainable infrastructure for transport. For this reason, a minor positive effect is expected in relation to **IIA11: Air pollution** because supporting smart city concepts and promoting sustainable travel choices will help minimise air pollution.

H.130 Policy SUS1: Sustainable building states that development proposals must result in net gain to, or at minimum level no net loss of local environmental quality. Therefore, it is expected to have a significant positive effect in relation to **IIA13: Biodiversity**. Policy SUS2: Sustainable living and working on the other hand promotes the provision of and improvements in supply of green infrastructure, with a minor positive effect expected in relation to **IIA13: Biodiversity**. A minor positive is also anticipated for policies SUS4: Minimising flood risk and SUS5: Surface water management in relation to this objective; Policy SUS4: Minimising flood risk makes reference to improving the ecological functioning of river corridors, whilst SUS5: Surface water management promotes the use of SuDS which would result in increased urban greening in the Borough. With SuDS significantly reducing flood risk, this policy would be likely to have a significant positive effect in relation to **IIA17: Flooding**. Similarly, Policy SUS4: Minimising flood risk states that the Council will require developments to minimise current and future risk of flooding to people and property, taking into account climate change, without increasing flood risk elsewhere. A significant positive is also therefore anticipated for SUS4: Minimising flood risk and **IIA17: Flooding**. Policy SUS1: Sustainable building is expected to have a minor positive effect in relation to **IIA16: Efficient use of land and materials** because the policy states that development proposals are expected to assess, protect and improve soil quality.

H.131 Finally, significant positive effects are likely for policies SUS1: Sustainable building, SUS2: Sustainable living and working, SUS3: Sustainable infrastructure and SUS5: Surface water management in relation to **IIA18: Water**, as they address issues surrounding water quality. Policy SUS1: Sustainable building states that development proposals must assess, protect and improve groundwater quality, particularly where it occurs within an Inner Source Protection Zone or on sites where historic contamination is likely to present a significant risk to groundwater, whilst Policy SUS2: Sustainable living and working promotes the restriction of mains water to 105 litres per head per day or less. Policy SUS3: Sustainable infrastructure states that development proposals must deliver or improve sustainable water supply, drainage and sewerage infrastructure, while Policy SUS5: Surface water management encourages all major developments to implement SuDS.

H.132 Negligible effects are expected in relation to IIA3: Housing, IIA5: Services and facilities, IIA7: Crime and community safety, IIA8: Road safety, IIA10: Town and local centres, IIA14: Historic environment and IIA15: Landscape and townscape.

Appendix I

Audit trail of site selection

I.1 Enfield Council has provided an audit trail of the site selection process, which can be found overleaf. The table lists all of the sites appraised in the IIA, with the final column setting out the Council's reasons for the selection of sites for allocation and why other sites were discounted.