

Enfield

Site Allocation Topic Paper

March 2024

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Background Topic Papers

A series of background topic papers have been prepared to support the proposed Submission Version Enfield Local Plan (Regulation-19). These are as follows:

- Spatial Strategy and Overall Approach Topic Paper
- Exceptional Circumstances Topic Paper
- Site Allocation Topic Paper
- Housing Topic Paper
- Employment Topic Paper
- Crews Hill Topic Paper
- Chase Park Topic Paper

These papers are intended to help explain the Local Plan spatial strategy, policies and associated allocations, with reference to the Local Plan evidence base.

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1. Introduction

- 1.1. This Topic Paper is one of a collection of Topic Papers to support Enfield's Draft Submission Version Local Plan (Regulation-19). The Draft Plan allocates sites for housing, employment and other uses to demonstrate the Council's proactive approach in meeting its identified future housing and employment needs.
- 1.2. The purpose of this Topic Paper is to set out the Council's approach for selecting the proposed Site Allocations to meet these requirements, providing an understanding why the draft Enfield Local Plan proposes the specified site allocations. The proposed Site Allocations are set out in Appendix C (Site Allocations) of the Local Plan.
- 1.3. This paper sets out the Site Selection process and proposed site allocations. It aims to provide clarity and transparency regarding the process of how the Plan has allocated sites, the rationale for selecting each site to support the implementation of the ELP Spatial Strategy (Draft Policy SS1) and, the reasons why potential alternative sites have not been selected. These decisions are informed by formal consultation responses made at Regulation 18 Issues and Options consultations in 2018 and 2021, as well as ongoing engagement with key stakeholders under the Duty to Cooperate.
- 1.4. The proposed site selection has been informed by the evidence base compiled to date including the iterative evidence provided in the Integrated Impact Assessment (IIA), Habitats Regulations Assessment (HRA), Strategic Flood Risk Assessment (SFRA), Transport Assessment (TA), Character of Growth Study, Whole Plan Viability Assessment, Green Belt and MOL Assessment and other evidence prepared as part of the Local Plan¹. This paper directs readers to the relevant evidence base and Local Plan sections where relevant. The paper does not introduce new information or evidence.
- 1.5. The paper is set out in the following sections:
 - Section 2 sets out the policy context within which the site selection methodology has been established;
 - Section 3 sets out background context relating to Enfield, specifically in relation to Housing and Employment, which has informed the approach to deciding whether sites should be selected or not;
 - Section 4 – sets out the methodology that has been applied
 - Section 5 – provides a summary of changes to proposed allocations since Regulation-18 and an overview of the sites which have been selected for allocation and why
 - Section 6 – provides a summary and conclusion.
 - The Appendices include further detail to supplement the main body of the report.

¹ <https://www.enfield.gov.uk/services/planning/evidence-base>

2. Policy Context

National Planning Policy Framework (December 2023)

- 2.1. The preparation of the new Local Plan has been influenced by the broad national, strategic and local policy context, particularly in developing a spatial strategy for the Borough.
- 2.2. As set out in the NPPF, the purpose of the planning system is to contribute to the achievement of sustainable development. The three overarching objectives are economic, social and environmental, which are interdependent and should be pursued in mutually supportive ways. It is therefore important that the site selection process adheres to these principles.
- 2.3. The Local Plan must allocate sufficient land in appropriate locations to ensure that there is an adequate supply as a minimum to meet the area's objectively assessed needs over the plan period. Paragraph 23 of the NPPF states that local planning authorities have a role in "planning for and allocating sufficient sites to deliver the strategic priorities of the area" and paragraph 69 sets out that strategic policy-making authorities should have a clear understanding of the land available in their areas through the preparation of a strategic housing land availability assessment.
- 2.4. The NPPF also recognises the importance of making effective use of land and states that "strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land". Paragraph 147 of the NPPF goes on to state that where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and / or is well served by public transport. Furthermore, Paragraph 146 of the NPPF sets out the range of reasonable options that should be fully examined before concluding that exceptional circumstances have been met, namely - making as much use of brownfield sites, optimising density of development, particularly in town/city centres and other areas well-served by public transport and ensuring this is informed by discussions with neighbouring authorities in relation to accommodating identified need through Statements of Common Ground.
- 2.5. Furthermore, the NPPF requires prioritisation of land that is well served by public transport in general and where there are opportunities to promote walking and cycling in order to promote healthy lifestyles and to minimise reliance upon the private car, allocating land with the least environmental or amenity, and requires plans to take a sequential risk based approach to sites in areas of flood risk.
- 2.6. Paragraph 35 of the NPPF requires Local Plans to be justified and provide "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence". The consideration of reasonable alternatives is therefore one of the key tests of soundness and the site selection process. Assessing how sites perform against each other is therefore relevant to satisfying this test.
- 2.7. Chapter 7 of the NPPF recognises the important role that residential development plays in ensuring the vitality of town centres and that policies should encourage residential development on appropriate sites. Chapter 8 promotes healthy and safe communities and for policies to deliver new open space, sport and recreation facilities, taking into account any deficits or surpluses. Policies should also protect and enhance public rights of way and access. Chapter 9 promotes sustainable transport. Within this, it sets out

that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. It recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas.

Planning Practice Guidance

- 2.8. The PPG requires local planning authorities to assess the future needs and opportunities for their area, explore and identify options for addressing these, and then set out a preferred approach. Key guidance on site selection is set out in the section - Housing and Economic Land Availability Assessment which aligns with Paragraph 67 of the NPPF.
- 2.9. The guidance sets out that housing and economic land availability assessments are an important source of evidence to inform plan-making and decision-taking as they identify a future supply of land which is suitable, available and achievable for housing and economic development over the plan period.
- 2.10. It highlights that whilst the land availability assessment does not in itself determine whether a site should be allocated for development, it provides information on the range of sites available to meet the local authority's needs. It is the role of the development plan to determine which of those sites are the most suitable, having regard to other evidence and the spatial strategy.

London Plan (2021)

- 2.11. Enfield's Local Plan must be in general conformity with the London Plan under the Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012. Amongst other matters, this means that Enfield's Local Plan must meet the net housing completions, of 12,460 homes, set out in the London Plan for the period 2019-2029, including for opportunity areas and small sites.

Previous Development Plan Documents in Enfield

- 2.12. Previous development plan documents prepared in Enfield have also informed the site selection for Enfield's Local Plan. A number of site allocations have been carried forward from earlier plans. Currently adopted Plans include the Edmonton Leaside Area Action Plan, North East Enfield Area Action Plan, and North Circular Area Action Plan and Core Strategy 2010. The new Local Plan will supersede these documents.

3. Background & Context

- 3.1. The Local Plan is the strategic planning framework that guides development over the next 15 years up to 2041. The Local Plan includes the spatial strategy which sets the strategic direction for the plan, identifying how growth will be distributed across the borough over the Plan Period.
- 3.2. The Spatial Strategy is set out in Policy SS1, which aims to provide a sustainable spatial approach to meet the levels of growth required in the borough². The proposed Site Allocations support and stem from the Spatial Strategy.
- 3.3. During the Plan Period (2019-2041) provision will be made for at least 34,000 homes, with an aim for 50% to be affordable. To meet the employment growth needs during the Plan Period, 304,000 sqm of net additional industrial and logistics floorspace; and 40,000 sqm of net additional office floorspace are needed.
- 3.4. The Enfield Housing Topic Paper (2024)³ has identified a number of key housing issues in Enfield, to be addressed through the Draft Local Plan policies and the proposed Site Allocations. These issues are summarised below:
- Enfield has a shortfall in housing development and has not been keeping pace with adopted housing targets, in particular including the need for larger family homes set out in the 2020 Local Housing Needs Assessment.
 - Enfield faces significant constraints on its housing capacity, particularly within the urban areas, including heritage considerations as well as viability challenges.
 - There is a significant need for housing across all sizes and tenures, with a specific emphasis on affordable housing that complies with the London Plan's definition of family housing.
 - Enfield requires a larger number of market homes to be built than are currently coming forward, to facilitate delivery of a higher amount of affordable housing to meet the boroughs' quantitative need. Consents being delivered are also not delivering the borough-wide target proportion as set out in current policy.
 - The delivery of housing is projected to drop significantly after 2029 if relying solely on sites within the existing urban area.
- 3.5. The Enfield Employment Land Review (2024)⁴ identified several key employment issues in Enfield, to be addressed through the Draft Local Plan policies and the proposed Site Allocations. These issues are summarised below:

² For further information on the spatial strategy, Spatial Strategy and Overall Approach Topic Paper sets out the evidence and information that has informed the Spatial Strategy (Policy SS1), including the justifications for not using Strategic Industrial Locations (SIL) to accommodate non-employment uses, and addresses the question of exceptional circumstance for Green Belt release.

³ The Housing Topic Paper (2024) can be viewed on the Local Plan evidence base web page:
https://www.enfield.gov.uk/__data/assets/pdf_file/0022/54526/Enfield-Housing-Topic-Paper-2024.pdf

⁴ Employment Land Review (2024)
https://www.enfield.gov.uk/__data/assets/pdf_file/0022/54751/Employment-land-review-2024-Planning.pdf

- Enfield has a growing population which is expected to keep expanding in the future. The population is relatively well skilled in comparison to the Borough's FEMA⁵, but is not as well paid and holds lower proportions of jobs in higher skilled occupations.
- The majority of industrial employment land in the Borough lies within clusters designated as Strategic Industrial Location (SIL) and Locally Significant Industrial Sites (LSIS), primarily located within the east of the borough within the Upper Lee Valley. Some SIL and LSIS is located outside in non-designated clusters.
- The M25 is a vital link for transporting goods around and into London and the wider South East, this key transport link runs along the northern edge of the Borough and coupled with high quality access to the A406 (North Circular) provides opportunity to support industrial intensification that requires good links for freight transport to support industrial uses.

⁵ A functional economic market area (FEMA) is not constrained by administrative boundaries but reflects the way the economy works; the relationships between where people live and work, the scope of service market areas and catchments.

4. Site Selection Methodology

- 4.1. The Council developed a Site Selection Methodology in line with PPG, which set out the approach to how sites have been identified as suitable for housing, employment, and other uses to support the objectives of the Draft Local Plan.
- 4.2. The Site Selection Methodology is set out over six stages detailed in Table 1 in Appendix 1. At each stage, sites were sieved, in order to identify sufficient sites to meet the borough's housing and employment needs, resulting in a list of Site Allocations, published alongside the Draft Local Plan. The process of selecting sites for Allocation was iterative, involving assessing sites against absolute, quantitative constraints, qualitative constraints, and changes in site deliverability over the plan period. Various stages were revisited where necessary to meet needs. A comprehensive overview of the Site Selection methodology can be viewed in Appendix 1 with a summary of the stages and process set out overleaf.

Stage 1: Identification and initial sift of sites

- 4.3. Stage one of the Site Selection methodology is formed of three stages:
- Stage 1a. Identification of sites
 - Stage 1b: Assessment of absolute constraints
 - Stage 1c: Size threshold
- 4.4. The Housing and Economic Land Availability Assessment (HELAA) identifies a future supply of land suitable, available and achievable for housing and economic development uses in the Borough over the Plan Period, forming the long list of sites from which potential site allocations will be selected. The HELAA forms the basis of the sites identified under Stage 1a of the Site Selection Methodology.
- 4.5. Sites within the HELAA were identified from a number of sources, such as recent planning applications and Call for Sites. The full list of sources used to identify sites is set out in paragraph 3.2 of the Site Selection Methodology in Appendix 1. In line with the Planning Practice Guidance part of the identification of the sites that could be considered appropriate for allocation, involves ensuring that sites can be considered available. The assessment of availability has been in line with the definition set out in the Planning Practice Guidance⁶.
- 4.6. As set out in the Site Selection Methodology, HELAA sites were considered against absolute and non-absolute constraints, and this has informed the assessment of suitability. The SHLAA methodology, which was consulted on in October 2020 and sets out details of the constraints considered through the HELAA process.
- 4.7. Absolute constraints (Level 1 constraints) were informed by national and local policy designations, a full list of absolute constraints can be viewed in table 2 of Appendix 1. Sites lying wholly within the constraints were excluded and considered not to have any reasonable development potential.

⁶ The Housing and Economic Land Availability Assessment (HELAA) PPG Paragraph 19 sets out approaches to assessing availability of sites, with information on suitability, availability, achievability, and constraints informing identifying overall deliverability.

- 4.8. 'Stage 1c, Size threshold' was applied to all sites that passed Stage 1b, sifting out sites that were under an estimated capacity of 25 homes or where the site was below 0.25ha in line with London Plan Small Sites Policy H2, or for employment sites beneath 500sqm or 0.25ha in line with Housing and Employment Land Availability Assessment (HELAA) PPG (Paragraph: 009 Reference ID: 3-009-20190722). As set out in the Site Selection Methodology the notable exception to this is where smaller sites may have marriage value with larger adjacent sites and/or could contribute towards a place-based approach to development in the area; in these instances, some smaller sites have been included for consideration as site allocations where appropriate.
- 4.9. All site that passed through Stages 1a to 1c were taken through to Stage 2 of the Site Selection process.

Stage 2: Promoting a Sustainable Pattern of Development

- 4.10. To support the approach of a sustainable pattern of development promoted in the NPPF, remaining HELAA sites that passed stage 1, were assessed under stage two using a sequential approach directing growth to specific locations, based on the overall hierarchy which prioritises land in the urban area before considering Green Belt, in line with the proposed Spatial Strategy.
- 4.11. Whilst most site allocations are identified to meet housing needs, it has been critical to ensure that the methodology is also appropriate for selecting sites to meet employment and other needs. Accordingly, a bespoke approach, which builds on the general foundations was used. The approach to selecting employment sites required striking the right balance of location and scale of employment sites to ensure integrated strategies with housing and other land uses, support for sustainable travel modes and a portfolio of sites which meet the development needs of business and the wider economy.
- 4.12. An overview of the priority approach to site allocation is set out in table 3 of Appendix 1 as a part of the full Site Selection Methodology details.

Stage 3: Detailed Planning Assessment

- 4.13. This stage concentrated on non-absolute constraints, how each site performs against them and whether constraints could be overcome, set out in table 5 of Appendix 1. Rather than assessing sites against a range of quantitative standards, each site was be considered qualitatively against each constraint. All sites not excluded at this stage were automatically taken forward to the next stage.

Stage 3 is undertaken in two parts:

- Stage 3a: Consideration of Technical Constraints
- Stage 3b: Consideration of other non-absolute constraints (e.g. historic/ecological etc.)

- 4.14. Where significant environmental and/or physical constraints were identified, sites were not taken forward for further consideration.

Stage 4: Sustainability Appraisal (As a part of the IIA)

- 4.15. This stage was undertaken alongside each iteration of the draft plan.

- 4.16. The purpose of the IIA is to promote sustainable development through better integration of sustainability considerations into plan preparation and has been an integral part of the plan-making process rather than a separate activity. It is an iterative process that identifies and reports on the likely 'significant effects' and the extent to which implementation of the plan will contribute towards sustainable development.
- 4.17. The aim of the IIA is to help to identify and assess different strategic and alternative options and help advise on the most sustainable solutions. It also aims to minimise negative impacts, optimise positive ones, and compensate for the loss of valuable features and benefits. Sites were considered against the 18 objectives, the full set of IIA objectives can be found in the Site Selection Methodology, table 6 of Appendix 1 and with further details are set out in the Regulation 19 Integrated Impact Assessment (2023), including how each of these factors has been considered.
- 4.18. The decision-making on which sites to take forward for potential allocation was fully informed by the overall outcomes of the IIA testing as a qualitative assessment, as well as by other evidence that emerged through or outside of the site assessment process. A summary of the IIA Appraisal for each site is available in the Regulation 19 Integrated Impact Assessment (2023).

Stage 5: Deliverability

- 4.19. This stage considered the deliverability of each site and the timescales and phasing of delivery. The starting point was the assessment of achievability contained within the HELAA. This included consideration of:
- Land ownership
 - Access to the road network
 - Key infrastructure requirements and capacity issues
 - Lead-in times, delivery rates and market capacity
 - Barriers to delivery (including whether or not proposed sites will require displacement and relocation of existing uses and whether an acceptable strategy can be put in place to do so)
 - Delivery approaches
 - Dwelling or floorspace capacity taking into account constraints and other relevant factors (that is likely to be delivered during the Plan period).

Stage 6: Overall Conclusion

- 4.20. The final stage of the process drew conclusions and made recommendations about the suitability of each site for inclusion in the New Local Plan. These conclusions were based on professional judgement and take account of:
- Availability, suitability and achievability (in line with the PPG definition);
 - Whether the land is previously developed land, and/or in the urban area;
 - Accordance with the emerging spatial strategy;
 - Integrated Impact Assessment findings;
 - Emerging Draft Local Plan Policy requirements;
 - Deliverability of Sites; and
 - Any other relevant factors.

Other Notes

- 4.21. Alongside the submission version of the Enfield Local Plan the Council is also preparing a separate Traveller Local Plan. The Council has prepared a separate Traveller Site Selection Methodology which will be used in preparation of that plan.

5. Site Allocations

Role of site allocations

- 5.1. The NPPF makes clear that plan-makers should identify sufficient sites to deliver the strategic priorities of the area. Site allocations are large-scale sites identified as suitable for delivering housing and where appropriate mixed-use development, employment land and other uses, such as sporting and leisure, through redevelopment. Importantly these sites are likely to come forward during the Plan Period.
- 5.2. Proposed site allocations have been identified as part of the plan across three broad use categories:
- Housing and housing-led mixed used site allocations
 - Industrial Site Allocations
 - Other Site Allocations (including crematorium, burial, sport and leisure uses)
- 5.3. The proposed site allocation policies set out suitable land use and infrastructure requirements, approximate capacities and delivery timeframes as well as urban design principles. The requirements for each site allocation address the broader objectives of national and regional planning policies. The allocations seek to give clarity to developers, local communities and other interested parties about the nature and scale of development that is suitable for each allocation as set out in the Plan Making PPG⁷.

How site allocations have been identified

- 5.4. As set out above, sites have been identified using the Council's Site Selection Methodology. The plan has first sought to identify sites within the urban area to meet the borough's housing and employment needs, optimising the estimated capacities that could be realised on these. It is only following this that sites within the Green Belt have been considered. Where Green Belt sites have been considered the most accessible Green Belt sites have been considered first, in line with the spatial strategy. However, to further refine the selection of the most accessible Green Belt sites, a brownfield first approach was taken on these sites to prioritise selection of previously developed land.
- 5.5. Following assessment of over 1200 sites, a list of proposed Site Allocations has been included as a part of the published Draft Local Plan. This can be found in Appendix C of the Plan.
- 5.6. Where identified sites have not been selected for allocation in the Local Plan, it does not mean that the principle of development is not supported, particularly if a site is located within the urban area. There are a variety of reasons why sites within the urban area may not have been deemed appropriate for allocation. This includes where development on site is already underway for sites which have a planning consent in place; if availability of land has not been indicated by the landowner/availability would not be within the plan period, or where sites fall beneath the London Plan small sites thresholds. Where sites have been considered too small for allocation, their contribution towards targets has been calculated through the HELAA and windfall allowance. Further detail is set out within the Housing and Economic Land Availability Assessment.

⁷ Paragraph 2 of the Plan Making PPG sets out where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development.

- 5.7. Unallocated sites may still come forward for development through the planning application process. Furthermore, many assessed sites have been identified as suitable for development through the Site Selection process, but fall below the threshold for selection, as set out in Appendix 1. These sites could come forward as windfall site during the plan period.

Summary of changes to proposed site allocations since regulation-18 (2021)

- 5.8. The majority of Site Allocations from Regulation 18 have been brought forward to Regulation 19, with the details of each site set out in Appendix 2. Out of the 96 proposed site allocations, the changes can be outlined as follows:
- 30 are wholly new allocations⁸
 - 4 proposed Site Allocations identified at Regulation 18 have not been carried forward or 'deleted'
 - High-level site capacities and estimates have been refined for 47 allocations.
- 5.9. Further detail on the reasons for changes to the proposed allocations since the last stage of plan-making are set out in the following sections.

Previously proposed site allocations deleted from the draft plan

- 5.10. During the preparation of the Submission version of the draft Plan, two proposed residential led sites have been removed which identified in the Regulation-18 version (see Appendix 5). This decision follows representations received during the Regulation 18 consultation, confirming these sites as no longer available within the Plan Period. In addition, two proposed site allocations identified for burial and crematorium uses have been removed, as these sites have been identified as excess to burial needs requirements as set out in the Enfield London Borough Council Burial Space Need and Provision Study⁹.

New proposed site allocations added to the draft plan

- 5.11. Three Call for Sites exercises were held as a part of the Local Plan preparation, with over 200 sites identified through this process.¹⁰ The majority of sites submitted were received during the first Call for Sites exercise in 2018, with subsequent exercises resulting in significantly fewer submissions, indicating a trailing of available land being promoted to the Council which it was not already aware of landowner intent for development.
- 5.12. Thirty wholly new site allocations have been included within the draft plan. These additional Site Allocations that have been selected at Regulation 19 (which can be found in Appendix 4) have been identified through subsequent Call for Sites as well as through extant planning consents that have yet to be commenced or completed (further information on these is contained within the next section). It is worth noting that of the new Site Allocations, almost half are in Council ownership – indicating a diminishing availability of available land in the borough within private ownership.

Changes in site availability and deliverability

⁸ The proposed allocations at Crews Hill, Chase Park and Meridian Water were previously included as single allocations, and have been subdivided for the purposes of aiding deliverability. This figure does not count these sub-divisions as new sites.

⁹ https://www.enfield.gov.uk/_data/assets/pdf_file/0019/4609/enfield-burial-needs-assessment-2020-planning.pdf

¹⁰ The purpose of the 'call for sites' is to help the Council establish what land is available in the borough. It is an opportunity for individuals, landowners and developers to suggest sites available for development within the borough for development over the next 20 years.

- 5.13. Over time, changes in site availability and deliverability, as confirmed by landowners have led to changes in the sites allocated.

Proposed Site allocations with extant Planning Consent

- 5.14. The Council has proposed Site Allocations both with and without planning consents in place. At the time of writing this Topic Paper, approximately 36% of all proposed Site Allocations have planning consents in place with the majority providing residential-led schemes and some employment-led, and all within the urban area.
- 5.15. These proposed site allocations are expected to come forward within periods 0-5 years and 6-10 years of the Plan. These sites have been proposed to safeguard the quality of any amendments to schemes proposed in the future, which the authority has been receiving an increasing amount of. This approach has only been applied to sites above the size threshold for allocation where substantial progress has not yet started on site, or for larger, complex multi-phased schemes which are expected to be brought forward over a number of years. This has been deemed an appropriate approach to account for worsening wider economic circumstance and legislative changes (such as requirements for two staircases¹¹) that may impact upon deliverability, despite extant consents indicating market interest in development..

Optimising capacities of proposed urban site allocations at Regulation-19

Policy Context

- 5.16. The London Plan Policy D3, sets out that development, including Site Allocations, should take a design-led approach to optimise capacity of sites by responding to the site's context. Optimum site capacity is defined as development with the most appropriate form for its site, following an evaluation of the site's attributes, its surrounding context and its capacity for growth (London Plan Policies D1, D2, and D3). Paragraph 3.3.1 makes clear that *“the optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as Gypsy and Traveller pitches - is the optimum development for the site.”*

Reasons for Refining Capacity Estimates

- 5.17. The Council has undergone a thorough and comprehensive process to optimise the estimated capacities of urban sites to ensure use of brownfield land has been optimised as far as possible, whilst minimising wholly unacceptable adverse impacts on local character and design quality of proposals themselves. The approach taken involved a thorough review and adjustment of capacity estimates based on further evidence, which included representations to the most recent regulation-18 plan, the updated Character of Growth study, and the Whole Plan Viability assessment amongst others pieces of evidence:
- **Feedback to the last consultation** from the public and bodies such as the GLA emphasised the importance of optimising urban site capacities to avoid the need for encroachment into the Green Belt. On the other hand, feedback from Historic England, the public and local groups highlighted the need to minimise impacts of proposals of tall buildings on local heritage, especially in areas such as Enfield Town – the borough's major centre – and registered parks and gardens. Further detail summarising responses can be found in the

¹¹ The Department for Levelling Up, Housing and Communities (DLUHC) confirmed in July 2023 that all new buildings over 18 metres will need to have a second staircase: <https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-press-releases/publish-second-staircase-guidance-soon-possible#:~:text=London%20has%20many%20buildings%20that,the%20event%20of%20an%20emergency>.

Consultation Statement.¹² The contrasting views have underscored the importance and need for the Council to take a balanced and measured approach in estimating site capacities.

- **Work in the Character of Growth study**¹³ was prepared in line with the Characterisation and Growth Strategy LPG (2023) and includes a series of diagrams and a typology library which sets out what typologies could be appropriate for each type of area, based on the level of change considered acceptable for each unique urban typology of the borough. The typology library comprises the case studies utilised to estimate site allocation capacity using a design-led optimisation approach. The housing typologies in the library represent award winning, best practice examples of contemporary urban living in London, modern and intensified workspace and gentle suburban densification¹⁴.
- **The Whole Plan Viability**¹⁵ identified that greenfield land in more affluent areas of the borough is likely to support higher levels of affordable housing, potentially reaching up to 50%, as well as substantial developer contributions.
- **The Industrial Intensification Viability**¹⁶ work by Stantec and Grant Mills Wood concluded that intensified industrial development could not be relied on to meet the borough's economic needs at least in the short and medium term. However, they considered that, viability was expected to improve over the plan period as the market rebalances and intensified formats become more established.

5.18. The approach to refinement of capacity estimates also took into account the site-specific design and infrastructure requirements, which were being formulated in a parallel as part of an iterative process during the preparation of the Regulation-19 plan. The requirements for each site that are now proposed have built upon the work prepared at the last stage of consultation, which merely included indicative site boundaries with estimated capacities. The design requirements which have been set out mirror the parameters set out within Figure 4.2 of the Optimising Site Capacity LPG.

Estimating Capacities

5.19. The methodology for estimating site capacities is set out within the Housing and Economic Land Availability Assessment. It is part of Stage 2 of the HELAA process. The approach used broadly aligns with the guidance set out within the draft 'Optimising Site Capacity' LPG (2023)¹⁷, with typologies categorised into the same as those used within the LPG. Given the sheer number of sites assessed, the key metrics from the GLA's 'indicative site capacity calculator' excel table were incorporated into our

¹² https://www.enfield.gov.uk/_data/assets/pdf_file/0022/39703/ELP-Reg-18-Consultation-Statement-Apr-23-Planning.pdf

¹³ The Character Of Growth study can be viewed under the Design and Character section of the Local Plan Evidence base web page: <https://www.enfield.gov.uk/services/planning/evidence-base>

¹⁴ Many of the examples within the GLAs library were inner London examples, so the range of typologies used were expanded upon to also include those which offered appropriate levels of car-parking for an outer London context. This has taken into consideration feedback from the market, to ensure the typologies (and thus capacities) proposed are deliverable. Feedback indicated that there is limited demand in this location for 3 bedroom + houses without car parking.

¹⁵ The Whole Plan Viability Assessment can be viewed under the Whole Plan section of the Local Plan evidence base page: <https://www.enfield.gov.uk/services/planning/evidence-base>

¹⁶ https://www.enfield.gov.uk/_data/assets/pdf_file/0015/5073/enfield-industrial-intensification-final-2020-planning.pdf

¹⁷ It should be noted that the relevant LPGs were in draft form at the time of plan preparation, and the drafts were published mid-way through preparation of the last regulation-18 plan.

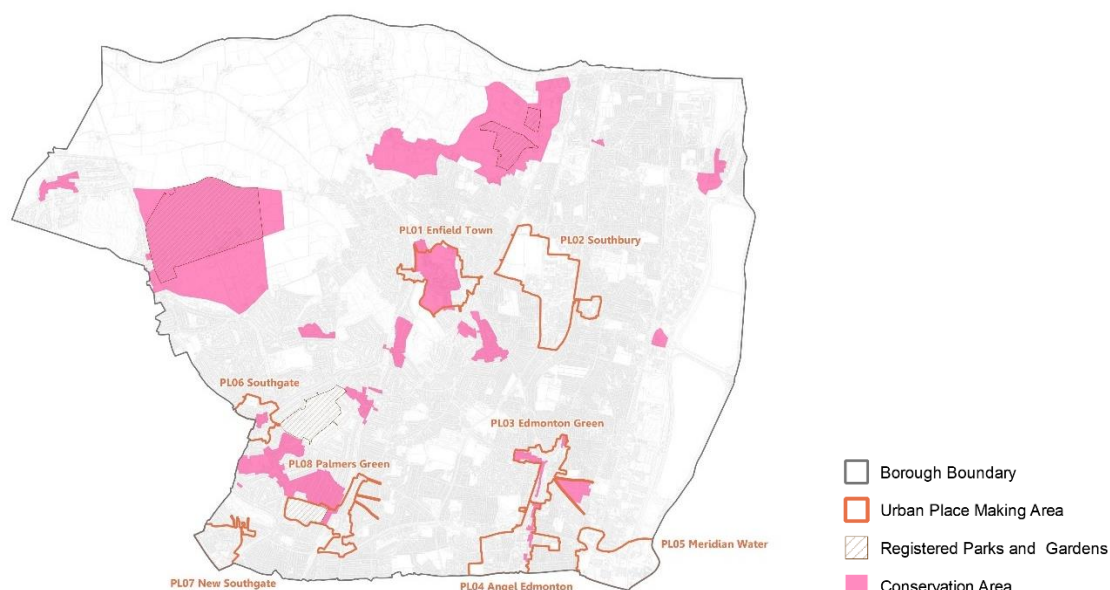
HELAA and site selection process, to enable easy comparison between site options, rather than relying on an unreasonable number of individual spreadsheets for each site that would not enable the public to easily see an overview of information across all potential allocations.

- 5.20. For proposed housing site allocations where a standard ‘typology approach’ was used to estimate capacities, the housing typologies used to estimate capacities were revisited – to establish whether higher density alternatives could be considered appropriate in light of further evidence and stakeholder engagement, when balanced against a range of other factors. The selection of appropriate typologies was informed by the findings of the updated Character of Growth study, which was revised in line with consultation with the GLA and Historic England. For those sites where a ‘bespoke approach’ was adopted, estimates were wholly re-calculated. Where available, this involved adapting proposals from developers but revising capacity estimates to make them more realistic and, whilst simultaneously reflecting developer aspirations as well as being acceptable to the LPA. Where developer proposals were not available a bespoke approach using 3D sketch-up models of sites produced estimated potential capacities. A bespoke approach was typically only undertaken for the largest sites (typically above the threshold above which schemes may be expected to be referred to the GLA). Given the mixed-use nature of the majority of the proposed urban site allocations, the simplistic London Plan typology models had to be adapted to a greater level of sophistication to ensure accurate capacities could be estimated.
- 5.21. For the vast majority of sites with potential as new industrial locations, the indicative capacity has been assessed by applying a plot ratio of 65%, in line with Publication London Plan guidance¹⁸. A bespoke approach was followed in some cases as needed, for example for sites where existing activities which need to be re-provided as part of a redevelopment scheme or for mixed-use sites. In these cases, the floorspace figure has discounted re-provided floorspace.
- 5.22. The Optimising Site Capacity LPG advocates use of 3D modelling to aid estimating capacities. Vu-City was used extensively in preparation of the Character of Growth study to determine appropriate tall building locations and heights, which is a key piece of evidence that has informed the ultimate estimated capacities that are considered appropriate for individual sites. This tool was also used to inform Duty to Cooperate discussions with Historic England – to respond to concerns raised during the regulation-18 consultation, reflecting the authority’s statutory duties in relation to protection of heritage assets. This has been particularly crucial given that the majority of our urban placemaking areas, to which growth is directed, are also conservation areas. See map below. The Council have similarly held Duty to Cooperate meetings¹⁹ with the GLA to ensure they have been kept informed of the direction of travel, proposed approaches, and emerging site allocation proposals during plan preparation.

¹⁸ The London Plan defines floorspace capacity as ‘the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio.’

¹⁹ As set out in the Duty to Cooperate Statement on the Evidence Base page

Map showing intersection of placemaking areas, conservation areas and Registered Parks and Gardens



5.23. A multi-disciplinary team of officers have been involved in reviewing site allocations, including urban design, heritage, transport, flood risk engineers, and other relevant specialist officers. All of these inputs also helped inform the approach to sites.

5.24. The process which the Council has undertaken is considered to be a thorough and comprehensive, yet proportionate approach to ensuring that both housing and employment capacities have been optimised within the urban area, before looking to land elsewhere within the borough.

Changes to proposed site allocation capacities

5.25. Following the publication of the Regulation 18 Enfield Local Plan, the estimated housing capacity for 47 proposed allocations were adjusted. The adjustments have been made to take into consideration a number of factors, including preparation of site-specific urban design principles, informed by further detailed work on the Character of Growth study, further information from landowners as well as further engagement with Historic England. The full detail of these adjustments can be viewed in Appendix 6.

Changes to proposed site allocation boundaries

5.26. Three large scale strategic site allocations - Crews Hill, Chase Park and Meridian Water - were previously published as large-scale individual Site Allocations (which were effectively broad locations) at Regulation 18. The boundaries at regulation-18 (2021) covered the entirety of the associated placemaking area. Following this, further work including masterplanning has led to the refinement of the boundaries for the overall placemaking areas as well as subdivision into smaller individual site allocations within these to assist with deliverability. Further detail can be found within the Crews Hill and Chase Park Topic Papers and associated spatial frameworks²⁰.

5.27. Alongside significant strategic sites allocation boundary changes, some minor site boundary changes have also been undertaken elsewhere. These amendments have been undertaken to rationalise site boundaries, such as rationalising to infill development boundaries and take account of landownership considerations.

²⁰ As set out on the Evidence Base Page

Proposed allocations: Urban sites

5.28. A significant proportion of the Borough's future development needs will be provided by intensification in the boroughs urban Placemaking Areas, set out in Chapter 3: Places, of the Local Plan:

- Enfield Town (PL1)
- Southbury (PL2)
- Edmonton Green (PL3)
- Angel Edmonton (PL4)
- Meridian Water (PL5)
- Southgate (PL6)
- New Southgate (PL7)
- Palmers Green (PL8)

Figure 02 Map illustrating all of the proposed placemaking areas across the borough

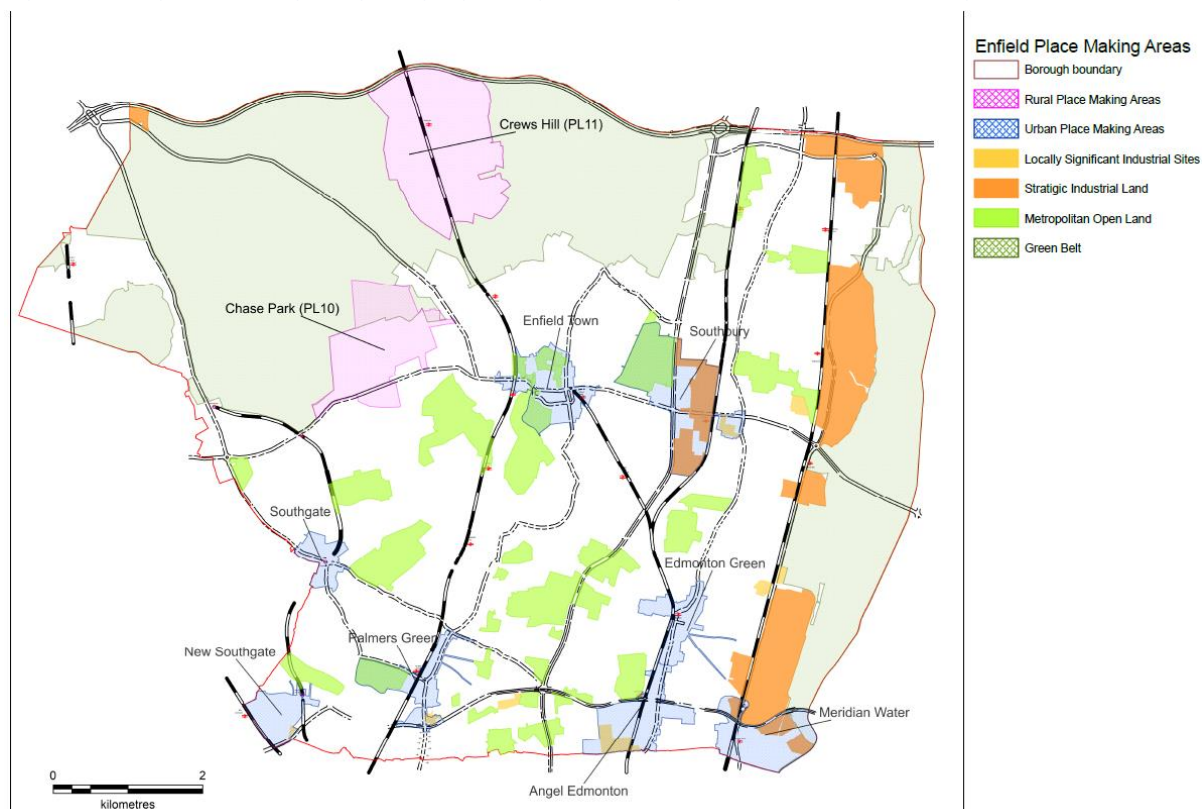


Table 1. Approximate Estimated quantum of homes for Urban Site Allocations

| Urban Areas (Site Allocations capacity) | Estimated quantum of homes to be delivered within the Plan Period (as proposed within Regulation-19 plan) | Estimated quantum of homes to be delivered beyond the Plan Period (as proposed within Regulation-19 plan) |
|--|---|---|
| Enfield Town (PL1) | 1,083 | 0 |
| Southbury (PL2) | 4,228 | 0 |
| Edmonton Green (PL3) | 1,608 | 0 |
| Angel Edmonton (PL4) | 1,760 | 0 |
| Meridian Water (PL5) | 6,711 | 0 |
| Southgate (PL6) | 249 | 0 |
| New Southgate (PL7) | 699 | 0 |
| Palmers Green (PL8) | 468 | 0 |
| Urban Placemaking Total | 16,806 | 0 |
| Urban (Outside PL) | 3,700 | 0 |
| Total (Urban Site Allocations) | 20,506 | 0 |

- 5.29. The urban placemaking areas will support the borough to deliver sustainable patterns of development, focusing development on sites with accessible, high frequency sustainable modes of transport, supported by active travel initiatives. Site allocations across the 8 urban placemaking areas will deliver approximately 16,800 homes during the Plan period. In addition to this, urban sites outside of the urban placemaking areas are estimated to deliver approximately 3,700 homes during the Plan Period.
- 5.30. Site Allocations within the Urban placemaking areas will make a significant contribution to net employment space with approximately 189,280sqm proposed across the 8 urban placemaking areas with an approximate estimate of 187,409sqm employment floorspace to be delivered through urban sites located outside of the urban placemaking areas.

Proposed Allocations: Rural Placemaking Areas & Green Belt Sites

- 5.31. To ensure that the full range of housing and employment needs are met and addressed it has been necessary to look beyond the urban area to identify potential site allocations as sources of land supply. The Exceptional Circumstances Topic Paper and Spatial Strategy and Overall Approach Topic Paper expand on the reasoning for Green Belt allocations, and areas of Green Belt release.
- 5.32. Further information setting out the reasons for the proposed Green Belt release to enable delivery of housing and employment land to meet identified needs can be found in several supporting Topic Papers as follows:
- Spatial Strategy and Overall Approach Topic Paper²¹
 - Exceptional Circumstances Topic Paper
 - Housing Topic Paper
 - Employment Topic Paper
- 5.33. Despite sites identified as developable and deliverable within the urban area, the Council's housing and employment needs cannot be fully met. Constraints such as site capacity and viability prevent these sites from delivering the necessary amount of

²¹ https://www.enfield.gov.uk/_data/assets/pdf_file/0020/54515/ELP-spatial-strategy-and-overall-approach-topic-paper-Planning.pdf

affordable family housing needed in the borough. Recent Authority Monitoring Reports (AMRs) have identified that over the past 10 years of housing delivery in Enfield (i.e. the period between 2013-2022), 71% of dwellings delivered in Enfield have been smaller homes with one and two bedrooms. The LHNA has identified a requirement for 60% of homes delivered to be larger family homes with three or more bedrooms. Furthermore, the Enfield Whole Plan Viability Assessment (2021) identified that greenfield land in more affluent areas of the borough is likely to support higher levels of affordable housing, potentially reaching up to 50%, as well as substantial developer contributions.

5.34. To address these challenges, two strategic rural placemaking areas have been identified to support the strategic delivery of homes and supporting infrastructure during both the Plan period and beyond. These areas are Chase Park (PL10 & SA10-1-10.4) and Crews Hill (PL11 & SA11.1-11.6). These two areas can contribute to the delivery of homes, specifically larger family dwellings and affordable housing that cannot be met through urban site allocations alone. Chase Park and Crews Hill Placemaking areas will have the capacity to deliver approximately 5,900 homes in total during the Plan period. Further information can be found in the Chase Park and Crews Hill Topic Papers.

5.35. Beyond the rural placemaking areas, excluding site allocations proposed at Crews Hill and Chase Park, two additional residential site allocations have been identified within the Green Belt, which would deliver a combined total of around 450 homes. In addition, three sites for employment uses have also been proposed for release from the Green Belt to help meet employment needs. A number of sites have also proposed for other uses beyond this within the Green Belt, which is covered in the next section, and listed below. See Appendix 2 for further details on each site.

Proposed Use: Housing

- RUR.01 Land opposite Enfield Crematorium (known as The Dell)
- RUR.02 Land between Camlet Way and Crescent West, Hadley Wood

Proposed Use: Employment

- RUR.03 Land West of Rammey Marsh
- RUR.04 Land East of Junction 24
- RUR.05 Land to the North-West of Innova Park

Proposed Use: Various 'Other' Uses

- RUR.06 Land at Picketts Lock
- RUR.07 Whitewebbs Golf Course & Land at Tottenham Hotspur football Club Training Ground
- RUR.08 Sloemans Farm

Table B. Approximate Estimated quantum of homes for Rural Place Site Allocations

| Rural Areas (Site Allocations capacity) | Estimated quantum of homes to be delivered within the Plan Period (as proposed within Regulation-19 plan) | Estimated quantum of homes to be delivered beyond the Plan Period (as proposed within Regulation-19 plan) |
|--|--|--|
| Chase Park | 2,592 | 0 |
| Crews Hill | 3,350 | 1990 |
| Total | 5,942 | 1990 |
| Rural (Outside PL) | 451 | 0 |
| Total (Rural Site Allocations) | 6,393 | 1990 |

Site Allocations for Uses Other than Employment and Housing

- 5.36. Site allocations proposing uses that are not identified for housing or employment have been assessed through a bespoke approach, dependent on the nature of proposed uses. Sites identified for 'Other' uses are listed below with further details available in Appendix 2, Table 9:
- RUR.06 - Land at Picketts Lock
 - RUR.07 - Whitewebbs Golf Course & Tottenham Hotspur football Club Training Ground
 - RUR.08 - Sloemans Farm
 - SA6.2 - Barnet and Southgate College
 - URB.36 - Church Street Recreation Ground
- 5.37. The selection and allocations of these sites have been informed by a number of evidence base studies including:
- Enfield London Borough Council Burial Space Need and Provision Study (2020)
 - Enfield Blue and Green Infrastructure Audit
 - Blue and Green Infrastructure Strategy (2021)
- 5.38. It should be noted that Site Allocations identified for 'Other' uses within the Greenbelt are not seeking Green Belt release, with reference to Paragraph 155 of the NPPF, as they comprise of development that is not considered inappropriate in the Green Belt provided development proposals preserve its openness and do not conflict with the purposes of the Green Belt or the land within it.

Engaging with landowners and the private sector & Ensuring deliverability of sites

- 5.39. Ensuring the deliverability of proposed site allocations is crucial to ensure that sites come forward within the plan period and deliver the quantum and type of homes required in the borough to meet its evidenced housing needs.
- 5.40. The Council has held numerous rounds of formal consultation, including the two recent rounds of Regulation-18 consultation. During the 'Main Issues and Preferred Approaches' consultation in 2021, a number of proposed strategic Site Allocations were published, setting out site boundaries and proposed land use requirements. Landowners, other interested parties alongside statutory consultees and wider public were able to submit formal representations related to the entire local plan, including specific representations related to the proposed Site Allocations.
- 5.41. Following this, the Council published a Regulation 18 Consultation Statement²² which summarises responses in relation to key policy areas, including a summary of feedback received in relation to the Spatial Strategy and Site Allocations. These representations were taken into consideration whilst refining the allocations proposed within the Submission version of the plan.
- 5.42. The Council has continuously engaged with landowners throughout the preparation of the draft plan. Engagement with the market has been essential in ensuring that "appropriateness and likely market attractiveness for the type of development

²² Documents published as a part of the Enfield Local Plan evidence base can be viewed here: <https://www.enfield.gov.uk/services/planning/evidence-base>

proposed;” (PPG Paragraph: 018 Reference ID: 3-018-20190722) is considered in what is proposed within site allocations.

- 5.43. Beyond formal consultation the Council has undertaken extensive informal engagement with the sector. This includes through formalised Developer Forum initiatives for strategic sites including in the Crews Hill, Chase Park and Southbury Placemaking Areas, as well as close engagement with the Council’s Meridian Water team and promoters of IKEA as they bring the former site to market. Alongside this engagement there are also a number of successful ongoing Planning Performance Agreements. The Council also organises quarterly Developer and Registered Provider forums to maintain strong relationships with the development industry, work together to address barriers to delivery including those related to costs and viability, and to understand the changing development market which in recent years has been heavily affected by inflation, borrowing costs, and changes to fire safety regulations.
- 5.44. The Council has commenced the process of preparing Statements of Common Ground (SoCGs) or Memorandum of Understanding (MoUs) with landowners and developers who have promoted sites which are proposed for inclusion in the plan. These will be set out in line with the requirements set out within the PPG to demonstrate that proposals have support from key stakeholders who will need to bring them forward (Paragraph: 011 Reference ID: 61-011-20190315).
- 5.45. Many of the site allocations already benefit from outline or hybrid permissions, and there is continuous engagement with applicants around future reserved matters and overall scheme buildout including around emerging viability challenges. Previous analysis undertaken of housing supply in the Local Plan has indicated very approximately that around one third of sites have some public sector involvement, e.g. a public sector freeholder.
- 5.46. Balancing allocations between Public and Private ownership plays an important role in ensuring resilience in the deliverability of sites for housing and employment within the Plan period. However, it has been necessary to carefully consider the appropriate balance given there is a risk of failure to meet housing target, if the plan relies too heavily exclusively on publicly owned sites to meet its housing requirement given the state of public sector finances. NPPF Paragraph 69 sets out the need to identify ‘a sufficient supply and mix’ of sites (our emphasis), taking into account their availability, suitability and likely economic viability. Given the challenges associated with brownfield housing delivery and changes in government spending priorities, there is a need to identify a broad range of sites with different viability characteristics to ensure that there is a reasonable prospect of the housing requirement being met in full.
- 5.47. NPPF Paragraph 69 also sets out the need for plans to identify a sufficient supply of sites taking into account their likely economic viability. The PPG clarifies that not every site is required to be tested individually for viability. Instead, ‘Plan makers can use site typologies to determine viability at the plan making stage’.
- 5.48. HDH Planning & Development Ltd produced a draft Whole Plan and CIL – Viability Update (HDH, April 2021) published with the Regulation 18 consultation on the draft Plan that ran from June to September 2021 . A technical viability consultation was conducted during February 2021 when a presentation was given, and an early draft of the report and a questionnaire were circulated. Notably, no further technical evidence was submitted by participants at this stage. Several workshops were also held with Council housing and planning officers. Residential and non-residential developers (including housing associations), landowners and planning professionals were invited to comment, and their comments were assimilated into the 2023 Update, alongside

analysis of a range of recent site specific viability assessments submitted by applicants as part of the development management process, including for major development sites.

Sites not proposed for allocation

- 5.49. Despite various sites being promoted to the Local Planning Authority (LPA) through call for sites and representations, not all were selected for inclusion within the emerging plan for a variety of reasons.
- 5.50. The Council received over 30 sites submitted by third parties²³ without direct interest in the land. For these sites to be considered appropriate for allocation they must be 'available' – as set out within the PPG. None of these sites were allocated, primarily because the majority fell beneath the size threshold for allocations. Although two larger sites which were not sieved out at this early stage, their availability could not be confirmed, preventing their inclusion in the allocation process²⁴.
- 5.51. During the site selection process, several Green Belt sites were excluded due to their isolated and inaccessible nature, and were not in a sustainable location. Consequently, allocating these sites would not align with the spatial strategy of the plan.

²³ Third parties include local groups and/or residents who have identified land that may be suitable for allocation and submitted site to the Council for assessment but have not direct interest in the land.

²⁴ The Housing and Economic Land Availability Assessment (HELAA) PPG Paragraph 019 sets out approaches to assessing availability of sites.

6. Summary & Conclusion

- 6.1. This topic paper provides an overview of the site selection process undertaken by the Council to identify the Site Allocations in the Enfield Local Plan.
- 6.2. Sites have been selected using the Council's Site Selection Methodology, which aligns with the Planning Policy Guidance. Over 1200 sites having been assessed and 96 sites proposed for allocation in the Local Plan.
- 6.3. The Site Allocations are aimed to support the spatial strategy of the Local Plan and its related policies, to enable housing and employment delivery and the necessary infrastructure to accommodate development led growth in the borough.
- 6.4. Sites within the urban areas have been given the highest priority for allocation, as set out in the Site Selection Methodology. The selection process has been iterative, drawing on various pieces of evidence as they have been prepared, representations received to the previous consultation, as well as engagement with key stakeholders.
- 6.5. For housing, the vast majority of new homes delivered over the plan period will be on site allocations within the urban area – 76% of all site allocations. However, as evidenced, urban sites will not fully meet local housing needs. As a result, the Council has identified sites within the Green Belt that will enable the delivery of larger family dwelling and affordable dwellings in order to fully address our housing needs with a particular focus on accommodating family homes and affordable housing.

Table C. Approximate estimated capacities from Site Allocations – housing

| Area | Estimated quantum of homes to be delivered within the Plan Period (as proposed within Regulation-19 plan) | % |
|-----------------------------|---|----------|
| Urban Site Allocations | 20,506 | 76% |
| Rural Site Allocations | 6,393 | 24% |
| All Site Allocations | 26,899 | - |

- 6.6. The aim is to meet employment needs through the intensification of existing industrial areas in the east of the Borough, and new sites in urban and rural locations. 60% of growth has been directed to existing designated SIL and LSIS employment areas within urban areas. However, in order to meet needs there has been a need to identify sites located within the Green Belt to help meet employment needs.

Table D. Approximate estimated capacities from Site Allocations – employment

| Area | Estimated quantum of floorspace (sqm) to be delivered within the Plan Period (as proposed within Regulation-19 plan) ²⁵ | % |
|-----------------------------|--|----------|
| Urban Site Allocations | 174,944 | 60% |
| Rural Site Allocations | 117,195 | 40% |
| All Site Allocations | 292,139 | - |

²⁵ This excludes the Estimated quantum of floorspace (sqm) to be delivered within the Plan Period (as proposed within Regulation-19 plan) for Chase Park (PL10) and Crews Hill (PL11)

- 6.7. A separate Exceptional Circumstances Topic paper outlines the exceptional circumstances for the proposed release of Green Belt to address development needs.
- 6.8. Not all sites promoted to the Council have been selected for allocation, due to a range of factors, including availability, suitability and achievability.
- 6.9. The detailed site requirements contained within the site allocation proformas will give landowners, members and the public a clear expectation of what can reasonably be expected to be considered acceptable on each site. These site allocations will serve as an essential tool in proactively and positively enabling high quality place shaping in the borough to secure substantial benefits and positive outcomes for residents, visitors and workers in Enfield and its surrounding areas.

// END

Appendix 1: Site Selection Methodology

London Borough of Enfield

Site Selection Methodology (SSM)

February 2024

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1. Introduction

- 1.1 Enfield Council is preparing a new Local Plan which will influence on the amount and location of new development across the borough in the period up to 2041 and set out policies and proposals that will guide development to ensure that new development is well-designed and that our built and natural heritage is conserved throughout the plan period. Once adopted, the Local Plan will be the development plan by which all planning applications will be determined (alongside national planning policy, the London Plan and any adopted Neighbourhood Plans). It will replace the Core Strategy (2010) and the Development Management Document (2014), and Area Action Plans including the North Circular Road Area (2014), North East Enfield (2016), and Edmonton Leaside (2020).
- 1.2 As well as identifying how much development the borough needs over the plan period, the new Local Plan must allocate sufficient land in appropriate locations to meet housing, retail and employment needs over the plan period. These sites (known as “allocations”) will need to be sustainable and deliverable and justified through an extensive evidence base for them to stand up to scrutiny. At a future stage, the Local Plan will progress through to Examination in Public by an independent Planning Inspector who will be appointed to examine whether the Plan is ‘sound’ or not. As part of the evidence base for the emerging Local Plan, potential development sites have been assessed using the site selection methodology. To ensure the Local Plan proposes the most sustainable and deliverable development allocations, which are in conformity with national and regional planning policy, and will deliver the Plan’s vision and objectives, a site selection methodology has been developed and has been followed consistently.
- 1.3 The site selection process takes account of key requirements identified the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG) and the adopted London Plan (March 2021) to justify the approach to site allocations within the new Local Plan.
- 1.4 This report sets out the process for what the various stages of this methodology are, including our Integrated Impact Assessment (IIA) criteria.

Structure of this report

- 1.5 This report sets out the Council’s Site Selection Methodology. The report is structured in the following manner:
- Chapter 2 provides an overview of the Site Selection Methodology.
 - Chapters 3-8 set out the detailed stages of the Site Selection Methodology:
 - Stage 1: The approach to site identification and the initial sift;
 - Stage 2: Promoting a Sustainable Pattern of Development;
 - Stage 3: Detailed Planning Assessment;
 - Stage 4: Integrated Impact Assessment;
 - Stage 5: Deliverability;
 - Stage 6: Overall Conclusion.

2. Site Selection Methodology Overview

- 2.1 In response to the requirements of government policy and practice guidance contained within the NPPF and Planning Practice Guidance (PPG), the Council have developed a Site Selection Methodology. The methodology provides an overview on how suitable sites have been identified for a range of uses including housing, employment and other uses. A list of the most appropriate sites has been selected and included as proposed site allocations in the Draft Local Plan.
- 2.2 The overall site selection methodology can be summarised in six stages and is set out in Table 1 below. Through each of the stages, sites have been sieved and subject to more detailed assessment at each stage, leading to identification of the proposed site allocations in the Draft Local Plan.

Table 1: Site Assessment Process

| Site Assessment Process Overview | |
|--|---|
| Stage 1: Identification and initial sift of sites | <ul style="list-style-type: none"> • Stage 1a: Identification of sites • Stage 1b: Assessment of absolute constraints • Stage 1c: Size threshold (25 homes+ or 0.25ha / 500sqm or 0.25ha) |
| 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 overall hierarchy which: <ul style="list-style-type: none"> • Prioritises land in the urban area, then • Prioritises the most accessible sites in the Green Belt (considering previously developed land first before considering greenfield sites in the Green Belt, starting with the lowest performing against the Green Belt purposes), then • Prioritises the least accessible isolated land in the Green Belt (considering previously developed land first). |
| 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 |
| 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. |

3. Stage 1: Site Identification and Initial Sift of Sites

Stage 1a – Identification of sites

- 3.1 The Housing and Economic Land Availability Assessment (HELAA) identifies a future supply of land which is suitable, available, and achievable for housing and economic development uses in the Borough over the Plan period. The HELAA will be updated on an annual basis. This is an important step in the preparation of Local Plans. The HELAA provides a list of sites identified for potential future development.
- 3.2 Sites included in the HELAA were identified from:
- Recent planning applications,
 - Enfield's 2022 Call for sites;
 - 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;
 - The most recent 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 Brownfield Land Register
 - Sites identified through Neighbourhood Plans in Enfield.
- 3.3 In line with national planning practice guidance (Paragraph: 017), sites considered in the HELAA have been assessed as to whether they are deliverable or developable. The assessment of suitability was as defined within the SHLAA methodology.

Stage 1b – Assessment of absolute constraints

- 3.4 HELAA sites have already been considered against absolute and non-absolute constraints and this has informed the assessment of suitability. (The SHLAA methodology²⁶, which was consulted on in October 2020, sets out details of the constraints considered through the HELAA process.) Those sites which were wholly covered by absolute constraints have been discounted from further stages of the site selection assessment.

²⁶ <https://www.enfield.gov.uk/services/planning/evidence-base>

Table 1 Sites to be excluded under Stage 1b

| Absolute constraints (Level 1) – To be excluded |
|--|
| Sites within the functional floodplain (Flood Zone 3b) Special Areas of Conservation (SAC) Sites of special scientific interest (SSSI) Special Protection Area (SPA) Ramsar sites National Nature Reserves (NNR) Ancient Woodland Suitable Alternative Natural Greenspace (SANG) Grade 1 and 2 agricultural land |

- 3.5 A renewed call for sites exercise was run between 15 June to 15 July 2022. As part of this exercise, landowners and parties who had previously submitted sites for consideration were asked to update their previous submission if there were any material changes to the information previously submitted, (e.g. in relation to availability/ownership etc.), or where additional information had been produced or obtained that could help inform the site selection consideration. Work was undertaken to determine the achievability of those sites within the HELAA.
- 3.6 Following the assessment of absolute constraints, sites were assessed for their suitability and availability for development through the HELAA process. Only those sites which were considered available, and suitable, or potentially suitable were taken forward for further consideration as part of the site selection process.

Stage 1c – Size Threshold

- 3.7 The HELAA identified a vast number of potentially developable sites. Whilst many of these might contribute towards the borough’s housing and economic land supply and other needs, not all of these will be appropriate for allocation. Only those sites which are of a significant size were included. Sites for housing which are beneath 25 dwellings or 0.25ha²⁷, whichever is smaller, were excluded. Similarly, sites for employment which are beneath 0.25ha or 500sqm were excluded. The notable exception to this was where smaller sites had marriage value with larger adjacent sites and/or could make a contribution towards a place-based approach to development in the area; in these instances some smaller sites were included for consideration as site allocations where appropriate.
- 3.8 The HELAA is a technical document and its role is to consider the potential land supply in LB Enfield to help meet development needs. It is not however the evidence which considers which of the submitted sites perform more strongly or sustainably than others and which should be taken forward to allocation.
- 3.9 In general terms, the HELAA did not involve the assessment of sites against local policy priorities, whereas the process of site selection was undertaken in the planning strategy context and involved making professional and planning judgements to produce a portfolio of sites and broad locations suitable for allocation and designation in the Local Plan. Critically, the HELAA represents a broad-brush assessment of land which, whilst considered comprehensive, does not go into the same level of the detail required for the site selection process. As such, the HELAA provided the starting

²⁷ A minor change was made to this threshold between regulation-18 and regulation-19 to ensure this aligned with the London Plan Small Sites policy H2, which classifies small sites as those beneath 0.25ha.

point for the assessment, helping to identify sites and guide the site selection process, however it is noted that this was a separate stage of the Local Plan and sites were assessed against a number of different, more exhaustive criteria to assess their potential for allocation.

4. Stage 2: Promoting a Sustainable Pattern of Development

- 4.1 The remaining site options were assessed 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 initially be considered based on the sequential approach to direct growth to specific locations, based on the overall hierarchy. The hierarchy sought to ensure that previously developed land (PDL) in the urban area was given the highest priority, with isolated greenfield sites in the Green Belt given the lowest priority. Where Green Belt land was needed to be considered to help meet needs it was after all suitable and available brownfield and greenfield land within settlement boundaries was first identified. On this basis all brownfield and greenfield land within the settlement boundaries was identified first.
- 4.2 Furthermore, the NPPF aims to promote patterns of development which make the fullest possible use of public transport, walking and cycling and which can minimise the need to travel. As such, this stage of the methodology considered the accessibility of sites. For residential development this was largely be based on Public Transport Accessibility Level, but also considered access to major service and employment centres as well as a range of services and facilities. This element was particularly important for sites located outside of the urban area. For industrial/logistics sites access to the Strategic Road Network was also be given consideration, to minimise the impact of associated traffic on existing local road network and air quality in these areas.
- 4.3 The preferred sites have been identified as allocations within the emerging Local Plan. So it has been important that the sites selected are consistent with the emerging spatial strategy and other relevant policies.

Table 3: Prioritisation of sites by category

| 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 ²⁸ 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 less likely, unless exceptional circumstances |
| 5 | | Greenfield in accessible, moderately performing Green Belt location | Potential allocation less likely, unless exceptional circumstances |

²⁸ Accessibility will be determined by the Public Transport Accessibility Level (PTAL) of sites

| | | | |
|---|---------------------------|---|--|
| 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 |

4.4 This step was based on the site as a whole, in some circumstances (particularly regarding larger sites) this resulted in a site being considered accessible because one part of it adjoined into the urban area. Due to site size the furthest extreme of such sites are not close settlement boundaries and therefore not considered accessible. A judgement was taken in such circumstances.

4.5 Site that fell within priorities 1-2 have generally been considered suitable for inclusion in the plan. However, some exceptional reasons meant this was not the case and reasons have been recorded. Sites that fell within priorities 7-8 were generally be considered unsuitable for inclusion in the plan, but as with the previous category, there were some exceptional justifications why they were included and this has be identified as appropriate.

4.6 Sites that fell within priorities 3 to 6 were considered to have potential for inclusion, to varying degrees. For these sites the next stage included a more detailed assessment to refine the criteria of selection, using planning judgement to determine if these sites could be taken forward for allocation, this was a particularly crucial step.

Strategic Sites

4.7 In addition to identifying suitable allocations, there was a need to consider the opportunity to achieve a sustainable strategic release of land as part of the spatial strategy, in order to meet our housing targets. Strategic site options provide an opportunity to create large scale comprehensive developments that could support the provision of significant infrastructure improvements. The appraisal of the strategic options and reasonable alternatives is covered in the Integrated Impact Assessment.

Employment sites

4.8 The approach to selecting employment sites required striking the right balance of location and scale of employment sites which ensured integrated strategies with housing and other land uses, support for sustainable travel modes and a portfolio of sites which meet the development needs of business and the wider economy.

4.9 Whilst primarily there is a need to ensure new employment land has been identified to meet the forecasted future requirements, there were a number of qualitative factors considered. These qualitative factors included:

- The locational needs for industry/logistics uses (including access to the Strategic Road Network);
- The compatibility with surrounding uses;

- Opportunities to benefit from clustering dynamics;
 - Demand for employment premises;
 - The quality of premises and land; and
 - Improving and modernising existing premises to meet business needs.
- 4.10 Based upon Planning Practice Guidance the most up to date evidence available on market signals and intelligence was taken into account to analyse the needs of particular sectors. This helped to ensure that new land supply is situated in appropriate locations for occupiers and businesses of different types. Further details on employment land supply can be found on the Council's website: <https://new.enfield.gov.uk/services/planning/evidence-base/>

Housing Trajectory

- 4.11 Work has been carried out to calculate the likely delivery trajectories of all proposed housing and employment sites. This demonstrates a theoretical estimate of the number of dwellings and employment space that could be delivered over the plan period. Further information on the Housing Trajectory can be found in the Housing Topic Paper (2024)²⁹ and is prepared using data from the HELAA (2023).

5. Stage 3: Detailed Planning Assessment

- 5.1 This stage concentrated on non-absolute constraints, how each site performed against them and if these constraints could be overcome. Rather than assessing sites against a range of quantitative standards, each site was considered qualitatively against each constraint. All sites not excluded from this stage were automatically taken forward to the next stage.
- 5.2 The assessment of sites comprised the consideration of several key criteria including Green Belt (as part of Stage 3) flood risk, and highways. In addition, the potential impact on landscape, historic assets ecological designations, utilities, education, health facilities were considered. There is an importance associated when taking a qualitative approach when analysing sites using these criteria.

Stage 3a – Consideration of Technical Constraints

- 5.3 This stage involved the consideration/assessment of physical and environmental constraints, in accordance with Planning Practice Guidance on Land Availability Assessments. A desktop assessment was initially undertaken to identify any site constraints.
- 5.4 Each site was subject to advice from relevant specialist officers, as well as those at the GLA and from statutory infrastructure providers as necessary, relating to matters including highways, environmental health and the environment. A strategic assessment of whether any constraints identified could be mitigated, for example through on-site infrastructure provision or use of S106 financial contributions.
- 5.5 For example, site access was a key consideration of the site selection process. To be confident that sites could be accessed via a safe and satisfactory highways solution, including any associated works to nearby junctions etc., and ultimately be

²⁹ <https://www.enfield.gov.uk/services/planning/evidence-base>

confident that any proposed allocations could be deliverable/developable in the plan period, it was considered appropriate to undertake further technical assessment of some sites. Further technical assessment was required in some cases.

- 5.6 Where significant environmental and/or physical constraints were identified, sites were not taken forward for further consideration.

Stage 3b - Consideration of other non-absolute constraints

- 5.7 As noted above, sites were initially considered based on the sequential approach as guided by the spatial strategy. An element of planning judgement was used to consider all the factors and decide on the suitability of sites for allocation. Tables 4 and Tables 5 below, set out the non-absolute constraints that each site was considered against. Sites which had no impacts against them were given greater consideration for allocation, compared to those where mitigation was required, or where there was a level of harm that could be mitigated.

Table 4: Detailed Assessment considerations

| Question | Assessment outcome | | |
|---|--|---|---|
| Is the site within a landscape character area? | Y could have significant impacts on landscape quality | Y but not considered to be harmful | N |
| Is the site within a valuable townscape character area? | Y the site could have significant impacts on townscape and cannot be mitigated to an acceptable level | Y the site is would impact the townscape but could be mitigated to an acceptable level | N The site has limited townscape character. |
| Does the site have open space / recreation value, or is it located within an area of deficiency? | Y the site is of important recreational value / would result in the total loss of an area of open space with no replacement in an area of deficiency | Y* The site is of moderate recreational value / would result in the loss of open space, but some space could be retained or re-provided / would not lead to loss of open space, but no potential to provide additional space in an area of deficiency | N |
| Are there Tree Preservation orders / veteran trees / protected vegetation on site (e.g. hedgerows / areas of woodland on the site)? | Y would require significant loss or harm | Y, but can be developed without significant loss or harm | N |
| Are there designated heritage assets on site? | Y would result in significant harm that cannot be mitigated | Y, adjacent to site and would result in less than substantial harm that could be mitigated | N |
| Are there undesignated heritage assets on site? | Y would result in significant harm that cannot be mitigated | Y, adjacent to site and would result in less than substantial harm that could be mitigated | N |
| Agricultural land classification | Grade 1 or 2 | Grade 3a | Grade 3b |
| Would proposed use compromise the integrity or effectiveness of Strategic Industrial Land? | Y Would compromise the integrity or effectiveness of the site (or adjacent SIL) in accommodating industrial-type activities | - | N |

| | | | |
|--|--|--|--|
| | and its ability to operate on a 24-hour basis. | | |
|--|--|--|--|

Table 5: List of non-absolute constraints

| Non-Absolute constraints (Level 2) – To be considered |
|--|
| Grade 3 Agricultural Land |
| Green Belt / MOL |
| Strategic Industrial Land |
| Locally Significant Industrial Land |
| Flood Risk Zone 2 |
| Lee Valley Regional Park |
| Scheduled Ancient Monuments |
| Historic Parks and Gardens |
| Contaminated land where mitigation would not be possible |
| Local Open Space |
| Allotments |
| Notified Safety Zones |
| Site of Importance for Nature Conservation |
| Common Land |
| Cemeteries |

6. Stage 4: Sustainability Appraisal (as part of the Integrated Impact Assessment)

6.1 A key part of the evidence base of the Local Plan was the Sustainability Appraisal (SA), a systematic process that it required to be carried out during the preparation of a Local Plan. The SA was integrated into the IIA; the IIA includes the following assessments:

- Sustainability Assessment (SA)/Strategic Environmental Assessment (SEA)
- Habitat Regulations Assessment (HRA)
- Equalities Impact Assessment (EqIA)
- Health Impact Assessment (HIA)
- Community Safety Impact Assessment (CSIA)

- 6.2 The IIA was undertaken in accordance with the procedural requirements set out by the Environmental Assessment of Plans and Programmes ('SEA') Regulations 2004, among other legislation.
- 6.3 The IIA promotes sustainable development through better integration of sustainability considerations into plan preparation and adoption. The IIA is an integral part of good plan-making and should not be seen as a separate activity. It is an iterative process that identified and reported on the likely significant effects of the plan or strategy and the extent to which implementation of the plan or strategy can contribute towards sustainable development.
- 6.4 The IIA identified and assessed different strategic and alternative options and advised on the most sustainable solutions. It also identified negative impacts and the positive ones to inform how to mitigate against the negative and optimise the positive outcomes and compensate for the loss of valuable features and benefits.
- 6.5 The IIA informed decision-makers about the environmental and sustainability consequences of the proposed Local Plan policies which can then be considered alongside financial, technical, political and other concerns. Thus, the IIA added an additional dimension to the decision-making process of Site Selection. The IIA process is, in many ways, a model for good plan-making. The more the plan-making and assessment processes are integrated, the more effective the assessment is likely to be.
- 6.6 All sites carried forward from the initial sift of sites were subject to Integrated Impact Assessment (IIA). This is to ensure that sites which were deemed 'reasonable alternatives' have been considered against the IIA objectives to determine their sustainability.
- 6.7 Sites have been considered against 18 objectives included in the Regulation 18 IIA (2021) and in the updated Regulation 19 IIA (2023). The objectives as part of this were adapted from the Sustainability Appraisal Scoping Report (May 2020)³⁰.
- 6.8 For employment³¹ and retail sites, different factors are included to take account of specific elements for employment uses and the locational requirements of different economic sectors.

Table 6: IIA objectives

| Topic | Objective(s) |
|---------------------------|--|
| Air quality | Minimise air pollution, 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. |
| Biodiversity | Deliver biodiversity net gain at an ambitious scale through individual development contributions and a wider strategic focus on avoiding/mitigating impacts to valued habitats and land that contributes to ecological connectivity and delivering targeted enhancements that improve the functioning of networks and are supportive of established conservation objectives. |
| Climate change adaptation | 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. |

³⁰ <https://new.enfield.gov.uk/services/planning/integrated-impact-assessment-scoping-report-2020-planning.pdf>

³¹ Employment sites refer to those which are used either for industrial purposes, or for business uses within offices

| | |
|------------------------------------|---|
| Climate change mitigation | Ensure the Local Plan serves to minimise LBE's per capita CO2 emissions such that the borough is on track to achieve carbon neutrality by 2030. |
| Communities | 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. Develop social cohesion through good urban design, using the healthy streets indicators and community spaces that act as a catalyst for community cohesion. Seek to ensure new developments provide for existing communities delivering targeted actions including in respect of housing needs, community infrastructure and urban realm. |
| Crime and community safety | 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. Focus on delivering the 'Vision Zero' target for road safety; through safe street design using healthy streets principles to ensure pedestrians and cyclists can travel safely. |
| Economy and employment | Support a strong, diverse and resilient economy that provides opportunities for all, including by supporting strategic industrial locations, the vitality of the borough's town and local centres and a diversification of the employment opportunities locally, including employment within the social enterprise, voluntary and community sectors and a growing higher wage economy. |
| Health | Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the borough. |
| Heritage and townscape | 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; and support access to, interpretation and understanding of the historic environment (including through investigations and studies which better reveal the significance of archaeological assets). |
| Housing | 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. |
| Landscape and green infrastructure | Protect and enhance the character, quality and diversity of the borough's landscapes and townscapes through appropriate location, layout and design of new development, including the preservation of important open gaps and key views, and contribute to London-wide Green Infrastructure objectives including in respect of the Lea Valley Regional Park. |
| Transport | Minimise the need to travel, support modal shift away from the private car and 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. |
| Water | Minimise water use in new developments through innovative design measures and ensure that development is directed to locations with sufficient wastewater infrastructure capacity. |

6.9 Further details are set out in the IIA, including how each of these factors has been considered.

6.10 Consistent with the purpose of the IIA, it will seek to identify the likely significant effects of development at each of the sites and where possible, will seek to identify ways in which the harmful effects of development could potentially be avoided or

mitigated. Where appropriate, consideration will be given to potential adverse effects and suitable types of mitigation measures rather than specific details or commitments, given it is recognised that substantial further work may be required on strategic sites should the plan be adopted.

- 6.11 The decision-making on the sites which have been taken forward for potential allocation has been informed by the overall outcomes of the IIA testing as a qualitative assessment, as well as by other evidence that emerged through the site assessment process. A summary of the IIA Appraisal for each site is included on the site assessment sheet. This ensures that the findings of the IIA and the site assessment process have informed the selection of the most appropriate sites for inclusion in the draft Local Plan.

Habitats Regulations Assessment (HRA)

- 6.12 The need for HRA is set out within Article 6 of the EC Habitats Directive 1992 and interpreted into British law by the Conservation of Habitats & Species Regulations 2017. The aim of the Habitats Directive is to “maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest” (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status. European sites (also called Natura 2000 sites) can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Natura 2000 sites.
- 6.13 The HRA is a separate process focused on avoiding impacts to internationally designated biodiversity sites, and there is no formal requirement to ‘scope’; however, an early discussion of HRA scope is considered appropriate. In short, the discussion within Appendix II IIA Scoping Report (May 2020) concludes that the HRA of the Local Plan is likely to require a focus on the risk of adverse effects on the Epping Forest Special Area of Conservation (SAC), although impacts on Lee Valley SPA/Ramsar site and Wormley Hoddesdon Park Woods SAC will also need to be a consideration.

7. Stage 5: Deliverability

- 7.1 This stage considered the deliverability of sites and the timescales and phasing of delivery. The starting point was the assessment of achievability contained within the HELAA and the anticipated delivery time set out in the housing trajectory. This included consideration of:
- Land ownership
 - Access to the road network
 - Key infrastructure requirements and capacity issues
 - Lead-in times, delivery rates and market capacity
 - Barriers to delivery (including whether or not proposed sites will require displacement and relocation of existing uses and whether an acceptable strategy is in place to do so)
 - Delivery approaches
 - Dwelling or floorspace capacity taking into account constraints and other relevant factors (that is likely to be delivered during the Plan period).

- 7.2 The deliverability of the sites has been assessed via a high-level assessment of whether development would be economically viable. This was informed by the Council's Whole Plan Viability Assessment. This indicated whether there is a reasonable prospect of each site being delivered and when, a key requirement of national planning policy.

8. Stage 6: Overall Conclusion

- 8.1 The final stage of the process drew on conclusions and made recommendations about the suitability of each site for inclusion in the New Local Plan. These conclusions were based on professional judgement and took account of:
- Suitability;
 - Whether the land is previously developed land, and/or in the urban area;
 - Accordance with the emerging spatial strategy;
 - Sustainability Appraisal;
 - Emerging Draft Local Plan Policy requirements;
 - Deliverability of Sites; and
 - Any other relevant factors.
7. A site assessment summary table has been prepared (Appendix A Site assessment summary table). The conclusions will set out whether or not a site is recommended for inclusion as a site allocation in the New Local Plan. It will also set out the main reasons to explain why a site is included or not.

Appendix 2: Summary of Site Assessment for Proposed Site Allocations

This appendix sets out the full list of proposed site allocations (for all uses), with the proposed mix of uses and estimated capacities for these as well as the reasons they have been selected. Table 07 sets out housing and mixed use, Table 08 sets out Industrial site allocations, Table 09 sets out Other site allocations. Where there have been changes to the estimated capacity of particular sites from regulation-18 the reasons for this are set out in Appendix 5.

Table 07. Housing and Mixed used site allocations

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|--|--|---|--|--|
| SA1.1 | Palace Gardens Shopping Centre | Mixed Use (Housing + town centre uses) | 329 | Reprovision | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. |
| SA1.2 | Enfield Town Station and the former Enfield Arms | Mixed Use (Housing + town centre uses at ground floor) | 79 | Reprovision | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute for site to placemaking vision. |
| SA1.3 | Tesco, Southbury Road | Mixed use (Housing + supermarket) | 303 | Reprovision | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. |
| SA1.4 | Enfield Civic Centre | Mixed Use (Housing + offices) | 114 | Reprovision | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. |
| SA1.5 | St Anne's Catholic High School for Girls | Housing | 133 | 0 | Available site within urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. The site is located within a sustainable location and has no absolute or environmental constraints. Local Open Space is not currently publicly accessible. Potential for some open space to be made accessible to public. |
| SA1.6 | 100 Church Street | Housing | 78 | 0 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|--------------------------------|---|---|--|---|
| | | | | | housing targets. Potential to contribute to placemaking vision. There is an extant consent which has yet to commence, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent. |
| SA1.7 | Oak House, 43 Baker Street | Housing | 47 | 0 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. |
| SA2.1 | Colosseum Retail Park | Mixed Use (Housing + town centre uses) | 1587 | 7224 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. There is an extant consent which has yet to commence, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent. |
| SA2.3 | Morrisons, Southbury Road | Mixed use (Housing + supermarket) | 646 | Reprovision | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. |
| SA2.4 | Southbury Leisure Park | Mixed Use (Housing + town centre uses i.e. re-provided leisure/recreation uses i.e. cinema) | 605 | Reprovision | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. |
| SA2.5 | Tesco, Ponders End | Mixed use (Housing + supermarket) | 521 | Reprovision | Brownfield site in urban area. All sites within the urban area will be required to help with delivering the Council's housing targets. Site also has potential to contribute to placemaking vision. |
| SA2.6 | Sainsburys, Crown Road | Mixed use (Housing + supermarket) | 868 | Reprovision of non-residential | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. |
| SA3.1 | Edmonton Green Shopping Centre | Mixed Use (Housing + town centre uses) | 1423 | 41,400 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. There is an extant consent which has yet to commence, so an |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|--|---|---|--|--|
| | | | | | allocation is justified to enable the LPA to positively shape any future changes to extant planning consent. |
| SA3.2 | Chiswick Road Estate | Housing | 146 | 0 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. |
| SA.3.3 | Fore Street Estate | Housing (infill) | 39 | 0 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. |
| SA4.1 | Joyce Avenue and Snells Park Estate | Housing (with some supporting non-residential uses such as social infrastructure) | 1188 | Reprovision | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. |
| SA4.2 | Upton Road and Raynham Road | Housing (with some supporting non-residential uses such as social infrastructure) | 134 | 188 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Site also has potential to contribute to placemaking vision. |
| SA4.3 | Langhedge Lane Industrial Estate | Mixed Use (Housing + re-provision of light industrial at Ground floor) | 120 | 4000 | Brownfield site in the urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Could enhance the Angel Edmonton placemaking area. Has housing potential, but would need to maximise employment development potential. Draft ELR recommends retention as LSIS. |
| SA4.4 | South-east corner of the North Middlesex University Hospital Trust, Sterling Way, London ³² | Mixed Use (Housing + offices) | 260 | 3000 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. |

³² For further details on the Planning Brief for Site Allocation SA4.4 see link: https://www.enfield.gov.uk/_data/assets/pdf_file/0021/51591/North-Middlesex-University-Hospital-planning-brief-Planning.pdf

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|--|--|---|--|--|
| SA4.5 | Public House, 50-56 fore Street London | Mixed Use (Housing + town centre uses at ground floor) | 58 | 420 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. |
| SA5.1 | Meridian Water Phase 1 | Residential-led mixed-use | Whole Place making area: 6,711 | 0 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Site also has potential to contribute to placemaking vision. The principle of a comprehensive urban regeneration project at Meridian Water has already been well established through previous plans such as the Core Strategy (2010) and ELAAP (2020) as well as in the Upper Lea Valley OAPF (2013). The individual site is suitable for allocation as part of wider site allocation to bring forward a comprehensive scheme. There is an extant consent which has yet to completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent. |
| SA5.2 | Meridian Water Phase 2 | Residential-led mixed-use | | 13,200 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Site also has potential to contribute to placemaking vision. The principle of a comprehensive urban regeneration project at Meridian Water has already been well established through previous plans such as the Core Strategy (2010) and ELAAP (2020) as well as in the Upper Lea Valley OAPF (2013). The individual site is suitable for allocation as part of wider site allocation to bring forward a comprehensive scheme. There is an extant consent which has yet to completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent. |
| SA5.3 | Former IKEA, Meridian Water | Residential-led mixed-use | | 13200 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Site also has potential to contribute to placemaking vision. The principle of a comprehensive urban regeneration project at Meridian Water has already been well established through previous plans such as the Core Strategy |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|-----------------------------|---|---|--|---|
| | | | | | (2010) and ELAAP (2020) as well as in the Upper Lea Valley OAPF (2013). The individual site is suitable for allocation as part of wider site allocation to bring forward a comprehensive scheme. |
| SA5.4 | Tesco Extra, Meridian Water | Residential-led mixed-use | | 6,800 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Site also has potential to contribute to placemaking vision. The principle of a comprehensive urban regeneration project at Meridian Water has already been well established through previous plans such as the Core Strategy (2010) and ELAAP (2020) as well as in the Upper Lea Valley OAPF (2013). The individual site is suitable for allocation as part of wider site allocation to bring forward a comprehensive scheme. |
| SA5.5 | Meridian 13 | Residential-led mixed-use | | 6800 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Site also has potential to contribute to placemaking vision. The principle of a comprehensive urban regeneration project at Meridian Water has already been well established through previous plans such as the Core Strategy (2010) and ELAAP (2020) as well as in the Upper Lea Valley OAPF (2013). The individual site is suitable for allocation as part of wider site allocation to bring forward a comprehensive scheme. |
| SA5.6 | Meridian East (Harbet Road) | Residential + light Industrial in new LSIS + intensified SIL area | | Reprovision | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing and employment targets. Site also has potential to contribute to placemaking vision. The principle of a comprehensive urban regeneration project at Meridian Water has already been well established through previous plans such as the Core Strategy (2010) and ELAAP (2020) as well as in the Upper Lea Valley OAPF (2013). The individual site is suitable for allocation as part of wider site allocation to bring forward a comprehensive scheme. The site is designated SIL. The |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|---|---|---|--|---|
| | | | | | evidence base suggests the site is in an ideal location to help deliver industrial intensification and thus provide employment floorspace to help meet the borough's employment needs. It is suggested the SIL designation is retained to retain industrial land. However, the site is also part of a broader regeneration area, the OAPF and the emerging placemaking area for Meridian Water. As the London Plan has a presumption in favour of previously developed land, this could be an ideal location for housing development, if phased release of industrial land could be managed. Additional SIL and intensification can be provided in close proximity to any SIL proposed to be de-designated. The principle of the SIL strategy has been discussed and agreed with the GLA. |
| SA6.1 | Southgate Office Village | Mixed Use (Housing + offices with ground floor café) | 216 | 3473 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. There is an extant consent which has yet to be completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent. |
| SA6.3 | Minchenden Car Park & Alan Pullinger Centre | Housing | 33 | Reprovision | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. |
| SA7.1 | Former Gasholder, New Southgate | Mixed Use (Housing with ground floor commercial uses) | 182 | 371 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. There is an extant consent which has yet to be completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent. Potential to contribute to placemaking vision. Potential to achieve additionality through a combined approach with adjacent site, given location. |
| SA7.2 | Aldi, New Southgate (formerly Homebase) | Mixed Use | 203 | Reprovision | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. Potential to achieve additionality through a combined approach with adjacent site, given location. |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|--|---|---|--|--|
| SA7.3 | Ladderswood Estate | Housing (with some supporting non-residential uses such as social infrastructure) | 107 | 1554 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. There is an extant consent which has yet to be completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent. |
| SA7.4 | Arnos Grove Station Car Park | Housing (with some non-residential uses such as café/retail) | 162 | 89 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. There is an extant consent which has yet to be completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent. |
| SA7.5 | Coppice Wood Lodge | Housing | 45 | 0 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. There is an extant consent which has yet to be completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent. |
| SA8.1 | Morrisons, Palmers Green. | Mixed Use (Housing + Supermarket) | 130 | 6000 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to inform/enhance outcome through site requirements in an allocation (in line with London Plan Good Growth policies). Potential to achieve additionality through a combined approach with adjacent site, given location. |
| SA8.2 | Lodge Drive Car Park | Housing | 124 | 0 | Brownfield site in urban area although not within a placemaking area. Potential to inform/enhance outcome through site requirements in an allocation (in line with London Plan Good Growth policies). All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. |
| SA8.3 | Corner of Green Lanes and the North Circular | Mixed Use (Housing + Supermarket) | 129 | Reprovision | Brownfield site in the urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Has housing potential but would need to maximise employment development potential. Draft ELR recommends remains as LSIS and proposals would need to be |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|---|---|---|--|--|
| | | | | | compatible with this. Potential to contribute to placemaking vision. |
| SA8.4 | Travis Perkins Palmers Green | Mixed Use (Housing with re-provision of existing use) | 84 | 3200 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. Potential to achieve additionality through a combined approach with adjacent site, given location. |
| SA10.1 | Chase Park South | Residential-led mixed-use | 2130 | TBC | The release of Green Belt will be required to help assist with meeting the Council's housing target and need beyond 2029. |
| SA10.2 | Arnold House (66 Ridgeway) & Land to the rear of 66 The Ridgeway (west) | Housing (older persons) | 42 | 0 | The deliverability of the urban sites will not meet needs in full and therefore Green Belt release is also required to help meet the target. Findings from technical evidence also indicates there may be viability constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required in order to meet a range of objectives. |
| SA10.3 | Chase Park North East | Residential-led mixed-use | 640 | TBC | |
| SA10.4 | Chase Park North West | Residential-led mixed-use | 890 | TBC | |
| | | | | | It is considered that development in this location provides a unique opportunity to deliver a strategic scale of growth that will provide for a significant proportion of the Borough's housing needs. The area is capable of delivering a good proportion of affordable and family homes in a sustainable location – to help contribute towards meeting a specific need that is not readily achievable within the urban areas, in a location with reasonable connections to and opportunities to improve public transport. The scale of development can be sufficient to support essential facilities that are required to make a self-sufficient urban extension, including new retail and community facilities, and the potential for a new primary school. |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|-----------|--------------|---|--|---|
| | | | | | <p>Change and new development in the area can take advantage of good access to the London Underground network which provides direct access into and across London. The expansion of the existing bus network, linking into the railway stations, will also enhance the existing network to provide a comprehensive public transport network for all existing and future residents. A comprehensive approach to redevelopment also provides the opportunity to create a network of active travel routes and corridors, linking new centres of activity with travel nodes and other existing corridors such as the east-west route along Enfield Road and also to the wider transformed rural area.</p> <p>Considering the individual parcels within the area in turn:</p> <p><u>SA10.1</u></p> <p>The area of SA10.1 is critical to the development of a sustainable new community. Placemaking work indicates that the land south of Enfield Road would accommodate 1,392 new homes in addition to the 676 South of Enfield Road, which alone would not be enough to support a new primary school and create a sustainable new community in this area. Development on either side of Enfield Road will help to activate the road corridor and create a new mixed use town centre. Developing just one side of this road would not create a high quality place. Therefore, the release of land North of Enfield Road is deemed critical to the delivery of a sustainable community and the local exceptional circumstances test has been met.</p> <p><u>SA10.2</u></p> |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|-----------|--------------|---|--|--|
| | | | | | <p>This site is critical in ensuring adequate active travel connections into the site and was found in the Green Belt Assessment to contribute only moderately to the Green Belt purposes. The site could enable the provision of an active travel (walking, cycling) and vehicular link to the western boundary to serve later phases of development within CPPA to the west of Salmon's Brook alongside a walking and cycling bridge crossing Salmon's Brook. As such the local exceptional circumstances case has been deemed to have been met.</p> <p><u>SA10.3-4</u></p> <p>SA 10.1, SA10.2, SA10.3 and SA10.4 will help to create a sustainable new community with new primary school and local centre. Bringing the land north of Merryhills Brook into the placemaking area allows the development to meet the threshold for a new primary school, with a further 1,543 homes added to the 2,068 south of the Brook. In addition to the school, without land North of Merryhills Brook, there is not considered to be the critical mass to create a local centre, nor to support the higher density development required from a design standpoint along Enfield Road. This release will contribute to creating a mixed-use local centre fronting onto an urban square incorporating essential retail, food and drink, non-retail services such as a post office or a parcel collection point. The critical mass and development footprint will also enable a new walking and cycling links through the site to the North including potential bus link through to Chase Farm Hospital to the North. Without development extending North of Merryhills Brook, the delivery of this active travel route is not considered feasible. Through</p> |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|---|---------------------------|---|--|---|
| | | | | | mitigation measures, the footprint of urbanisation would therefore be contained to the natural basin South of Hog Hill which is considered a defensible long-term boundary. These measures are considered to outweigh the benefits of retaining Green Belt North of Merryhills Brook and as such the local exceptional circumstances test has been met. |
| SA11.1 | Land north of Cattlegate Road, Crews Hill | Residential-led mixed-use | 800 | TBC | The release of Green Belt will be required to help assist with meeting the Council's housing target and need beyond 2029. The deliverability of the urban sites will not meet needs in full and therefore Green Belt release is also required to help meet the target. Findings from technical evidence also indicates there may be viability constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required in order to meet a range of objectives. It is considered that development in this location provides a unique opportunity to deliver a strategic scale growth that will provide for a significant proportion of the Borough's housing needs. The area is capable of delivering a good proportion of affordable and family homes in a sustainable location – to help contribute towards meeting a specific need that is not readily achievable within the urban areas, whilst utilising a mixture of previously developed land and lower quality greenfield land in a location well connected to public transport. The scale of development will be sufficient to support essential facilities that are required to make a small self-sufficient settlement including new retail and community facilities, and the potential for new primary schools and a secondary school. Change and new development in the area can take advantage of |
| SA11.2 | Land south of Cattlegate Road, Crews Hill | Residential-led mixed-use | 200 | TBC | |
| SA11.3 | Land South of M25, Crews Hill | Residential-led mixed-use | 440 | TBC | |
| SA11.4 | Land North & South of Cattlegate Road, Crews Hill | Residential-led mixed-use | 1000 | TBC | |
| SA11.5 | Land east of Theobalds Rd, Crews Hill | Residential-led mixed-use | 370 | TBC | |
| SA11.6 | Land south west of Theobalds Rd, Crews Hill | Residential-led mixed-use | 700 | TBC | |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|-----------|--------------|---|--|--|
| | | | | | <p>Crews Hill Railway Station which provides direct access into London and out across Hertfordshire. The station is currently under-utilised and provides a significant opportunity for enhancing the sustainability of the proposals. The expansion of the existing bus network, linking into the railway station will also enhance the existing network to provide a comprehensive public transport network for all existing and future residents. A comprehensive approach to redevelopment also provides the opportunity to create a network of active travel routes and corridors, linking new centres of activity with travel nodes including the station.</p> <p>Crews Hill has been identified in the Plan as it provides a unique opportunity to deliver a strategic scale new settlement served by new and improved sustainable transport connections and can provide for a significant proportion of the Borough's housing needs, both within this Plan period and beyond.</p> <p><u>SA11.1 and SA11.2</u></p> <p>The area of SA11.1 to the West of the Railway Line has the highest landscape sensitivity and also contributes very highly to all of the green belt purposes. Therefore, a stronger case must be made for its release from the Green Belt. The release of these areas is critical on viability grounds to contribute to making a sustainable community, as well as to deliver a sufficient quantum of dwellings to deliver a critical mass to enable local services and facilities to be sustainable.</p> <p>The gross area of the Crews Hill placemaking area is 75% greenfield including fully greenfield areas West of the Rail line. However, much of this greenfield land is given over to infrastructure, particularly green infrastructure which cannot realistically be placed on brownfield sites. Excluding areas of</p> |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|-----------|--------------|---|--|--|
| | | | | | <p>infrastructure including green infrastructure in the placemaking area, the greenfield elements make up over half (55%) of the development parcel areas. A lower proportion of greenfield land across these areas would have a marked impact on the schemes viability. The significant areas of brownfield land within the comprehensive masterplan approach required for good placemaking significantly affects the viability of the site as a whole. Without the inclusion of the additional greenfield areas West of the Railway line, the overall viability of the scheme and its ability to deliver sustainable placemaking through infrastructure contributions and affordable housing, would be severely compromised. If the areas West of the Railway line were excluded from the Placemaking Area, the proportion of development parcel area comprised of greenfield land would drop from 55% to 44%, fundamentally altering the scheme's viability and therefore its capacity to deliver a sustainable new community. As such it is considered that the local exceptional circumstances test has been met for these parcels.</p> <p><u>SA11.3 to SA11.6</u></p> <p>The areas to the East of Theobalds Park Road contribute less to the Green Belt purposes than areas West of the Railway Line. However, they are also rated as some of the more sensitive in Landscape terms. A strong case must be made for their release from Green Belt. These areas of release will contribute significantly to the placemaking of the area in two key ways:</p> <ul style="list-style-type: none"> • Development on either side of Theobalds Park Road will help to activate the road and create a new mixed use town centre. Developing just one side of this road would not create a high quality place and would run the risk of piecemeal development to the East of the road. This area is already semi-developed into hardstanding and industrial |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|---------------------------------------|---|---|--|--|
| | | | | | <p>uses – i.e. large proportions of the area constitute previously developed land within the Green Belt.</p> <ul style="list-style-type: none"> The development of these areas will, in contrast to their current use, help to open up access to Whitewebbs Wood and will also activate the edge of the built up area, creating a clear defensible boundary with the areas of retained green belt to the East and the new country park linking Sloemans Farm and Whitewebbs Wood. <p>On this basis it is considered that the local exceptional circumstances test has been met for these parcels.</p> |
| URB.01 | Land known as Brimsdown Sports Ground | Housing (with supporting non-residential uses to support open space) | 225 | TBC - Community use | Available site in urban area. Sites within the urban area will be required to help with delivering the Council's housing targets. The site is located in a sustainable location and has no absolute or environmental constraints. Whilst the site has a current local open space designation, it is not currently accessible and therefore does not offer any amenity/recreation benefits to residents. The site has potential for some open space to be made accessible to the public again through redevelopment. |
| URB.02 | Cockfosters Station Car Park | Housing | 351 | 924 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to contribute to placemaking vision. There is an extant consent which has yet to commenced, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent. |
| URB.03 | Former Chase Farm Hospital | Housing (with some supporting non-residential uses such as social infrastructure) | 344 | 36,320 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. There is an extant consent which has yet to completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent. |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|---|---|---|--|--|
| URB.04 | Blackhorse Tower, Cockfosters Road | Housing | 216 | Provision of non-residential floorspace | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to inform/enhance outcome through site requirements in an allocation (in line with London Plan Good Growth policies). There is an extant consent which has yet to completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent- particularly in light of worsening economic situation. |
| URB.05 | New Avenue Estate | Housing (with some supporting non-residential uses such as social infrastructure) | 204 | 319 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to inform/enhance outcome through site requirements in an allocation (in line with London Plan Good Growth policies). There is an extant consent which has yet to completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent- particularly in light of worsening economic situation - particularly in light of worsening economic situation. |
| URB.06 | Former Middlesex University, Trent Park | Housing (with some supporting non-residential uses such as social infrastructure) | 249 | Reprovision | Site in urban area where principle of development has already been established through a planning consent. All sites within the urban area will be required to help with delivering the Council's housing targets. Potential to inform/enhance outcome through site requirements in an allocation (in line with London Plan Good Growth policies). There is an extant consent which has yet to completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent- particularly in light of worsening economic situation - particularly in light of worsening economic situation. |
| URB.07 | Sainsburys Green Lanes | Mixed use (Housing + supermarket) | 368 | 13325 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|--|---|---|--|---|
| URB.08 | Hoe, Eastfield, Cherry and Bouvier Estates | Housing (infill) | 240 | 0 | Located within urban area. Available sites within the urban area will be prioritised to help with delivering the Council's housing targets. |
| URB.09 | Exeter Road Estate | Housing (with some supporting non-residential uses such as social infrastructure) | 129 | Reprovision | Available site within the urban area. Sites within the urban area will be prioritised to help with delivering the Council's housing targets. There is an extant consent which has yet to be commenced, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent- particularly in light of worsening economic situation - particularly in light of worsening economic situation. |
| URB.10 | Alma Estate | Housing (with some supporting non-residential uses such as social infrastructure) | 127 | 3800 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. There is an extant consent which has yet to be completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent- particularly in light of worsening economic situation - particularly in light of worsening economic situation. |
| URB.11 | The former Royal Chace Hotel | Housing (including older persons) | 115 | 0 | Brownfield site at the edge of urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. There is an extant consent which has yet to be completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent- particularly in light of worsening economic situation - particularly in light of worsening economic situation. |
| URB.12 | 241 Green Street | Mixed use (Housing + non-residential commercial use at ground floor) | 92 | Reprovision | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to inform/enhance outcome through site requirements in an allocation (in line with London Plan Good Growth policies). There is an extant consent which has yet to be completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent- particularly in light of worsening economic situation - particularly in light of worsening economic situation. |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|--|--|---|--|--|
| URB.13 | Hertford Road, Archers and Roman Way, Larksfield Grove Caterhatch, Lytchet Way and Sherbourne Avenue Estate, | Housing (infill) | 199 | 0 | Located within urban area. Available sites within the urban area will be prioritised to help with delivering the Council's housing targets. |
| URB.14 | Four Hills Estate, Lavender Hill | Housing (infill) | 99 | 0 | Located within urban area. Available sites within the urban area will be prioritised to help with delivering the Council's housing targets. |
| URB.15 | Kettering Rd Estate | Housing (infill) | 90 | 0 | Located within urban area. Available sites within the urban area will be prioritised to help with delivering the Council's housing targets. |
| URB.16 | 188-200 Bowes Road | Housing | 86 | 526 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. To positively shape any future changes to extant planning consent. |
| URB.17 | Main Avenue Site | Housing (infill) | 80 | 0 | Brownfield site in urban area although not within a placemaking area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to inform/enhance outcome through site requirements in an allocation (in line with London Plan Good Growth policies). There is an extant consent which has yet to be completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent- particularly in light of worsening economic situation - particularly in light of worsening economic situation. |
| URB.18 | Land at Ritz Parade | Mixed Use | 71 | Reprovision | Brownfield site in urban area although not within a placemaking area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to inform/enhance outcome through site requirements in an allocation (in line with London Plan Good Growth policies). Also to safeguard against future changes to extant planning permission - particularly in light of worsening economic situation. |
| URB.19 | Albany Leisure Centre and Car Park | Housing (with some supporting non-residential) | 85 | 0 | Site located within urban area. All sites within the urban area will be required to help with delivering the Council's housing targets. |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
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| | | uses to reprovide existing) | | | The site is partially designated as MOL and adjacent to MOL. Potential for impacts to be mitigated through design. Potential for site to deliver enhanced community facilities, contribute to enhancements in the adjacent open space. |
| URB.20 | Cuckoo Hall Lane Estate | Housing (infill) | 59 | 0 | Located within urban area. Available sites within the urban area have been be prioritised to help with delivering the Council's housing targets. |
| URB.21 | Moorfield Health Centre | Housing (with some supporting non-residential uses such as social infrastructure) | 52 | Reprovision | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. There is an extant consent which has yet to completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent-particularly in light of worsening economic situation - particularly in light of worsening economic situation. |
| URB.22 | Oakwood Station Car Park | Housing | 52 | 0 | Brownfield site in urban area although not within a placemaking area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Potential to inform/enhance outcome through site requirements in an allocation (in line with London Plan Good Growth policies). |
| URB.23 | Stoneleigh Avenue Estate | Housing (infill) | 42 | 0 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Due to the small scale nature of the site, the site allocation is a simple allocation confirming the acceptability of the principle of development and with an indicative estimate of capacity. |
| URB.25 | Pevensey Avenue | Housing (infill) | 36 | 0 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Due to the small scale nature of the site, the site allocation is a simple allocation confirming the acceptability of the principle of development and with an indicative estimate of capacity. |
| URB.26 | Fords Grove Car Park | Housing | 29 | 0 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Due to the small scale nature of the site, the |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
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| | | | | | site allocation is a simple allocation confirming the acceptability of the principle of development and with an indicative estimate of capacity. |
| URB.27 | South Street | Housing (infill) | 29 | 0 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing targets. Due to the small-scale nature of the site, the site allocation is a simple allocation confirming the acceptability of the principle of development and with an indicative estimate of capacity. |
| RUR.01 | Land opposite Enfield Crematorium (known as The Dell). Great Cambridge Road | Housing (with some supporting non-residential uses such as social infrastructure) | 291 | 0 | <p>Whilst within designated Green Belt and local open space designation, site is at the edge of the urban area, within close proximity to services. Whilst adjacent to landscape character areas and heritage assets potential for site to mitigate these effects. Initial transport input has suggested that there is scope for safe and adequate vehicular access to be achieved.</p> <p>The viability of many of the urban sites is marginal, and evidence suggests they will not help meet needs – particularly in respect of family and affordable housing. Therefore, Green Belt release is also required to help meet the target. Initial emerging findings from technical evidence also indicates there may be viability constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.</p> <p>The site is at the edge of the urban area, within close proximity to services and within a 10-minute walk of Turkey Street Overground Station and adjacent to the A10 and numerous bus routes. Whilst adjacent to landscape character areas and heritage assets there is potential for site to mitigate these effects. The planning balance for the site is regarding Green Belt Harm and balanced against the potential housing gains. The moderate Green Belt harm and are considered outweighed by the housing gains, especially as a strong and reinforced Green Belt boundary</p> |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
|---|---|--------------|---|--|---|
| | | | | | <p>can be created along the New River and Turkey Brook and suitable buffering could help to mitigate the harm and visual impact of any scheme. The site has the potential to deliver larger family sized homes through a mix of courtyard, mansion blocks and terraced housing.</p> <p>The site also offers the opportunity to improve east-west pedestrian and cycle connections toward s the New River and Green Link as well as North South Connections along the Turkey Brook and Enfield Green Loop as well as providing 0.5 hectares of new publicly accessible open space fronting the river. As a result the local exceptional circumstances case has been deemed to be met for release.</p> |
| RUR.02 | Land between Camlet Way and Crescent West, Hadley | Housing | 160 | 0 | <p>Although the site sits within the Green Belt, it is at the edge of the urban area, and has excellent access to public transport – being directly adjacent to Hadley Wood station. There are also a number of local amenities/facilities located around the station. Green Belt land will be required to help ensure the Council can meet its housing targets.</p> <p>The viability of many of the urban sites is marginal, and evidence suggests they will not help meet needs – particularly in respect of family and affordable housing. Therefore, Green Belt release is also required to help meet the target. Findings from technical evidence indicate there may be viability constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required.</p> <p>The site is at the edge of the urban area and has good access to public transport being around 5 minutes walk from Hadley Wood Station and local bus routes. The site has the potential to deliver larger family sized homes through mansion blocks houses, housing.</p> |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Approximate Estimated Housing Capacity | Reg 19 Approximate estimated Quantum of Non-residential Floorspace (sqm) | Justification for allocation |
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| | | | | | The site has the potential to deliver improvements to north-south pedestrian and cycle connections with access points from Camlet Way and Crescent West, a to create a new pedestrian bridge over the Monken Mead Brook, and an improved connection to the station, whilst retaining the area North of the Monken Mead Brook as open space, as well as new publicly accessible open space. These benefits balanced with the strategic level exceptional circumstances set out above mean that the local level exceptional circumstances have been met for the site. |

Table 08. Industrial site allocations

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Quantum of Non-residential Floorspace Proposed (sqm) | Justification for allocation |
|---|--------------------------------|--------------|---|--|
| SA2.2 | Heritage House | Industrial | 22,120 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with meeting the Council's employment targets. There is an extant consent which has yet to completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent. Potential to contribute to placemaking vision. |
| SA2.7 | Crown Road Lorry Park | Industrial | 4,495 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with meeting the Council's employment targets. Potential to contribute to placemaking vision. |
| SA2.8 | Martinbridge Industrial Estate | Industrial | 25,000 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with meeting the Council's employment targets. Potential to contribute to placemaking vision. |
| SA5.7 | Ravenside Retail Park | New SIL | 32,500 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing and employment targets. Site also has potential to contribute to Meridian Water placemaking vision. The principle of a comprehensive urban regeneration project at Meridian Water has already been |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Quantum of Non-residential Floorspace Proposed (sqm) | Justification for allocation |
|---|--|--------------|---|---|
| | | | | well established through previous plans such as the Core Strategy (2010) and ELAAP (2020) as well as in the Upper Lee Valley OAPF (2013). The individual site is suitable for allocation as part of wider site allocation to bring forward a comprehensive scheme. The site is proposed to be designated as SIL. The evidence base suggests the site is in an ideal location to help deliver industrial intensification and thus provide employment floorspace to help meet the borough's employment needs. The site is also part of a broader regeneration area, the OAPF and the placemaking area for Meridian Water. This provides additional SIL and intensification can be provided in close proximity to other existing SIL proposed to be de-designated. The principle of the SIL strategy has been discussed and agreed with the GLA. |
| SA5.8 | Kenninghall Metals and Waste | New SIL | 0 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with delivering the Council's housing and employment targets. Site also has potential to contribute to Meridian Water placemaking vision. The principle of a comprehensive urban regeneration project at Meridian Water has already been well established through previous plans such as the Core Strategy (2010) and ELAAP (2020) as well as in the Upper Lee Valley OAPF (2013). The individual site is suitable for allocation as part of wider site allocation to bring forward a comprehensive scheme. The site is proposed to be designated as SIL. The evidence base suggests the site is in an ideal location to help deliver industrial intensification and thus provide employment floorspace to help meet the borough's employment needs. The site is also part of a broader regeneration area, the OAPF and the placemaking area for Meridian Water. This provides additional SIL and intensification can be provided in close proximity to other existing SIL proposed to be de-designated. The principle of the SIL strategy has been discussed and agreed with the GLA. |
| URB.28 | Land and Buildings South East of Stockingswater Lane | Industrial | 25,375 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with meeting the Council's employment targets. The site has been promoted for industrial intensification, which is compatible with existing designations. |
| URB.29 | Land to the south of Millmarsh Lane, Brimsdown Industrial Estate | Industrial | 13,500 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with meeting the Council's employment targets. The Brimsdown Estate is also in the NEEAAP (2016) and the Upper Lee Valley OAPF (2013). This site has been promoted for industrial intensification, which is compatible with existing designations. |
| URB.30 | Montagu Industrial Estate | Industrial | 17,902 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with meeting the Council's employment targets. The Estate is in the ELAAP (2020) and the Upper Lee Valley OAPF (2013). The site has been promoted |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Quantum of Non-residential Floorspace Proposed (sqm) | Justification for allocation |
|---|------------------------------|--------------|---|---|
| | | | | for industrial intensification, which is compatible with existing designations. There is an extant consent which has yet to completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent. |
| URB.31 | Snowbird foods extension | Industrial | 3,289 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with meeting the Council's employment targets. The Estate is also in the NEEAAP (2016) and the Upper Lee Valley OAPF (2013). There is an extant consent which has yet to completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent. |
| URB.32 | Claverings Industrial Estate | Industrial | 3,219 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with meeting the Council's employment targets. |
| URB.33 | 6 Morson Road | Industrial | 2,600 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with meeting the Council's employment targets. |
| URB.34 | 5 Picketts Lock Lane | Industrial | 0 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with meeting the Council's employment targets. |
| URB.35 | Riverwalk Business Park | Industrial | 924 | Brownfield site in urban area. All brownfield sites within the urban area will be required to help with meeting the Council's employment targets. There is an extant consent which has yet to completed, so an allocation is justified to enable the LPA to positively shape any future changes to extant planning consent. |
| RUR.03 | Land West of Ramme Marsh | Industrial | 70,200 | <p>Although the site sits within the Green Belt, it is at the edge of the urban area, and has excellent access to public transport.</p> <p>The viability of industrial intensification of urban sites may be marginal in many cases, and so may not be able to meet needs. Therefore, Green Belt release is also required to help meet the target.</p> <p>The site sits within the UK Innovation Corridor, would form a logical extension to the nearby SIL and is an attractive location for logistics (with good access to the strategic road network). This 12 ha site, immediately south of the M25 and with good connections to Junction 25, is an excellent location for a large logistics scheme, similar to those immediately adjacent at Freezy Water (Mollison Avenue) to the west and Innova Park to the south. Redevelopment can provide at least 70,200 sq m of new employment floorspace (light industrial, general industrial, storage and distribution, and related sui generis) floorspace in a strategically connected location to the M25.</p> <p>Paragraph 87 of the NPPF states that 'the specific locational requirements of different sectors' should be recognised. It goes on to say that this includes 'making provision for... storage and distribution operations at a variety of scales and in</p> |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Quantum of Non-residential Floorspace Proposed (sqm) | Justification for allocation |
|---|--------------------------|--------------|---|---|
| | | | | <p>suitably accessible locations.'</p> <p>It is an excellent location for employment use given the high quality road transport links and the proximity to neighbouring established industrial locations which makes its relative deliverability, a key challenge with employment allocations nationally, more certain, particularly over the short term.</p> <p>The site also has the potential to contribute to biodiversity net gain improvements to the nearby Marsh and will contribute to an active travel corridor and new public open space along the Small River Lea.</p> <p>Given the low sensitivity of the site, the assessed low moderate harm of release, and the suitability of the land to help address the need for more employment floorspace, the case is clear, and the exceptional circumstances test is considered to be met.</p> |
| RUR.04 | Land East of Junction 24 | Industrial | 30,550 | <p>Although the site is situated within the Green Belt, its location at the edge of the urban area offers excellent access to public transport networks.</p> <p>The viability of intensifying industrial uses in urban sites may be marginal in many instances, and may not be able to meet needs, therefore, necessitating Green Belt release to help meet the identified employment needs.</p> <p>Paragraph 87 of the NPPF states that 'the specific locational requirements of different sectors' should be recognised. It goes on to say that this includes 'making provision for.... storage and distribution operations at a variety of scales and in suitably accessible locations.'</p> <p>Positioned, adjacent to the M25, the site is considered highly desirable for logistics purposes. Despite being divided by the M25, its proximity to the urban edge of Potters Bar enhances its appeal. The site could potentially take access onto the Ridgeway (A1005), which is suitable for HGVs and provides easy access onto Junction 24, which further enhances its attractiveness. Soft-market testing indicates that a logistics scheme such as those at Mollison Avenue and Innova Park, close to Junction 25 (of the M25), would be attractive to the occupier/developer market. Its excellent road connectivity and proximity to established industrial hubs in neighbouring areas bolsters its relative deliverability, addressing a common challenge associated with employment allocations nationally, more certain, particularly over the short term.</p> |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Quantum of Non-residential Floorspace Proposed (sqm) | Justification for allocation |
|---|---------------------------------------|--------------|---|---|
| | | | | <p>The site could potentially be brought forward in conjunction with land under the same ownership in the adjacent borough of Hertsmere. Although the landowner is promoting this joint development, Hertsmere's plan making process is at a different stage, and there is no equivalent proposed allocation on the other side of the borough boundary.</p> <p>Given the strategic imperative outlined to support economic growth set out in the London Plan and NPPF, the benefits of releasing this site are deemed to outweigh the harms of release. The site's alignment with the local exceptional circumstances test is considered to be met, reinforcing the rationale for its release.</p> |
| RUR.05 | Land to the North West of Innova Park | Industrial | 16,445 | <p>Situated within the Green Belt, the site is at the edge of the urban area and has excellent access to public transport networks.</p> <p>The viability of intensifying activities for industrial uses within urban sites may be marginal in many cases, hindering their ability to meet needs. Consequently, the release of Green Belt land becomes necessary meet these requirements.</p> <p>Positioned within the UK Innovation Corridor, the site serves as a logical extension to adjacent SIL along the Lee Valley and presents an attractive location for logistics operations, benefitting from good access to the strategic road network via the M25. With the capacity to provide a minimum of 30,550 sq m employment floorspace comprising light and general industrial, storage and distribution, and related sui generis uses, within LB Enfield, the site aligns with... Paragraph 87 of the NPPF states that 'the specific locational requirements of different sectors' should be recognised. It goes on to say that this includes 'making provision for.... storage and distribution operations at a variety of scales and in suitably accessible locations.'</p> <p>The planning balance here weighs Green Belt harm (and any other associated harm), against the provision of employment land to support economic growth and local jobs, aligned with the spatial strategy of the plan. Given is the site's proximity to established industrial areas and its high quality road transport links, its relative deliverability, a common challenge with employment allocations nationally, more certain, particularly over the short term. Setting aside all other policy issues the site would certainly be attractive for a single warehouse similar to that occupied by John Lewis at Innova Park.</p> |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Reg 19 Quantum of Non-residential Floorspace Proposed (sqm) | Justification for allocation |
|---|-----------|--------------|---|---|
| | | | | Given the low sensitivity of the site, the assessed low harm associated with its release, and its suitability to help address the need for more employment floorspace, the case for Green Belt release is compelling, and the exceptional circumstances test is considered to be met. |

Table 09. Other site allocations

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Justification for allocation |
|---|---------------------------------|--|--|
| SA6.2 | Barnet and Southgate College | Education and complementary uses | <p>This brownfield site in the urban area contains a significant local institution. It occupies a large area within one of the urban placemaking areas. Any development on the site has potential to offer a range of benefits to the local community that complement existing education uses on site.</p> <p>The proposed allocation is justified, as it enables the ability for the LPA to proactively shape proposals in this location.</p> |
| URB.36 | Church Street Recreation Ground | Crematorium | <p>There is a need for the borough to plan for burial uses to meet needs. Only a small number of sites were put forward for such uses. Of the sites submitted, this location is considered to be the preferred location for siting of a crematoria use. The Council has a requirement under the Public Sector Equality Duty to consider the needs of different faith groups. The delivery of a new crematorium will be particularly key to ensuring that specific faith groups can have adequate local access to these facilities.</p> |
| RUR.06 | Land at Picketts Lock | Sporting / Leisure - being promoted for a bespoke surfing lake | <p>Use of the site for sporting and recreation training grounds will facilitate the location of a significant institution within the borough. This will align with a number of objectives of the Local Plan.</p> <p>The proposed use is considered to be compatible with the Green Belt and thus exceptional circumstances do not need to be demonstrated. The proposed allocation is justified, as it</p> |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Justification for allocation |
|---|--|--|--|
| | | | enables the ability for the LPA to proactively shape proposals in this location. |
| RUR.07 | Whitewebbs Golf Course & Land at and within the vicinity of Tottenham Hotspur football Club Training Ground, Hotspur Way, Whitewebbs Lane. | Nature Recovery / Sporting - being promoted for expansion of club's training ground including ladies training ground | <p>This former golf course site did not offer unrestricted public access previously. There is an opportunity for parts of this site to offer this through a change of use. Use of the site for sporting and recreation training grounds will facilitate the location of this significant institution within the borough.</p> <p><u>Former Whitewebbs Golf Course</u></p> <p>The site comprises the Whitewebbs Golf Course and some of its associated buildings. This Green Belt land generally makes a strong contribution to two of the Green Belt purposes (purposes 3 and 5) and a relatively strong contribution to purpose 1. The southern portion of the site makes a strong contribution to purposes 1 and 4 because it is much closer to the existing large built up area of London, including the historic areas of Clay Hill and Forty Hill. Inappropriate development within the site has the potential to generate Very High Green Belt harm (see Chapter 6 and Appendix B for further details). The vast majority of the site is covered by the golf course, is free from buildings and is fundamentally open. Therefore, the majority of the site offers little opportunity to accommodate new buildings and above ground infrastructure without affecting openness. Appropriate open uses would be best located across these portions of the site.</p> <p>The two clusters of permanent buildings located at the southern end and north western corner of the site represent the best locations for new built development associated with new or improved leisure uses in the Green Belt. Harm would be minimised by confining new development/uses within the existing fabric of these permanent buildings or through relatively small 'proportionate' extensions to them.</p> <p><u>Tottenham Hotspur Football Club Training Ground</u></p> <p>The site comprises the Tottenham Hotspur Football Club</p> |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Justification for allocation |
|---|---------------|--------------|---|
| | | | <p>Training Ground and its associated buildings, open fields to the north of Whitewebbs Lane and west of Bulls Cross Ride, and a collection of old farm buildings to the east of Bulls Cross Ride. This Green Belt land generally makes a strong contribution to Green Belt purpose 1 and 5 and a relatively strong contribution to purpose 3, but for the open fields to the north of Whitewebbs Lane and west of Bulls Cross Ride which make a strong contribution to purpose 3 and the large buildings which contribute less to purposes 1 and 3. The open areas of the site that fall within the Forty Hill Conservation Area also make a strong contribution to purpose 4. Inappropriate development within the site generally has the potential to generate Very High Green Belt harm, with the exception of the land east of and south east of Bulls Cross Ride which has the potential to generate High Green Belt harm (see Chapters 6 and Appendix B in the main report for further details).</p> <p>The large permanent building located in the centre of the site and the smaller clusters of buildings at the southern and eastern edges of the site represent the best locations for new built development associated with new or improved sport and leisure uses in the Green Belt. Harm would be minimised by confining new development/uses within the existing fabric of these permanent buildings or through relatively small 'proportionate' extensions to them.</p> <p>The proposed use is considered to be compatible with the Green Belt and thus exceptional circumstances do not need to be demonstrated. The proposed allocation is justified, as it enables the ability for the LPA to proactively shape proposals in this location.</p> |
| RUR.08 | Sloemans Farm | Burial | <p>There is a need for the borough to plan for burial uses to meet needs. Only a small number of sites were put forward for such uses. Whilst this site is located outside of the existing urban area, it is considered a preferable location to loss of existing open space for communities located within urban areas, which were the alternatives. The proposed use is considered to be</p> |

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Justification for allocation |
|--|-----------|--------------|---|
| | | | compatible with the Green Belt and thus exceptional circumstances do not need to be demonstrated. |

Appendix 3: Summary of site assessment for ‘reasonable alternatives’ not selected for allocation

This appendix sets out the full list of reasonable alternatives that were identified through the Housing and Economic Land Availability, which were not selected for allocation, and the reasons for this. The table sets out the overall conclusion for each site that was assessed for potential in the plan (Stage 6 of the site selection process), and the reason to allocation or not allocate in the Regulation 19 Local Plan. This table does not include sites which were not selected due to their small size. The London Plan makes provision for part of delivery to come through ‘small sites’ as ‘windfall.’ Consequently, whilst it has not been considered appropriate to assess such sites for inclusion as site allocations, this does not indicate that the principle of development on such sites could not be considered appropriate through the development management process.

Table 08. Summary of sites not selected for allocation and justification (Housing and residential-led mixed-use sites)

| Site Source | Site HELAA Reference | Site Source Reference | Site name / address | Assessment for reasonable alternatives sites not selected for allocation |
|---------------------|----------------------|-----------------------|--|--|
| Call for Sites | CFS160 | CFS160 | Land surrounding Crews Hill station - Silverdale One | The site is located within the Green Belt. The site does not have a defensible boundary, and therefore this would suggest that release from the Green belt in isolation would be inappropriate in accordance with the NPPF. It is not anticipated that the scale of development that could be accommodated here could support delivery of enhancement of the required social infrastructure and services in isolation. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | HIC11 | LP707 | Vicarage Farm, Land between Hadley Road & Enfield Rd | The site is located within the Green Belt. Whilst the site is in close proximity to existing residential areas, any release of this site in isolation, would lead to other adjacent areas of Green Belt to the south, east and west, to no longer adequately meet the Green Belt purposes. Therefore it is considered that exceptional Circumstances could not be demonstrated on this site in isolation. There may be scope for the site to be considered as part of an assessment of the broad location in this area – also taking in adjacent sites, to facilitate creation of a defensible boundary. |
| Call for Sites 2022 | CFS311 | CFS311 | East Lodge Nursery | Isolated inaccessible site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites 2022 | CFS313 | CFS313 | Part Rectory Farm | Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with |

| Site Source | Site HELAA Reference | Site Source Reference | Site name / address | Assessment for reasonable alternatives sites not selected for allocation |
|---------------------|----------------------|-----------------------|---|--|
| | | | | the spatial strategy. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites 2022 | CFS318 | CFS318 | Land at Braeside | Isolated inaccessible site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. In addition, existing leases on the site mean that the land could not reasonably be expected to come forward within the plan period. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites 2022 | CFS320 | CFS320 | Land at Rectory Farm (south) | The site is a greenfield site located within the Green Belt. It is not anticipated that the scale of development that could be accommodated here could support delivery of enhancement of the required social infrastructure and services in isolation. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites 2022 | CFS323 | CFS323 | Land south of Clay Hill, Strayfield Road, EN2 9JA | Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. |
| Call for Sites 2022 | CFS294 | CFS294 | Parkview Nursery Crews Hill | The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites 2022 | CFS307 | CFS307 | Phoenix Rose Homes and Gardens, Cattlegate Road, Crews Hill | The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | CHC7 | LP1142 | Crews Hill Golf Club | The site is located within the Green Belt. The site alone does not have a clear defensible boundary, and therefore this would suggest that release from the Green belt in isolation would be inappropriate in accordance with the NPPF. The site also faces a number of other constraints, including technical constraints such as topography, the existing of large numbers of mature trees many of which may be high value, and the whole golf course is covered by a SINC designation. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | HIC8 | LP488 | Land west of The Ridgeway and Fairview Road, Gordon Hill, Enfield | The site is heavily wooded and thus considered inappropriate for development. There are a multiplicity of landownerships that could make achievability of delivery in this location unachievable. Considering both of |

| Site Source | Site HELAA Reference | Site Source Reference | Site name / address | Assessment for reasonable alternatives sites not selected for allocation |
|----------------|----------------------|-----------------------|--|--|
| | | | | these factors, exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for sites | CFS158a | CFS158a | Owls Hall Estate, Cattlegate Road (Parcel a) - east of road | Isolated inaccessible site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for sites | CFS158b | CFS158b | Owls Hall Estate, Cattlegate Road - (Parcel b) - west of road | Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for sites | CFS159 | CFS159 | Wyevale Garden Centre, Cattlegate Road | The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for sites | CFS169 | CFS169 | Kings Oak Equestrian Centre | The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for sites | CFS174 | CFS174 | Sunbeam Stud | Isolated inaccessible site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for sites | CFS208 | CFS208 | Land North of Waggon Road, Chase and Slopers Pond Farm, Stagg Hill | Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for sites | CFS284 | CFS211 | Bulls Cross Nursery Bulls Cross, Enfield | Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for sites | CFS212 | CFS212 | Botany Bay Cricket Club, East Lodge Lane, Enfield | Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | CHC1 | LP031 | Warmerdams Nursery, Cattlegate Road, Enfield | The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be |

| Site Source | Site HELAA Reference | Site Source Reference | Site name / address | Assessment for reasonable alternatives sites not selected for allocation |
|----------------|----------------------|-----------------------|---|---|
| | | | | achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | CHC10 | LP179 | Site at Oak Farm and Homestead Nursery, Cattlegate Road, Enfield | The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | CHC11 | LP472 – Parcel 1 | Land to the rear of Jesus Christ Church, Parcel 1 | Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. Development in this location would also lead to unacceptable heritage harm. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | CHC12 | LP472 – Parcel 2 | Land to the south of Forty Hill C of E school, Forty Hill, Parcel 2 | Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. Development in this location would also lead to unacceptable heritage harm. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | CHC15 | LP639 | Land to the North of Crews Hill Station | Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | CHC17 | LP645 | Towneley Nurseries, Theobalds Park | The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | CHC18 | LP649 | Brown's Garden Village, Theobalds Park Rd, Enfield | The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | CHC19 | LP651 | Theobalds Park Road Nursery | The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation. However, the site could potentially form part of a wider allocation for whole Crews Hill area. Exceptional Circumstances could not be demonstrated on this site in isolation. |

| Site Source | Site HELAA Reference | Site Source Reference | Site name / address | Assessment for reasonable alternatives sites not selected for allocation |
|---------------------|----------------------|-----------------------|--|---|
| Call for Sites | CHC2 | LP056 | Wolden Garden Centre, Cattlegate Road, Crews Hill, Enfield | The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | CHC21 | LP715, LP1152 | Land at Crews Hill, Theobalds Park Road, Enfield | The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services/infrastructure improvements to be delivered nearby or as part of the site allocation to support growth in this location. It is considered unsustainable. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | CHC3 | LP107 | Burnt Farm Ride | The site is located within the Green Belt. The site is not located in close proximity to local services. The site also has numerous policy constraints that would make it inappropriate for allocation in isolation. It is partially covered by Flood Zone 3, Flood Zone 2 and is within a designated site of importance for nature conservation. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | HIC10 | LP642 | Land opposite Jolly Farmers | Large proportion of site is constrained by Level 2 constraints. The borough's SFRA suggests that the extent of the site that is covered by Flood Risk Zone 3 would render the site undevelopable for residential development. It is therefore not considered appropriate for allocation. The site is also located within Green Belt. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | HIC6 | LP1153 | Bramley Road, London | The site is located within the Green Belt. The site does not have a defensible boundary, and therefore this would suggest that release from the Green belt in isolation would be inappropriate in accordance with the NPPF. It is not anticipated that the scale of development that could be accommodated here could support delivery of enhancement of the required social infrastructure and services in isolation. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | HIC9 | LP623 | Land south of Enfield Road | The site is a greenfield site located within the Green Belt. It is not anticipated that the scale of development that could be accommodated here could support delivery of enhancement of the required social infrastructure and services in isolation. |
| Call for Sites 2022 | CFS322 | CFS322 | Land to the east of Snakes Lane, N14 4UW | Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. Exceptional Circumstances could not be demonstrated on this site in isolation. |

| Site Source | Site HELAA Reference | Site Source Reference | Site name / address | Assessment for reasonable alternatives sites not selected for allocation |
|-------------------------|----------------------|------------------------------------|--|--|
| Call for sites | CFS116 | CFS116/ LP1161/CFS 554 A + B | Land SW Green Lanes Junction | This has been confirmed as not available within the plan period by all those with an interest in the land. |
| SHLAA 2017 | BOS2 | 2E+07 | Open Space | The site is currently designated MOL. Loss of open space could lead to deficiency to access to open space in the urban area. Exceptional Circumstances could not be demonstrated on this site. |
| Call for Sites | BUC2 | LP1099 | The Oak, 144 Firs Lane | The site is located 100% in MOL and is therefore not considered appropriate for allocation. Exceptional Circumstances could not be demonstrated on this site. |
| Enfield Road Watch/CPRE | BUE32 | LP662 | Esso and neighbouring block plus car park on Ayley Croft | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. |
| SHLAA 2017 | BUS1 | 2E+07 | Express Dairies | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. |
| Call for Sites | CHC13 | LP472 – Parcel 3 | Land to the south of Jesus Church, Parcel 3 | Isolated inaccessible site located within the Green Belt. Site is not in a sustainable location. The site is also heavily wooded which acts as a constraint to development and is adjacent to a SINC. Allocation of the site would not accord with the spatial strategy. |
| Call for Sites | CHC6 | LP1141 | East Lodge, Botany Bay | Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. |
| Call for Sites | CHC8 | LP1148. LP661 | Anglo Aquatic Plant Co, Strayfield Road, Enfield | Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | CHC9 | LP148 | Whitewebbs Rd | The site is located within the Green Belt. The site is not located in close proximity to local services. The scale of development that could be achieved on this site alone would not enable local services to be delivered nearby or as part of the site allocation. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| SHLAA 2017 | CHS16 | 2E+07 | Land At Waterworld, Bullsmoor Lane /Great Cambridge Road | Construction on site has started, not appropriate to allocate. |
| Call for Sites | COC1 | LP1120 | Saracens ARFC, Green Rd | Site is within MOL in the urban area. Loss of community facility is not acceptable. Impact on MOL from denser form of development would not be acceptable. Exceptional Circumstances could not be demonstrated on this site in isolation. |

| Site Source | Site HELAA Reference | Site Source Reference | Site name / address | Assessment for reasonable alternatives sites not selected for allocation |
|-------------------------------|----------------------|------------------------------------|---|--|
| Call for Sites | COC10 | LP608_6 | Cockfosters Terminus Railway Depot, Bramley Road, London | A large proportion of submitted site contains operational tube tracks, in use. No information has been submitted to demonstrate acceptable access could be achieved in order to facilitate development in this location. As a result it is not considered appropriate for allocation. |
| Call for Sites | COC2 | LP1177 | Rear of 1-91 Westpole Avenue | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. |
| Call for sites | CFS149 | CFS149 | Land at Brimsdown Industrial Estate | Site is within designated SIL. The evidence base indicates there will be a need for further employment land in the borough by the end of the plan period. As a result the release SIL for other uses would not enable this objective to be met. SIL should be retained to retain existing employment capacity. The site is therefore considered inappropriate for residential development as it is proposed it should be retained for ongoing/future employment use. |
| Call for Sites | ELC2 | LP553 | Canal & River Trust, Enfield Lock, Ordnance Road, Enfield | 60% in Flood Zone 3 and remaining 40% in Flood Risk Zone 2 constraints. This would render the site unsuitable for residential development. |
| Call for Sites | GRC10 | LP1188 | 10-44 The Orchard | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. |
| Allocations/Opportunity Sites | GRD3 | Enfield Town Master Plan (Site 23) | Gladbeck Way Car Park | Whilst the site was identified as a potential development site within the Enfield Town Masterplan it is not possible to allocate as it has partially unknown availability. Therefore could not reasonably be expected to come forward in the plan period. |
| Allocations/Opportunity Sites | GRD4 | Enfield Town Master Plan (Site 11) | BT Exchange, Cecil Road | Whilst the site was identified as a potential development site within the Enfield Town Masterplan it is not possible to allocate as we do not have confirmation of availability. Therefore could not reasonably be expected to come forward in the plan period. |
| Enfield Road Watch/CPRE | GRE20 | LP662 | 58-60 Silver Street with Sydney Road car park | Whilst the site was identified as a potential development site within the Enfield Town Masterplan it is not possible to allocate as we do not have confirmation of availability. Therefore could not reasonably be expected to come forward in the plan period. |
| SHLAA 2017 | GRS7 | 2E+07 | 1-6 Clock Parade | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. |

| Site Source | Site HELAA Reference | Site Source Reference | Site name / address | Assessment for reasonable alternatives sites not selected for allocation |
|-----------------------|----------------------|-----------------------|--|--|
| SHLAA 2017 | JUS5 | 2E+07 | Land at Lincoln Road and Great Cambridge Road | Site is within designated SIL. The evidence base indicates there will be a need for further employment land in the borough by the end of the plan period. As a result the release SIL for other uses would not enable this objective to be met. SIL should be retained to retain existing employment capacity. The site is therefore considered inappropriate for residential development as it is proposed it should be retained for ongoing/future employment use. |
| Planning Applications | LOP20 | 19/00043/FUL | 434 Montagu Road London | Site has existing extant consent for non-residential uses. |
| Public Sector Land | PGG1 | LP662 | Unit 3 C & D, Regents Avenue Industrial Estate | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. In addition, the site is located within LSIS and there is a need to retain industrial capacity within the borough. |
| Call for Sites | POC2 | LP1139 | Alma Road Open Space | Site is MOL and has open space/recreation value within the urban area, serving existing communities. Exceptional Circumstances could not be demonstrated on this site. |
| Call for Sites | POC4 | LP567 | Redburn Industrial Estate, Woodall Road, Enfield | Site is within designated SIL. The evidence base indicates there will be a need for further employment land in the borough by the end of the plan period. As a result the release SIL for other uses would not enable this objective to be met. SIL should be retained to retain existing employment capacity. The site is therefore considered inappropriate for residential development as it is proposed it should be retained for ongoing/future employment use. |
| SHLAA 2017 | POS29 | 2E+07 | 318 Lincoln Road | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. |
| SHLAA 2017 | POS43 | 2E+07 | Peerglow Estate | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. In addition, the site is located within LSIS and there is a need to retain industrial capacity within the borough. |
| SHLAA 2017 | POS44 | 2E+07 | Hertford Road High Street | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. In addition, the site is located within LSIS and there is a need to retain industrial capacity within the borough. |
| SHLAA 2017 | POS45 | 2E+07 | Queensway | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan |

| Site Source | Site HELAA Reference | Site Source Reference | Site name / address | Assessment for reasonable alternatives sites not selected for allocation |
|-----------------------|----------------------|--------------------------------|---|--|
| | | | | period. As a result it cannot be considered for allocation in line with the PPG. In addition, the site is located within LSIS and there is a need to retain industrial capacity within the borough. |
| Call for Sites | SBC3 | LP1121 | Verve House Baird Road | Not suitable for allocation due to existing SIL designation and need to retain industrial capacity within the borough. |
| Call for Sites | SBC6 | LP656_1 | 46 Crown Rd, Enfield | Site is within designated SIL. The evidence base indicates there will be a need for further employment land in the borough by the end of the plan period. As a result the release SIL for other uses would not enable this objective to be met. SIL should be retained to retain existing employment capacity. The site is therefore considered inappropriate for residential development as it is proposed it should be retained for ongoing/future employment use. |
| Call for Sites | SGC6 | LP608_7 | Arnos Grove Sidings | A large proportion of submitted site contains operational tube tracks, in use. No information has been submitted to demonstrate acceptable access could be achieved in order to facilitate development in this location. As a result it is not considered appropriate for allocation. |
| SHLAA 2017 | SGS13 | 2E+07 | Land Adj To New Southgate Station, Station Road | Development in this location has been completed. |
| Call for Sites | SOC4 | LP1189_1 | Rear of 180-216 Chase Road | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. |
| Call for Sites | SOC7 | LP1191 | 24-54 Chelmsford Road | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. |
| Call for Sites | SOE9 | CFS209 | Asda site – 130 Chase Side | Updated information has been received from the landowner (LBE) indicating that the store lease is for another 90 years. No indication has been received from the long leaseholder as to intent for redevelopment. As such it is not considered this site could reasonably be expected to come forward for development within the plan period. |
| Call for sites | SOS11 | CFS157 | M&S Food, Southgate | Information received from the landowners indicates that the site could come forward in 15+ years. Therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. |
| SHLAA 2017 | SOS19 | 2E+07 | Chase Road | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. |
| Planning Applications | TOP46 | 19/03612/PRJ, 19/00768/PRJ, | Refuge House 9 – 10 River Front Enfield | Site has extant planning consent. A site allocation is not deemed necessary or appropriate given its scale. However, the estimated capacity |

| Site Source | Site HELAA Reference | Site Source Reference | Site name / address | Assessment for reasonable alternatives sites not selected for allocation |
|------------------------|----------------------|--|--|---|
| | | 19/01707/PRJ, 19/01708/PRJ, 19/04354/PRJ | | of the site would still be considered to contribute to the overall total of homes expected to be delivered within the plan period. |
| SHLAA 2017 | TUS5 | 2E+07 | Lidl Store And Parking, Hertford Road | Whilst this is an ideal brownfield site in the urban area, the site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. |
| Call for Sites | UPC34 | LP631 | Land at Bull Lane | Application has come in for an industrial use for most of the site. There is a safeguarded waste site. Some factories are early 20th century - might be non-designated heritage assets. Full application. 22/03672/FUL. No longer considered available for residential development. |
| Call for Sites | LP637 | LP637 | Land north of Goat Lane | Inaccessible location within the Green Belt. Not appropriate for allocation. Exceptional Circumstances cannot be demonstrated on this site. |
| Call for sites | CFS145 | CFS145 | Land adjacent to New River north of Hoe Lane PS, Goat Lane | Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. Exceptional Circumstances cannot be demonstrated on this site. |
| Call for sites | CFS181 | CFS181 | Alma House 301 Alma Road Enfield EN3 7BB | The site is a single piecemeal site being proposed for mixed use development within LSIS. It is not deemed appropriate for residential development. |
| Call for sites (ELP21) | CFS236 | CFS236 | Lombard House, 339 Southbury road | Site is within designated SIL. The evidence base indicates there will be a need for further employment land in the borough by the end of the plan period. As a result the release SIL for other uses would not enable this objective to be met. The site is therefore considered inappropriate for residential development as it is proposed it should be retained for ongoing/future employment use. |
| Call for Sites 2022 | CFS249 | CFS249 | Bullsmoor Lane , EN1 4SE - McDonalds, BP and Burger King | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. |
| Call for Sites 2022 | CFS250 | CFS250 | Churchfield Recreation Ground, Great Cambridge Rd, London N9 9LE | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. |
| Call for Sites 2022 | CFS251 | CFS251 | David LLoyd, Carterhatch Ln, Enfield EN1 4LF | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. |
| Call for Sites 2022 | CFS252 | CFS252 | Land north of Lower Hill Lane Walkpath (N18) and to the South of William Girling Reservoir | Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. Exceptional Circumstances cannot be demonstrated on this site. |

| Site Source | Site HELAA Reference | Site Source Reference | Site name / address | Assessment for reasonable alternatives sites not selected for allocation |
|---------------------|----------------------|-----------------------|---|---|
| Call for Sites 2022 | CFS253 | CFS253 | St Michael's Primary Care Centre, Gater Dr, Enfield EN2 0JB | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. |
| Call for Sites 2022 | CFS255 | CFS255 | Toby Carvery, 801 Great Cambridge Rd, Enfield EN1 3PN | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. |
| Call for Sites 2022 | CFS327 | CFS327 | 5 Picketts Lock Lane - Abra Wholesale | Not an appropriate location for small scale residential accommodation. No nearby services/facilities and no nearby public transport. Loss of currently active commercial use is to be resisted. |
| Call for Sites | PAC3 | LP1160, LP575, CFS244 | 173-189 Green Lanes | 75% in Flood Risk Zone 2 constraints. This would render the site unsuitable for residential development. |
| SHLAA 2017 | GRS8 | 2E+07 | 52 London Road | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. |

Table 08. Summary of sites not selected for allocation and justification (Employment sites)

| Site Source | Site HELAA Reference | Site Source Reference | Site name / address | Assessment for reasonable alternatives sites not selected for allocation |
|----------------|----------------------|-----------------------|---|---|
| Call for sites | CFS138 | CFS138 | Watkins House, Pegamoid Road, London | Site has absolute constraints (80% of site within Flood Zone 3). Would not be in line with PPG to allocate. |
| Call for Sites | PAC8 | LP656 | Travis Perkins Palmers Green, Bridge Drive, Broomfield Lane | The site has been put forward by the freeholder (Travis Perkins) for mixed-use redevelopment combining builders merchant with residential uses above. Accordingly, the site has been selected as part of a mixed-use allocation for residential with sui generis / B8. It has not been promoted for industrial uses only, and so has not been allocated for this as it cannot be considered 'available' for this purpose. |
| Call for Sites | SBC35 | LP653 | Sainsburys Baird Road | It has not been promoted for industrial uses, and so has not been allocated for this as it cannot be considered 'available' for this purpose. Whilst identified as site for employment uses at regulation-18 the landowner has provided further clarification on aspirations for the site which does not include employment uses. |
| Call for Sites | SBC6 | LP656_1 | 46 Crown Rd, Enfield | Site contains a Grade II statutorily listed building (Ripaults Factory). As such, the typologies of industrial intensification identified would not be achievable on the site and the site cannot be realistically expected to deliver industrial intensification without demolition of the listed building, which would not be considered acceptable. |

| Site Source | Site HELAA Reference | Site Source Reference | Site name / address | Assessment for reasonable alternatives sites not selected for allocation |
|-------------------------|----------------------|-----------------------|--|---|
| Call for Sites | PAC39 | LP654 | Sainsburys Green Lanes | It has not been promoted for industrial uses, and so has not been allocated for this as it cannot be considered 'available' for this purpose. Whilst identified as site for employment uses at regulation-18 the landowner has provided further clarification on aspirations for the site which does not include employment uses. |
| Enfield Road Watch/CPRE | WIE23 | LP662 | Car park / garages (with Scout Hut at the end) at Wilson Street | The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. |
| Call for sites | CFS259 | CFS259 | Kenninghall, Meridian Water | Site has absolute constraints. Almost all of the site is contained within Flood Zone 3. Would not be in line with PPG to allocate. |
| Call for sites | CFS258 | CFS258 | West Bank, Meridian Water | The site has been put forward for mixed-use redevelopment combining employment and industrial uses with residential. Accordingly, the site has been selected as part of a mixed-use allocation for residential with employment. It has not been promoted for industrial uses only, and so has not been allocated for this as it cannot be considered 'available' for this purpose. |
| Call for sites | CFS237 | CFS237 | Langhedge Lane Industrial Estate, Langhedge Lane, London | The site has been put promoted for mixed-use redevelopment combining commercial (which could include light industrial uses) with residential. It has not been promoted for industrial uses only, and so has not been allocated for this as it cannot be considered 'available' for this purpose. Accordingly, the site has been selected as part of a mixed-use allocation for residential with light industrial. |
| Call for Sites | CFS247 | CFS247 | Sterling Way Weighbridge Site | Inadequate information submitted to assess site. |
| Call for Sites | CFS132 | CFS132 | Land at 135 Theobalds Park Road, Crews Hill, Enfield, | Isolated site with poor accessibility located within the Green Belt. Site is not in a sustainable location. Allocation of the site for employment uses would not accord with the spatial strategy. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for Sites | CFS160 | CFS160 | Land surrounding Crews Hill station, Broad Location | Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site for employment uses would not accord with the spatial strategy. Exceptional Circumstances could not be demonstrated on this site in isolation. |
| Call for sites | LP1146 | LP1146 | Land south of William Girling Reservoir, Lower Hall Lane, Chingford, | Site lies within Flood Risk Zone 3 and has multiple environmental constraints. Not developable. |
| Call for sites | CFS142 | CFS142 | Land adjacent to NW of William Girling Reservoir, Lee Valley Road, | Site has absolute constraints. Almost all of the site is within Flood Zone 3 and the whole site is contained within a SSSI. It is not considered to be in line with PPG to select the site for allocation. |
| Call for sites | CFS144 | CFS144 | Land adjacent to King George V Reservoir, Lea Valley Road | Whilst the site is not covered by absolute constraints, it has a large number of 'level 2 constraints'. The site is covered by Green Belt, Flood Zone 2, is a Site of Metropolitan Importance of Nature Conservation as well as being located within the Lee Valley Regional Park Authority area. As such, it has not been deemed a preferable site for allocation above other alternatives. |

| Site Source | Site HELAA Reference | Site Source Reference | Site name / address | Assessment for reasonable alternatives sites not selected for allocation |
|----------------|----------------------|-----------------------|---|---|
| Call for sites | CFS146 | CFS146 | Land at Wharf Road, Columbia End, Ponders End | Site has absolute constraints (Flood Zone 3). Would not be in line with PPG to allocate. |
| Call for sites | CFS147 | CFS147 | Land at Wharf Road 2, Columbia End, Ponders End | Site has absolute constraints (Flood Zone 3). Would not be in line with PPG to allocate. |
| Call for sites | CFS294 | CFS294 | Parkview Nursery, Theobalds Park Road, Crews Hill | Isolated site with poor accessibility located within the Green Belt. Site is not in a sustainable location. Allocation of the site for employment uses would not accord with the spatial strategy. Exceptional Circumstances could not be demonstrated on this site in isolation. |

Appendix 4: New Site Allocations proposed at Regulation 19

Table 10. New Site Allocations (Regulation 19)

| Regulation 19 Site Allocation Reference | Site name | Proposed use | Regulation 19 Site Allocation Approximate Estimated Housing estimate (Net Gain) | Reg 19 Quantum of Non-residential Floorspace Proposed (sqm) Net Gain |
|---|--|---|---|--|
| SA2.2 | Heritage House | Industrial | 0 | 22,060 |
| SA2.8 | Martinbridge Industrial Estate (formerly Land and buildings north of Lincoln Road) | Industrial | 0 | 25,000 |
| SA4.3 | Langhedge Lane Industrial Estate | Mixed Use (Housing + re-provision of light industrial at Ground floor) | 120 | 4,000 |
| SA5.6 | Meridian East (Harbet Road) | Residential + light Industrial in new LSIS + intensified SIL area | 815 | 20,800 |
| SA6.2 | Barnet and Southgate College | Non-residential | 106 | Reprovision |
| SA7.3 | Ladderswood Estate | Housing (with some supporting non-residential uses such as social infrastructure) | 107 | 1,554 |
| SA7.5 | Coppice Wood Lodge | Housing | 45 | 0 |
| SA8.1 | Morrisons, Palmers Green. | Mixed Use (Housing + Supermarket) | 130 | 6000 |
| SA8.3 | Corner of Green Lanes and the North Circular | Mixed Use (Housing + Supermarket) | 129 | Reprovision |
| URB.03 | Former Chase Farm Hospital | Housing (with some supporting non-residential uses such as social infrastructure) | 344 | 36,320 |
| URB.05 | New Avenue Estate | Housing (with some supporting non-residential uses such as social infrastructure) | 204 | 319 |
| URB.06 | Former Middlesex University, Trent Park | Housing (with some supporting non-residential uses such as social infrastructure) | 249 | TBC |
| URB.08 | Hoe, Eastfield, Cherry and Bouvier Estates | Housing (infill) | 240 | 0 |
| URB.10 | Alma Estate | Housing (with some supporting non-residential uses such as social infrastructure) | 127 | 3,800 |
| URB.11 | The former Royal Chace Hotel | Housing (including older persons) | 115 | 0 |
| URB.13 | Hertford Road, Archers and Roman Way, Larksfield Grove Caterhatch, Lytchet Way and Sherbourne Avenue Estate, | Housing (infill) | 199 | 0 |
| URB.14 | Four Hills Estate, Lavender Hill | Housing (infill) | 99 | 0 |
| URB.15 | Kettering Rd Estate | Housing (infill) | 90 | 0 |
| URB.20 | Cuckoo Hall Lane Estate | Housing (infill) | 59 | 0 |

| | | | | |
|--------|--|---|-----------|-------------|
| URB.21 | Moorfield Health Centre | Housing (with some supporting non-residential uses such as social infrastructure) | 52 | Reprovision |
| URB.22 | Oakwood Station Car Park | Housing | 52 | 0 |
| URB.23 | Stoneleigh Avenue Estate | Housing (infill) | 42 | 0 |
| URB.24 | Fore Street Estate | Housing (infill) | 39 | 0 |
| URB.25 | Peveny Avenue | Housing (infill) | 36 | 0 |
| URB.27 | South Street | Housing (infill) | 29 | 0 |
| URB.28 | Land and Buildings South East of Stockingswater Lane | Industrial | 0 | 80,753 |
| URB.31 | Snowbird foods extension | Industrial | 0 | 3,289 |
| URB.34 | 5 Picketts Lock Lane | Industrial | 0 | 0 |
| URB.35 | Riverwalk Business Park | Industrial | 0 | 924 |

Appendix 5: Deleted Regulation 18 Site Allocations

The table below sets out the list of sites that are no longer proposed for allocation in the next iteration of the draft plan, but were previously proposed as site allocations, with the reasons why.

Table 11. Other site allocations

| Site name / address | Reason for not allocating. | Proposed Use | Change since Reg-18? | Reason for change? |
|---|---|--|-----------------------|--|
| Asda site – 130 Chase Side | Updated information has been received from the landowner (LBE) indicating that the store lease is for another 90 years. No indication has been received from the long leaseholder as to intent for redevelopment. As such it is not considered this site could reasonably be expected to come forward for development within the plan period. | Residential/ residential-led mixed use development | Change – removed site | Site cannot be considered available within the plan period. |
| M&S Food, Southgate | Information received from the landowners indicates that the site could come forward in 15+ years. The site has not been confirmed as available by the landowner and therefore could not reasonably be expected to come forward in the plan period. As a result it cannot be considered for allocation in line with the PPG. | Residential/ residential-led mixed use development | Change – removed site | Site cannot be considered available within the plan period. |
| SA58 - Alma Road Open Space | The site is excess to burial needs requirements as set out in the Enzygo Burial Needs Assessment. | Burial | Change – removed site | The evidence identifies a total need for only 7.7ha of land by 2041. The site is designated MOL and is identified as being a priority open space for enhancement within the local plan evidence base. The ward boundaries have shifted since the B&G Infrastructure audit evidence was produced, however, the ward adjacent to the south - Ponders End - is identified as having deficient levels of open space for the population currently, which will only worsen with growth within the plan period. Therefore, it is not considered appropriate to allocate this site for other uses. |
| SA59 – Firs Farm Recreation Ground (Part) | The site is considered to be in excess to burial needs requirements as set out in the Enzygo Burial Needs Assessment. | Crematorium | Change – removed site | The evidence base within the Blue and Green Infrastructure Audit identifies the site as a high value open space. The site also has a number of green links running through the site as part of the Council's Green and Blue Infrastructure Strategy. There have also been a number of recent wetlands proposals in nearby proximity, within the park. |

Appendix 6: Site Allocation Capacity amendments (Regulation 18 to Regulation 19).

Table 12: Site Allocation Capacity amendments

| Regulation 19 Site Allocation Reference | Site name | Reg 18 Approximate Housing estimate (Plan Period) | Reg 19 Approximate Housing estimate (Plan Period) | Change since reg-18? | Reason for capacity change |
|---|--|---|---|-----------------------------|---|
| SA1.1 | Palace Gardens Shopping Centre | 350 | 329 | Change – capacity decreased | Minor estimated capacity reduction to address Historic England feedback. |
| SA1.2 | Enfield Town Station and the former Enfield Arms | 100 | 79 | Change – capacity decreased | Capacity revised to reflect further testing taking on board comments from regulation-18 consultation including from statutory consultees such as Historic England |
| SA1.3 | Tesco, Southbury Road | 350 | 303 | Change - capacity decreased | Capacity revised to reflect further testing |
| SA1.4 | Enfield Civic Centre | 150 | 114 | Change - capacity decreased | Capacity revised to reflect further testing |
| SA1.5 | St Anne's Catholic High School for Girls | 236 | 133 | Change – capacity decreased | Reduced capacity reflects significant amendments to the Site Allocation boundary based on additional information clarifying ownership. |
| SA1.6 | 100 Church Street | 56 | 78 | Change – capacity increased | Based on planning application that now has resolution to grant. |
| SA1.7 | Oak House, 43 Baker Street | 55 | 25 | Change – capacity decreased | Capacity revised to reflect further testing and taking into consideration more detailed evidence such as the Character of Growth Study, as well as Duty to Cooperate engagement with bodies such as Historic England. |
| SA2.3 | Morrisons, Southbury Road | 892 | 646 | Change – capacity decreased | Capacity revised to reflect further testing and taking into consideration more detailed evidence such as the Character of Growth Study, |
| SA2.4 | Southbury Leisure Park | 450 | 605 | Change – capacity increased | Capacity revised to reflect further testing taking on board comments from regulation-18 consultation including from statutory consultees such as GLA |

| Regulation 19 Site Allocation Reference | Site name | Reg 18 Approximate Housing estimate (Plan Period) | Reg 19 Approximate Housing estimate (Plan Period) | Change since reg-18? | Reason for capacity change |
|--|--|--|--|-----------------------------|--|
| SA2.5 | Tesco, Ponders End | 350 | 521 | Change – capacity increased | Capacity revised to reflect further testing taking on board comments from regulation-18 consultation including from statutory consultees such as GLA |
| SA2.6 | Sainsburys, Crown Road | 1041 | 868 | Change – capacity decreased | Capacity revised to reflect further testing and taking into consideration more detailed evidence such as the Character of Growth Study, |
| SA3.1 | Edmonton Green Shopping Centre | 1173 | 1423 | Change – capacity increased | Revised capacity based on the planning application with recommendation for approval. |
| SA3.2 | Chiswick Road Estate | 272 | 146 | Change – capacity decreased | Reduced capacity reflects Historic England concerns regarding heritage constraints |
| SA4.1 | Joyce Avenue and Snells Park Estate | 1217 | 1188 | | Reduced capacity reflects Historic England concerns regarding heritage constraints |
| SA4.2 | Upton Road and Raynham Road | 198 | 134 | Change – capacity decreased | Reduced capacity reflects Historic England concerns regarding heritage constraints |
| SA4.4 | South-east corner of the North Middlesex University Hospital Trust, Sterling Way, London | 400 | 260 | Change – capacity decreased | Reduced capacity reflects Historic England concerns regarding heritage constraints |
| SA4.5 | Public House, 50-56 fore Street London | 68 | 58 | Change – capacity decreased | Reflects extant planning consent. |
| SA5.1 | Meridian Water Phase 1 | Whole Place making areas: 5,000 | Whole Place making areas:6711 | Change – capacity increased | Capacity revised to reflect further testing taking on board comments from regulation-18 consultation including from statutory consultees such as GLA |
| 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 (Harbet Road) | | | | |
| SA6.1 | Southgate Office Village | 125 | 216 | Change – capacity increased | Reflects extant planning consent. |

| Regulation 19 Site Allocation Reference | Site name | Reg 18 Approximate Housing estimate (Plan Period) | Reg 19 Approximate Housing estimate (Plan Period) | Change since reg-18? | Reason for capacity change |
|---|---|---|---|-----------------------------|---|
| SA6.3 | Minchenden Car Park & Alan Pullinger Centre | 48 | 33 | Change – capacity decreased | Capacity revised to reflect further testing and taking into consideration more detailed evidence such as the Character of Growth Study. |
| SA7.1 | Former Gasholder, New Southgate | 230 | 182 | Change – capacity decreased | Reflects extant planning consent. |
| SA8.2 | Lodge Drive Car Park | 18 | 124 | Change – capacity increased | More detailed analysis and information provided by landowner indicated potential to further maximise numbers. |
| SA8.4 | Travis Perkins Palmers Green | 76 | 84 | Change – capacity increased | More detailed analysis and information provided by landowner indicated potential to further maximise numbers. |
| SA10.1 | Chase Park South | Whole Place making areas: 3000 | Whole Place making areas: 2592 | Change – capacity decreased | Reflects detail master planning work undertaken at Reg 19 |
| SA10.2 | Arnold House (66 Ridgeway) & Land to the rear of 66 The Ridgeway (west) | | | | |
| SA10.3 | Chase Park North East | | | | |
| SA10.4 | Chase Park North West | | | | |
| SA11.1 | Land north of Cattlegate Road, Crews Hill | Whole Place making areas: 3000 | Whole Place making areas: 3350 | Change – capacity decreased | Reflects detail master planning work undertaken at Reg 19 |
| SA11.2 | Land south of Cattlegate Road, Crews Hill | | | | |
| SA11.3 | Land South of M25, Crews Hill | | | | |
| SA11.4 | Land North & South of Cattlegate Road, Crews Hill | | | | |
| SA11.5 | Land east of Theobalds Rd, Crews Hill | | | | |
| SA11.6 | Land south west of Theobalds Rd, Crews Hill | | | | |
| URB.02 | Cockfosters Station Car Park | 316 | 351 | Change – capacity increased | Reflects extant planning consent. |

| Regulation 19 Site Allocation Reference | Site name | Reg 18 Approximate Housing estimate (Plan Period) | Reg 19 Approximate Housing estimate (Plan Period) | Change since reg-18? | Reason for capacity change |
|--|---|--|--|-----------------------------|---|
| URB.04 | Blackhorse Tower, Cockfosters Road | 200 | 216 | Change – capacity increased | Reflects extant planning consent. |
| URB.07 | Sainsburys Green Lanes | 299 | 368 | Change – capacity increased | Capacity revised to reflect further testing and taking into consideration more detailed evidence such as the Character of Growth Study, |
| URB.09 | Exeter Road Estate | 110 | 129 | Change – capacity increased | Reflects extant planning consent. |
| URB.16 | 188-200 Bowes Road | 125 | 86 | Change – capacity decreased | Reflects extant planning consent. |
| URB.17 | Main Avenue Site | 82 | 80 | Change – capacity decreased | Reflects extant planning consent. |
| URB.18 | Land at Ritz Parade | 79 | 71 | Change – capacity decreased | Reduced capacity reflects Historic England concerns regarding heritage constraints |
| URB.19 | Albany Leisure Centre and Car Park | 30 | 85 | Change – capacity increased | More detailed analysis and information provided by landowner indicated potential to further maximise numbers. |
| URB.26 | Fords Grove Car Park | 24 | 29 | Change – capacity increased | More detailed analysis and information provided by landowner indicated potential to further maximise numbers. |
| RUR.01 | Land opposite Enfield Crematorium (known as The Dell). Great Cambridge Road | 270 | 291 | Change – capacity increased | Capacity revised to reflect further testing and taking into consideration more detailed evidence such as the Character of Growth Study, |