

IN2: Appendix 1 – ‘Stage 1’ Matters, Issues and Questions

Matter 1: Legal, procedural and other general matters

Issue 1.1: Duty to Co-operate (DtC)

Section 33A of the 2004 Act (the Act) sets out a duty to cooperate (DtC) during the preparation of the Plan in relation to strategic matters¹. The Council has prepared a DtC Statement², and accompanying Statements of Common Ground (SoCG) which provide information about engagement with local planning authorities and prescribed bodies on strategic matters during the preparation of the Plan. The ‘key strategic issues’ are set out in section 6 of the DtC Statement.

Various SoCG refer to outstanding matters that had not been addressed at the time of submission.

Q1.1: Has the Council maximised the effectiveness of the Plan by engaging constructively, actively and on an on-going basis with neighbouring authorities and the other prescribed bodies on the relevant strategic matters and what form has this engagement taken?

Q1.2: What outcomes have resulted from engagement and cooperation on relevant strategic matters and how have these informed the Plan’s policies, including but not limited to:

- a) Housing
- b) Infrastructure
- c) Economy
- d) Heritage and culture
- e) Green infrastructure and the natural environment
- f) Flooding and drainage
- g) Transport

Q1.3: Is the process of cooperation demonstrated with clear evidence, including SoCG as expected by NPPF paragraph 27 and the Planning Practice Guidance (PPG)? Do SoCG identify relevant strategic matters, actions in relation to cross boundary issues, and the outcomes of actions taken?

¹ A “strategic matter” is (a) sustainable development or use of land that has or would have a significant impact in at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and (b) sustainable development or use of land in a two-tier area if the development or use is a county matter or would have a significant impact on a county matter [section 33A(4) of the 2004 Act].

² Documents SUB14, SUB14a and E3.1

Q1.4: Are there any strategic matters, as defined by the legislation, which have not been specifically addressed through the DtC?

Q1.5: Are there any outstanding concerns from adjoining authorities or other DtC bodies regarding the DtC itself, or the strategic matters identified? If so, how has the Council sought to address any issues raised?

Q1.6: In overall terms, is there evidence to demonstrate that, during the preparation of the Plan, the Council has engaged constructively, actively and on an on-going basis with relevant authorities and prescribed bodies on relevant strategic matters? Has the Duty to Cooperate been met in a manner consistent with paragraphs 24 - 27 of the NPPF?

Issue 1.2: General Conformity with the London Plan

Section 24(1)(b) of the Act, requires the Plan to be in general conformity with the London Plan. At my request, the Council has prepared a "Conformity Topic Paper"³. There is also a SoCG with the Greater London Authority, which identifies areas of agreement, and outstanding areas of disagreement, in relation to the issue of general conformity with the London Plan.

Note: Specific issues relating to general conformity with the London Plan (for example, in relation to the housing requirement) will be addressed under relevant Matters where necessary. The following questions are meant to provide an overview of the issue as a whole.

Q1.7: In overall terms, is the Plan in general conformity with the London Plan?

Q1.8: What, if any, modifications have been proposed to address any issues of general conformity? What is the current position of the Mayor of London in light of these suggested modifications?

Q1.9: Are any further discussions with the Mayor of London taking place, when is it expected those discussions would be concluded and what is the intended outcome?

Q1.10: Are any main modifications proposed to address issues of general conformity?

Q1.11: Is it clear how the individual policies of the Plan relate to the those of the London Plan? Is there any duplication between the policies of the Plan and the London Plan? If so, does this impact on the effectiveness of the development plan as a whole?

³ Document E3.2

Issue 1.3: Public Engagement

Section 19(3) of the 2004 Act requires local planning authorities to prepare local development documents in accordance with their statement of community involvement. The summary of representations made during the regulation 19 consultation⁴ indicates that concerns were raised that a number of local planning authorities had failed to comply with their statement of community involvement (SCI).

As set out in their response to PQ1, following the submission of the Plan, the Council identified a number of issues relating to the consultation database and the 'Regulation 22' statement⁵. At my request, the Council has sought to address such issues and has since published an updated database of representations and a revised 'Regulation 22' statement⁶.

Q1.12: Has the Plan been prepared in accordance with the statutory requirements of the Planning and Compulsory Purchase Act 2004 and the associated Regulations, including in respect of the publication and availability of documents, advertisements and notifications?

Q1.13: Were adequate opportunities made available for participants to access and make comments on the Plan and other relevant documents?

Q1.14: Have representations been adequately taken into account?

Q1.15: Is there any clear evidence that the public consultation carried out during the plan-making process failed to comply with the Council's SCI or any other legal requirements?

Issue 1.4: Sustainability Appraisal

Local planning authorities are required to carry out a sustainability appraisal during the preparation of local plans and prepare a report of its findings⁷.

The Council has prepared an "Integrated Impact Assessment" and associated Non-Technical Summary⁸ which includes sustainability appraisal.

Q1.16: As part of the integrated impact assessment (IIA), has the formulation of the Plan been based on a sound process of sustainability appraisal? In particular:

- a) Has the IIA been prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004?
- b) Does the IIA test the Plan against reasonable alternatives, including in terms of the scale of housing and employment growth, the broad distribution of development and site allocations and policies?

⁴ Part LEG6 of submission document SD56 (Appendix C22 Other Issues Summary).

⁵ Document SUB12

⁶ Document SUB12.1

⁷ Sections 19(5) and 39 of the 2004 Act, and the *Environmental Assessment of Plans and Programmes Regulations 2004*

⁸ Documents SUB08 and SUB09

- c) Has the IIA been robustly prepared with a comparative and equal assessment of each reasonable alternative?
- d) Is the IIA decision making and scoring robust, justified and transparent?
- e) Has the Council provided clear reasons for not selecting reasonable alternatives?
- f) Is it clear how the IIA has influenced the Plan strategy, policies and proposals and how mitigation measures have been taken account of?
- g) Have any concerns been raised about the IIA and, if so, what is the Council's response to those?

Issue 1.5: Habitats Regulations Assessment

The Council has carried out a Habitat Regulations Assessment (HRA) during the preparation of the Plan. The most recent version appears to have been completed in December 2023⁹.

Paragraph 5.40 of the HRA states that, until air quality assessment has taken place, it is not possible to conclude that there will be no adverse effects on the integrity of the Epping Forest SAC, Wormley Hoddesdonpark Woods SAC or Lee Valley SPA and Ramsar site as a result of air pollution. Paragraph 5.39 states that once air quality assessment has been finalised, the need for mitigation will be identified and agreed in consultation with Natural England and that this mitigation will need to be agreed and secured prior to adoption of the Plan.

In relation to the effect of development on recreation pressures, paragraph 5.44 of the HRA refers to visitor number calculations being confirmed in the "next version of the HRA". Paragraph 5.58 states that there is some uncertainty and that it has not been possible to conclude there would be no adverse effects on the integrity of the Epping Forest SAC because of recreation pressure.

The PPG¹⁰ states that where an adverse effect on a site's integrity cannot be ruled out, and where there are no alternative solutions, the plan or project can only proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured.

Q1.17: Have any concerns been raised about the HRA and, if so, what is the Council's response to these? Have Natural England been involved in the HRA process and what is their current position?

Q1.18: What are the implications for the Plan of the HRA not being able to rule out adverse effects on the integrity of sites, as set out above and in Chapter 5 of the HRA? How are any uncertainties to be addressed?

Q1.19: Have the necessary mitigation measures to avoid adverse effects on the integrity of designated sites been incorporated into the Plan's policies?

⁹ Document SUB11

¹⁰ Paragraph ID 65-001-20190722

Q1.20: Overall, has the HRA been carried out in accordance with the Conservation of Habitats and Species Regulations 2010 (as amended) and Habitats Directive?

Issue 1.6: Other Matters

Local Development Scheme

Section 19(1) of the 2004 Act requires local plans to be prepared in accordance with the Local Development Scheme. Section 15 of the Act sets out that Local Development Schemes should specify the subject matter and geographical area to which a plan relates, as well as the timetable for preparation.

Q1.21: Has the Plan been prepared in accordance with the Local Development Scheme in terms of its form, scope, and timing?

Equalities

Public authorities are required under section 149 of the Equality Act 2010 to have due regard to the following aims when exercising their functions:

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act.
- b) advance equality of opportunity between persons who share a relevant protected characteristic¹¹ and persons who do not share it.
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Q1.22: In what ways does the Plan seek to ensure that due regard has been had to the three aims expressed in s149 of the Equality Act 2010 in relation to those who have a protected characteristic?

Superseded policies

Regulation 8(5) of the 2012 Regulations states that where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy. Paragraph 1.15 of the Plan lists the documents which the Plan is intended to supersede. The Council's response to PQ3 suggests a main modification in relation to this issue.

Q1.23: Is the Plan consistent with Regulation 8(5) of the Town and Country Planning (Local Planning) (England)?

Q1.24: Is the suggested main modification necessary to make the Plan sound and legally compliant?

¹¹ Age; disability; gender reassignment; marriage and civil partnerships; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

Climate Change

Section 19(1A) of the 2004 Act, requires that development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.

Q1.25: Does the Plan accord with s19(1A) of the Planning and Compulsory Purchase Act 2004 by including policies that are designed to secure that the development and use of the land in the London Borough of Enfield contribute to the mitigation of, and adaptation to, climate change?

Matter 2: Housing Need and Supply

Issue 2.1: Whether the assessment of overall housing need and the housing requirement is justified, positively prepared, consistent with national policy and in general conformity with the London Plan

Policy SS1 identifies a requirement of at least 33,280 homes by 2041. The London Plan sets a housing target for Enfield of 12,460 between 2019 and 2029 (1,246 per annum). The Housing Topic Paper¹² seeks to explain the basis on which the overall requirement has been calculated.

The Council's Conformity Topic Paper¹³ and SoCG¹⁴ with the GLA also provide additional commentary on the Council's position with regard to how the housing requirement relates to the London Plan. Paragraph 26 of the Conformity Topic Paper refers to the GLA's position on housing requirements having changed and that, as an interim measure, housing targets should as a minimum be rolled over from those in Table 4.1 of the London Plan.

Note – in relation to the 'Stage 1' hearings, I wish to focus only on the issue of overall housing need and the housing requirement. Other issues under this Matter, including those relating to the housing supply, will be considered through subsequent MIQs.

Q2.1: Is the housing requirement of at least 33,280 homes by 2041 justified and positively prepared. In particular:

- a) What is the housing requirement up to 2029 and is this consistent with Policy H1 of the London Plan?
- b) What approach has been used to calculate the housing requirement for the post-2029 period?
- c) Is this approach consistent with the requirements of Policy H1 of the London Plan?

¹² Document TOP3

¹³ Document E1.2

¹⁴ Document E1.1

d) Consequently, is the overall housing requirement positively prepared and in general conformity with the London Plan?

Q2.2: Where is the “GLA guidance” referred to in paragraph 26 of the Conformity Topic Paper (and also paragraph 3.4 of the SoCG with the GLA) documented?

Q2.3: How does this “guidance” effect the legal requirement for the Plan to be in general conformity with the London Plan?

Q2.4: If the “interim measure”, referred to in paragraph 26 of the Conformity Topic Paper were adopted, what would the housing requirement be for the overall Plan period? How would this compare to that set out in Policy SS1?

Paragraph 67 of the NPPF states that within the overall requirement, strategic policies should also set out a housing requirement for designated areas which reflects the overall strategy for the pattern of development. The response to PQ37 refers to footnote 1 of the Plan, which establishes a minimum requirement for the Hadley Wood Neighbourhood Plan of 160 homes.

Q2.5: Does footnote 1 adequately meet the requirements of paragraph 67 of the NPPF? To be effective, should the footnote be included within the policy?

Q2.6: How does the 160 homes relate to the made Hadley Wood Neighbourhood Plan? Is this figure over and above any requirement set out in that Plan?

Q2.7: Does the figure of 160 homes reflect the overall strategy for the pattern and scale of development and any relevant allocations, as required by paragraph 67?

Issue 2.2: Whether the approach to meeting needs for Gypsy and Travellers is justified, positively prepared, consistent with national policy and in general conformity with the London Plan?

Paragraph 63 of the NPPF states that planning policies should reflect the needs of different groups in the community, including Gypsies and Travellers. Policy H10 establishes an identified need for 21 pitches over the plan period for Traveller accommodation. It also sets out an intention to produce a separate “Traveller Local Plan” to identify the locations or sites to meet that need.

Policies PL10 and PL11 both refer to the provision of Gypsy and Traveller pitches “being explored” subject to the policies and proposals to be set out in the Enfield Traveller Local Plan.

In summary, the Council’s responses to PQ10 to PQ18 make the following points:

- The Council intends this Plan to establish the need and requirement for Gypsy and Traveller pitches.
- Further to this, an updated Gypsy and Traveller Accommodation Assessment (GTAA) was completed in May 2024. This was not available in time for the Regulation 19 consultation. However, the Council now wish to use the revised evidence to support a main modification to the Plan.
- This would increase the number of pitches from 21 to 30 and make an additional requirement for one transit site to accommodate a minimum of 15 caravans.

- It remains the intention to meet identified need through a separate Traveller Local Plan, which has been subject to recent consultation.
- That it is *not* the intention for this Plan to identify the exceptional circumstances to justify altering Green Belt boundaries. However, the recent consultation did identify potential sites within the Green Belt to meet the need identified (albeit this is a relatively early stage in the plan preparation process).

Amongst other things, Policy B of national Planning Policy for Traveller Sites (PPTS) states that local planning authorities should, in producing their Local Plan, identify and update annually a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets. It also states, in paragraph 11, that criteria should be set to guide land supply allocations where there is a need identified.

Policy E of the PPTS states that Green Belt boundaries should be altered only in exceptional circumstances. It goes on to state that, if a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan-making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.

Paragraph 145 of the NPPF states that strategic policies should establish the need for any changes to Green Belt boundaries but where a need for changes to Green Belt boundaries have been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies.

Note: Detailed matters relating to Policy H10 will be dealt with through subsequent MIQs.

Q2.8: Is the identified need for Gypsy and Traveller pitches set out in Policy H10 justified and positively prepared? Is it based on a robust and up-to-date assessment of need which follows national guidance?

Q2.9: If not, is the revised need set out in the updated GTAA, based on a robust and up-to-date assessment of need which follows national guidance?

Q2.10: Is the suggested main modification to Policy H10 necessary to make the Plan sound?

Q2.11: Is it justified, effective and consistent with national policy for the need identified in Policy H10 to be met through a separate development plan document? Does identifying allocations in a separate plan have any implications for the PSED?

Q2.12: Further to the above, does the Plan meet the requirements of the PPTS both in terms of identifying a supply of land to meet needs and/or setting out criteria for identifying allocations? Without specific allocations, how will a five-year supply of sites be identified?

Q2.13: Given that the requirement for Gypsy and Traveller sites is identified in this Plan and that policies PL10 and PL11 refer to the potential for such development

within these areas, should the exceptional circumstances for altering Green Belt boundaries be established through this Plan?

Q2.14: If so, what does the Council consider the exceptional circumstances to be for altering Green Belt boundaries to meet the needs of Gypsies and Travellers?

Issue 2.3: Whether the approach to meeting the needs of different groups in the community is justified, positively prepared, consistent with national policy and in general conformity with the London Plan.

In addition to the needs of Gypsies and Travellers, paragraph 63 of the NPPF requires planning policies to reflect the needs of other groups in the community, including families with children, older people, students, people with disabilities, people who rent their homes and people wishing to commission or build their own homes.

While I will consider the specifics of relevant policies under different Matters, as part of the 'stage 1' hearings I wish to ask questions relating to the overall approach and the evidence base. The Council's responses to PQ21 and PQ36 are relevant to this issue.

Q2.15: Is the evidence on the need for different groups in the community, including the types of housing delivered, based on robust and proportionate evidence? Does the Local Housing Need Assessment (2020) represent an up-to-date assessment of need?

Q2.16: Does the Plan make adequate provision for the needs of other groups in the community, including but not limited to older people?

Matter 3: Employment Land Need and Supply

Issue 3.1: Whether the assessment of overall employment land need and requirement is justified, positively prepared, consistent with national policy and in general conformity with the London Plan

Policy SS1 sets out a requirement for 304,000 sqm of net additional industrial and logistics floorspace and 40,000 sqm of net additional office floorspace. The Employment Topic Paper¹⁵ sets out how these figures were derived.

Note: As part of the 'stage 1' hearings, I wish to focus on the overall requirement. Other matters relating to employment land, including supply issues, will be addressed through subsequent MIQs.

Q3.1: Are the requirements for additional floorspace justified and based on robust and up-to-date evidence of need?

¹⁵ Document TOP4

Q3.2: Do the requirements appropriately reflect the quantitative and qualitative need for those forms of development over the Plan period?

Q3.3: Are the requirements for additional floorspace consistent with the expectations of the London Plan?

Matter 4: Green Belt

Issue 4.1: Whether all reasonable options for meeting the identified need for housing and employment development on land that is not in the Green Belt fully examined.

The Plan seeks to alter the Green Belt boundaries in a number of locations to accommodate housing and employment development. This Matter is concerned with the strategic reasons why the Plan seeks to remove land from the Green Belt. Site specific issues related to each allocation, including the impacts on Green Belt purposes, the proposed Green Belt boundaries and proposals for compensatory improvements to remaining Green Belt, under subsequent Matters.

National policy advises that the essential characteristics of Green Belts are their openness and their permanence. Therefore, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans.

Paragraph 146 of the NPPF states that before concluding exceptional circumstances exist to justify changes to Green Belt boundaries, the plan-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.

Q4.1: What is the identified capacity to meet a) housing and b) employment needs within the Plan area without requiring any alteration to Green Belt boundaries?

Q4.2: Were all reasonable opportunities assessed for meeting the need for (a) housing and (b) employment related development outside the Green Belt, including through making as much use as possible of suitable brownfield sites and underutilised land and optimising the density of development?

Q4.3: Is there any substantive evidence to indicate that relevant neighbouring local planning authorities outside the Plan area could accommodate some of the housing or employment development proposed?

Issue 4.2: Whether removing land from the Green Belt as proposed in the Plan necessary to ensure that the identified need for housing and employment development can be met in a way that promotes sustainable patterns of development.

Sustainable patterns of development

National policy advises that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. 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. This Matter considers this issue at a strategic level. Any additional issues that need to be considered in relation to individual locations will be addressed through subsequent Matters.

Q4.4: What was the Council's approach to assessing the opportunities for altering Green Belt boundaries?

Q4.5: In selecting the locations to be removed from the Green Belt, was first consideration given to land which has been previously developed and/or is well served by public transport?

Removing land from the Green Belt to provide land for housing and employment development

Q4.6: Is there a quantitative need to remove land from the Green Belt in the Plan area to ensure the provision of at least 33,280 homes in the period by 2041?

Q4.7: Is there a quantitative need to remove land from the Green Belt to ensure that the identified need for additional industrial and warehousing floorspace can be met by 2041?

Q4.8: Overall, are there exceptional circumstances in principle to justify altering Green Belt boundaries for a) housing and b) employment development?

Compensatory Improvements

Q4.9: Is the Plan consistent with paragraph 147 of the NPPF with regard to the provision of compensatory improvements to the environmental quality and accessibility of land in the Green Belt? Are the measures identified in criterion 13 of the Policy SS1 meant to deliver this objective? If so, are they viable and deliverable?

Policies Map

The submitted Policies Map¹⁶ appears to identify site SA URB.06 as being within the Green Belt.

Q4.10: Is the submitted Policies Map accurate with regard to the boundaries of the Green Belt?

Q4.11: Are the inset maps associated with Green Belt allocations in Appendix C consistent with what appears on the Policies Map?

Issue 4.3: Whether other proposals in the Green Belt are justified, consistent with national policy and in general conformity with the London Plan

As well as sites for housing and employment, the Plan also identifies a number of other proposals within the Green Belt. My questions PQ30 and PQ31 deal with such matters but I have not had an answer to these at the time of publishing these MIQs.

¹⁶ Document SUB07

At this stage I wish only to clarify some overarching issues relating to these proposals and matters of principle. Specific issues will be addressed through subsequent Matters.

Q4.12: Other than the allocated housing and employment sites, what other allocations are identified within the Green Belt?

Q4.13: Are there any proposed changes to Green Belt boundaries resulting from these allocations?

Q4.14: In principle, are the uses proposed within these areas compatible with the Green Belt? Would any development associated with them be considered “inappropriate development in the Green Belt” by the NPPF?

Q4.15: Are the inset maps relating to other proposals in the Green Belt in Appendix C accurate?

Matter 5: Key Diagram, Spatial Strategy and methodology for selecting site allocations

Issue 5.1 Whether the vision and strategic objectives have been positively prepared and are justified and effective.

Q5.1: Are the spatial vision and strategic objectives soundly based, justified by the evidence and is it clear how the Plan’s policies will help to deliver the vision and strategic objectives over the Plan period?

Issue 5.2: Whether Policy SS1 establishes an appropriate spatial strategy, taking into account reasonable alternatives.

The spatial strategy is set out in Policy SS1. This identifies the scale of growth proposed (discussed specifically under Matters 2 and 3). The policy states that a major focus will be on previously developed sites, regeneration areas in the east of the Borough and London Plan Opportunity Areas at Meridian Water and New Southgate. The spatial strategy is supported by the 11 ‘Placemaking’ areas in Chapter 3.

General Matters

Q5.2: Is the spatial strategy for the scale and distribution of growth, set out in Policy SS1, justified and appropriate for the sustainable development of the area when considered against reasonable alternatives? What reasonable alternatives were considered by the Council and why were these rejected?

Q5.3: Other than those specifically referred to in Policy SS1 (ie PL5, PL6, PL10, PL11 and New Southgate (PL7)) is it clear how the ‘place making’ areas relate to the overall spatial strategy and the purpose they serve in delivering the overall strategy?

Strategic Approach to Minimising Flood Risk

Q5.4: Is the spatial strategy consistent with national policy on flood risk? Has the Plan been informed by a Strategic Flood Risk Assessment based on the most up-to-date flood risk data and climate change allowances and taking advice from the Environment Agency?

Q5.5: Can the Council demonstrate that the Plan takes a sequential, risk-based approach to the location of development, so as to avoid where possible flood risk to people and property?

Q5.6: Is the Plan consistent with the actions set out in paragraph 167a)-d) of the NPPF, namely applying the sequential test, safeguarding land from development that is required, or likely to be required for current or future flood management, using opportunities provided by new development to reduce the causes and impacts of flooding and demonstrating how changes to flood risk arising from climate change have been taken into account?

Q5.7 Further to the above, are any of the locations identified for growth in the Plan within Flood Zones 2 and 3? If so, has the exception test been carried out and are the conclusions of this justified?

Strategic Transport Issues

Q5.8: Have the cumulative effects on the transport network been robustly assessed?

Q5.9: What strategic transport issues have been identified that would require mitigation to enable the scale of growth envisaged to be delivered?

Q5.10: What transport infrastructure, or other mitigation schemes, have been identified that would address these transport issues? Has the likely effectiveness of proposed transport mitigation schemes been assessed?

Q5.11: Are there any outstanding concerns on transport matters from Transport for London, National Highways or any other relevant transport authorities?

Other Matters

Q5.12: Is the spatial strategy and scale of growth justified and consistent with national policy in respect of the effect on air quality?

Q5.13: Is the Plan effective in ensuring adequate provision of infrastructure and local services to deliver the spatial strategy, in particular those relating to education, health and green infrastructure?

Q5.14: Does the evidence on whole plan viability and infrastructure demonstrate that the spatial strategy can viably deliver the housing, employment floorspace and infrastructure required to support the growth proposed?

Q5.15: In general terms, does the Whole Plan Viability Assessment¹⁷ use a robust methodology and is it based on proportionate up-to-date and accurate data?

Issue 5.3: Whether other aspects of Policy SS1 are justified, effective, consistent with national policy and in general conformity with the London Plan

Q5.16: Are the overarching approaches to Town Centres, Residential Communities and Metropolitan Open Land, as set out in criteria 7, 8 and 9 of Policy SS1 justified, effective and consistent with national policy?

Issue 5.4: Whether the Key Diagram effectively illustrates the spatial strategy and indicates the broad locations for development proposed in the Plan.

Q5.17: Does the Key Diagram (Figure 2.4) effectively and accurately illustrate the spatial strategy?

Q5.18: Is the key diagram accurate with regard to the following factors:

- a) the extent of the Green Belt and Metropolitan Open Land (MOL)?
- b) the relationship between the concept of 'gentle densification' and MOL? Is it the case that the Plan allows for 'gentle densification' within areas of MOL?
- c) the relationship between the concept of 'gentle densification' and areas identified for 'intensification around transport nodes and town centres'? Are these two policy approaches compatible?

Q5.19: Is the relationship between concepts identified on the Key Diagram and policy clear? For example, is the Plan clear how 'gentle densification' and 'intensification around transport nodes and town centres' will be implemented?

Issue 5.5: Whether the allocations in the Plan have been selected using an appropriate methodology based on proportionate evidence.

The following questions relate to the site selection process and general approach to allocations. Issues relating to specific sites will be considered under separate Matters. Therefore, references to individual allocations are not necessary unless used as examples of how the process has been carried out.

¹⁷ Document VIA1

The site selection methodology is set out in the Site Allocations Topic Paper¹⁸. The Council's responses to PQ7 to PQ9 provide additional information, particularly in respect of how 'strategic' and employment sites were assessed.

Q5.20: Is the approach to the assessment and selection of sites, as set out in the Site Allocations Topic Paper justified? Does the submitted evidence demonstrate that the sites have been selected on a robust, consistent and objective basis?

Q5.21: Was the criteria used in the initial sift of sites (Stage 1 of the process) justified, in particular the 'absolute constraints'?

Q5.22: Paragraphs 4.5 and 4.6 of the Site Selection Methodology paper refer to sites that fell within priorities 1 and 2 being generally considered suitable for development, but with some exceptions, and sites that fell within priority 7 and 8 were generally considered unsuitable but with some exceptions. On what basis were the 'exceptions' justified and is it clear which sites fall into which category?

Q5.23: Are the reasons for selecting some sites and rejecting others clearly set out and justified?

Q5.24: Were constraints to development, such as transport, flooding, landscape character, heritage and mineral safeguarding appropriately taken into account as part of the selection process?

Q5.25: Where mitigation was deemed to be required, how was this determined and have measures been subject to assessment of viability?

Q5.26: Has the site selection process ensured the allocated sites are consistent with the spatial strategy, as set out in Policy SS1?

Q5.27: Have any additional sites been proposed to the Council since the renewed call for sites in July 2022? If so, have these been assessed using the same methodology? Is this clearly documented?

Issue 5.6: Whether Policy SS2 is justified, effective, consistent with national policy and in general conformity with the London Plan

Policy SS2 is an overarching policy which forms part of the 'spatial strategy' for the Plan. It also directly relates to a number of other policies relating to design and the quality of development.

Q2.28: Is the threshold of 50 dwellings or 500 sqm of non-residential floorspace for the preparation of a masterplan justified and likely to be effective? Would preparation of a masterplan for a development of this scale be unduly onerous?

¹⁸ Document TOP2

Q2.29: Is the threshold of 100 dwellings for the submission of a planning brief justified and likely to be effective? Would preparation of a planning brief for a development of this scale be unduly onerous?

Q2.30: Is the Plan clear as to when masterplans or planning briefs must be prepared and the mechanism by which they would be approved?

Q2.31: How would Policy SS2 be used in decision making? Are matters covered addressed in more detail in other policies in the Plan? Are there any parts of Policy SS2 that are not addressed by other policies?