



**LONDON BOROUGH OF ENFIELD**

**AGENDA FOR THE COUNCIL MEETING  
TO BE HELD ON TUESDAY, 19TH MARCH, 2024  
AT 7.00 PM**

**THE WORSHIPFUL THE MAYOR  
AND COUNCILLORS OF THE  
LONDON BOROUGH OF ENFIELD**

**Please  
Reply to:**

Nicola Lowther  
Governance Manager

Dear Councillor,

You are summoned to attend the meeting of the Council of the London Borough of Enfield to be held at the Civic Centre, Silver Street, Enfield on Tuesday, 19th March, 2024 at 7.00 pm for the purpose of transacting the business set out below.

Yours sincerely

*Terry Osborne*

Director Law & Governance

**5. THE LOCAL PLAN (Pages 1 - 16)**

Council is asked to agree the Local Plan.

**Enfield Council**

# **Non-Technical Summary** **Integrated Impact** **Assessment**

**Final report**

Prepared by LUC

February 2024





**Enfield Council**

**Non-Technical Summary**  
**Integrated Impact Assessment**

Version	Status	Prepared	Checked	Approved	Date
1.	Final report	S. Temple	S. Temple	J. Pearson	06.02.2024

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## Contents

Introduction	2
Method	2
Identifying and appraising alternatives	3
Identification of spatial strategy options	3
Assessment results for spatial strategy options	4
Reasons for choosing the preferred spatial strategy	8
Appraising the Local Plan proposals	11
Good growth in Enfield (Chapter 2 of the Local Plan)	11
Places (Chapter 3 of the Local Plan)	11
Other topics (Chapters 4 to 15 of the Local Plan)	12
Cumulative effects	13
Next steps	13
Submission, examination and adoption	13
Monitoring	13

## Introduction

1. Enfield Council commissioned LUC to undertake Integrated Impact Assessment (IIA) of the Enfield Local Plan. IIA is an assessment process designed to identify the likely significant effects of a plan and ways of minimising its negative effects and maximising its positive effects. So that it can best influence the plan, IIA runs alongside the plan-making process, considering and informing alternatives and opportunities for mitigation. The IIA also documents the 'story' of the plan – why the plan is the way it is and not something else.
2. The new Enfield Local Plan will cover the period to 2041 and, alongside the new Traveller Local Plan (anticipated for adoption in 2026) and any neighbourhood plans, will replace the Council's current suite of Development Plan Documents and be used to guide and approve future development in the Borough. It will address local housing need, the economy, environmental considerations including the climate emergency, community infrastructure as well as strategic infrastructure needs and will assist the Council in its move towards carbon neutrality.
3. The Enfield Local Plan is not prepared in isolation and must align with national planning policy and the London Plan. It is supported by other documents such as the Statement of Community Involvement, Local Development Scheme, Authority Monitoring Report and Supplementary Planning Documents.
4. This report is the Non-Technical Summary of the full IIA Report.

## Method

5. The IIA integrated a number of types of assessment:
  - Sustainability Appraisal incorporating Strategic Environmental Assessment – which consider environmental, social and economic effects of the plan.
  - Health Impact Assessment – focussing on public health effects.
  - Equality Impact Assessment – considering equalities issues and avoidance of discrimination against groups such as older people and the disabled.
  - Community Safety Impact Assessment – aiming to improve community safety.
6. The IIA began with a 'Scoping' process. This brought together information about current and emerging conditions and significant problems in the Borough that the Local Plan

could try to address. It also establishes what higher level plans such as the London Plan and national planning policy say the Local Plan must or should aim to do.

7. The information about existing problems and external policy requirements was used to develop a set of environmental and sustainability objectives (known as the IIA framework) against which the likely effects of the Local Plan, including reasonable alternatives, could be assessed.
8. The topics covered by the IIA objectives, which were also informed by legal requirements, were as follows:
  - Climate change mitigation;
  - Climate change adaptation;
  - Housing;
  - Health and wellbeing;
  - Services and facilities;
  - Social inclusion;
  - Crime and community safety;
  - Road safety;
  - Economy;
  - Town and local centres;
  - Air pollution;
  - Sustainable transport;
  - Biodiversity;
  - Historic environment;
  - Landscape and townscape;
  - Efficient use of land and materials;
  - Flooding; and
  - Water.

9. The IIA identifies what effects different aspects of the Local Plan are expected to have on these topics. The effects can be positive or negative, significant or minor. Mixed effects are also identified in some cases, where directly opposing effects are expected.

10. The IIA was subject to a number of technical difficulties and limitations, such as the inherent difficulty of predicting the effects of development provided for by the Local Plan when the particular design and layout of developments will only be known when specific proposals come forward, and the need to use assessment methods that are proportionate to the level of detail of a borough-wide plan.

## Identifying and appraising alternatives

**11.** An important part of the IIA process is to assess reasonable alternatives to what the plan is proposing. In particular, the IIA sets out:

- How reasonable alternatives were identified.
- The assessment results of these alternatives.
- Why the preferred alternatives have been chosen and others rejected.

**12.** The IIA of alternatives or options aims to inform the aspects of the Local Plan that address the biggest planning issues facing the plan area and where clear alternative approaches to addressing these issues exist. This Non-Technical Summary therefore focuses on the reasonable alternatives considered by the Council for the total amount and broad spatial distribution of development in the Borough. The distribution of development and amount of growth that can be accommodated in an area is referred to as the spatial strategy.

### Identification of spatial strategy options

**13.** Chapter 2 (paragraphs 2.31-2.50) of the full IIA Report describes the process that led to the different spatial strategy options considered during the development of Enfield's new Local Plan. This is summarised below.

**14.** In the June 2021 IIA Report, a wide range of spatial strategy options were considered. Different levels of housing growth were assessed, as well as different strategies for accommodating the different levels of growth.

- Option 1: Baseline growth (17,000 new homes).
  - Option 1A: Focused in the urban area only.
  - Option 1B: Focused in the urban area and employment areas.
- Option 2: Medium growth (25,000 new homes).
  - Option 2A: Focused in the urban area and employment areas.
  - Option 2B: Growth in the urban area, employment areas and some release of Green Belt.
  - Option 2C: Focused in the urban area and Green Belt.

- Option 2D: Focused in the urban area only.
- Option 3: High growth (55,000 new homes).
  - Option 3A: Focused in the urban area only.
  - Option 3B: Focused in the urban area and employment areas.
  - Option 3C: Growth across the Borough including the urban area, employment areas and the Green Belt.
  - Option 3D: Focused in the urban area and Green Belt.
- Option 4: Focus growth outside the Borough.<sup>1</sup>
- Option 5: Focus growth in the urban area east of the A10.
- Option 6: Focus growth in the urban area west of the A10.

**15.** Following publication of the June 2021 IIA Report, Enfield Council undertook a Call for Sites, which identified additional opportunities for accommodating development within the urban area of the Borough. This resulted in the identification of three additional spatial strategy options, which were appraised in the December 2023 IIA Report.

- Option 7: Revised baseline growth (30,000 new homes), focused in the urban area only.
- Option 8: Medium to high growth (34,500 new homes), focused in the urban area and Green Belt.
- Option 9: Medium to high growth (31-32,000 new homes), focused in the urban area and some Green Belt.

**16.** In parallel with the 'top-down' consideration of spatial strategy options, the Council identified potentially available and suitable reasonable alternative site allocation options as part of its Housing and Employment Land Availability Assessment (HELAA). The Council then subjected these to the six stage assessment process detailed in the Site Selection Methodology (2021), of which the IIA of site options formed Stage 4. The IIA findings for these reasonable alternative site options are provided in Appendix F of the full IIA Report. The Council's reasons for selecting the allocated sites and discounting the other reasonable alternative site options are provided in Appendix I.

<sup>1</sup> This option was not considered a reasonable alternative, as it is outside the geographical scope of the Local Plan area.

## Assessment results for spatial strategy options

17. Appendix E of the full IIA Report provides a detailed appraisal of the likely effects of these spatial strategy options in relation to each IIA objective. The main findings are discussed below and the magnitude (significant or minor) and direction (positive or negative) of the effects in relation to each IIA objective are shown in **Table 2**. The colour-coded symbols used are shown in **Table 1**.

**Table 1: Key to IIA effects symbols**

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

### Climate change mitigation

18. All of the spatial strategy options focus some development in the urban area of the Borough. Public transport availability increases in urban areas and more services and facilities are within walking distance of one another, reducing reliance on the private car and associated CO<sub>2</sub> emissions. Therefore, all options are likely to have minor positive effects in relation to climate change mitigation. The minor positive effects are uncertain, as levels of walking and cycling within the Borough are not currently very high. Some of the options also receive minor negative effects in relation to climate change mitigation, as they focus development not just within the urban area but elsewhere (including in the Green Belt), which can increase reliance on the private car and associated emissions. They are: 2B, 2C, 3C, 3D, 8 and 9. Option 1B also receives a minor negative effect, as not as many people under this option will be within close proximity of services and facilities, as it proposes a lower level of growth than the other options.

### Housing

19. The high growth options (3A to 3D) would deliver a significant amount of new housing and so are expected to have significant positive effects in relation to housing. Option 3A would, however, involve the development of significantly taller buildings, which would result in a very high proportion of flats, studios and 1-bedroom dwellings, and so would not accommodate the needs of certain groups of people. Therefore, Option 3A is also expected to have a significant negative effect in relation to housing. The medium growth options (2A to 2D) would deliver the number of new homes identified under the medium growth scenario, and so are expected to have significant positive effects in relation to housing. The effects are recorded as uncertain because the Council has had to predict what their housing targets might be beyond the first ten years of the London Plan period. Options 8 and 9 would also deliver a significant number of new homes (although less than the high growth options) and so are also expected to have significant positive effects in relation to housing, although uncertain. Although the baseline growth options (1A to 1B) would deliver the number of new homes identified under the baseline growth scenario, they may not meet future housing needs in full, although this is uncertain. Options 1A and 1B are therefore expected to have uncertain minor positive effects in relation to housing. Likewise, Options 5 and 6 are unlikely to meet the full housing need and so also receive this effect. Option 7 is also expected to have an uncertain minor positive effect in relation to housing. As was the case with Option 3A, Options 1A, 2D, 5 and 6 focus development in the urban area only and are therefore expected to result in an increase in the density of development in these areas, which could potentially limit the availability of housing types in the Borough. Therefore, Options 1A, 2D, 5 and 6 are also expected to have minor negatives effect in relation to housing.

### Health and wellbeing

20. As mentioned already, all options focus some development in the urban area of the Borough. In the urban area, services and facilities are within close proximity of one another, which encourages walking and cycling. This can have beneficial effects on people's health and wellbeing. Therefore, all options are expected to have significant positive effects in relation to health and wellbeing. However, the volume of development proposed by the high, medium to high and medium growth options would place a lot of pressure on existing services, particularly GP surgeries, whilst also potentially resulting in loss of open space. Concentrating development in certain areas of the Borough (e.g. Options 5 and 6) would also place more pressure on service provision. High density development can also contribute to social isolation and poorer health. Therefore, Options 3A to 3D, 5



and 6 are also expected to have uncertain significant negative effects in relation to health and wellbeing, whilst Options 2A to 2D and 7 to 9 are also expected to have uncertain minor negative effects. It is noted, however, that infrastructure provision in strategic new developments in the Green Belt may not rival that in existing service centres, particularly in the short term before the developments are fully built out. Options 2B, 2C, 3C, 3D, 8 and 9 support more distributed growth across the Borough than the other options, including within the Green Belt, but there are no GP surgeries located in the Green Belt and the services and facilities that are available are not within close proximity of potential development locations and so could discourage active travel choices. As such, this contributes towards the mixed effects these options are already expected to have in relation to health and wellbeing.

### Services and facilities

**21.** All options are expected to have significant positive effects in relation to services and facilities, as all promote some development in the urban area where a number of services and facilities are present, including primary and secondary schools. The volume of development proposed by the high, medium to high and medium growth options would place a lot of pressure on existing services, such as schools, although this is uncertain. Concentrating development in certain areas of the Borough (e.g. Options 5 and 6) would also place more pressure on existing schools. Therefore, all options with the exception of 1A and 1B are also expected to have uncertain minor negative effects in relation to services and facilities. As mentioned in the previous paragraph, there is potential for new strategic developments in the Green Belt as proposed under Options 8 and 9 to provide new services.

### Social inclusion

**22.** Although all options have the potential to help regenerate the more deprived areas of the Borough, they could also enhance the less deprived areas, as the urban area in which growth is proposed covers much of the Borough and not specifically the deprived areas. As such, all options receive minor positive effects in relation to social inclusion. Option 5 receives a significant positive effect as it specifically focuses growth in the east of the Borough, which contains ten areas that fall within the 10% most deprived nationally. All options, with the exception of 2A to 2C, 8 and 9, also receive minor negative effects in relation to social inclusion. This is mainly due to the fact they would result in a significant increase in the density of development within the urban area, which would limit the mix of housing types available and not meet the accommodation needs of certain groups of people. Open space may also be lost to new housing, contributing towards inequalities in access to open space. As Options 2A

to 2C, 8 and 9 provide more development than the baseline growth options, including some in the rural area, they are not expected to contribute to a significant increase in the density of development within the urban area. With regard to the baseline growth options (1A and 1B), these would contribute to a lower amount of affordable housing than the medium, medium to high and high growth options, and so not meet affordable housing needs with adverse effects on social inclusion.

### Crime and community safety

**23.** The spatial distribution of development is not likely to influence levels of crime, anti-social behaviour, fear of crime and perceptions of safety, which will be more influenced by policies which seek to deliver inclusive design. However, as SA utilises a precautionary basis, all options are expected to have minor negative effects in relation to crime and community safety. The effects are uncertain, as there may be policies included in the Local Plan to support high quality developments, improvements to estates that suffer from poor quality housing and a high quality public realm that supports the integration of communities and natural surveillance. The higher growth options may have more of an adverse effect than the other options, as the higher level of growth may result in higher levels of crime. Therefore, Options 3A to 3D receive uncertain significant negative effects in relation to crime and community safety.

### Economy

**24.** Concentrating development in the urban area is expected to encourage the retention and expansion of town and local centre commercial and retail uses. Options 1A, 2D, 3A and 7 focus development in the urban area only and so have the potential to help boost the economy by increasing the available workforce and attracting investment to the area, whilst also helping improve these local economies. These four options are therefore expected to have significant positive effects in relation to the economy. An even larger proportion of job opportunities are provided at the Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). With Options 1B, 2A, 2B, 3B, 3C and 5 (and to a lesser extent 6) concentrating future residential development in the employment areas, there would be a loss in SIL and LSIS. These options are therefore expected to have mixed significant positive and minor negative effects in relation to the economy. The minor negative effects are uncertain as although there may be a loss in employment land, residential development may be provided as part of mixed-use schemes at the SIL and LSIS. Options 2B and 3C spread development more evenly across the Borough, including on Green Belt land. However, the areas of Green Belt land where intensification is proposed are not located within the main

urban centres of the Borough, where more job opportunities are available. Conversely, supporting development in these areas may have positive effects on the rural economy and jobs. Option 3C is therefore expected to have a mixed significant positive and significant negative effect in relation to the economy. Option 2B is still expected to have a mixed significant positive and minor negative effect. Options 2C, 3D, 8 and 9 also allow for some development in the Green Belt, and so are expected to have uncertain minor negative effects in relation to the economy for directing some residential development to areas of the Green Belt where there are less existing job opportunities, but a significant positive effect in terms of supporting the rural economy.

### Town and local centres

**25.** Options 1A, 2D, 3A and 7 are expected to enhance the vitality and vibrancy of the town and local centres in the Borough, resulting in significant positive effects in relation to town and local centres. Option 5 would only support the town and local centres to the east of the A20 and Option 6 would only support the town and local centres to the west of the A10, therefore both of these options would only have minor positive effects. All the remaining options support development in the urban area of the Borough, SIL and LSIS (Options 1B, 2A, 2B, 3B and 3C) and/or intensification within the Green Belt (Options 2B, 2C, 3C, 3D, 8 and 9). Although the SIL, LSIS and Green Belt are located on the edge and/or outside of the town and local centres, and development under these options may not directly revitalise the town and local centres, these options still support development around town and local centres. All remaining options are therefore expected to have significant positive effects in relation to town and local centres.

### Air pollution

**26.** All options focus some development in the urban area, with easy access to public transport. Facilities are also within close proximity of one another and so locating development in the urban area is likely to encourage walking and cycling, which can minimise air pollution. Therefore, all options are expected to have significant positive effects in relation to air pollution. However, the entire Borough is designated an Air Quality Management Area. Further to this, the amount of development proposed by all options is expected to have significant adverse effects on air quality through population increase and a higher presence of cars. Some options also support development in the Green Belt, where access to public transport is not as easy. People in these locations may be more reliant on the car, which can have adverse effects on air quality. Overall, all options are also expected to have significant negative effects in relation to air pollution.

### Sustainable transport

**27.** As all options focus some development in the urban area with easy access to public transport, they all receive significant positive effects in relation to sustainable transport. The effects are recorded as uncertain, as uptake of walking and cycling is dependent on people's behaviour. A small number of the options also receive minor negative effects in relation to sustainable transport (2B, 2C, 3C, 3D, 8 and 9), as they support development in the Green Belt where access to public transport is not as good. Subsequently, residents are more likely to be reliant on the private car.

### Biodiversity

**28.** All options are expected to have significant negative effects in relation to biodiversity, as the zones of influence for the Lee Valley Special Protection Area and Ramsar site, and the Epping Forest Special Area of Conservation, extend into the Borough and indirect effects due to general population increase and pressure on any nature conservation sites, for example from recreation and increased air pollution, could still occur. Sites of Importance for Nature Conservation are spread relatively evenly across the Borough, with most containing a railway station. All options would therefore include land that falls within a Site of Importance for Nature Conservation. Options 2B, 2C, 3C, 3D, 8 and 9 also promote development in the Green Belt on brownfield and greenfield land, which can have biodiversity interest but be lost as a result of development. The effects are recorded as uncertain because designated nature conservation sites could be avoided through site design, and there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Options 8 and 9 are also expected to have minor positive effects in relation to biodiversity, as they would involve ambitious biodiversity improvements. The effects are uncertain, as their implementation is dependent on the timing and location of development.

### Historic environment

**29.** All options are expected to have adverse effects in relation to the historic environment because they all focus some development in the urban area where most heritage assets are located. As Options 1A and 1B support the lowest number of new homes in the Borough, they are expected to have minor negative effects in relation to the historic environment. Options 2A to 2C are also expected to have minor negative effects in relation to the historic environment because although they do not propose the lowest number of new homes when compared to the other growth scenarios, they propose a medium number of new homes not just within the urban area but spread more widely across the Borough. Option 2D is expected to have a significant negative effect, as it supports a medium number of homes in the urban area only.

The remaining options are also expected to have significant negative effects. The effects are recorded as uncertain, with the exception of 3A to 3D, as they could potentially reduce adverse impacts on the historic environment through mitigation and the design, scale and layout of development.

### Landscape and townscape

**30.** Due to the amount of development proposed under the high growth scenarios (Options 3A to 3D), they are all expected to have significant negative effects in relation to landscape and townscape. For Options 3C and 3D, the effect is recorded as uncertain because development within the Green Belt could be designed in a way that helps mitigate any adverse impacts on the character of the area. Options 1A and 1B support the lowest number of new homes in the Borough and any subsequent increase in density would not be comparable to that under the high growth scenarios. Options 1A and 1B are therefore expected to have uncertain minor negative effects in relation to landscape and townscape. Options 2A to 2D support a higher number of new homes than Options 1A and 1B and could therefore potentially result in more adverse effects on townscape and/or landscape character – particularly Option 2D which focuses development in the urban area only. Similar to Option 2D, Options 5 and 6 concentrate development within the urban areas to the east and west of the A10 respectively. Overall, Options 2D, 5 and 6 are expected to have uncertain significant negative effects in relation to landscape and townscape. Options 2A to 2C are expected to have uncertain minor negative effects. Options 7 to 9 could also result in an increase in density but not necessarily as much as the other options due to the identification of more sites in urban areas across which development could be distributed. Options 8 and 9 would deliver more homes than Option 7 but would spread this development more evenly across the Borough, including areas in the Green Belt for Options 8 and 9. Options 7 to 9 are expected to have uncertain minor negative effects in relation to landscape and townscape.

### Efficient use of land and materials

**31.** All options focus some development in the urban area, on previously developed land. As such, they are also expected to have significant positive effects in relation to efficient use of land. The options that also propose development in the Green Belt are also expected to have minor negative effects (Options 2B, 2C, 3C, 3D, 8 and 9), as although areas of Green Belt contain some brownfield land, they also contain greenfield land.

### Flooding

**32.** All options focus some development in the urban area, which contains land at risk of flooding. Further to this,

development would reduce the amount of permeable surface available. As such, all options are expected to have minor negative effects in relation to flood risk. The effects are uncertain, as development may be able to incorporate flood risk mitigation measures.

### Water

**33.** As all options contain land that falls within Source Protection Zones 1 and 2 but already contain built development, uncertain minor negative effects are expected in relation to water. The level of growth anticipated under Options 3A to 3D would place more pressure on water resources and water treatment capacity and so all four options receive uncertain significant negative effects in relation to water.

### Overall performance

**34.** Looking across the whole range of IIA objectives, the spatial strategy options that achieved the most positive effects, particularly significant positive effects, and the fewest negative effects, particularly significant negative effects, were (ranked from most sustainable to least sustainable):

- Option 1A: Baseline growth focused in the urban area only.
- Option 1B: Baseline growth focused in the urban area and employment areas.
- Option 2A: Medium growth focused in the urban area and employment areas.
- Option 2B: Medium growth in the urban area, employment areas and some release of Green Belt.
- Option 2C: Medium growth focused in the urban area and Green Belt.

**35.** The spatial strategy options that achieved the fewest positive effects, particularly significant positive effects, and the most negative effects, particularly significant negative effects, were (ranked from least sustainable to most sustainable):

- Option 3D: High growth focused in the urban area and Green Belt.
- Option 4: Focus growth outside the Borough.
- Option 3B: High growth focused in the urban area and employment areas.
- Option 6: Focus growth in the urban area west of the A10.

**36.** While these rankings provide some indication of the most and least sustainable spatial strategy options, they must be treated with caution since they implicitly assume that all IIA objectives are equally important and that all sustainability

topics are represented by equal numbers of objectives in the IIA framework.

### Reasons for choosing the preferred spatial strategy

37. In the June 2021 IIA Report, the Council's preferred option which formed the basis of the Local Plan spatial strategy was Option 2C: Medium growth in the urban area with some Green Belt release. In the December 2023 IIA Report, the Council's preferred option was Option 8: Medium to high growth focused in the urban area and Green Belt. Option 8 broadly aligns with Option 2C but delivers more homes as a result of additional urban sites and capacity. The Council's reasons for selecting this option and for discounting the other options were as follows.

#### Option 1A: Baseline growth focused in the urban area only

38. Discounted because it would not meet the required housing need that must be planned for and would not deliver the mix of housing types needed (as it would require mostly flats in tall buildings). Other land use requirements not met.

#### Option 1B: Baseline growth focused in the urban area and employment areas

39. Discounted because it would not meet the required housing need that must be planned for, would not deliver the mix of housing types needed, and would require limited use of Strategic Industrial Locations (SILs) so would not be in conformity with the London Plan. Other land use requirements not met.

#### Option 2A: Medium growth focused in the urban area and employment areas

40. Discounted because it would not deliver the mix of housing types needed and would require use of SILs so would not be in conformity with the London Plan. Other land use requirements not met.

#### Option 2B: Medium growth in the urban area, employment areas and some release of Green Belt.

41. Discounted because it would not deliver the mix of housing types needed, would require use of SILs so would not be in conformity with the London Plan, and Green Belt release which may be contrary to the National Planning Policy Framework (NPPF). Other land use requirements not met.

#### Option 2C: Medium growth focused in the urban area and Green Belt

42. Selected as the Preferred Option in the June 2021 IIA Report because it would meet the required housing need that must be planned for and mix of housing types. Although it involves some limited Green Belt release, it would not require use of SIL. Other land use requirements met in full or close to full. Positive enhancements to existing employment areas.

#### Option 2D: Medium growth focused in the urban area only

43. Discounted because it would not meet the required housing need that must be planned for and would not deliver the mix of housing types needed (as it would require mostly flats in tall buildings). Other land use requirements not met.

#### Option 3A: High growth focused in the urban area only

44. Discounted because it would result in very high density development and tall buildings in the urban area resulting in significant change to the Borough's character and not deliver the mix of housing types needed.

#### Option 3B: High growth focused in the urban area and employment areas

45. Discounted because it would result in very high density development and tall buildings in the urban area resulting in significant change to the Borough's character and not deliver the mix of housing types needed. It would also require significant use of SIL contrary to London Plan policy.

#### Option 3C: High growth across the Borough including the urban area, employment areas and the Green Belt

46. Discounted because it would result in very high density development and tall buildings in the urban area resulting in significant change to the Borough's character and not deliver the mix of housing types needed. It would also require significant use of SIL and Green Belt release contrary to London Plan policy and the NPPF.

#### Option 3D: High growth focused in the urban area and Green Belt

47. Discounted because it would result in very high density development and tall buildings in the urban area resulting in significant change to the Borough's character and not deliver the mix of housing types needed. It would also require significant Green Belt release contrary to the NPPF.

#### Option 4: Focus growth outside the Borough

48. Discounted because none of the neighbouring authorities were willing to take Enfield's housing and other land use requirements, and the Borough would be likely to

suffer decline or stagnation and be unable to lever in investment and infrastructure improvements.

#### **Option 5: Focus growth in the urban area east of the A10**

**49.** Discounted because it would result in very high density development and tall buildings in the urban area east of the A10, and would not meet the housing need or deliver the mix of housing types needed. It would also require significant use of SILs contrary to London Plan policy. It would not be able to address inequality and east/west imbalances and there could be stagnation of western areas in the Borough.

#### **Option 6: Focus growth in the urban area west of the A10**

**50.** As for Option 5 but could result in stagnation of eastern areas rather than western.

#### **Option 7: Revised baseline growth focused in the urban area only**

**51.** Discounted because it would not help address the housing shortfall across London as a whole, and it would not deliver the mix of housing types needed in Enfield (as it would mostly deliver flats many of which would be in tall buildings, the viability of which is worsening). Other land use requirements not met.

#### **Option 8: Medium to high growth focused in the urban area and some Green Belt**

**52.** Selected as the Preferred Option in the December 2023 IIA Report because it would help address the housing shortfall across London as a whole, enable better place-making and provide a mix of housing types (including more family and more affordable homes). Although it involves some Green Belt release, it would not require the release of SIL for housing. Other land use requirements met in full or close to full.

**53.** This option would positively enhance existing employment areas to become more sensitively integrated with the wider neighbourhood. It would also offer significant opportunities to enhance remaining Green Belt areas and provide better sustainable access for food production, forestry, eco-tourism, recreation, education, leisure and sporting excellence and natural burial, for new and existing residents.

#### **Option 9: Medium to high growth focused in the urban area and some Green Belt**

**54.** Discounted because while it would do more to meet family and affordable housing needs than Option 7, it would not deliver the same level of benefits as Option 8.

Table 2: IIA findings for the spatial strategy options

IIA objective	1A	1B	2A	2B	2C	3A	3B	3C	3D	4	5	6	7	8	9
IIA1: Climate change mitigation	++	++/-	++	++/-	++/-	++	++	++	++/-	++/-	++	++	++	++/-	++/-
IIA2: Climate change adaptation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IIA3: Housing	++/-	++	+++	++	+++	+++/-	++/-	+++	++	+++	++/-	++/-	++	+++	+++
IIA4: Health and wellbeing	++	++	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-
IIA5: Services and facilities	++	++	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-
IIA6: Social inclusion	++/-	++/-	+	+	+	+/-	+/-	+/-	+/-	+/-	++/-	+/-	+/-	+	+
IIA7: Crime and community safety	-?	-?	-?	-?	-?	-?	--?	--?	--?	--?	-?	-?	-?	-?	-?
IIA8: Road safety	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IIA9: Economy	++	++/-	++/-	++/-	++/-	++	++	++/-	++/-	++/-	++/-	++/-	++	++/-	++/-
IIA10: Town and local centres	++	++	++	++	++	++	++	++	++	++	+	+	++	++	++
IIA11: Air pollution	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-
IIA12: Sustainable transport	+++	+++	+++	+++/-	+++/-	+++	+++	+++	+++/-	+++/-	+++	+++	+++	+++/-	+++/-
IIA13: Biodiversity	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?/+?	--?/+?
IIA14: Historic environment	-?	-?	-?	-?	-?	--?	--	--	--	--	--?	--?	--?	--?	--?
IIA15: Landscape and townscape	-?	-?	-?	-?	-?	--?	--	--	--?	--?	--?	--?	-?	-?	-?
IIA16: Efficient use of land and materials	++	++	++	++/-	++/-	++	++	++	++/-	++/-	++	++	++	++/-	++/-
IIA17: Flooding	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?
IIA18: Water	-?	-?	-?	-?	-?	-?	--?	--?	--?	--?	-?	-?	-?	-?	-?

## Appraising the Local Plan proposals

**55.** The Local Plan policies were appraised independently of one another and the findings are summarised below.

### Good growth in Enfield (Chapter 2 of the Local Plan)

#### Vision and strategic objectives

**56.** Chapter 2 of Enfield's Publication Version Local Plan ('Good growth in Enfield') sets out the vision for the Borough, which is underpinned by four guiding themes: (1) A nurturing place; (2) A deeply green place; (3) The workshop of London; and (4) A distinct and leading part of London. Further detail is then provided by 20 strategic objectives. The IIA appraised this chapter of the Local Plan with the findings presented in Chapter 4 of the full IIA Report.

**57.** In summary, the vision and strategic objectives are expected to have significant positive effects in relation to the following topics / IIA objectives: climate change mitigation; climate change adaptation; housing; health and wellbeing; social inclusion; economy; town and local centres; sustainable transport; biodiversity; and flooding. Strategic objective 14, which seeks industrial intensification amongst other things, received uncertain minor negative effects in relation to climate change mitigation and air pollution, as industrial intensification could lead to an increase in carbon emissions due to industrial activity and an influx of workers from outside of the Borough that use private vehicles to commute.

**58.** Due to the fact they are not specifically mentioned or indirectly affected, the vision's contribution to the achievement of the following objectives is likely to be negligible: climate change adaptation; crime and community safety; road safety; and efficient use of land and materials. The strategic objectives are also expected to have negligible effects on these objectives, with the exception of climate change adaptation.

#### Strategic Policies SS1 and SS2

**59.** Chapter 2 of Enfield's Publication Version Local Plan also contains two strategic policies: SS1: Spatial strategy and SS2: Making good places. The first of these sets out the spatial strategy for the area (i.e. where development will be distributed and how much there will be). The second policy sets out the different ways in which development proposals can contribute towards making good places. The policies scored very positively in relation to the IIA objectives, with Policy SS1 expected to have significant positive effects in

relation to housing, economy, and town and local centres. However, Policy SS1 is also expected to have uncertain minor negative effects in relation to the historic environment, landscape and townscape, flooding, and water. This is due to the large amount of development proposed by the spatial strategy, which could adversely affect the landscape and townscape, and heritage assets and their settings. Further to this, there are some areas located within areas at risk of flooding and the amount of development proposed by the spatial strategy would place pressure on water resources and water treatment capacity.

### Places (Chapter 3 of the Local Plan)

**60.** Chapter 3 of Enfield's Publication Version Local Plan ('Places') sets out eleven strategic policies for the eleven proposed placemaking areas within the Borough. The IIA appraised this chapter of the Local Plan with the findings presented in Chapter 5 of the full IIA Report.

**61.** In summary, the strategic policies for the proposed placemaking areas performed more positively than negatively, particularly in relation to the following objectives: climate change mitigation; housing; health and wellbeing; services and facilities; economy; town and local centres; sustainable transport; and efficient use of land and materials, which received the most significant positive effects. Only a small number of negative effects were recorded, but particularly in relation to biodiversity, the historic environment, flooding, and water. Strategic Policy PL7: New Southgate is expected to have a significant negative effect in relation to biodiversity, as the placemaking area contains a Priority Habitat and is within 250m of Arnos Park Site of Importance for Nature Conservation. Strategic Policy PL4: Angel Edmonton is expected to have an uncertain significant negative effect in relation to the historic environment due to the effects its regeneration could have on nearby heritage assets, including the Fore Street South Conservation Area, Fore Street Angel Conservation Area, Fore Street North Conservation Area, Upper Edmonton Archaeological Priority Area, listed buildings and local heritage assets.

**62.** Strategic Policy SP PL4: Angel Edmonton is expected to have a mixed significant positive and uncertain significant negative effect in relation to health and wellbeing, as although the placemaking area contains a GP surgery and the policy seeks funding towards a new integrated health and wellbeing centre, the area contains a number of open spaces that could be lost as a result of development. It is unknown whether these existing open spaces will be incorporated into the new design for the area, and so the effect is recorded as uncertain. Strategic Policy PL10: Chase Park is expected to have an uncertain significant negative effect in relation to the efficient use of land and materials, as the placemaking area mainly comprises greenfield land and so its development is not the

most efficient use of land. The land is classed as Grade 3 agricultural land but due to the fact the GIS data does not distinguish between Grades 3a (high quality) and 3b (not high quality) agricultural land, uncertainty is recorded.

### Other topics (Chapters 4 to 15 of the Local Plan)

**63.** Chapters 4 to 15 of Enfield's Publication Version Local Plan cover the following topics:

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

**64.** The IIA appraised these chapter of the Local Plan with the findings presented in Chapter 6 of the full IIA Report.

**65.** In summary, only significant positive and minor positive effects were identified for the policies contained within the following chapters of the Local Plan:

- Chapter 4 Sustainable Enfield;
- Chapter 5 Addressing equality and improving health and wellbeing;
- Chapter 10 Town centres and high streets;
- Chapter 12 Culture, leisure and recreation;
- Chapter 13 Movement and capacity;
- Chapter 14 Environmental protection; and
- Chapter 15 Delivering and monitoring.

**66.** The policies in Chapter 6 of the Local Plan ('Blue and green Enfield') scored more positively than negatively, with Strategic Policy BG1: Enfield's blue and green infrastructure network expected to have significant positive effects in relation to climate change mitigation, health and wellbeing, sustainable transport, biodiversity, landscape and townscape, and water. Strategic Policies BG2: Protecting nature conservation sites,

BG3: Protecting Epping Forest Special Area of Conservation, BG4: Biodiversity net gain, landscape restoration and offsetting and BG7: Strategy for enhancing the beneficial uses of the Green Belt and Metropolitan Open Land also perform strongly, each receiving significant positive effects in relation to biodiversity. Further to this, Strategic Policies BG5: Green Belt and Metropolitan Open Land and BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land receive significant positive effects in relation to landscape and townscape.

**67.** However, Policy DM BG12: Burial and crematorium spaces is expected to have significant negative effects in relation to biodiversity, landscape and townscape, and the efficient use of land and materials, and minor negative effects in relation to health and wellbeing, sustainable transport, the historic environment, and water. This is due to the fact the burial/crematorium sites allocated under this policy contain or are close to a Priority Habitat, with one of the sites also located within 250m of two Sites of Importance for Nature Conservation, and so could have adverse effects on biodiversity. The effect against biodiversity is recorded as uncertain because mitigation may avoid adverse effects. The sites allocated under this policy are also located on greenfield land with one of them classed as Grade 3 agricultural land, and the burial and crematorium site would result in a loss of space. Further to this, the sites are not easily accessible, could have adverse effects on nearby heritage assets and contribute to surface water flooding. Some minor negative effects are also expected in relation to housing, the economy, and water, as some of the policies prevent development in certain areas, which includes residential and employment development. There is also some emphasis on water-borne freight and passenger transport along the River Lea Navigation via Policy DM BG9: Watercourse, which could contribute towards water pollution.

**68.** The policies contained in Chapter 7 of Enfield's Publication Version Local Plan ('Design and character') also performed more positively than negatively, with policies receiving significant positive effects in relation to the following topics: climate change mitigation; health and wellbeing; services and facilities; social inclusion; crime and community safety; road safety; the economy; sustainable transport; biodiversity; the historic environment; and landscape and townscape. Although no significant negative effects are expected, some minor negative effects are. Development Management Policies DE8: Design of business premises and DE9: Shopfronts and advertisements both received minor negative effects in relation to the economy, as they could restrict economic development due to the restrictions set out in each policy regarding design, business advertising and signage. Similarly, Policy DM DE15: Residential extensions and outbuildings may prevent people from adapting their



homes and so received a minor negative effect in relation to housing. Development Management Policy DE10: Conserving and enhancing heritage assets received an uncertain minor negative effect in relation to climate change mitigation (as part of a mixed effect), as although it seeks to improve the energy efficiency of heritage assets, the criteria included in the policy could make improving energy efficiency of heritage assets harder to achieve due to reasons of viability.

**69.** The policies in Chapter 8 of the Local Plan ('Homes for all') also performed more positively than negatively, although some adverse effects were recorded in relation to housing, health and wellbeing, and social inclusion for Development Management Policy H10: Traveller accommodation. This is because the policy seeks to meet the accommodation needs of Gypsies and Travellers but not Travelling Showpeople. Therefore, it would not meet the needs of all.

**70.** The policies in Chapter 9 of the Local Plan ('Economy') also performed more positively than negatively, although some adverse effects were recorded for Development Management Policy E12: Meridian Hinterlands. The policy is anticipated to have uncertain significant negative effects in relation to the historic environment, landscape and townscape, flooding, and water, due to the sensitivity of the site and the fact it is at risk of surface water flooding and contains watercourses, yet no mitigation is provided by the policy. The site is also expected to have a minor negative effect in relation to biodiversity, as it is located within the Lea Valley Site of Importance for Nature Conservation (SINC), yet no provision is made for mitigating the impacts of development on the SINC.

**71.** The policies in Chapter 11 of the Local Plan ('Rural Enfield') also performed positively and only Development Management Policy RE1: Character of the Green Belt and open countryside was expected to have adverse effects, specifically in relation to housing and the economy. This is because it prevents development adjoining to or close to the Green Belt.

## Cumulative effects

**72.** The effects of the Local Plan as a whole are referred to as 'cumulative effects' and are set out in Chapter 7 of the full IIA Report. They highlight that many of the potential negative sustainability effects identified for individual components of the Local Plan (the vision, strategic objectives and policies), as described in the previous section of this Non-Technical Summary, will be reduced or avoided by strong policy requirements governing all future development in the Borough.

**73.** Geographically, there is potential for some cumulative effects to be felt across the Borough due to the large-scale

development proposed in a range of locations (e.g. potential increases in air pollution). Other cumulative effects, both positive (e.g. for social inclusion, local economy or health and wellbeing) and negative (e.g. for historic environment or biodiversity), are likely to be concentrated in particular locations within the Borough where a cluster of new growth/intensification occurs, e.g. in the south east around Edmonton Green, Meridian Water and Angel Edmonton, or the centre of the Borough around Enfield Town and Southbury, or the new settlements at Chase Park and Crews Hill.

## Next steps

### Submission, examination and adoption

**74.** This Non-Technical Summary will be available on the Council's website and accompany the IIA Report, which will be consulted on together with the Publication Version Local Plan.

**75.** Once the period for representations on the Publication Version Local Plan and IIA Report is complete, the Council will consider whether the Plan is 'sound'. If this is the case, the Plan will be submitted for examination alongside the IIA Report.

**76.** At examination, the Inspector will consider the representations received on both the Local Plan and IIA, before reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications, these will be prepared and published for consultation alongside an IIA if necessary.

**77.** Once found to be 'sound', the Local Plan will be adopted by the Council. At that time, the 'IIA Adoption Statement' must be published that sets out certain information including on monitoring indicators.

### Monitoring

**78.** Chapter 8 of the IIA Report suggests indicators for monitoring the potential sustainability effects of implementing the Local Plan. It is then for the Council to choose an appropriate monitoring framework in light of practical considerations around available resources.

LUC

February 2024

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