



# Report to London Borough of Enfield

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an Inspector appointed by the Secretary of State  
for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004  
SECTION 20

**REPORT ON THE EXAMINATION INTO THE LONDON BOROUGH  
OF**

**ENFIELD CORE STRATEGY**

**DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 16 March 2010

Examination hearings held on 29 June and 8 July 2010

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## ABBREVIATIONS

AAP	Area Action Plan
AQMA	Air Quality Management Area
BD	Background Document
CIL	Community Infrastructure Levy
CS	Core Strategy
CSSD	Core Strategy Submission Document
DPD	Development Plan Document
EB	Evidence Base (Document)
FMC	Further Minor Change
GLA	Greater London Authority
GOL	Government Office for London
ha	Hectares
IDP	Infrastructure Delivery Plan
LB	London Borough
LBE	London Borough of Enfield
LP	London Plan
LPA	Local Planning Authority
LSIS	Locally Significant Industrial Site
LVRP	Lee Valley Regional Park
MDS	Major Development Site
NGAP	Northern Gateway Access Package
NLSA	North London Strategic Alliance
NMP	National Minerals Policy
pdl	Previous developed land
PMC	Proposed Minor Change
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
s	Section
SAC	Special Areas of Conservation
SCI	Statement of Community Involvement
SIL	Strategic Industrial Location
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
TfL	Transport for London
UDP	Unitary Development Plan
ULVOA	Upper Lee Valley Opportunity Area

### **Non-technical Summary**

**This report concludes that the Enfield Core Strategy provides an appropriate basis for planning of the borough over the next 15 years. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.**

**I have found no need to make any recommendations that require changes to the Core Strategy relating to its soundness. Other changes, which I endorse, are of a minor nature and are based on suggestions put forward by the Council either in response to points raised by participants or for purposes of clarity, factual correction, consistency, correcting typographical errors or to improve referencing/signposting within the document. They do not alter the essential thrust of the Council's overall strategy.**

<b>LEGAL REQUIREMENTS</b>	
Local Development Scheme (LDS)	The Core Strategy DPD is identified within the Council's Local Development Scheme 2010-2012 (BD-02). The Local Development Scheme was brought into effect in March 2010. There, the Core Strategy DPD is shown as having a submission date of February 2010. The Core Strategy is compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The Council's Statement of Community Involvement (SCI) (BD-04) has been found sound by the Secretary of State and was formally adopted by the Council in June 2006. The Council has met the requirements set out in the Regulations, including Regulation 30(1)(d) and 30(1)(e) Statements (CSSD-06) and its Self Assessment of Soundness (CSSD-07).
Sustainability Appraisal (SA)	Alongside the preparation of the DPD the Council has carried out a parallel process of sustainability appraisal (CSSD-04). It has been independently verified and is adequate.
Appropriate Assessment	In accordance with the Habitats Directive, an Appropriate Assessment has been undertaken (EB-12). It confirms that there would be no significant harm to the conservation of the SACs, SPAs and European sites that lie either within Enfield or neighbouring districts.
National Policy	The Core Strategy complies with national policy.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS (BD-10).
2004 Act & Regulations	The Core Strategy complies with the Act and the Regulations.

## **1 Introduction and Overall Conclusion**

- 1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:
  - (a) whether it satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document; and
  - (b) whether it is sound.
- 1.2 This report contains my assessment of the London Borough of Enfield Core Strategy DPD in terms of the above matters, along with my recommendations and the reasons for them, as required by s20(7) of the 2004 Act.
- 1.3 Appendix A to my report contains a number of minor changes suggested by the Council. The changes are in 2 parts. The first schedule was produced by the Council following publication of the pre-submission Core Strategy DPD (Schedule of Minor Changes CSSD-08)). The second, comprises changes suggested by the Council during the examination (Further Minor Changes (CSSD-11)). Both sets of changes have been suggested by the Council to improve the document and do not affect the soundness of the Plan. As they do not affect the soundness of the plan they are not dealt with in this report, but they are endorsed in the light of the Council's wish to include them.
- 1.4 I am satisfied that the DPD meets the requirements of the Act and Regulations. My role is also to consider the soundness of the submitted Core Strategy against the advice set out in Planning Policy Statement 12 (PPS12) paragraphs 4.51-4.52. In line with national policy, the starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. My overall conclusion is that the Core Strategy DPD is sound.

## **2 General & Background**

- 2.1 The DPD begins by providing the national, regional and local policy context to the Council's Core Strategy. It then goes on to confirm Enfield's strategic objectives. It then outlines the borough's spatial strategy the main thrust of which is to focus future growth and development on 4 strategic growth areas located in Central Leaside, North East Enfield, Enfield Town and the area around the North Circular Road at New Southgate. The DPD contains 46 policies and is some 236 pages long of which 67 pages comprise appendices. The policies are arranged in sections dealing with housing, economic development, physical infrastructure, environmental protection and green infrastructure, place making and implementation and monitoring.

- 2.2 **Please note that the numbering and coverage of the issues I deal with in the report do not follow the issues for examination that I listed at my Pre-Hearing Meeting (Pre-Hearing Meeting Notes, 12 May 2010). To avoid repetition and to deal succinctly with what I regard as the key issues, I have combined some issues and excluded others where I do not see them addressing the basic soundness of the CS or where the Council has dealt with them through a proposed minor change to the CS.**

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### **3 Assessment of Soundness**

- 3.1 ***Issue 1 – Whether the CS represents an effective holistic document in accordance with PPS12 guidance.***
- 3.2 The CS has been prepared fully in accord with the guidance laid down in PPS12. The strategy and policies are based on a substantial and focused evidence base that is both robust and credible. The strategy timeline of 15 to 20 years exceeds that laid down in PPS12 (paragraph 4.13). Deliverability is set out in an Infrastructure Delivery Programme. The CS policies have been written to allow for changing circumstances to provide flexibility and monitoring will be carried out through an extensive list of measurable actions/indicators against defined targets where appropriate (CS, Section 10.3). I find the CS is sound, being justified, flexible and consistent with national policy and in conformity with the London Plan.

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- 3.3 ***Issue 2 – Whether the regeneration schemes proposed for the 4 strategic growth areas are deliverable and viable.***
- 3.4 The Core Strategy (CS) proposes an impressive range of regeneration schemes to provide for a substantial increase in homes (11,000+ units) and jobs (6,000+). This order of growth will require additional infrastructure and community services to improve and support the existing and proposed increase in population over the period of the plan (2010/2011 to 2024/2025). Much of the new development is proposed to the south and on the eastern side of the district on previously developed land (pdl) often within Flood Zones 2 and 3. The CS acknowledges that flood risk presents a major challenge (paragraph 8.3).
- 3.5 The development of pdl could involve the prospect of having to deal with pollution on land formerly used for utilities, the cost of contributions towards flood defence/mitigation as well as other infrastructure and social infrastructure including affordable housing

and new schools. Given these factors, I posed the following questions of the Council: how it rated its prospects of delivering the strategy's planned development in the early years of the plan in the present depressed state of the economy? Whether there was evidence of current developer interest in developing in the district as a whole; and, if yes, whether that interest extends to those regeneration schemes planned for the early years of the plan?

- 3.6 The Council acknowledges that, in the current economic climate, the biggest risk to the delivery of development in the early (5 years) plan period is the recovery of the construction and house building industry (LBE/Issue 1). The CS envisages a minimum of a 15 year plan. The current uncertainty is not addressed in policy wording as economic cycles dictate that recovery is possible within the plan period. To provide certainty in delivering its objectives in the early period the Council has sought to profile schemes and establish a sound planning framework that will help create the conditions to attract capital investment and allow the Council to steer investment in ways to secure delivery.
- 3.7 Accordingly, it has phased development in the early years to progress developments which take a strong public sector lead. In the medium to long term, where delivery would be more dependent on private land interests and economic conditions, the Council, through a series of public partnerships and investment, is working to provide greater confidence by investing in master planning and viability work that will investigate the key challenges of the borough's pdl sites.
- 3.8 The evidence base to support the CS recognises the cumulative implications of development within the borough and in neighbouring boroughs. It has produced an Infrastructure Delivery Plan (IDP) (CSSD-10); it has engaged widely with statutory consultees and other partners in drawing up its strategy which is supported by its borough wide Transport Assessment (EB-18a). It will be contributing to the forthcoming Upper Lee Valley Transport Study that will be key to unlocking the potential for change in the Upper Lee Valley. It is confident that the challenges to its development proposals represented by the risk of flooding will be surmountable by adopting PPS25's sequential approach.
- 3.9 Although key sites within the overall regeneration and development package proposed in the strategy are wholly, or partly, within Flood Zones 2 or 3, I am satisfied that their development/redevelopment will be undertaken in such a way as to accord with PPS25 policies and thereby reduce the risk of flooding to acceptable levels in line with EA advice.

*Whether CS regeneration proposals are currently showing active developer interest?*

- 3.10 The Council confirms that it is taking a proactive role in the delivery of Place Shaping in the borough. Despite the current recession developer interest is strong in many parts of the borough which coupled with public sector investment will ensure delivery of regeneration programmes.
- 3.11 The Council lists schemes within **Meridian Water, Angel Edmonton, Enfield Town** and the **North Circular Road** where substantial development is under way or where there is active developer interest much of it on Council owned land. In addition, at **Ponders End** and **South Brimsdown**, three key development areas are identified at **Ponders End Central, Ponders End South Street Campus** and **Ponders End Waterfront**. Of 5 sites earmarked for development and following viability assessments, only one, (South Brimsdown) is regarded as likely to require public sector intervention.
- 3.12 The Infrastructure Delivery Plan outlines the proposed infrastructure to be delivered within the plan period. Infrastructure Schedule A4.1-A49 sets out the proposed infrastructure to be included in the Strategic Growth Areas where the majority of the housing and employment is to be concentrated. A Planning Contributions & Community Infrastructure Levy Supplementary Planning Document (SPD) is to be produced in 2011. A key consideration of the SPD will be that any proposed levy should not inhibit development in the borough.

#### Conclusions on Issue 2

- 3.13 Notwithstanding the effects of the current economic recession, I consider that the Place Shaping Priority Areas proposals for both the early years and for the remainder of the plan period are flexible, viable and deliverable and that the CS is sound.

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- 3.14 ***Issue 3 – Whether Core Policy 1 is effective and justified in focusing strategic growth on the 4 areas identified.***
- 3.15 The Council's approach to focusing growth on 4 Strategic Growth Areas is founded on what I accept is an extensive robust and credible evidence base. The strategy is consistent with the London Plan (LP) and will seek to address the disparities across the borough that are evident in health, wealth, education attainment and environmental attainment by concentrating development in those areas where the levels of deprivation and need are greatest. It has been accepted as providing the most appropriate strategy when considered against reasonable alternatives. As already discussed under issue 2 I find the strategy is deliverable and flexible given the



constraints on development imposed by the current economic conditions. The strategy is capable of being monitored and Section 10.3 of the CS provides for that to be done. I find Core Policy 1 is sound in basing its strategy on the 4 Strategic Growth Areas.

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3.16 ***Issue 4 - Whether the amount of housing proposed in Core Policy 2 (Housing Supply & Locations for New Homes) can be provided in the Strategic Growth Areas; whether the quantum of housing proposed is based on a robust, credible and transparent evidence base; whether alternative delivery locations other than the Strategic Growth Areas need to be identified.***

3.17 Core Policy 2 of the CS plans to provide for some 11,000 new homes (some 730 units pa) in the 15 year period 2010/11 to 2024/25. This is well in excess of the 3,950 (395 pa) ten year target in the current LP. It also comfortably exceeds the increased target of 5,600 units (560 pa) proposed for the ten year period 2011/12 to 2021/22 in the emerging draft Replacement LP. The breakdown provided in Core Policy 2 shows where the new housing will be located. Of the indicative target of 2,690 units for the first 5 years of the plan, the 4 Strategic Growth Areas would provide some 37%, other large sites some 18% and small sites some 45%. The evidence base includes the Enfield Housing Trajectory Justification Report 2009 (EB-03) and the GLA's Strategic Housing Land Availability Assessment & Housing Capacity Study 2009 (EB-21A). These support the attainability of the CS's housing proposals.

3.18 Further detailed justification for its approach to achieving its housing targets is provided by the Council in its paper LBE/Issue 11 and in evidence provided in its rebuttal of a respondent's assertion that a number of sites included in its Housing Trajectory Justification Report were not deliverable.

3.19 I am satisfied that the quantum of housing proposed in the Strategic Growth Areas is deliverable over the period of the plan and, even in the early years when economic conditions are likely to prove difficult, all reasonable measures are being undertaken by the Council to ensure that delivery will stay on target (see Issue 2 above). The Council's housing evidence and its further elaboration of that evidence set out in LBE/Issue 11 paper have not been seriously challenged. I find that the strategy's indicative housing supply figures and the proposed locations, set out in Core Policy 2 are sound.

3.20 The CS's housing allocations are so far in excess of the LP requirement both in the current and emerging Replacement LP that I see no reason or justification for the CS to identify alternative locations for the provision of housing in the borough.

- 3.21 The CS is sound with regard to the proposed location of housing, the quantum proposed, its anticipated delivery and the evidence base on which these matters are founded.

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- 3.22 ***Issue 5 - Whether in order to be effective Core Policy 5 (Housing Types) needs to confirm that new housing types and sizes will need to be updated to reflect the findings of Strategic Housing Market Assessments (SHMAs) & Local Market Assessments (LMAs) when reviewed.***

- 3.23 The policy reflects the present under-provision of particular types of housing. The forthcoming Development Management DPD will set out arrangements for its application on a site by site basis. The policy will be applied flexibly in recognition that the housing mix recommended will not be appropriate on some sites. The policy will be kept under review as part of the Council's monitoring systems. If that process suggests that the policy's housing mix does not reflect needs as and when SHMAs or LMAs are undertaken, the policy will be reviewed. No change is required. The policy is effective and sound as drafted.

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- 3.24 ***Issue 6 – Whether the Council is aware of the proportion of pdl sites identified in the Housing Trajectory Justification Report 2009 (EB-03) that would be regarded as having “abnormal” site conditions that would affect delivery of affordably housing.***

- 3.25 As already mentioned, some 37% of the CS's housing supply, in the first 5 years of the plan, would be located in the 4 Strategic Growth Areas. The Council confirmed (Hearing Agenda Issue Paper LBE/Issue 12A) that, of the sites identified in the Enfield Housing Trajectory Justification Report 2009 (EB-03), 26 sites covering 71 ha (out of 70 sites covering some 106 ha) are located within flood risk areas and/or are potentially contaminated due to historic land use. However, 5 of these sites are under construction and therefore provide confidence that, in spite of potential constraints, development continues to be viable enough to proceed.

- 3.26 Of the remaining 21 sites, the biggest contributors are 2 sites totalling 41.3 ha. These are made up of land around IKEA and Tesco N18 in Central Leaside (19 ha) and North Circular Road (from Bounds Green Road to Callard Avenue) (22.31 ha). Only a small part of that area falls in a flood zone. The Council's paper LBE/Issue 12A provided sufficiently convincing evidence to persuade me that the incidence of “abnormal” costs would not significantly affect the delivery of affordable housing in the early, or later, years of the plan period.

- 3.27 The Council has agreed a 3 year target with the GLA to deliver 648 affordable homes (2008/9 to 2010/11). The Council's assessment that these are deliverable because there are enough schemes in the affordable housing programme is not disputed. For the early years, the Council identifies 8 large and 2 small sites that are shown to be deliverable, with affordable housing and are scheduled for completion in the first five years of the plan.

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- 3.28 ***Issue 7 – Whether the CS should be considered independently of the Infrastructure Delivery Plan (IDP); whether Core Policy 1 should make reference to the IDP.***

- 3.29 The IDP (CSSD-10) forms part of the evidence base. It has been produced in accordance with paragraph 4.8 of PPS12 and sets out the additional infrastructure that will be required to support the planned levels of growth within the 4 Strategic Growth Areas. The CS cannot be considered separately from the evidence base. A minor change is proposed (FMC12) to clarify the link between the strategic growth areas and their infrastructure requirements contained in the IDP. I find the CS is sound in this respect and consistent with PPS12 guidance.

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- 3.30 ***Issue 8 – (i) Whether the CS spatial strategy and proposed infrastructure framework will be effective in retaining businesses and attracting new.***
- (ii) Whether the CS proposals to safeguard employment land are justified; and***
- (iii) Whether the boundaries of the safeguarded employment areas are appropriately drawn in relation to: Harbet Road Industrial Estate/Meridian Water; Commercial Road and New Southgate Industrial Estates.***
- (iv) Whether Core Policy 37 is unsound because it does not specifically support the continued use of the Eco Park site for waste management purposes.***

***(i) The spatial strategy***

- 3.31 The borough contains a significant proportion of London's stock of employment land. Core Policy 13 seeks to protect and improve Enfield's employment offer by helping to facilitate the creation of at least 6,000 new jobs over the period of the plan (4,000 + jobs in

the Upper Lee Valley and another 2,000 + in town centres and other Place Shaping Priority Areas).

- 3.32 The Enfield Employment Land Study 2006 (EB-07) and its review (Enfield Employment Land Update 2009 (EB-08)) underpin the Council's employment strategy. Following those studies, the Council has reviewed and rationalised its employment land bank with the objective of protecting, promoting and growing the local economy and safeguarding jobs while exploiting under-used and vacant land through regeneration in its Place Shaping Priority Areas. In my judgement the strategy represents a balanced approach in promoting urgently needed regeneration while retaining, for the most part, its strategic and locally important employment areas. The CS therefore sets a framework that should help to retain existing businesses while attracting new and modern ones to its existing employment areas and those areas identified for mixed development.

(ii) **Whether proposals to safeguard employment land are justified**

- 3.33 Core Policy 14 will safeguard 11 sites totalling some 309 ha identified under the London Plan (LP) as strategically important Strategic Industrial Locations (SILs). In addition, Core Policy 15 will safeguard some 31.9 ha of employment land on 9, Locally Significant Industrial Sites (LSISs). Land at Meridian Water (some 23 ha) and south Brimsdown (3 ha), at present identified indicatively as SIL, will be used to aid regeneration of 2 of the Strategic Growth Areas at Central Leaside and Ponders End (part of North East Enfield). Also in order to support regeneration, some 3.4 ha of LSIS land presently used for employment purposes will be developed for mixed uses.
- 3.34 This package is supported by the GLA which is concerned to ensure that strategic employment land is used sustainably and will be sufficient to meet London's planned economic and population growth. To this end the GLA identifies Enfield as a borough where limited transfer of industrial sites would be acceptable (GLA-Supplementary Planning Guidance - Industrial Capacity 2004). The loss of 26 ha of SIL to mixed development will be more than compensated for by designating an additional 60 ha of employment land as SIL resulting in a net gain of about 33 ha. New SIL designations will be made at Innova Park (about 26 ha), Aztec 406 (18 ha) and Edmonton Eco Park (16 ha).
- 3.35 Notwithstanding the proposed loss of 26 ha of SIL land, it is intended that, on redevelopment, a substantial element of modern employment floorspace at least equivalent to existing employment floorspace will be provided to meet the needs of local businesses. The same requirement is to be applied where land previously identified as LSIS is to be used to support regeneration. In the

circumstances I find that the measures proposed in the CS to safeguard employment land are sound.

***(iii) Whether the boundaries of employment areas are appropriately drawn.***

- 3.36 Criticism is made in respect of 3 existing employment areas. Under the employment strategy, Harbet Road Estate is to remain as a SIL site and Commercial Road Estate is to continue to be protected as a LSIS. A third, New Southgate, another LSIS, is to be partly redeveloped to aid regeneration of an adjoining housing estate.

**Harbet Road Industrial Estate/Meridian Water**

- 3.37 This estate forms part of a collection of employment sites to the south of the North Circular Road known collectively as Meridian Water, which in turn is within the wider employment area of Central Leaside. To the west of the canal Meridian Water is dominated by gas holders, 2 large retail stores (Ikea & Tesco), their car parks and vacant land. Harbet Road Estate, at some 18 ha, makes up the eastern part of the group and is separated from it by the canalised River Lee Navigation. It is more intensively developed than the central area.
- 3.38 The Harbet Road estate contains some 200 businesses providing an estimated 1,500 jobs. The Stonehill Estate makes up about half of the total area of the Harbet Road complex and approximately a third of its floorspace of the Stonehill part is vacant, much of it related to a single property. The land owner argues that the whole of the Harbet Road Estate should be de-designated from SIL and included in the mixed use regeneration of Meridian Water.
- 3.39 Harbet Road Estate makes a significant contribution to the local job market. Although the estate is well related to the strategic road network it is not as accessible in terms of public transport as the land to the west nor is it as well located to existing residential areas. It has a large number of ownerships and there is no guarantee that all landowners would wish to go down the mixed development route. While its premises command lower rents than better appointed estates elsewhere, it provides a variety of business premises that can continue to be attractive to small and medium sized businesses. Release of Stonehill Estate alone could create a relatively small pocket of residential use isolated from essential infrastructure such as schools.
- 3.40 Moreover, the land to the west represents a large and substantially under-used resource. It has the advantage of being in a small number of ownerships. The scale of development envisaged for the core of Central Leaside would support community and transport infrastructure that is required for the new community and improve that for existing residents in an area of high unemployment and deprivation. Furthermore, if public funding is constrained over the

early years of the plan, as is probable, concentrating redevelopment resources on the 23 ha central core is likely to be more successful than would be the case if it had to be spread more widely to embrace the less accessible Harbet Road area.

- 3.41 In contrast to Harbet Road, the 3 ha of land to the south of Brimsdown proposed for mixed development is under-used as a strategic industrial location. Moreover, that area is well located to take advantage of existing and proposed infrastructure and regeneration funding due to it being well related to public transport services. The 2 areas do not bear comparison in terms of accessibility, size, relationship to residential hinterland or the contribution each makes to the local business and jobs pool.
- 3.42 Core Policy 38 (Meridian Water) lays down a number of requirements including community infrastructure (e.g. residential, schools, health, shops and employment) with an indication that employment will occupy 20% of the area with other uses occupying the remainder. The employment use is stated as being set at "no less than 5.5 ha". This is criticised as being too prescriptive. Also criticised, on the grounds that it would stifle development, is the requirement that development should be progressed in tandem with phased improvements to public transport.
- 3.43 A Masterplan is being prepared for the area to test the Council's vision and, "will be flexible with delivery designed to grow and evolve as market and requirements change" (LBE/Issue 20). The Council need to set a framework for future development to guide developers and other stakeholders. With the flexibility promised in the preparation of the Masterplan, the policy will not be overly prescriptive. Nevertheless, a Further Minor Change proposed by the Council (FMC63) will remove the reference in the policy to "no less than 5.5 ha". The 20% indicative figure for revitalised employment uses will remain.
- 3.44 The Council's evidence base supports the tandem provision of public transport improvements. Rather than stifling development the requirement will unlock the regeneration potential of Meridian Water.
- 3.45 The Council acknowledges that the 2 gas holders at Willoughby Lane are still operational. Nevertheless, the means by which decommissioning would be implemented is too detailed a matter for the CS. That aspect would best be dealt with in the forthcoming AAP.
- 3.46 Finally, the package of regeneration proposals has to strike a balance between retaining an essential bank of employment land for existing and future needs while stimulating the investment necessary to achieve that renewal. The strategy strikes the correct balance as drafted. Despite the vacancy level, Harbet Road should

remain and be protected as SIL and as a reserve of employment land for purposes of preparing a Masterplan for Meridian Water.  
Commercial Road / North Middlesex Industrial Estate

- 3.47 The estate is identified as a Locally Significant Industrial Site (LSIS). It has an area of about 9.4 ha. The retention of the northern part, representing about a third of the whole estate, is criticised because of the presence of vacant premises within this block. A narrow strip of land on the east side of Commercial Road was effectively removed from employment use in 1995 by the grant of planning permission for residential development; although that permission was never taken up. That strip is proposed for deletion from the proposed LSIS designation.
- 3.48 The Enfield Employment Land Study Update (2009) (EB-08) recommends that the estate continue to be safeguarded while being monitored for vacancies, with potential for improvement or redevelopment. The retention of the estate is seen as meeting a demonstrable short term demand for industrial development. It provides lower cost business premises, which contribute to the diversity of the local economy. Provided vacancies on the estate are kept under review as intended by the Council, the boundary of the LSIS designation should remain as proposed in the CS.

New Southgate Industrial Estate

- 3.49 This is a 1.8 ha industrial estate abutting the North Circular Road at the western gateway to the borough. The land is owned by the Council who propose to redevelop the western part (about 1 ha) in conjunction with the Ladderswood housing estate, adjoining to the north. The area is recognised as being one of high deprivation where opportunities will be sought to improve living conditions of residents, visitors and businesses.
- 3.50 The occupiers of a number of the units are concerned that they will be deprived of their business premises if the Council's regeneration proposals are implemented. Moreover, it is argued that the loss of employment land here would be contrary to the Council's commitment to encouraging local businesses and safeguarding jobs.
- 3.51 The Council is of the view that it is necessary to develop part of the industrial estate to achieve a viable and acceptable density on its proposed redevelopment of the adjoining housing estate. The proposal is for a residential led mixed use scheme that would include some 3,000m<sup>2</sup> of employment floorspace, which would approximate to that to be lost on redevelopment.
- 3.52 Those businesses that cannot be relocated in the replacement commercial floorspace would be assisted by the Council to find alternative premises in the borough. Given the regeneration objectives of the scheme and the intention to replace a similar employment floorspace, the redevelopment of part of this industrial

estate is in line with PPS1 and PPS4 in positively and proactively encouraging sustainable economic growth by prioritising areas with high levels of deprivation for regeneration investment while seeking to make the most effective use of land. I find the proposed revision of the estate's boundary to be justified and Core Policy 15 to be sound.

- 3.53 My conclusions on these issues are firstly that the strategy will provide an effective employment framework that will encourage the retention of existing businesses and attract new and, secondly, that the rationalisation of employment allocations in respect of both SILs and LSISs are justified and sound in terms of the totality of the allocation and their definition on the Proposals Map.

**(iv) Eco Park**

- 3.54 Core Policy 14 (Safeguarding Strategic Employment Locations) confirms the protection of the Eco Park site at Edmonton as a SIL. Core Policy 22 safeguards existing waste management sites and a minor change (FMC61) to Core Policy 37 refers to the LPA's support of waste management on this site. The policy was not unsound as originally drafted, but a minor change proposed by the Council will help address North London Waste Authority's concerns.

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- 3.55 ***Issue 9 – Whether the CS is unsound because it fails to adequately address the value of having the Lee Valley Regional Park (LVRP) so close to some of the most deprived communities in London.***

- 3.56 The CS acknowledges the value of the LVRP as a unique swathe of public open space, part of which is located in the borough, and which provides opportunities for sport and recreation on the doorstep of some of the most deprived areas of London. The spatial vision (CS, page 27), strategic objective 9 (page 30) and spatial strategy (page 33) all demonstrate a clear commitment to realising the potential and enhancing the value of the LVRP. Moreover, Core Policy 35 relates specifically to the LVRP and Waterways and confirms the intention to support the work of the key stakeholders in improving access to the park and in realising its potential. Core Policy 34 recognises the existing open space deficiencies in Upper Lee Valley and, in the light of the strategic growth proposed there, seeks to capitalise on the unique opportunities represented by the park to benefit the wider community. I find that the CS goes as far as it reasonably can in addressing the relationship of the LVRP to deprived communities and is sound in this regard.

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- 3.57 ***Issue 10 - Whether the Core Policy 33 proposes the most appropriate strategy for Pickett's Lock.***
- 3.58 Pickett's Lock is a rectangular shaped parcel of predominantly open land, some 58 ha in area, located within the LVRP. The site is shown on the Proposals Map as a Major Development Site (MDS) in the Green Belt. The buildings, which include a cinema, Bowls Hall and Athletics Centre, occupy the south western part of the site and cover about 1.6 ha. About 3.75 ha of hardstanding provide car parking for the covered facilities. The built development represents a small proportion (2.8%) of the site identified as a MDS.
- 3.59 The Park Authority seeks to have an area totalling some 13.62 ha around the built-up part of the site excluded from the Green Belt in order to encourage and attract the development of commercial leisure activities onto the site.
- 3.60 In the absence of an adopted planning brief/master plan for the MDS it would not be appropriate to remove such a large area of land from the Green Belt merely based on the Park Authority's aspirations, particularly as those aspirations might well impact adversely on the Green Belt of which the site forms part. The Park Authority's intentions are based on a speculative ambition for the site that may or may not produce the facilities that it seeks to encourage. At present the site forms an important and integral function within the park and the Green Belt by virtue of its predominantly open character. The Council's decision to propose the site as a MDS accords with PPG2 (Annex C) and recognises the partially built-up character of the site. The CS need go no further in that recognition. Core Policy 33 is sound in its treatment of this site in the Green Belt.

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- 3.61 ***Issue 11 - Whether the issue of gravel extraction at King George V reservoir is represented as an appropriate strategy in the CS.***
- 3.62 Core Policy 23 states that the Council will work with its partners including the London Aggregates Working Party to identify potential sources of aggregates in the borough. The only known potential source of aggregates in the borough is that located beneath the King George V reservoir within the LVRP. The reservoir is owned by Thames Water. The extent of any aggregate deposit is not known nor whether it has any commercial value. The reservoir is a Site of Special Scientific Interest (SSSI).
- 3.63 The Park Authority regards the identification of the reservoir site as a potential aggregate source as being in conflict with its SSSI designation and the park's function as an important regional open space.

- 3.64 National Minerals Policy 1-Planning and Minerals (NMP1) (2006) at paragraphs 9 and 13 requires the safeguarding of minerals as a national objective and in Local Development Documents. However, where non-major mineral development would be involved, paragraph 14 of the guidance states that permission would not normally be granted for mineral extraction in SSSIs. Policy 4A.31 of the London Plan (LP) requires DPD's to identify and safeguard aggregate resources suitable for extraction.
- 3.65 In this case there is no certainty that the reservoir overlays a commercially workable reserve that would justify identification under the LP. Nor is it known whether any reserve would rate as a major mineral development in terms of NMP1. Moreover, if a commercial reserve were shown to exist, and it was judged not to be a major development it would be unlikely, according to national policy guidance, to be granted permission because of its SSSI status. In my view the CS is not unsound in identifying a potential reserve of aggregates. The reasoned justification explains that environmental constraints would be a major consideration. I see no objection to the CS acknowledging the existence of a potential aggregate source. NMP1 provides adequate protection to the SSSI and the LVRP. Accordingly, I find the CS sound.

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- 3.66 ***Issue 12 - Whether the CS is sound in making reference to the North Gateway Access Package (NGAP), a transport proposal that is, at present, uncertain as to its feasibility and acceptability.***
- 3.67 Core Policy 24 (The Road Network) states that the Council will work with partners to continue to consider the potential merits, benefits and impacts of a Northern Gateway Access Package to improve accessibility and movements within north east Enfield and to support existing and new businesses in the Upper Lee Valley. The reference to NGAP is criticised because it is uncertain as a proposal and therefore undeliverable.
- 3.68 The policy is doing no more than making reference to a transport aspiration that the Council will be considering together with partners and stakeholders to deal with congestion in this part of north London. The reasoned justification to the policy is clear in stating that NGAP is not a prerequisite to support development proposals in the CS. I see no objection to it being mentioned as an ambition on the part of the Council to deal with traffic conditions in the wider area. The scheme is not referred to as a firm proposal. The reference to NGAP in the policy does not make it unsound.

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3.69 ***Issue 13 - Whether the absence of an adopted Area Action Plan (AAP) for the Strategic Growth Areas would delay delivery of housing development.***

3.70 The Council confirms, and this is not disputed, that the housing delivery scheduled for the first 5 years of the plan can be delivered in advance of the adoption of AAPs. Since the delivery of housing in the short term would not be made uncertain by the absence of an adopted AAP I find the strategy sound.

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3.71 ***Issue 14 - Whether Core Policy 3 (Affordable Housing) needs to confirm that no site will be required to provide more than 40% affordable housing.***

3.72 Core Policy 3 is framed in accordance with PPS3 and London Plan policy 3A.9 (BD-17). It is sound as drafted.

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3.73 ***Issue 15 – Whether Core Policy 12 (Visitors & Tourism) is in conformity with PPS4; whether the requirement regarding public transport accessibility should be removed***

3.74 This policy has been informed by London Plan (LP) policies 3B.9 (Tourism Industry) and 3D.7 (Visitor Accommodation & Facilities). The policies seek to enhance existing facilities and create sustainable new products, particularly in locations outside central London, where good public transport accessibility exists and where they can contribute to suburban and town centre renewal. The CS policy is in conformity with both the LP and the recently updated PPS4-Planning and Economic Growth. Good public transport access and measures to improve such access are integral to Core Policy 12. The support given by the policy to the provision of visitor accommodation in the Upper Lee Valley when accompanied by proposals to improve public transport accessibility (second bullet point) is a key objective of the policy and should not be removed. Schemes that fail in that objective would need to be justified on their merits.

3.75 The expansion of hotels and other facilities outside of suburban town centres, for instance where they are located in the Green Belt, would need to be considered, again on their merits, against national policies, for example PPG2, and policies of the CS. I find the policy sound.

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3.76 ***Issue 16- Whether proposals contained in Core Policy 40 (North East Enfield) to provide leisure development at Columbia Wharf would prejudice the commercial viability***

***and regeneration of surrounding employment sites; whether expectations are set too high in stating that development will help cross-fund improvements to infrastructure; whether cross-funding references in other policies needs to be linked to Core Policy 46 (Infrastructure Contributions).***

- 3.77 The Council is satisfied that with careful attention to design, layout and detailing, the regeneration schemes, which incorporate a mix of uses, including housing and leisure, can be accommodated cheek by jowl with employment uses. It cites a number of examples in other London Boroughs where this has been successfully achieved. I am satisfied that, with the promised attention to layout and design, the components and objectives of this policy are sustainable and sound.
- 3.78 Any cross-funding within policies would need to meet the tests laid down in paragraph B6 of Circular 5/2005 and/or by means of the Community Infrastructure Levy (CIL), should the Council choose to adopt CILs as a means of financing infrastructure. Contributions will always be assessed on a site by site basis taking into account the viability and costs of taking a scheme forward (Core Policy 46- Infrastructure Contributions). The plan should be read as a whole. Individual policies need not repeat a general policy statement appearing in another part of the CS. The policies are sound.

\* \* \*

- 3.79 ***Issue 17 - Whether the provisions to improve air quality along the A406 (North Circular) would be effective and whether air quality would adversely impact on proposals to develop alongside this road.***
- 3.80 The western section of the North Circular is identified as a Strategic Growth Area with potential to accommodate up to 2,000 homes. The Council confirms that the whole of Enfield is an Air Quality Management Area (AQMA) and problems of pollution are particularly marked along major roads. Air quality is a London wide concern. The Mayor and TfL have a key role in improving London's air quality.
- 3.81 The forthcoming North Circular AAP will consider how pollution and its effects can be reduced. The forthcoming Development Management DPD will set criteria for assessing pollution levels and the means of mitigating them. It is intended, through a combination of high quality design, layout, landscaping, use of mechanical ventilation systems and reduced traffic congestion, to reduce the effect of poor air quality on new housing. I would expect these measures to be sufficient to create an acceptable environment for new housing along this road. The policy is sound in meeting what is a difficult London wide condition.

\* \* \*

- 3.82 ***Issue 18 - Whether the place shaping Core Policies 37 (Central Leaside) and 38 (Meridian Water) are unsound because they fail to adequately incorporate provisions to link to other parts of Upper Lee Valley Opportunity Area to maximise benefits between Communities in Enfield and Haringey.***
- 3.83 These policies have been prepared in the context of their location within the Upper Lee Valley Opportunity Area (ULVOA). That fact is not seriously contested. Moreover, in drawing up the policies, the Council is on record as having worked closely with a wide range of partners as it is recognised that the regeneration of Central Leaside and the development of a new community at Meridian Water will act as a catalyst for the wider change needed at both a local and regional level to benefit adjoining communities, including Edmonton in the LB of Enfield and Northumberland Park in the LB of Haringey.
- 3.84 The location and scale of development proposed in these place shaping policies is supported by TfL, the GLA and North London Strategic Alliance (NLSA) and is reflected in the Mayor of London's Draft Upper Lee Valley Opportunity Area Planning Framework and NLSA's Upper Lee Valley Vision (2009). There is no doubt that the policies have been developed, inclusively, within a coordinated strategy that is based on a robust and thorough evidence base and following a comprehensive consultation and testing process.
- 3.85 The implications of potential cross-boundary issues have been addressed in the development of the supporting CS evidence base. Appendix 5 of the CS details adjoining boroughs policies and development plans where relevant to Enfield. The Council confirms that it will continue to engage with adjoining boroughs, TfL, the GLA and other partners in the planning and delivery of housing, infrastructure, and investment in this area of North London.
- 3.86 Criticism was levelled at these policies because they do not sufficiently reflect development aspirations in the LB Haringey and, in particular, a major development proposed at White Hart Lane. The scheme for rebuilding the football stadium includes a new foodstore, hotel, offices, homes and car parking. At the time of writing, the application has yet to be determined. The application will need to be assessed on its merits in the context of the development plan and emerging policies insofar as the latter can be given weight. Enfield's Study of Town Centres Update (2009) (EB-06) analysed retail growth in the borough and specifically assessed the impact with or without proposed retail development at the Tottenham Hotspur FC Stadium which lies outside the borough boundary. Haringey officers will be represented on the Delivery Board that has been established in the preparation of the Master Plan for Meridian Water.

- 3.87 The record suggests that the Council has worked assiduously to ensure that linkages to other parts of the ULVOA were considered and, where possible, incorporated into the CS's policies. The suggestion that the Council has failed to take into account cross-borough linkages is unfounded. I deal with the criticism that the policies are too prescriptive under Issue 8 (iii). I find both policies sound.

\* \* \*

- 3.88 ***Issue 19 - Whether it is appropriate for Core Policy 42 (Enfield Town) to seek to protect existing office accommodation.***

- 3.89 The GLA's London Office Policy Review (2009) identifies Enfield Town as one of the main office locations in the borough. Projections for office employment (2011-2031) suggest that it will increase with the borough's office accommodation catering mainly for the local market. The proposed Enfield Town AAP will appraise viability and the role that the town plays in the London and local office market. Pending the outcome of that appraisal the policy is sound in seeking to protect existing office accommodation.

\* \* \*

#### **4 Overall Conclusions**

- 4.1 I conclude that, with the changes proposed by the Council set out in Appendix A, the Enfield Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12.

*Ian Broyd*

INSPECTOR

## APPENDIX A (Part 1) - RECOMMENDED MINOR CHANGES SUGGESTED BY THE COUNCIL<sup>1</sup>

(<sup>1</sup> These changes are only subject to a recommendation because the Council cannot change the document even, to correct minor errors without a recommendation).

### Schedule of Minor Changes – Post Publication Stage The Enfield – Proposed Submission Core Strategy



Re-published with referencing 13.04.2010

### **Minor Changes – Justification**

In consideration of the representations received during the Publication stage of the Enfield Plan – Pre-submission Core Strategy the Council is minded to put forward the following minor changes for consideration by the Planning Inspector.

Minor changes represent one of more of the following:

- points of clarity
- factual corrections
- consistency
- typographical errors
- improved referencing / signposting

No direct changes have been made to the Pre-submission Core strategy as published on the 14<sup>th</sup> December 2009. The Council's intention is to submit this schedule to the Secretary of State alongside the following submission documents for the Inspector's consideration.

### **Submission Documents**

- Pre-Submission Core Strategy
- Errata: Appendix 7: Illustrative Maps
- Pre-Submission Core Strategy Executive Summary
- Pre-Submission Sustainability Appraisal Report
- Pre-submission Consultation Statement
- Post-publication Consultation Statement – Main Issues Report
- Self Assessment of Soundness
- Schedule of Minor Changes – Post-Publication Stage
- Statement of Availability
- Infrastructure Delivery Plan



## Schedule of Minor Changes

**Text in Bold Print and underline** Proposed insertion  
~~Text with a strikethrough~~ Proposed deletion

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
PMC 1	General referencing	English Heritage	'built heritage' should be amended to 'built heritage <b>including its archaeology...</b> will continue to be protected and enhanced.	<b>Clarification:</b> Council would consider inserting additional wording of <b><u>including its archaeology...</u></b> could be inserted.	N	N
PMC 2	Pg 24 Key Issues	Thames Water	5th bullet point should include a specific reference to infrastructure. Specifically the following is suggested: - 'Promoting the provision of key services <b>and infrastructure</b> to support existing and future Communities.	<b>Clarification:</b> Council would consider inserting additional <ul style="list-style-type: none"> <li>▪ 'Promoting the provision of key services <b>and infrastructure</b> to support existing and future Communities.</li> </ul>	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
PMC3	Pg 28 Spatial Vision	Environment Agency	<p>Recommend that the last paragraph is amended to read</p> <p>the following:                      'Transformational change at Meridian Water will include new housing and employment opportunities together with transport, community <b>and green infrastructure</b> vital to support sustainable communities, and will stimulate the regeneration of surrounding communities including Edmonton and Northumberland Park in nearby Haringey.'</p>	<p><b>Clarification:</b> Council would consider inserting additional wording <b>and green infrastructure....</b></p>	N	N
PMC4	Spatial Strategy for Planning	NHS HUDU	The source of the 10,000 new homes	<b>Clarification:</b> of housing figures for consistency:	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
	Prosperity		<p>projection should be provided. The new housing target would total 11,200 additional dwellings over a 20 year period between 2011 and 2031. Core Policy 2 refers to the provision of 11,000 new homes over a 15 year period 2010/11 to 2024/25. The housing growth figure should be clarified.</p> <p>It is important to agree housing and population projections as these form the basis of forecasting future social infrastructure needs.</p>	<p>The Borough will plan for an increase in population from an estimated 285,100 in 2006 to approximately 309,500 by 2026. Over this period close to <b>11,000</b> <del>over 10,000</del> new homes are <del>predicted</del> <b>planned</b> to be built and the number of jobs will increase by up 6,000.</p>		
PMC5	Spatial Strategy for Prosperity	Enfield Council	<p>Council would wish to amend text to clarify intention, by deleting the words "up to" and replacing with "<b>a minimum of</b>".</p>	<p><b>Clarification:</b> of employment figures for consistency: The Borough will plan for an increase in population from an estimated 285,100 in 2006 to approximately 309,500 by 2026.</p>	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
				<p>Over this period close to <b>11,000</b> over 10,000 new homes are predicted <b>planned</b> to be built and the number of jobs will increase by <b>a minimum of</b> up 6,000.</p>		
PMC6	Spatial Strategy North Circular area and New Southgate	NHS HUDU	Should mention the opportunity for improved health facilities to address cross-boundary needs with Barnet.	<p><b>Clarification:</b> in first paragraph under "Implementation" to address cross borough needs:</p> <p>Overall this strategy represents a proactive and demanding agenda to help shape the future of the Borough. The Council and its partners will work together to coordinate and deliver it through a place shaping approach and a shared understanding of priorities and range of solutions needed to improve the well being and quality</p>	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
				of life of all Enfield's communities, particularly those who are most disadvantaged. This will ensure that good social, utilities and transport infrastructure is provided, retained, improved or expanded where needed, <b><u>taking account of cross borough opportunities.</u></b>		
PMC7	Spatial Strategy Implementation	NHS HUDU	We suggest that reference is made to the development management process (and a forthcoming Development Management Document) to achieve the plan priorities, secure good design and mitigate against negative impacts, and to the role of planning obligations to secure financial contributions towards infrastructure requirements.	<p><b>Clarification:</b> Council would consider taking opportunity to sign-post to relevant DPDs.</p> <p>Insert new paragraph after paragraph 2:</p> <p><b><u>The Council will bring forward a series of documents to provide detailed policy and supplementary guidance for implementation, including a Development Management Document, Planning Obligations and Community Infrastructure Levy and the Enfield Design Guide.</u></b></p>	N	N
PMC8	Paragraph 5.10	Enfield Council	Paragraph should read as 70 sites being	<b>Correction:</b> 5.10 A large site within the housing	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
			assessed not 68.	trajectory is defined as being 0.5ha in area or greater. A small site is less than 0.5ha in area. For the housing trajectory a total of <del>68</del> <b>70</b> large and small sites were assessed to place them most accurately in the trajectory. Within small sites, only those yielding 10+ dwellings were contacted.		
PMC9	<b>Core Policy 3 AFFORDABLE HOUSING</b>	<b>National Grid Property Holdings</b>	Core Policy 3 should refer explicitly to the GLA's affordable housing toolkit as an appropriate form of viability assessment. This is also consistent with Core Policy 46. To ensure the DPD is effective and consistent with national policy the following amended wording to Core Policy 3 is proposed: '...as well as the relative importance of other planning priorities and	<b>Clarification:</b> Recommend adding this in at paragraph. 5.24 under Implementation.  <b>5.24</b> The Development Management DPD will set out details on the mechanisms for providing affordable housing and for determining applications. <u><b>In the interim the Council will continue to use the GLA's affordable housing toolkit to calculate the viability of providing affordable housing and other planning contributions and abnormal costs associated with developing specific sites will be taken into account.</b></u>	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
			<p>obligations on the site. The GLA's affordable housing toolkit will be used to calculate the viability of providing affordable housing and other planning contributions and abnormal costs associated with developing specific sites will be taken into account.'</p>			
PMC10	<p>New Paragraph Core Policy 8 EDUCATION</p>	<p>Enfield Council</p>	<p>The Council would wish to update supporting under the Monitoring and Targets sub-section by way of inserting a new paragraph before paragraph 5.72.</p>	<p><b>New Paragraph before 5.72</b>  <u>In common with many other education authorities in London, Enfield subscribes to the school roll projections service of the Greater London Authority (GLA). Annual projections are prepared on the basis on the January Schools Census; in preparing these projections, the GLA receives its basic population data from the Office for National</u></p>	<p>N</p>	<p>N</p>

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
				<p><u>Statistics (ONS) and information about housing developments from the Council. Most recent projections<sup>1</sup> have reflected not only the effects of increased housing and migration, but also a sharp and sustained increase in birth rates across London, with comparatively higher levels of growth in Outer London and specifically in Enfield. The Council is now considering the impact of the 2010 projections on Pupil Places Planning. Further work is underway to consider options for meeting increased demand, including the more efficient use of existing school sites and playing fields. New sites for schools will be set out in the Site Schedule DPD.</u></p>		
PMC11	Paragraph 5.96 <b>EMERGENCY AND ESSENTIAL SERVICES</b>	CgMs Consulting on behalf of Metropolitan	The MPA recommends amending the wording to a) and b) as follows: a) delivering several	<p><b>Clarification:</b></p> <p><b>5.96</b> In 2007, the Metropolitan Police Authority produced an Asset</p>	N	N

<sup>1</sup> The projection is based on the latest reception forecast from the GLA informed by the 2010 January Schools Census and the 2009 population projections (in turn based on the latest actual birth data – for 2008).



Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
		Police Service	police facilities that enable better public access to the police provision for neighbourhood policing teams which will ideally be located within town and local centres that are readily accessible. Neighbourhood police centres without a contact point do not have to be in accessible areas, and b) a new custody centre.	Management Plan (AMP) (33) for Enfield which looks at the existing estate and local requirements for modern day policing. The AMP identifies that future operational needs will focus on a) delivering several police <u>facilities</u> 'shops' with provision for Safer Neighbourhood Teams (34) which will ideally be located within town and local centres that are readily accessible, and b) a new custody suite.		
PMC12	Core Policy 11 Para 5.113 RECREATION, LEISURE, CULTURE AND ARTS	Lee Valley Regional Park	5.113 should be amended to refer to the <b>strategic importance of Picketts Lock</b> as a major leisure, sporting and entertainment node.	<b>Clarification:</b> Additional wording to Paragraph 5.113 accepted to add clarity.  Within Enfield, the Lee Valley Regional Park Authority is investigating the potential of additional sports development at Pickett's Lock to complement the existing Lee Valley Athletics Centre, camping and Caravan site, golf centre and golf course. Current regional and local guidance also	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
				<p>identifies Pickett's Lock as an area for future development and investment. The draft vision for the Upper Lee Valley, the existing Lee Valley Park Plan and 'Enriching Enfield' -Enfield's Leisure and Strategy 2005 - 2008 all identify Pickett's Lock as an area for the development of additional sports and recreation facilities of <b><u>strategic importance</u></b>.</p>		
PMC13	Core Policy 12 TOURISM	British Waterways	<p>5<sup>th</sup> Bullet Point: the policy states that the Council will continue to work with the LVRPA to identify the priority mix of additional recreation and leisure facilities in the east of the borough, particularly at Ponders End, Pickett's Lock and Meridian Water. British Waterways has land ownership we should be recognised as a key stakeholder who are</p>	<p><b>Consistency:</b> suggest minor change.</p> <p>Continuing to work with the Lee Valley Regional Park Authority, to help develop its Park Development Framework, <b><u>and with other partners such as British Waterways, and Thames Water</u></b> to identify the priority mix of additional recreation and leisure facilities in the east of the Borough, particularly at Ponders End, Pickett's Lock and Meridian Water, and encourage more visitors to the Lee</p>	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
			keen to continue working with the Council.	Valley Regional Park.		
PMC14	Section 6.1 Economic Prosperity	Enfield Council	The Council wishes to provide a factual update within section 6.1: <b>Promoting Economic Prosperity.</b> Clarifications are intended to provide additional background material and detail, which could not be included in the Submission Core Strategy document, but, which in light of new government guidance and emerging work on Enfield's Economic Assessment provide additional clarification as to the way the employment figures were presented in the Pre-Submission Core Strategy.	<p><b>Clarification:</b> Council would consider the following new paragraphs be inserted above existing paragraph 6.8:</p> <p><b>6.8A <u>The Council is taking a proactive approach to investment and sustainable job growth and will plan to exceed the minimum target growth set out in Core Policy 13. To achieve this the Council is developing further work in understanding the local economy and aligning this knowledge to the strategic growth areas and place shaping priority areas. An Economic Assessment is forthcoming and this in turn will inform an Enterprise Framework/Inward</u></b></p>	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
				<p><b><u>Investment Strategy to be adopted later in 2010. This work will inform the preparation of Area Action Plans, Masterplans and a review of the Core Strategy where appropriate.</u></b></p>		
PMC15	Core Policy 13 and supporting Paragraphs <b>PROMOTING ECONOMIC PROSPERITY</b>	Enfield Council	Additional clarity is suggested by the Council to ensure the intention of Core Policy reflects the long term economic intention of the Core Strategy approach. The approach of the Policy is to secure a minimum of at least 6,000 new jobs.	<p><b>Clarification:</b> Council suggest inserting additional text to Core Policy and supporting paragraphs:</p> <p><b>PROMOTING ECONOMIC PROSPERITY CORE POLICY 13</b></p> <p>The Council will protect and improve Enfield's employment offer helping to facilitate the creation of <b>a minimum of</b> 6,000 new jobs from 2010-2026, focusing new growth in the Upper Lee Valley and Enfield's town centres. Approximately <b>a minimum of</b> 4,000 new jobs are expected to be created in the Upper Lee Valley with the remainder concentrated in Enfield's main town</p>	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?								
				<p>centres and in other place shaping priority areas.</p> <p>Table 6.1 Spatial Distribution of New Jobs</p> <table border="1" data-bbox="1218 676 1744 943"> <tr> <td data-bbox="1218 676 1592 708"></td> <td data-bbox="1592 676 1744 708"></td> </tr> <tr> <td data-bbox="1218 708 1592 778">Upper Lee Valley</td> <td data-bbox="1592 708 1744 778">4,000</td> </tr> <tr> <td data-bbox="1218 778 1592 871">Other town centres and Place Shaping Priority Areas</td> <td data-bbox="1592 778 1744 871">2,000</td> </tr> <tr> <td data-bbox="1218 871 1592 943"><b>Borough total</b></td> <td data-bbox="1592 871 1744 943"><b><u>At least 6,000</u></b></td> </tr> </table> <p><b>New paragraph after 6.16 under Implementation</b></p> <p><b><u>The Council is to undertake an economic assessment during 2010 and this piece of work will help bring forward an Enterprise Framework/Inward Investment Strategy.</u></b></p>			Upper Lee Valley	4,000	Other town centres and Place Shaping Priority Areas	2,000	<b>Borough total</b>	<b><u>At least 6,000</u></b>		
Upper Lee Valley	4,000													
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Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
				<p><b>Amend paragraph 6.19 under Monitoring and Targets</b></p> <p><b>6.19</b> New jobs created in the Borough will be monitored to achieve <b>a minimum</b> target of 6,000 new jobs by 2026, of which <b>at least</b> 4,000 will be located in the Upper Lee Valley.</p>		
PMC16	Paragraph 6.9 Footnote 38 PROMOTING ECONOMIC PROSPERITY	Enfield Council	The Council would wish to provide a correction to the omission of footnote 38 is required to provide the full reference.	<p><b>Correction: footnote 38</b></p> <p><b>(38) <u>The Working Paper No. 20 employment projections by sector and borough, Source GLA Economic, February 2007.</u></b></p>	N	N
PMC17	Paragraph 6.24 SAFEGUARDING STRATEGIC INDUSTRIAL LOCATIONS	Enfield Council	Council would consider additional signposting to Appendix 7 within Paragraph 6.24.	<p><b>Amendment:</b> paragraph 6.24 under Justification.</p> <p><b>6.24</b> The Borough has undergone some changes since the adoption of the UDP. The boundaries of the former Preferred Industrial Areas (PIAs), as identified in the UDP, have therefore been reviewed in partnership with the GLA in order to</p>	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
				<p>identify and safeguard industrial land which is of strategic importance to London and is appropriate to be designated as Strategic Industrial Locations (SIL) <b>(40)</b>. <b><u>The revised designations are illustrated in Map Series 1, Appendix 7.</u></b> Following this review, the extent of the former PIAs remains largely unaltered. However, the review has identified scope to release land for mixed use development in a limited number of former PIAs without compromising the overall range and quality of employment land available in the Borough. This has the potential to meet other objectives, such as the regeneration of the Council's place shaping priority areas in particular – Ponders End and Meridian Water.</p>		
PMC18	6.48 on page 76 TOWN CENTRES	The Theatres Trust	First word in brackets in last sentence should read 'if' not 'of'.	<b>Typographical Correction:</b> Replace words "#f" with <b>of</b>	N	N
PMC19	Paragraph 7.34 DELIVERING SUSTAINABLE	British Waterways	More emphasis could be given to the transportation of waste	<b>Clarification:</b> Insertion – New sentence at the end of paragraph 7.34:	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
	<b>WASTE MANAGEMENT</b>		by water here, including the use of Ash Wharf at Edmonton Eco Park, which is not currently utilized but presents an excellent opportunity for waterborne transport.	7.34 Self-sufficiency aims to increase the responsibility communities take for their waste, reducing the distance it travels and so the associated congestion and vehicle emissions. This is supported in the London Plan, which aims to increase the self-sufficiency of London through the borough-level apportionment. Inevitably waste will have to travel some distance from its source to its treatment facility, and occasionally a significant distance where specialised facilities are needed (e.g. for hazardous waste). A key aim should therefore be to minimise the impacts of this through the use of more sustainable alternatives to road-based transport. <b><u>Opportunities such as utilizing Ash Wharf at Edmonton Eco Park for waterborne transportations should be explored.</u></b>		
PMC20	<b>Core Policy 25 PEDESTRIANS AND CYCLISTS</b>	Sustrans	Supports the implementation of greenways. However,	<b>Clarification:</b> Insertion to Core Policy 25 final paragraph:	N	N



Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
			the policy should make explicit reference to greenways.	Priority will be given to schemes that overcome community severance, particularly those linking communities on either side of the West Anglia Main Line, routes to schools, town centres, and recreational resources including <b>greenways</b> , and the Lee Valley Regional Park.		
PMC21	Core Policy 26 <b>PUBLIC TRANSPORT</b>	British Waterways	This policy could include a point promoting better way finding between transport hubs and the waterways.	<p><b>Clarification:</b> Insertion to Core Policy 26 - of bullet 4:</p> <p>Improving public transport interchanges to facilitate better <b>wayfinding</b>, integration between modes including provision for taxis, <b>water based transportation</b> and cycle parking and storage, particularly at Enfield Town, Edmonton Green, Ponders End, New Southgate and Southgate Circus;</p>	N	N
PMC22	Core Policy 28: <b>MANAGING FLOOD RISK THROUGH DEVELOPMENT</b>	British Waterways	SUDs are not the only way to manage flood risk through development. There should be a policy also	<p><b>Clarification:</b> Glossary definition of SUDs to be expanded to clarify that SUDs are <b>one of a number of measures to manage flood risk</b>.</p>	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
			<p>of encouraging Green Roofs and Green Walls in new builds. Green Roofs on flat-roofed buildings provide natural insulation, rainwater attenuation and cooling, and are visually attractive and innovative. Green walls provide many of the same benefits and have been shown to provide considerable temperature regulation. They also contribute greatly to on-site biodiversity also, by providing nesting and foraging opportunities for birds and invertebrates.</p>			
<p><b>PMC23</b></p>	<p><b>Core Policy 29 FLOOD MANAGEMENT INFRASTRUCTURE</b></p>	<p><b>Environment Agency</b></p>	<p>We support this policy and recommend a slight amendment to the following sentence: 'Development behind existing defences will be</p>	<p><b>Clarification:</b> Insertion of new text: <u>river restoration and wetland creation</u> in paragraph 3 of Core Policy 29 accepted.</p>	<p>N</p>	<p>N</p>

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
			<p>expected to reduce residual flood risk and works to open spaces within the floodplain or adjacent to watercourses elsewhere should explore opportunities for floodwater storage, <b>river restoration and wetland creation.</b></p>			
PMC24	<p><b>Core Policy 30 MAINTAINING AND IMPROVING THE QUALITY OF THE BUILT AND OPEN ENVIRONMENT</b></p>	<p><b>Environment Agency</b></p>	<p>We recommend reference is made to the restoration of the Blue Ribbon Network by amending the following: 'The Council will: Adopt borough-wide standards and guidance to design quality, including: - maximising, <b>restoration</b>, access to and visibility of the blue ribbon network and the Borough's green assets'</p>	<p><b>Clarification:</b> Insertion of new text <b><u>restoration.</u></b></p>	<p>N</p>	<p>N</p>

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
PMC25	Paragraph 8.63 GREEN BELT AND COUNTRYSIDE	Environment Agency	When developing a project for a specific reason i.e. regional sport and recreational, it's important to build in other benefits which may not be the core reason for developing the project i.e. biodiversity. As a result we recommend this paragraph is amended as follows: ' At Picketts Lock, there is an opportunity for improvements to the regional sports and, recreational <b>and biodiversity offer</b> , as reflected in the Upper Lee Valley Vision, the emerging	<b>Clarification:</b> Insertion of <b><u>and biodiversity offer</u></b> accepted for additional clarity.	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
			Lee Valley Regional Park Development Framework.'			
PMC26	Core Policy 34 PARKS, PLAYING FIELDS AND OTHER OPEN SPACES.	The Wildlife Trust	Consider adding a new point re managing positively for biodiversity:	<p><b>Clarification:</b> to Core Policy 36 Biodiversity to recognise the value of these spaces.</p> <p><b>CORE POLICY 36 BIODIVERSITY</b> The Council will seek to protect, enhance, restore or add to biodiversity interests within the Borough, <b><u>including parks, playing fields and other sports spaces</u></b>, green corridors, waterways, sites, habitats and species identified at the national, London or local level as being of importance for nature conservation by: .....</p>	N	N
PMC27	Core Policy 35 LEE VALLEY REGIONAL PARK AND WATERWAYS	The Wildlife Trust	This should highlight more strongly the international significance of the Lee	<p><b>Clarification:</b> Suggest amendments to Core Policy 36 Biodiversity, as</p>		

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
			<p>Valley to biodiversity and its designation as a Special Protection Area (SPA). The Lee Valley is one of only two SPAs in the London area.</p> <p>It is the most important feature of the Regional Park. Core Policy 35 should have at least one key point which acknowledges this importance and gives its support to biodiversity management of the park.</p>	<p>opposed to Core Policy 35, to recognise the European Special Protection Area (SPA) designation of Lee Valley.</p> <p><b>CORE POLICY 36</b></p> <p>The Council will seek to protect, enhance, restore or add to biodiversity interests within the Borough, <b>including parks, playing fields and other sports spaces</b>, green corridors, waterways, sites, habitats and species identified at the <b>European</b>, national, London or local level as being of importance for nature conservation by:.....</p>		
PMC28	<b>Paragraph 8.96 LEE VALLEY REGIONAL PARK AND WATERWAYS</b>	<b>Environment Agency</b>	Timescales for the Lee Valley Regional Park framework needs to be updated as consultation has only just begun.	<p><b>Amendment:</b> Amend text to provide update.</p> <p>8.69 The Lee Valley Regional Park Authority is preparing a new Park Development Framework to</p>	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
				<p>set out the Authority's vision, proposals and policies for the future management of the Park for the next 5-10 years. Within the emerging Park Development Framework, Picketts Lock is identified as one of the main destinations in the Park with the potential for multiple uses for sport, recreation, accommodation and biodiversity. The <b>forthcoming</b> Park Development Framework <del>is expected to be published in late 2009</del> and will inform the preparation of the Central Leaside Area Action Plan and future reviews of the Core Strategy.</p>		
PMC29	Paragraph 8.97	Environment Agency	Please note that the London Rivers Action Plan is not a definitive list of all the river restoration projects but merely one that highlights current	<p><b>Amendment final sentence to provide clarity:</b></p> <p>The London Rivers Action Plan identifies a series of <b>current and known</b> river restoration projects in Enfield, to inform decisions on</p>	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
			known potential projects. This should be updated as new potential projects or developments come forward.	priority projects to be funded.		
PMC30	Monitoring & Biodiversity Targets Paragraphs 8.110, 8.111	Environment Agency	We recommend that another paragraph is added to paragraphs 8.110 and 8.111. This target could be in line with NI197 Biodiversity which requires the Local Authority to increase the percentage of SINC's and the number in Positive Conservation Management. In addition we recommend another target related to river restoration be included. This should	<p><b>Clarification:</b> The Council is not in a position to add an additional target of river restoration at this stage as this is to be considered through the forthcoming Biodiversity Action Plan. However the Council is minded to clarify paragraph 8.110.</p> <p>Delete current wording and replace with:</p> <p><b>8.110 "The Enfield Biodiversity Action Plan, which is to be adopted during 2010, will contain targets for biodiversity enhancements across the Borough. This will</b></p>	N	N



Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
			<p>be: 'New planning permissions will be monitored to achieve a target of restoring 225 meters of river a year or 1125 meters by 2015.'</p> <p>in Enfield (70.4km), this is 11.15% of the rivers in London. From this we have taken the objective in the London Rivers Action Plan (produced in 2009) of restoring 15km of river by 2015 or 2.5km each year. 11.15% of 2.5km is 225 meters each year or 1125 meters or river by 2015.</p>	<p><b>include targets for National Indicator 197 (Improved Local Biodiversity – proportion of Local Sites where positive conservation management is being achieved), the restoration of rivers in line with the London Rivers Action Plan and targets for the maintenance, enhancement and increase in area of priority habitats in line with those given in the London Plan. These and other Enfield BAP targets will be monitored and reported on through the Enfield Biodiversity Partnership."</b></p>		
PMC31	Core Policy 37 Central Leaside	North London Waste	Consistent with Core Policies 22 and 14, the Authority believes Core Policy 37 should	<b>Clarification:</b> Insert recommended wording for clarity and cross-referencing.	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
			<p>make reference to the EcoPark site to reflect its status as a Preferred Industrial Location where waste management uses will be supported.</p> <p>Currently CP 37 makes reference to a number of SILs and LSISs being retained and intensified. However, the policy does not refer to the EcoPark which is identified at CP14 as a Preferred Industrial Location. The Authority therefore requests that the policy be revised to make reference to the EcoPark site being retained and</p>	<p>The majority of the Central Leaside area will retain its industrial and employment character (see Core Policy 14). The Strategic Industrial Locations of Eley, Aztec 406, Montagu (the northern part), Kenninghall and Harbet Road estates, as well as the Locally Significant Industrial Sites; The Claverings Estate and the southern part of the Montagu Industrial Area, will be retained and intensified, <b>(see Core Policy 22)</b>. .....</p>		

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
			<p>intensified, consistent with its designation as a PIL and the proposals set out in CP 22. This amendment would ensure that there is clarity as to the status of the PIL land through out the Central Leaside area.</p> <p>The following wording is suggested:                      '...and the southern part of the Montagu Industrial Areas, will be retained and intensified. <b>In line with Core Policy 22 waste management will be supported at the Edmonton EcoPark site....'</b></p>			
PMC32	Core Policy 43 THE AREA	Royal Mail	Core Policy 43 refers	Correction:	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
	AROUND ENFIELD TOWN STATION		to Picture 9.14 which details the boundary for the Enfield Town Station Place however this is not provided in the document. We therefore request that the Council confirm the Enfield Town Station Place Shaping Priority Area boundary, whether indicatively, to be determined in detail subsequently through the Enfield Town AAP.	Delete reference to picture 9.14 and replace with referencing to <b>Map 9.7</b> .		
PMC33	Section 10.2 Delivery Mechanisms Paragraph 10.12	British Waterways	British Waterways have been working with the North London Strategic Alliance on their plans for the Upper Lea Valley, so are happy to be included in the list of partners.	<b>Update:</b> Add <b>British Waterways</b> to the list of organisations listed.	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
PMC34	Appendix 2	GoL	Appendix 2 sets out the relationship between the core policies and the UDP saved policies. The format used does not make clear whether this is a table that lists UDP policies superseded by core strategy policies or simply a cross referencing of the two sets of policies, especially as it appears to cover all UDP policies when it should be expected that the Core Strategy would only replace certain UDP policies and some would be replaced by later DPDs or AAPs. Regulation 13(5) of	<b>Clarification accepted,</b> an additional column titled "Superseded by Core Strategy". <b>Appendix 1 of this schedule sets out a revised table.</b>	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
			<p>the 2004 regulations requires that a DPD should indicate precisely which UDP policies would be replaced upon adoption of the DPD. Therefore, before submission, the Table should be clarified so that it accords with the regulatory requirement.</p>			
PMC35	Appendix 4 Evidence Base	British Waterways	<p>The Evidence Base should also make reference to the following documents:</p> <ul style="list-style-type: none"> <li>- Town and Country Planning Association's recent publication Policy Advice Note for Inland Waterways, July 2009 (<a href="http://www.tcpa.org">http://www.tcpa.org</a>).</li> </ul>	<p><b>Clarification:</b></p> <p>Insertion of relevant guidance and plans within the appropriate list of evidence base.</p>	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
			<p>uk/pages/inland-waterways.html)                      - English Heritage's recent publication "England's Historic Waterways: A working heritage - Promoting high quality waterside development" (2009 <a href="http://www.helm.org.uk/upload/pdf/HistWat.pdf?1258977969">http://www.helm.org.uk/upload/pdf/HistWat.pdf?1258977969</a>)                      - Department of Health's publication of the Physical Activity Plan for England "Be active, be healthy: a plan for getting the nation moving" (<a href="http://www.dh.gov.uk/en/publicationsandstatistics/publications/publicationspolicyand">http://www.dh.gov.uk/en/publicationsandstatistics/publications/publicationspolicyand</a></p>			

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
			<p>guidance/dh_094358)</p> <ul style="list-style-type: none"> <li>- British Waterways' document, produced in cooperation with the Metropolitan Police, "Under Lock and Quay", which offers advice on waterside design that balances the needs of the area, such as security, as part of successful redevelopments. (<a href="http://www.britishwaterways.co.uk/media/documents/BWL_Under_Lock_and_Quay.pdf">http://www.britishwaterways.co.uk/media/documents/BWL_Under_Lock_and_Quay.pdf</a>)</li> <li>- Waterways for Tomorrow (DETR 2000)</li> <li>- Waterways for Everyone (DEFRA consultation – Dec</li> </ul>			



Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
			09) - DEFRA and DTLR sponsored Inland Waterways Amenity Advisory Council (IWAAC) Good Practice Guide – Planning a Future for the Inland Waterways (Dec 2001).			
PMC36	Appendix 4 Evidence Base	English Heritage	It is noted that the Borough side Characterisation Study is not listed as part of the evidence base.	Correction: Insert <b>Characterisation Study</b> into list of evidence base.	N	N
PMC37	Appendix 8 Glossary	GoL	It would be helpful if the glossary included the acronyms for SIL, IBP, PIL, LSIS .	<b>Clarification:</b> Additional acronyms to be inserted: <b>SIL</b> "Strategic Industrial Land" <b>IBP</b> "Industrial Business Parks" <b>PIL</b> "Preferred Industrial Locations"	N	N

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Respondent	Requested Change	Justified Change	Is consultation required?	Is further SA required?
				LSIS "Locally Significant Industrial Sites".		

**Recommended amendment to Appendix 2: Relationship to Saved UDP Policies**

**Proposed Minor Changes – Appendix 2: Relationship to Saved UDP Policies**

UDP POLICY			LDF POLICY DOCUMENTS				
UDP Policy No. <i>(excludes policies expired Sept 07)</i>	Policy Title	Superseded By This DPD	Core Strategy Core Policy No.	Development Management DPD	Area Action Plan DPDs	Sites Schedule DPD	Enfield Design Guide SPD
(I) EO1	Equal Opportunities	Y	9 (77)				
(I) N1-N4	Borough Structure	Y	(78)				
(I) EN1-EN6	General Environmental Considerations	Y	28-36				
(II) EN3-EN5	Advertisements			Y			Y
(II) EN6	Telecommunications			Y			
(II) EN10-EN15	Nature Conservation		35				
(II) EN16	Article 4 Directions		(79)				
(II) EN17-EN18	Environmental improvements		29				
(II) EN20-EN21	Vacant and under-used land	Y	15				
(II) EN23	Environmental Education						
(II) EN24-EN26	Minerals	Y	23				
(II) EN29	Waste	Y	21, 22				
(II) EN30-EN32	Pollution	Y	32				
(II) EN33	Environmental Assessment			Y			
(I) G1-G3	Green Belt	Y	33				

UDP POLICY			LDF POLICY DOCUMENTS				
UDP Policy No. (excludes policies expired Sept 07)	Policy Title	Superseded By This DPD	Core Strategy Core Policy No.	Development Management DPD	Area Action Plan DPDs	Sites Schedule DPD	Enfield Design Guide SPD
<b>(II) G1</b>	<b>Green Belt</b>	<b>Y</b>	<b>33</b>				
<b>(II) G5-G3-G6</b>	<b>Management Plan</b>			<b>Y</b>			
(II) G7-G10	Landscape Measures		31	Y			Y
(II) G11-G19	Environmental Measures affecting New Development		28, 29	Y			
(II) G20-G21	Urban Edge		33	Y			Y
(II) G22-G24	Agriculture			Y			
(II) G25	Horticulture		33	Y			
(II) G26	Garden Centres		33	Y			
(II) G27-G28	Horsekeeping			Y			
(II) G29-G30	Lee Valley Regional Park	Y	33, 35				
(II) G31-G33	Recreation	Y	11, 34				
(II) G34-G39	Residential Development			Y			
(II) G40-G41	Horticulture/Garden Centres		32	y			
(II) G42	Livestock Units			Y			
(II) G43	Horsekeeping			Y			
(II) G44-G45	Landscape Treatment			Y			
(I) O1-O4	Open Space & Metropolitan Open Land	Y	34				

UDP POLICY			LDF POLICY DOCUMENTS				
UDP Policy No. <i>(excludes policies expired Sept 07)</i>	Policy Title	Superseded By This DPD	Core Strategy Core Policy No.	Development Management DPD	Area Action Plan DPDs	Sites Schedule DPD	Enfield Design Guide SPD
(II) O1-O5	Metropolitan Open Land		34	Y			
(II) O6-O9	Green Chains		34	Y			
(II) O10-O18	Urban Open Space		34	Y			
(II) O19	Playing Fields		34	Y		Y	
(II) O20	Leisure Gardens (Allotments)		34	Y	Y		
(I) C1	Conservation and Townscape	Y	31				
(II) C1-C7	Archaeology and Ancient Monuments		31	Y			
(II) C8-C11	Procedures						Y
(II) C12-C14	Protection and Maintenance of Listed Buildings		31	Y			Y
(II) C16-C17	Use of Listed Buildings		31	Y			
(II) C18-C20	Historic Landscapes		31	Y			Y
(II) C21	Designation of Conservation Areas		31				Y
(II) C23-C25	Safeguarding the Environment in Conservation Areas		31	Y			Y
(II) C26-C31	Quality of Development		30	Y			Y
(II) C32-C34	Advertisements			Y			
(II) C35-39	Tree Protection			Y		Y	

UDP POLICY			LDF POLICY DOCUMENTS				
UDP Policy No. <i>(excludes policies expired Sept 07)</i>	Policy Title	Superseded By This DPD	Core Strategy Core Policy No.	Development Management DPD	Area Action Plan DPDs	Sites Schedule DPD	Enfield Design Guide SPD
(I) GD1-GD2	General Development Considerations	Y	(80)				
(II) GD1	Land Use Compatibility			Y			
(II) GD3-GD9	Planning Standards			Y			
(II) GD12-GD13	Flooding and Surface Water Drainage	Y	28, 29				
(I) H2-H4	Housing	Y	2 - 6				
(II) H2-H6	Housing - The Existing Housing Stock		4	Y			
(II) H8-H15	Standards of Residential Development - General Standards of Residential Development		4	Y			
(II) H16	Standards of Residential Development - Conversions		4	Y			Y
(II) H18	Standards of Residential Development - Housing Needs of People with Disabilities		4	Y			
(II) H20	Housing Support Services - Accommodation for Homeless Persons			Y			
(II) H22	Housing Support Services -	Y	6, 9	Y			

UDP POLICY			LDF POLICY DOCUMENTS				
UDP Policy No. <i>(excludes policies expired Sept 07)</i>	Policy Title	Superseded By This DPD	Core Strategy Core Policy No.	Development Management DPD	Area Action Plan DPDs	Sites Schedule DPD	Enfield Design Guide SPD
	Special Needs						
(I) E1-E4	Employment and Economic Development	Y	12	Y			
(II) E1	Availability of Land and Labour	Y	13, 14	Y			
(II) E2-E3	Commercial and Industrial Defined Areas		14	Y			
(II) E4	Special Needs of Small Firms		14, 15	Y			
(II) E5-E7	Secondary Industrial Premises		14, 15	Y			
(II) E9	Non-Commercial and Industrial Uses		14	Y			
(II) E11	Standards of Development			Y			
(II) E12-E13	Infrastructure		20 - 29	Y			
(II) E14-E15	Environmental Safeguards			Y	Y		
(I) S1-S3	Shopping and Town Centres	Y	17				
(II) S1	Town Centres	Y	17				
(II) S2	Town Centres	Y	17				
(II) S3	Management of the Town Centres		17, 18	Y	Y		
(II) S5-S11	Non-Retail Uses in Town Centres		17, 18	Y			

UDP POLICY			LDF POLICY DOCUMENTS				
UDP Policy No. <i>(excludes policies expired Sept 07)</i>	Policy Title	Superseded By This DPD	Core Strategy Core Policy No.	Development Management DPD	Area Action Plan DPDs	Sites Schedule DPD	Enfield Design Guide SPD
(II) S13-S15	Local Centres		17, 18	Y			
(II) S17	Major Out-of-Centre Retail Development			Y			
(II) S18	Food and Drink Establishments			Y			
(II) S19	Design Considerations		30				Y
(II) S20-S21	Accommodation on Upper Floors			Y			
(II) S22	Access for People with Disabilities			Y			
(I) T1-T11	Transportation	Y	24 - 27	Y			
(II) T1	Land Use and Transportation	Y	24 - 27				
(II) T3-T5	Public Transport	Y	26				
(II) T6-T7	Roads - Highway Network	Y	24				
(II) T8-T12	Roads - Environmental Considerations			Y			
(II) T13-T14	Roads - Highway Improvements		24	Y			
(II) T15-T17	Pedestrians	Y	25	Y	Y		Y
(II) T19-T21	Cycling		25	Y	Y		Y
(II) T22-T23	Freight - Road Freight	Y	27	Y			



UDP POLICY			LDF POLICY DOCUMENTS				
UDP Policy No. <i>(excludes policies expired Sept 07)</i>	Policy Title	Superseded By This DPD	Core Strategy Core Policy No.	Development Management DPD	Area Action Plan DPDs	Sites Schedule DPD	Enfield Design Guide SPD
(II) T24	Freight - Rail	Y	27				
(II) T25-T26	Freight - Waterways	Y	27	Y	Y		
(II) T27-T32	Parking			Y			
(II) T33	Safety	Y	9	Y			
(I) AR1-AR2	Arts, Recreation and Tourism		11, 12	Y			
(II) AR1-AR3	Recreation		11	Y			
(II) AR4-AR5	Arts, Culture and Entertainment		11	Y			
(II) AR6-AR7	Tourism		12	Y			
(I) CS1	Community Services	Y	7 - 10	Y			
(II) CS1-CS3	Land and Environmental Considerations			Y		Y	
(II) CS4	Day Nurseries			Y			
(II) CS5	Places of Public Worship			Y			
(II) ET1	Enfield Town - Land Uses		17, 18, 42, 43	Y			
(II) ET3-ET15	Enfield Town - Shopping Developments		17, 18, 42	Y			

## APPENDIX A (Part 2) - RECOMMENDED FURTHER MINOR CHANGES SUGGESTED BY THE COUNCIL<sup>1</sup>

(<sup>1</sup> These changes are only subject to a recommendation because the Council cannot change the document even, to correct minor errors without a recommendation).

### Rolling Schedule of Further Changes – Post Publication Stage The Enfield – Proposed Submission Core Strategy



As At

28<sup>th</sup> JULY 2010

#### Rolling Schedule of Further Minor Changes (FMCs)

The Council has taken the opportunity to identify minor amendments to the Core Strategy DPD now under examination. The **FMCs do not follow** document order.

## Schedule of Further Changes

**Text in Bold Print and underline** Proposed insertion  
 Text with a strikethrough Proposed deletion

Ref:	Chapter, Policy, Tables, Figures	Section, Paragraph, Figures	Further Minor Change	Reason
FMC1	<b>Chapter 3: Spatial vision; General &amp; Glossary</b>	<b>Enfield's</b>	<p>Replace references to community infrastructure, community facilities and social facilities, to one definition of social infrastructure.</p> <p>Redefine within the Glossary definition of Social Infrastructure:</p> <p><del>The range of activities, organisations, and facilities supporting the formation, development and maintenance of social relationships on a community. It includes educational, recreational, health and law and order facilities.</del></p> <p>Replace with:  <u>Covers facilities such as health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities.</u></p>	To address representation raised by MPS/MPA reference. 30/03/T/0

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Further Minor Change	Reason
		<p><u>places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social infrastructure.</u></p>	
FMC 2	Strategic Objective 5	<p>Insert addition words:</p> <p><b><u>Strategic Objective 5: Education, health and wellbeing –</u></b>                      To ensure the capacity and quality of local social infrastructure provision including schools and further education, health <b><u>and policing</u></b> facilities, social care, retail services, leisure and recreation facilities is sufficient to meet the needs of Enfield's existing population and new residents.....</p>	<p>To address representation raised by MPS/MPA reference. 32/04/T/0.</p>

Ref:	Chapter, Section, Paragraph, Tables, Figures	Further Minor Change	Reason
FMC 3	Paragraph 5.96	<p>Insert addition updates:</p> <p><b>5.96</b> In 2007, the Metropolitan Police Authority produced an Asset Management Plan (AMP) <b>(33)</b> for Enfield which looks at the existing estate and local requirements for modern day policing. The AMP identifies that future operational needs will focus on a) delivering several police <u>facilities 'shops' that enable better public access to the police with provision for neighbourhood policing teams</u> with <del>provision for Safer Neighbourhood Teams</del> <b>(34)</b> which will ideally be located within town and local centres that are readily accessible. <u>Neighbourhood police centres without a contact point do not have to be in accessible areas</u> and b) a new custody centre.</p>	To address representation raised by MPS/MPA reference. 32/05/T/0.

Ref:	Chapter, Policy, Section, Paragraph, Tables, Figures	Further Minor Change	Reason
FMC 4	Core Policy 17	<p>Insert addition updates:</p> <p>The Council will strengthen the role of Enfield's town centres by focusing new commercial, retail, leisure, office, residential and <b><u>other appropriate social infrastructure related uses, such as police facilities</u></b> within the centres according to the Borough's town centre hierarchy identified in Table 6.3</p>	<p>To address representation raised by MPS/MPA reference. 32/06/CP17/0</p>
FMC 5	Paragraph 6.26	<p><b>Second and third sentences of Paragraph 6.26</b> – remove reference to draft PPS4 and replace with PPS4 to read as follows:</p> <p>"It is also in line with the objectives set out in the Government's <del>draft Planning Policy Statement 4 (2009): Planning for Prosperous Economies</del> <b><u>Planning Policy Statement 4 (2009): Planning for Sustainable Economic Growth</u></b>, which stresses ... "(and)</p> <p><del>"Draft PPS4 asks Local Planning Authorities to consider...."</del></p>	<p>Update Core Strategy to reflect national guidance by removing reference to draft PPS4 and replace with PPS4</p>

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Further Minor Change	Reason
FMC 6	Paragraph 6.26	<p><b>Clarification:</b> The Council suggest inserting additional text to paragraph 6.26 of the Core Strategy.</p> <p>The <u>Core</u> Policy <b>14</b> accords with <u>the provisions set out in the London Plan consolidated with alterations since 2004 (2008) and its</u> Supplementary Planning Guidance on Industrial Capacity (2008).</p>	<p>Additional clarity is suggested by the respondent National Grid Property Holdings to ensure that the intention of the Core Strategy is in accordance with the provisions set out in the London Plan and its associated Supplementary Planning Guidance on Industrial Capacity (2008).</p>
FMC 7	Paragraph 6.47.	<p><b>Paragraph 6.47.</b> Delete reference to PPS6 and replace with; PPS4 policy EC3.1bi as follows:</p> <p>"The Government's Planning Policy Statement <del>6 (PPS6) on Planning for Town Centres (2005)</del> <b>4 (PPS4): Planning for Sustainable Economic Growth</b>, identifies the situations when the designation of new centres may be appropriate. New centres may be appropriate in areas <del>of significant growth</del> or where there are deficiencies in the existing network of centres (with priority given to deprived areas). Enfield has four strategic growth areas where substantial new growth is</p>	<p>Amend Core Strategy to reflect advice in PPS4 which has replaced PPS6.</p>

Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
		<p>anticipated, with the most significant change taking place at Meridian Water within Central Leaside.</p>	
<p><b>FMC 8</b></p>	<p><b>New Paragraph to follow 6.49</b></p>	<p>Additional paragraph to follow paragraph 6.49 - to read as follows:</p> <p><u>Heritage assets are often concentrated in town centres; PPS4 indicates that these assets if conserved and enhanced are important in promoting and sustaining town centre vitality and viability. Many of the Borough's town centres are designated in part as Conservation Areas for example, Southgate district centre and the major centre at Enfield Town. Town centre proposals which impact on heritage assets will be assessed against criteria contained in Core Policies 30 relating to maintaining the quality of the built and open environment and 31 which applies to preserving and enhancing built and landscape heritage.</u></p>	<p>Minor change proposed to the lower text accompanying Core Policy 17 to reflect the new guidance in PPS4 relating to heritage assets.</p>



Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
FMC 9	Core Policy 18	<p>Amend the final sentence of the final paragraph of Core Policy 18 to read as follows:</p> <p>"If <b><u>If</u></b> it can be demonstrated <b><u>following an impact assessment</u></b> that there will not be a negative impact on <b><u>a)</u></b> the vitality and viability of existing centres, <b><u>b) planned investment in centres,</u></b> and <b><u>c)</u></b> that the development increases the overall sustainability and accessibility of the retail park in question.</p>	<p>Minor change proposed to give clarity to policy CP18 following guidance issued in PPS4.</p>

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Further Minor Change	Reason
FMC 10	New paragraph to follow Paragraph 6.63	<p>New paragraph to follow Paragraph 6.63 – to read as follows</p> <p><u>“PPS4 requires an impact assessment for retail and leisure proposals above 2,500 square metres gross that are not in an existing centre. An impact assessment may also be required for smaller scale proposals where the nature of the proposal is likely to have a significant localised impact on a designated centre(s)”</u></p>	Minor change proposed to Core Strategy text following guidance issued in PPS4.
FMC 11	Paragraph 7.28	<p>Amend paragraph to read:</p> <p>The NLWP will ensure that sufficient land is allocated for waste management facilities capable of dealing with the combined apportionment targets for the seven boroughs: <del>1,514,000</del> <b>1,504,000</b> tonnes/year by 2010; <del>2,005,000</del> <b>1,994,000</b> tonnes/year by 2015 and <del>2,355,000</del> <b>2,341,000</b> tonnes/year by 2020.</p>	To ensure consistency with the London Plan (2008).

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
FMC 12	New paragraph 4.5.	<p>New paragraph 4.5. To read as follows:</p> <p><u>“Chapter 9 Core Policies for Places provides more detailed information on how the Council will work with its partners to achieve growth within these areas, including the provision of necessary social, physical and green infrastructure. The Infrastructure Delivery Plan supports the Council’s approach and forms a key part of the evidence base. This evidence while looking at the whole borough, also focuses on the nature, timing and funding of infrastructure required in delivering growth in each of these areas.”</u></p>	Additional lower case text to provide clarity to Core Policy 1.

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Further Minor Change	Reason
FMC 13	New paragraph 4.6.	<p>New paragraph 4.6. To read as follows:</p> <p><u>Central Leaside, North East Enfield and the North Circular Road Strategic Growth Areas lie close to the Borough boundary. The Council will work with its partners at the sub-regional level through for example, the North London Strategic Alliance (the sub-regional strategic partnership) and at local level through the Enfield Strategic Partnership and the Area Partnerships to maximise benefits to communities. The Council will also continue the ongoing informal dialogue with adjoining boroughs and stakeholders to establish cross boundary needs arising from respective emerging Local Development Frameworks. Appendix 5 provides details of adjoining Borough policies and developments that inform this Core Strategy.</u></p>	<p>Additional lower case text to make reference to cross boundary borough needs.</p>

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Further Minor Change	Reason
FMC 14	Spatial Strategy	<p><b>Clarification:</b> The Council suggest inserting additional text to the spatial strategy.</p> <p>Spatial Strategy: Enfield's valuable reservoir of strategically important industrial land in the east of the Borough will be safeguarded and managed <b><u>in accordance with the London Plan and its Supplementary Planning Guidance on Industrial Capacity (2008)</u></b> to meet the needs of modern industry in an efficient and sustainable way.</p>	<p>Additional clarity is suggested by the respondent, National Grid Property Holdings to ensure that the intention of the Core Strategy is in accordance with the provisions set out in the London Plan and its associated Supplementary Planning Guidance on Industrial Capacity (2008).</p>
FMC 15	Core Policy 3	<p>The third paragraph of CP3 to be amended and the final sentence of the final paragraph of CP3 be deleted to avoid misinterpretation.</p> <p>In order to determine the precise number of affordable housing units to be delivered for each development, the Council will <b><u>plan for balanced and sustainable communities and</u></b> work with developers and other partners to</p>	<p>The overall approach and policy intent is to provide balanced communities borough-wide and not single out addressing balance within areas of high social housing.</p>

Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
		<p>agree an appropriate figure, taking into consideration site-specific land values, grant availability and viability assessments, market conditions, as well as the relative importance of other planning priorities and obligations on the site. The Council will monitor the implementation of these targets and identify any need to review them via the preparation of the Annual Monitoring Report.</p> <p>The Council will aim for a borough-wide affordable housing tenure mix ratio of 70% social rented and 30% intermediate provision. <del>In areas where there are existing high levels of social housing, it may be appropriate to seek a higher proportion of intermediate housing provision in order to create sustainable and balanced communities, in both social and economic terms.</del></p>	

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
FMC 16	Core Policy 4	<p>Amend the first paragraph of CP4 to read as follows:</p> <p><b><u>'High quality design</u></b> Excellence and sustainability will be required in all new homes. New housing developments should take account of the design an construction policies and sustainable design and construction guidance set out in the London Plan and should seek to exceed the Code for Sustainable Homes Level 3.....'</p>	<p>Minor change proposed following representation by National Grid Property holdings.</p>
FMC 17	Core Policy 6	<p>Amend 2<sup>nd</sup> Paragraph to Core Policy 6 to read:</p> <p><b><u>The Council will work to ensure that there is appropriate provision of specialist accommodation across all tenures.</u></b> Criteria for assessing applications for housing to meet particular needs, having regard to need and supply will be set out in the Development Management Document. ....</p>	<p>Additional clarity.</p>

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
FMC 18	Paragraph 5.66	<p>Recommend amended wording to paragraph 5.66:</p> <p>The infrastructure requirements set out in the above Core Policy have been based on an assessment of need informed by a) the GLA's <del>2007</del> <b>2009</b> pupil projections for Enfield (<del>28</del>) and b) the estimated child yield arising from additional housing growth proposed within each of the strategic growth areas. The Core Policy will help to deliver the necessary primary and secondary schools to accommodate pupils arising from the levels of growth being proposed.</p>	<p>The change will bring the Core Strategy into line with the Infrastructure Delivery Plan.</p>
FMC 19	Core Policy 17	<p>Amend the final paragraph of Core Policy 17 to read as follows:</p> <p>"The Council will work with its partners to support town centre management initiatives which enhance the vitality and viability of centres, <del>and</del> improve the quality of the environment, <b><u>and conserve and enhance the historic, archaeological and architectural heritage</u></b> within them.</p>	<p>Minor change proposed to give clarity to Core Policy 17 following guidance issued in PPS4.</p>



Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Further Minor Change	Reason
FMC 20	Core Policy 20	<p>Suggest inserting additional text to Core Policy 20:</p> <p>The Council will set local standards and targets, based on an understanding of local potential and opportunities for renewable or low carbon energy and existing or planned decentralised energy infrastructure. Where opportunities are identified, development will be required to contribute to realising these opportunities <b><u>subject to the Council and its partners undertaking further work that is required to explore the feasibility and development potential projects or strategies to take them forward</u></b></p>	<p>Additional clarity to ensure that the intention of the Policy is subject to detailed feasibility work.</p>
FMC 21	Spatial Strategy, Paragraph 2 under "Improving Quality of Life"	<p>Amend Spatial Strategy, Paragraph 2 under "Improving Quality of Life"</p> <p>Sufficient waste management facilities will be retained and safeguarded to ensure Enfield plays its part alongside six other North London boroughs in dealing with north London's waste and developing the North London Joint Waste Plan. The Edmonton EcoPark is ideally</p>	<p>NLWA requests the Spatial Strategy be revised to confirm the position in relation to the EcoPark. To address representation raised by NLWA reference: 40/01/T/0.</p>

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
		<p>located to continue to play a strategic role in waste management. New more sustainable waste movement and treatment processes will be supported on the site <b><u>including the future decommissioning of the incinerator.</u></b> following the end of the current incinerator's lifespan.</p>	
FMC 22	Core Policy 30	<p>Core Policy 30: Amend the 2<sup>nd</sup> bullet as follows:</p> <p>Build on <b><u>and extend</u></b> work of the Enfield Characterisation Study to investigate wider urban design issues, and identify: ".....</p> <p>And amend the 4<sup>th</sup> sub bullet as follows:</p> <p>Areas appropriate, <b><u>inappropriate and sensitive to</u></b> for tall buildings, including consideration of the strategic growth areas located in the Upper Lee Valley Opportunity Area. <b><u>These areas will be mapped and policies will be developed as part of the Development Management DPD.</u></b></p>	<p>To clarify the Council's commitment to further work, and to specify where this work will take place.</p> <p>To more accurately reflect the advice of the English Heritage/CABE Guidance on Tall Buildings (2007).</p>

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
FMC 23	Paragraph 8.25	<p>Amend the penultimate sentence of paragraph 8.25 as follows:</p> <p>"However, <u>these benefits may equally be achieved through other means and</u> the suitability of these areas <u>for tall buildings</u> may depend on the provision of sufficient transport infrastructure and a more detailed analysis of <u>the</u> potential impacts on their surroundings, <u>including local character, in accordance with Policy 4B.1 of the London Plan</u>"</p> <p>Amend the final sentence of paragraph 8.25 as follows:</p> <p>Therefore, <del>the suitability for</del> <u>areas appropriate, sensitive or inappropriate for tall buildings will be considered in the</u> relevant area <del>action plan</del> <u>Development Management DPD, and more detailed work will be conducted to inform proposals in relevant area action plans</u> <del>and</del>. <del>This</del> will be informed by the work set out above.</p>	<p>Remove ambiguity regarding approach to tall buildings and clarify approach to setting out the framework for appropriate, inappropriate and sensitive to tall buildings in line with the English Heritage/CABE Guidance on Tall Buildings and the London Plan.</p> <p>Clarify approach to Upper Lea Valley Opportunity Area</p> <p>More closely reflect the requirements of the London Plan.</p>

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
FMC 24	Paragraph 8.42	<p>Amend paragraph 8.42 as follows:</p> <p>The number of assets on English Heritage's Heritage at Risk Register will be monitored and the Council will work with partners to reduce the number <del>of buildings</del> <u>assets</u> at risk in the Borough."</p>	<p>Clarification needed that the Council will work with partners to reduce any asset identified on the register, such as buildings at risk.</p>
FMC 25	Core Policy 38	<p>Amend the final paragraph of CP38 to read as follows:</p> <p>A coordinated strategy to managing flood risk in accordance with Core Policy 28 and a co-ordinated strategy for the decommissioning of <del>surplus</del> gas holders and other contaminated land in the area in line with Core Policy 32.'</p>	<p>Minor change proposed to following representation by National Grid Property holdings.</p>
FMC 26	Core Policy 31	<p>Amend the 4<sup>th</sup> bullet point as follows:</p> <p>Ensuring developments in areas of archaeological importance take into account the potential for new finds by requiring consultation with English Heritage and on-site investigations, <u>including the appropriate recording and dissemination of</u></p>	<p>EH recommends that the 4th bullet of the policy requires the recording appropriate dissemination of archaeological evidence</p>

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
		<u>archaeological evidence.</u>	
FMC 27	Core Policy 41	<p>Amend Core Policy 41, 3<sup>rd</sup> bullet as follows:</p> <p>High quality new development that complements the <del>historic buildings and features</del> <b><u>heritage assets and historic environment</u></b> of Ponders End, such as the listed Middlesex University building in Ponders End Central and Ponders End Flour Mill at Ponders End Waterfront.</p>	Replace "historic buildings and features" with "Heritage Assets and the Historic Environment"
FMC 28	Core Policy 42	<p>Amend Core Policy 42, 1<sup>st</sup> paragraph as follows:</p> <p>The Council will seek to retain Enfield Town's market town character and protect its heritage assets, <b><u>their setting and the historic environment</u></b>, whilst maximising development opportunities to</p>	Expand reference to heritage assets to heritage assets and their settings.

Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
		enhance the retail function of the centre to better serve the retail and community needs of the Borough and beyond.	
FMC 29	Paragraph 7.45	<p>Add a further bullet point to paragraph 7.45 as follows:</p> <p>The Core Strategy seeks to address the following key transport issues:</p> <ul style="list-style-type: none"> <li>• <b><u>Provide a framework by which transport proposals are appropriate to their context, complement local character and are designed in accordance with the principles set out in Core Policy 30.</u></b></li> </ul>	Greater emphasis that transport proposals to be of quality design that respects the local context and character.

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
FMC 30	Paragraph 2.68	<p>Amend Paragraph 2.68 as follows:</p> <p>Enfield has much in common with other outer London boroughs, but its rich diversity and distinctiveness arises from its particular location and topography, landownership patterns and its response to the social, economic and political changes that have affected Greater London. One of its main distinguishing characteristics is the contrast between the parkland setting to the north west and the industrial band to the east, arising from its topography. Others include a significant number of important historic buildings, estates, parks and gardens; a network of former village centres; a network of rivers and waterways; groupings of 19th Century housing that arrived with the railway and inter-war housing that arrived with the Underground. <b><u>Many of these features are important and valued heritage assets. Just one example of this is provided by the Borough's</u></b> 21 conservation areas, reflecting early country estates, old town and village centres,</p>	Greater emphasis on environmental context.

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
		<p>nineteenth century railway-centred development, the Borough's industrial past and other important local townscapes. For much of the rest of the Borough, good urban environments enhance residents' quality of life. But in other areas former land uses or patterns of development have resulted in poor quality environments. Factors such as traffic and parking congestion, the decline in local and independent retail facilities and the effects of air and noise pollution contribute to a deteriorating quality of life for some residents.</p>	
FMC 31	<p><b>Chapter 2 Key Issues New Bullet Point</b></p>	<p>Insert additional bullet point under Key Issues.</p> <p><b><u>"Promote the protection and enhancement of the Borough's waterways by improving water quality and ecological diversity through the River Basin Management Plan."</u></b></p>	<p>Environment Agency recommends reference be made to improving water quality and ecological diversity.</p>



Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
FMC 32	Chapter 2 Key Issues Bullet point 8	<p>Insert additional words in bullet point 8:</p> <p>“Protecting, enhancing and improving access to Enfield’s green and open areas, <u>including enhancing biodiversity and linking habitats via wildlife corridors</u> particularly in areas deficient in open space in the east and south of the Borough”.</p>	<p>Environment Agency recommend that bullet 8 goes beyond green spaces and include enhancing biodiversity and the linking of habitats via wildlife corridors to allow for migration as climate changes.</p>
FMC 33	Chapter 2 Key Issues Bullet point 13	<p>Insert additional wording to bullet point 13:</p> <p>Responding to the local causes and impacts of climate change and addressing other environmental issues likely to affect Enfield by, for example, responding to flood risk in the Upper Lee Valley, <u>land contamination associated with historic industrial uses particularly in the east of the Borough</u>, developing the Council’s sustainable design and construction policies, securing sustainable utility infrastructure provision for future developments, and actively planning with the other North London boroughs to provide</p>	<p>Environment Agency: Environmental quality in general is not mentioned as a key issue. We suggest that this could be merged with the point above to include land contamination.</p> <p>In addition this section does not identify the need to manage the effects of historic industrial use for the protection of human health, controlled waters and other important receptors as a key issue.</p>

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
		sufficient land in the sub region to deal with waste;	
<b>FMC 34</b>	<b>Strategic Objective 4</b>	Insert additional word:  To ensure new residential development is supported by good public transport, social, <b>green</b> and utilities infrastructure and achieve the maximum intensity of use having regard to development plan policy.	Reference to green infrastructure.
<b>FMC 35</b>	<b>Strategic Objective 9</b>	Insert addition word:  <b>Natural environment</b> - To protect and enhance Enfield's natural heritage by retaining the open character of the Borough, safeguarding the green belt and other open space and developing the wider network of green infrastructure. To meet the deficiencies in open spaces that	Meet representations made by the Environment Agency.

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
		<p>exists in the east and south of the Borough and improve access to green areas and waterways <b><u>(i.e. through River Restoration projects)</u></b> particularly for the communities close to the Lee Valley Regional Park.</p> <p>We support this objective and again suggest that reference is made to green infrastructure. We recommend that the last sentence of the objective be amended as follows:</p>	
FMC 36	Strategic Objective 10	<p>Insert additional words:</p> <p><b>Built environment</b> - Use a design-led approach to developments and places, <b><u>while addressing historic land contamination,</u></b> to promote a step-change in the quality of the built environment and public realm, creating safe and accessible environments and improve urban greening with tree planting and landscaping. To maximise the contribution that heritage assets and existing features make, enhance local distinctiveness and identity, and create safer, stronger communities.</p>	<p>To meet Environment Agency recommendation that the section titled 'Improving Quality of life' makes reference to contaminated land remediation, ecological enhancement and the Water Framework Directive and River Basin Management Plan.</p>

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Further Minor Change	Reason
FMC 37	<p><b>Spatial Strategy</b> 1<sup>st</sup> paragraph under <b>'Improving quality of life'</b>:</p>	<p>Insert additional words in 1<sup>st</sup> paragraph under <b>'Improving quality of life'</b>:</p> <p>.....'Parts of the Upper Lee Valley are at medium to high risk from flooding and comprehensive redevelopment of the core areas will provide opportunities <u>to remediate contaminated land</u>, renew <u>and enhance</u> existing flood defences <u>and rivers</u>, thereby supporting the objectives of the Environment Agency's Thames Catchment Flood Management Plan <u>and meet objectives of the Water Framework Directive, River Basin Management Plan.</u></p>	<p>Recommendation by EA that makes reference to contaminated land remediation, ecological enhancement and the Water Framework Directive and River Basin Management Plan.</p>
FMC 38	<p><b>Paragraph 7.17</b></p>	<p>Insert additional wording</p> <p>7.17 The London Plan notes that water is an increasingly scarce resource for which there is rising demand. Hotter drier summers due to climate change combined with the predicted growth in Enfield's population may increase overall water demand, whilst reducing</p>	<p>Recommendation by EA to include additional words to recognise implications of peak rainfall events and increased development.</p>

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
		availability <b><u>and placing further pressure on water quality.</u></b> Higher intensity rainfall events <b><u>and increased development</u></b> are also likely to increase <b><u>surface run-off,</u></b> foul and storm water discharge and make it more difficult to retain rainfall for utilisation.	
<b>FMC 39</b>	<b>Core Policy CP28</b>	Insert after the 2 bullet points within the policy:  <b><u>"The Sequential Approach, Exception Test , and all other requirements of PPS25 will still need to be applied to individual developments"</u></b>	Recommendation by EA that the policy should contain some recognition that, where appropriate, compliance of part c of the Exception Test is required in order for developments to be considered appropriate from a flood risk perspective.
<b>FMC 40</b>	<b>Core Policy CP32</b>	Insert additional text in 2nd bullet point within the policy:  Ensure that water quality will not be compromised, and to secure, where appropriate, improvements to water quality. The Council will work with partners, particularly the Environment Agency, to seek improvements to the water environment <b><u>in adherence with</u></b>	Recommendation by EA that 2 <sup>nd</sup> bullet point needs to be strengthened to say that the Council will be working towards achieving good ecological status in all water bodies in adherence with the Water Framework Directive and as per the programme of measures set within the Thames River Basin Management Plan.

Ref:	Chapter, Section, Paragraph, Tables, Figures	Further Minor Change	Reason
		<b><u>the Water Framework Directive and as per the programme of measures set within the Thames River Basin Management Plan.</u></b>	
FMC 41	Core Policy CP35	Insertion within 1st sentence of CP35  The Council will work with the Lee Valley Regional Park Authority, British Waterways, riparian owners <b><u>the Environment Agency</u></b> and other partners to:.....	The Environment Agency should be stated as a partner in this section.
FMC 42	Core Policy CP37	Insertion within final sentence of CP37  ....Opportunities will be taken to improve, <b><u>restore,</u></b> and open up access to the Lee Valley Regional Park and waterfront through promoting opportunity areas along the Borough's eastern boundary.:.....	EA recommend the last sentence of this policy is amended to include the word 'restore'.

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Further Minor Change	Reason
FMC 43	Core Policy CP38	Insertion of new bullet points within CP38 <ul style="list-style-type: none"> <li>▪ <u>Restoration of the waterways which run through the development site as part of an integrated approach to water management in Meridian Water.</u></li> <li>▪ <u>Development should achieve efficiency target of 105 l per person per day in line with the Code for Sustainable Homes.</u></li> </ul>	EA recommendation that a bullet point is included to ensure the restoration of all waterways which run through the development site.  In addition EA recommend that a bullet point referencing water efficiency target of 105 l per person per day is included as a minimum.

Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
FMC 44	Table 10.2	Insertion of additional measure under:  32. Pollution.  <b>Percentage of Contaminated land brought back into beneficial use.</b>	EA recommendation that table 10.2 include measure or indicator for the amount of Contaminated land brought back into beneficial use.
FMC 45	Spatial Strategy	Insert a new paragraph under <b><u>"Implementation"</u></b>  <b><u>A holistic approach will be adopted to ensure that the delivery of new housing, education, community infrastructure, employment and transport improvements in an area are considered as a whole rather than being planned for and provided independently of each other. Delivery of social, economic, and physical change can only be achieved by building social and economic capital. The Council will work with a range of partners including the public, private and third sector to deliver the strategy, and will help to</u></b>	In response to Local Labour Group representation. Agreed minor change with Council administration.



Ref:	Chapter, Policy, Tables, Figures	Section, Paragraph, Further Minor Change	Reason
		<u>build the capacity amongst partners including the voluntary sector to deliver change.</u>	
FMC 46	Table 5.1	In Table 5.1 supporting CP2 Housing Supply include reference to <b>"including New Southgate"</b> within North Circular housing supply figures.	To provide additional clarity in response to Local Labour Group representation.
FMC 47	Core Policy 9	Insertion of new bullet point to CP9 <ul style="list-style-type: none"> <li>• Supporting area based policy interventions relating to the place shaping agenda which seek to tackle social disadvantage;</li> <li>• Promoting accessibility whereby all members of the community have access to</li> </ul>	To provide additional clarity in response to Local Labour Group representation. Agreed minor change with Council administration.

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
		<p>good quality health care, housing, education and training, employment, open space and other social facilities in locations that best serve the community;</p> <ul style="list-style-type: none"> <li>• Contributing towards reducing crime, fear of crime and anti-social behaviour by using design principles that create environments which promote community safety and discourage offending, in accordance with Core Policy 30; and</li> <li>• Actively encouraging participation by all members of the community in planning and decision making processes</li> <li>• <b><u>Requiring the provision of necessary community facilities to support local need within the delivery of Core Policies 37- 45.</u></b></li> </ul>	

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
FMC 48	Core Policy 40	<p>Insertion of additional text at the end of 2<sup>nd</sup> paragraph in CP40.</p> <p>Across the North East Enfield area, there is scope to develop 1,000 new homes (see Core Policy 2 on Housing Supply and Locations for New Homes). The focus for change and development, and hence the majority of these new homes, will be in Ponders End (see Core Policy 41 on Ponders End below), where there is a string of key opportunity sites along an east-west axis. In the west, in the heart of Ponders End local centre, there is a cluster of sites including the former Middlesex University campus, adjacent Queensway employment area, land around Tesco and sites along Hertford Road, referred to as "Ponders End Central". In the middle, along South Street, there are opportunities at the gasholder site on South Street, around Ponders End railway station, and at Alma Estate. This collection of sites is referred to as "Ponders End South Street Campus". In the east, near the Lee Valley Regional Park, development opportunities</p>	<p>To provide additional clarity in response to Local Labour Group representation. Agreed minor change with Council administration.</p>

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Further Minor Change	Reason
		<p>exist at Columbia Wharf and at the southern part of Brimsdown, collectively referred to as "Ponders End Waterfront". <b><u>The interdependencies of these sites mean that their future should be considered and planned for in a holistic way to ensure that the cumulative social, economic and transport impacts are thoroughly assessed.</u></b></p>	
FMC 49	Core Policy 40 New Paragraph	<p>Insert new paragraph after paragraph 3 of CP40.</p> <p><b><u>The Council will work with the Enfield Strategic Partnership to Develop an Area Partnership for wider North East Enfield and bring forward a Single Implementation Plan.</u></b></p>	<p>To provide additional clarity in response to Local Labour Group representation. Agreed minor change with Council administration.</p>

Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
FMC 50	New Paragraph 9.42	<p>Insert new paragraph after 9.41 within the "Implementation" section supporting CP40.</p> <p><b><u>Working closely with Enfield Strategic Partnership, the Council is to establish a wider Area Partnership that will collectively begin to establish a vision and a Single Implementation Plan to coordinate place shaping in the wider North East Enfield area. The Area Partnership will maximise the synergies between liveability and as well as physical regeneration initiatives.</u></b></p>	<p>To provide additional clarity in response to Local Labour Group representation. Agreed minor change with Council administration.</p>
FMC 51	Core Policy 44 New Paragraph	<p>Insert new paragraph after paragraph 1 of CP44 as follows:</p> <p><b><u>The Council will work with the Enfield Strategic Partnership to Develop an Area Partnership for wider North East Enfield and bring forward a collective vision and single Implementation Plan.</u></b></p>	<p>To provide additional clarity in response to Local Labour Group representation. Agreed minor change with Council administration.</p>

Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
FMC 52	New Paragraph 9.62	<p>Insert new paragraph after 9.61 within the "Implementation" section supporting CP45.</p> <p><u>Working closely with Enfield Strategic Partnership, the Council is to establish a wider Area Partnership that will collectively begin to establish a vision and a single Implementation Plan to coordinate place shaping in the wider North East Enfield area. The Area Partnership will maximise the synergies between liveability and as well as physical regeneration initiatives.</u></p>	<p>To provide additional clarity in response to Local Labour Group representation. Agreed minor change with Council administration.</p>

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Further Minor Change	Reason
FMC 53	Core Policy 38	Reference to Figure 9.4 should be corrected to state ' <b>Map 9.3</b> '	Minor correction in response to National Grid Property Holdings representation.
FMC 54	Paragraph 8.68	<p>Clarification:</p> <p>The Council Development Management DPD will set out criteria for the review <b>and undertake a detailed review</b> of green belt boundaries in accordance with PPG2 and the local character. This work will inform the Development Management DPD.</p>	At hearing session Day 1 the Council agreed to provide additional clarity on the future review of the green belt boundaries.
FMC 55	Core Policy 7, new paragraph to follow paragraph 5.61	<p><b>Additional paragraph to follow paragraph 5.61 - to read as follows:</b></p> <p><b><u>Provision of primary care and adult health and social care will be the subject of ongoing discussions with the PCT and other health care providers as a means to establish future</u></b></p>	Additional lower text to add clarity to the policy.

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
		<p><b><u>requirements. Any changes to health care provision will be highlighted in updates of the Infrastructure Delivery Plan and the Council's Annual Monitoring Report.</u></b></p>	
FMC 56	CP40: North East Enfield	<p><b>Core Policy 40:</b> Social and community infrastructure to support an expanding population will be accommodated. This includes a large new health practice in Innova Park and the expansion of Eagle House surgery in Ponders End (see Core Policy 7). A new Academy will be developed in Ponders End, replacing Albany secondary school, and allowing the Albany School site to be developed for residential or continued educational uses, depending on the Council's future education requirements (see Core Policy 8). The local retail centres of Ponders End, Enfield Highway and Enfield Wash will be enhanced to improve the shopping experience.</p>	To address representation raised by British Waterways reference: 2/22/CP40/3.



Ref:	Chapter, Policy, Tables, Figures	Section, Paragraph, Further Minor Change	Reason
		<p>Sites will be identified in Ponders End to accommodate retail uses in accordance with Core Policies 17 and 18. <b><u>Enhanced access to and quality of recreation and leisure opportunities will also be promoted.</u></b></p>	
FMC 57	Table 10.1	<p><b>Proposed change to Table 10.1:</b></p> <p>"Green Infrastructure" column re-titled to include "<b><u>Blue</u></b>" infrastructure.</p> <p>Amend "Green Infrastructure" column (6-10years phase) to read:</p> <p>Improve access to <b><u>and enhance quality of</u></b> Lee Valley Regional Park <b><u>and Waterways</u></b></p> <p>Amend "Green Infrastructure" column (11-15 years phase) to read:</p> <p>Improve access to <b><u>and enhance quality of</u></b> Lee Valley Regional Park</p>	To address representation raised by British Waterways reference: 2/24/T/2.

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
		<u>and Waterways</u>	
FMC 58	Core Policy 21:	<p><b>Additional text to Core Policy 21:</b></p> <p><b><u>In order to improve water quality in the Borough</u></b>, during the life of this Plan, Thames Water Utilities Ltd plan to improve / redevelop Deephams Sewage Treatment Works.</p>	To address representation raised by Thames Water reference: 47/03/CP21/2.
FMC 59	Paragraph 8.49	<p><b>change to paragraph 8.49:</b></p> <p>Water quality can be improved through a number of measures including the effective design, construction and operation of sewerage systems <b><u>and sewage treatment plant</u></b>. .....</p>	To address representation raised by Thames Water reference 47/06/CP32/2.

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Further Minor Change	Reason
FMC 60	Core Policy 22	<p>Amended text to CP22:</p> <p>Continuing to support the use of Edmonton EcoPark as a strategic waste site and working with the NLWA and London Waste <del>the site operator to maximise the use of the site with more sustainable and efficient</del> <u>secure a new more sustainable and efficient use of the site after the current incinerator is decommissioned.</u> <b><u>waste management processes including the future decommissioning of the current incinerator....</u></b></p>	To address representation raised by NLWA reference: 40/02/CP22/0.
FMC 61	Core Policy 37	<p>Insert additional text:</p> <p>The majority of the Central Leaside area will retain its industrial and employment character (see Core Policy 14). The Strategic Industrial Locations of Eley, Aztec 406, Montagu (the northern part), Kenninghall and Harbet Road estates, as well as the Locally Significant Industrial Sites; The Claverings Estate and the southern part of the Montagu Industrial Area, will be retained and intensified. <b><u>Waste management will be</u></b></p>	To address representation raised by NLWA reference: 40/03/CP37/0.

Ref:	Chapter, Section, Paragraph, Tables, Figures	Further Minor Change	Reason
		<p><u>supported at the Edmonton EcoPark site in line with Core Policy 22....</u></p>	
FMC 62	<p>Core Policy 23 paragraphs 7.40, 7.42 and new paragraph after 7.42</p>	<p>Minor changes proposed to both supporting text and Core Policy.</p> <p><b>7.40 <u>It is understood that</u></b> workable land-based reserves of aggregates in Enfield are <b><u>largely</u></b> depleted. There may be potential for dredging sand and gravel from the King George V Reservoir, but the feasibility of extraction is currently unknown.</p> <p><b>CORE POLICY 23</b></p> <p><b>AGGREGATES</b> The Council will continue to work with its partners, including the London Aggregates Working Party, to identify potential sources of aggregates in the Borough. These</p>	<p>At hearing session Day 1 the Council agreed to provide additional clarity to overcome concerns raised by Lee Valley Regional Park Authority in reference to the King V Reservoir and environmental considerations.</p>

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
		<p>sources will be protected providing that exploitation can be shown to be both feasible and desirable. <del> (for example, when considered against the environmental impact of such operations).</del></p> <p><b>Justification</b>  <b>7.41</b> Initial indications from Thames Water are that there are no plans for the extraction of aggregates from the King George V reservoir, but they have been unable to confirm this and the impact of such operations upon the environmental qualities of the site, which is a Site of Special Scientific Interest, would need to be carefully assessed. There are no other known potential sources of aggregates within the Borough.</p> <p><b>Implementation</b>  <b>7.42</b> The Council will continue to engage with the London Aggregates Working Party regarding potential aggregate resources in the Borough. The Council will also continue to engage with Thames Water <b>and the Lee Valley Regional Park Authority</b> to establish the</p>	

Ref:	Chapter, Section, Paragraph, Policy, Tables, Figures	Further Minor Change	Reason
		<p><u>acceptability</u> of aggregate extraction in the King George V Reservoir. <u>This will be assessed against a range of matters which include the need to consider the degree of impact on the wildlife of the reservoir given its designations as a SSSI and the wider amenity of the Regional Park.</u></p> <p><u>Should further aggregate resources be identified in the Borough, the feasibility of extraction would be assessed against a number of considerations including national and regional planning policy guidance, an adequate and steady supply of minerals to meet demand and the impact of operations on the environment, local character and amenity .If proven, these sites will be identified on the Proposals Map and protected through policies in the Development Management Document.</u></p>	

Ref:	Chapter, Section, Paragraph, Policy, Tables, Figures	Further Minor Change	Reason
FMC 63	Core Policy 38	<p>Insert new text within 1<sup>st</sup> sentence of policy and delete text in brackets in 2<sup>nd</sup> bullet point as follows:</p> <p><del>In</del> <b><u>Based on the evidence of initial growth scenarios</u></b> in the Meridian Water Place Shaping Priority Area (see boundary in <b>Map 9.3</b> <del>Figure 9.4</del>), the objectives of new development will be to create a new community by 2026 with up to 5,000 new homes, 1,500 new jobs and all the necessary infrastructure to support the community and attract families and new employers to the area, including:</p> <p>2<sup>nd</sup> bullet point...</p> <ul style="list-style-type: none"> <li>▪ Approximately 80% of the area should comprise a mix of residential, retail, community uses and open spaces, with 20% of the area <del>(no less than 5.5ha)</del> as revitalised employment uses, integrated into the wider development;</li> </ul>	<p>At hearing session Day 2 the Council agreed to provide a FMC to overcome concerns of the need for clarity and flexibility in terms of the principles established in the policy, as raised by La Salle Investment Management.</p>

Ref:	Chapter, Section, Paragraph, Policy, Tables, Figures	Further Minor Change	Reason
FMC 64	Core Policy 14	<p>Reference relating to Montagu Industrial Area</p> <p>Name of industrial area Montagu Industrial Area (northern section) <del>including Kenninghall Estate and Rail Track Land</del></p> <p>Area of site to the nearest hectare <del>12</del> <b>10 ha</b></p>	<p>In light of recommendations from the Employment Land Study Update report (2009), and following discussions between the Council and the GLA in terms of reviewing SIL boundaries, it has been recommended that the area should be retained for employment uses, but the southern part (area covered by the former rail sidings at Rays Road and Kenninghall Estate) could potential be considered as part of a comprehensive masterplan for Meridian Water.</p>
FMC 65	Core Policy 14: Safeguarding Strategic Industrial Locations	<p>Reference relating to Harbet Road (Lee Valley Trading Estate) within CP14 to read:</p> <p>Name of industrial area: Harbet Road <b><u>Industrial Area</u></b> (<b><u>covering Lee Valley Trading Estate, Hastingwood Trading Estate and Stonehill Business Park</u></b>)</p>	<p>Consistency with the Employment Land Studies</p>



Ref:	Chapter, Section, Paragraph, Policy, Tables, Figures	Further Minor Change	Reason
FMC 66	Core Policy 14	<p>Reference relating to: Great Cambridge Road Industrial Area and Martinbridge Trading Estate</p> <p>Name of industrial area Great Cambridge Road <del>Industrial Area</del> and Martinbridge Trading Estate</p> <p>Replace with the following Great Cambridge Road <b>(part)</b> and Martinbridge Trading Estate <b>(part)</b></p>	<p>Consistency with the London Plan. Only part of Martinbridge Trading Estate is to be retained as IBP</p>
FMC 67	Core Policy 14	<p>Reference relating to: Total: 311*</p> <p>Total: <del>311</del> <b>309*</b></p> <p>* this measurement is the gross employment floorspace <del>area</del>, excluding main roads and amenity areas.</p>	<p>The southern part of Montagu Industrial Area has been excluded from SIL, but included as LSIS.</p> <p>To provide clarity.</p>
FMC 68	Core Policy 15	<p>Reference relating to The southern part of Montagu Industrial Area to read:</p> <p>Replace with: The southern part of Montagu Industrial Area <b>(includes the former rail sidings at Rays Road and Kenninghall Estate)</b></p>	<p>To provide clarity.</p>

Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
FMC 69	Core Policy 15	<p>Reference relating to: Footnote 40: Replace with:</p> <p>Further details of the review of Strategic Industrial Locations is set out in Enfield's review of Employment Designations – Further Background to the Submission Core Strategy (<del>December 2009</del> <b>May 2010</b>)</p>	Report was updated and agreed in May 2010.
FMC 70	Glossary	<p>Glossary to include the following definition:</p> <p><b><u>Third Sector: A term used to describe the collection of non-governmental organisations that are value driven and principally reinvest their surpluses to further social, environmental or</u></b></p>	Definition provided for clarity.

Ref:	Chapter, Section, Paragraph, Policy, Tables, Figures	Further Minor Change	Reason
		<p><u>cultural objectives. This includes voluntary and community organisations, charities, social enterprises, cooperatives and mutuals and housing associations.</u></p>	
FMC 71	Foreword	<p>Replace all text with the following.</p> <p><u>By Councillor Del Goddard Lead Member for Regeneration and Improving Localities</u></p> <p><u>Enfield Council has had a longstanding commitment to produce a document that sets out the Council's overall ambitions and aspirations for Enfield's future between now, 2026 and beyond. This document is known as the Core Strategy. It is the lead document within the Council's New Local Development Framework which will replace the existing Unitary Development Plan.</u></p>	Change in Lead Member.

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Further Minor Change	Reason
		<p><u>With this adopted Core Strategy there comes greater confidence in facilitating the delivery of sustainable communities through coordinating social, economic, physical and green infrastructure. This document marks a significant milestone that enables the Council to put into practise its vision for a prosperous and sustainable borough.</u></p> <p><u>Our LDF is built on a thorough understanding of the local challenges and opportunities facing Enfield. It is informed by extensive research, feasibility studies and the participation of local communities and others who have a stake in the future of the borough. This means we have strong evidence based policies to guide the creation of new homes, jobs and services essential to support Enfield's growing communities and improve the quality of life for existing residents.</u></p>	

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
		<p><u>Enfield's Core Strategy focuses change in the areas of the borough that need it most – the south and east. It also aims to protect and enhance those parts of the borough which already offer a good quality of life to residents. The Council has a community leadership role to play and is working with our partners in the private, public and third sectors to deliver a programme of transformational change. Changes that will really make a difference to the lives of the people who live, work and study in Enfield, making sure that everyone has access to the same opportunities and can really see improvements in their quality of life.</u></p> <p><u>This Core Strategy gives us certainty over development in the borough over the coming years and is based on a shared understanding of our commitments and priorities, and those of our partners, for the long term. Many issues cross</u></p>	

Ref:	Chapter, Section, Policy, Paragraph, Tables, Figures	Further Minor Change	Reason
		<p><u>borough boundaries and this Core Strategy and other LDF documents will help facilitate joint working with neighbouring authorities.</u></p> <p><u>The strategy also provides the flexibility to respond to current and future social and economic challenges and puts us in a strong position to take the fullest advantage of investment opportunities in Enfield as well strengthening our role in the opportunity area of the Upper Lee Valley and North London as a whole.</u></p>	

Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
FMC 72	Introduction	<p>Changes to the Introduction section of the document.</p> <p><b>1 Introduction</b></p> <p><b>1.1</b> Enfield has much to offer - our cultural diversity, heritage, proximity to Central London and to open countryside make it a good place to live, work, study and do business. Enfield is growing and changing, our population and diversity is increasing but so too is the gap between the prosperous and deprived neighbourhoods of the Borough. This represents a major challenge for the Borough and one which will guide the strategies and plans of the Council and its partners in planning for Enfield's future.</p> <p><b>1.2</b> Enfield's Sustainable Community Strategy was revised by the Enfield Strategic Partnership in 2009. The Partnership is made up of a wide spectrum of local public, private, voluntary and community organisations including the Council, police and health providers. The Partnership is committed to</p>	Update the document post pre-submission and submission stage.

Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
		<p>making Enfield a healthy, prosperous and cohesive community living in a borough that is safe, clean and green, through social progress that recognises everyone's needs, effective protection of the environment, prudent use of natural resources, and promoting economic growth and employment opportunities for Enfield residents.</p> <p><b>1.3</b> The Partnership has adopted a proactive place shaping approach to deliver this commitment. Place shaping is about making the whole of Enfield a place of choice where people choose to live, work, learn and do business now and in the future. The Council is preparing a Local Development Framework (LDF) which will provide the long-term spatial vision, policies and implementation programmes to deliver this commitment over the next 20 years. This means planning now for good quality new homes, shops and businesses, improved transport systems, and better employment opportunities. It means planning to conserve the Borough's</p>	



Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
		<p>attractive built heritage areas, parkland and open landscapes whilst enhancing the environment elsewhere to bring it up to the standard of the best. The LDF, together with the London Plan, will comprise the development plan for the Borough and will replace the Council's Unitary Development Plan (UDP).</p> <p><b>1.1 Enfield's Local Development Framework</b></p> <p><b>1.4</b> The Council is required to prepare the LDF by the Planning and Compulsory Purchase Act 2004. Enfield's LDF will contain the following documents, the most important of which is the Core Strategy which sets out the Council's strategy for planning in Enfield and provides the context for more detailed documents:</p> <ul style="list-style-type: none"> <li>▪ Core Strategy;</li> <li>▪ Proposals Map;</li> <li>▪ Sites Schedule;</li> <li>▪ Enfield Design Guide;</li> <li>▪ Development Management Document;</li> </ul>	

Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
		<ul style="list-style-type: none"> <li>▪ Enfield Town Area Action Plan and Masterplan for the area around Enfield Town station; North East Enfield Area Action Plan,</li> <li>▪ Ponders End Framework for Change and three Planning Briefs for the key sites in Ponders End;</li> <li>▪ Central Leaside Area Action Plan and Masterplan for Meridian Water;</li>   <li>▪ North Circular Area Action Plan and Masterplan for New Southgate; and</li> <li>▪ North London Joint Waste Plan.</li> </ul> <p><b>1.5</b> The relationship between these documents is set out in Appendix 1. Further details on the content, role and production timetable for each of them is set out in the Council's Local Development Scheme <b>(1)</b>. Under the terms of the Act, most of the UDP's policies have been retained and will remain valid until they are superseded by the relevant parts of new LDF documents. The relationship</p>	

Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
		<p>between existing UDP policies and new LDF documents, and the UDP policies which are superseded by this Core Strategy are set out in Appendix 2.</p> <p><b>1.2 About this document</b></p> <p><b>1.6</b> This Core Strategy sets out a spatial planning framework for the long term development of the Borough for the next 15 to 20 years. It is a strategic document providing the broad strategy for the scale and distribution of development and the provision of supporting infrastructure, ensuring that investment decisions are not made in isolation but are properly coordinated to ensure development is sustainable. It contains core policies for delivering the spatial vision, guiding patterns of development and is supported by other development plan documents within the LDF such as area action plans and a waste plan.</p> <p><b>1.7</b> The Council has been working in partnership with other infrastructure</p>	

Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
		<p>providers such as the Primary Care Trust and Transport for London in order to identify the range of physical, social, and green infrastructure required to facilitate the development set out in this Core Strategy, particularly in the strategic growth areas. Alongside the Core Strategy, the Council <b>has prepared</b> <del>is preparing</del> an <b>Infrastructure Delivery Plan</b>, which sets out the infrastructure required to support future housing provision and predicted population growth in the Borough, with details of when, where and by whom the infrastructure will be delivered. A summary of the core infrastructure phasing is provided in Chapter 10.</p> <p><b>1.8</b> The Core Strategy has evolved following earlier consultations on the key issues and options for the Borough in 2007 and the Council's preferred options in 2008. The Issues and Options Report looked at the problems, challenges, opportunities, issues and the potential options to deal with them. The Preferred Options Report took this further and</p>	

Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
		<p>set out the Council's suggested strategic spatial planning policies. Further consultation on the preferred options for strategic growth areas in the Borough in 2009 helped to refine the strategy. <u>Pre-submission consultation took place in December 2009 and the Council formally submitted the Core Strategy in March 2010. Public hearings sessions were held in June and July and the Inspector's binding report was received on the ?? The Council adopted the Core Strategy at Full Council on the 10<sup>th</sup> November 2010. The is adopted Core Strategy Submission version reflects a continuous 5 year process and</u> has taken account of the extensive responses received during consultation on these previous stages and sets out the Council's spatial strategy for the Borough for the next 15 to 20 years.</p> <p><b>1.9</b> Each stage has been informed by an independent sustainability appraisal to evaluate the social, economic and environmental effects</p>	

Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
		<p>of the suggested options and final preferred strategy. An Equalities Impact Assessment (EqIA) has been undertaken to ensure that the policies and proposals within the Report do not discriminate against specific groups within Enfield's communities. The report has also been subject to an Appropriate Assessment (also known as a Habitats Regulations Assessment) to ensure that the Core Strategy does not adversely impact upon nature conservation sites of European Importance (the Natura 2000 network and Ramsar sites). The LDF is also informed by a number of technical studies which contribute to the evidence underpinning the Core Strategy and other documents. Further information on the evidence base is set out in Appendix 4.</p> <p><b>1.10</b> The final Core Strategy will be accompanied by <u>a fully interactive, on-line Proposals Map in addition to a paper format Proposals Map</u> illustrating the boundaries of the various designations set out in the main</p>	

Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
		<p>body of the Report. The designations to be shown on the Proposals Map are set out in the illustrative maps in Appendix 7. Once the Submission Core Strategy is found to be sound it will be adopted and supported by a fully interactive, on-line Proposals Map in addition to a paper format.</p> <p><b>The Structure of this Report</b></p> <p><b>1.11</b> Chapter 2 contains a brief description of the national, regional and local policy and guidance which inform the Core Strategy. It then summarises the context for this report, giving a spatial overview of Enfield highlighting the key strategic planning issues.</p> <p><b>1.12</b> Chapter 3 "Enfield Spatial Strategy", puts forward the Council's spatial vision, strategic objectives and a spatial strategy for Enfield.</p> <p><b>1.13</b> Chapters 5 to 8 set out policies for specific themes such as housing, economic development, the physical environment and travel. Chapter 9 sets out more detailed policies for</p>	

Ref:	Chapter, Policy, Tables, Figures	Section, Paragraph, Further Minor Change	Reason
		<p>strategic growth areas in the Borough and the Council's place shaping priority areas.</p> <p><b>1.14</b> Chapter 10 looks at how the Core Strategy will be delivered and monitored.</p> <p><del><b>1.3 How to make representations on this document</b></del></p> <p><del><b>1.15</b> This Core Strategy Submission Report and its accompanying Sustainability Appraisal are available to view at the following locations:</del></p> <ul style="list-style-type: none"> <li><del>▪ Enfield's Public Libraries</del></li> <li><del>▪ The Civic Centre, Enfield Town.</del></li> </ul> <p><del><b>1.16</b> The documents are also available to view on the Council's website at: <a href="http://www.enfield.gov.uk/core-strategy">www.enfield.gov.uk/core-strategy</a></del></p> <p><del><b>1.17</b> Representations are invited relating to issues of soundness on this document. To be <i>sound</i> a core strategy should be justified, effective and consistent which national policy.</del></p>	



Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
		<p><del>Justified</del> means that the document must be founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives. <del>Effective</del> means that the document must be deliverable, flexible and able to be monitored.</p> <p><del>1.18</del> Representations can be made from Monday 14th December 2009 until Friday 29th January 2010. We would encourage you to send us your comments using the Council's on-line consultation system. On-line consultation is the easiest and most convenient way to make your comments. To access this system, view the document and submit your comments please use the following link:  <b><a href="http://consult.enfield.gov.uk/portal">http://consult.enfield.gov.uk/portal</a></b></p> <p><del>1.19</del> Alternatively, you may also make your comments in writing and send them to:</p> <p>The Planning Policy Team  Place Shaping and Enterprise</p>	

Ref:	Chapter, Policy, Tables, Figures Section, Paragraph,	Further Minor Change	Reason
		<p>Department London Borough of Enfield Civic Centre Silver Street Enfield EN1 3XA Tel: 020 8379 1634 Or Fax:020 8379 3887 Or email: ldf@enfield.gov.uk</p> <p><del>1.20 Please also remember to complete and return the equal opportunities monitoring form.</del></p> <p><del>1.21 The closing date for comments is Friday 29th January 2010.</del></p> <p><del>1.22 Please note that all comments made on the Core Strategy Submission Report will be made available for public inspection.</del></p> <p><del>What happens next</del></p> <p><del>1.23 Following this period the Council will submit the Core Strategy to the Secretary of State for Communities and Local Government who will arrange for it to have an independent examination. It is anticipated that this will take place in</del></p>	

Ref:	Chapter, Policy, Section, Paragraph, Tables, Figures	Further Minor Change	Reason
		Spring 2010.	
FMC 73	Appendix 5 Table 5.1	<p>Update table in several places.</p> <p>Page 184 Update column 1: Under Information Source:</p> <p><b>Hertsmere Borough Council</b> Core Strategy (<del>December 2008</del>) <b><u>Submission 2009 (Withdrawn)</u></b></p> <p>Update table columns on page 185 <b>London Borough of Haringey</b></p> <p>Update Column 1: Information Source:</p> <p><b><u>Core Strategy Preferred Options Proposed Submission 2010</u></b></p> <p>Update Column 2: Relevant Polices</p>	Update status of adjoining borough's policies & developments.

Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
		<p>and Development:</p> <p>Tottenham Hale and Haringey Heartlands are identified as the key growth areas, where future growth will be directed.</p> <p><del>Central Leaside is identified as a key growth area, with the majority lying within Enfield and a portion extending over Enfield's boundary to the south, to include employment land within Haringey.</del></p> <p>Major development is also proposed <b><u>at Northumberland Park as part of the overall investment in Tottenham Hotspurs Football Ground</u></b> which includes redevelopment of the stadium, retail, leisure and residential uses.</p> <p>Update Column 3: Cross Borough Implications:</p> <p>Development proposed in Haringey, <b><u>in particular in the Northumberland Park area (which relates most closely to the Enfield border) will have</u></b></p>	

Ref:	Chapter, Policy, Tables, Figures, Section, Paragraph,	Further Minor Change	Reason
		<p><u>cross borough issues</u> for Enfield in terms of the transport network, and in the provision of green, community and physical infrastructure, for which a co-ordinated approach will enable the timely and efficient delivery of development, infrastructure and services.</p> <p>A high quality station square and state of the art public transport interchange at Tottenham Hale is proposed.</p> <p>TfL are working with Haringey Council <del>proposing</del> to return the Tottenham Hale Gyratory to two way working. <del>Consultation on this project is expected to commence in October 2009.</del></p> <p>Update table page 186</p> <p>Update column 1: Under Information Source</p> <p>Under <b>London Borough of Waltham Forest</b></p> <p><del>Core Strategy Issues &amp; Options (June</del></p>	

Ref:	Chapter, Policy, Tables, Figures	Section, Paragraph, Further Minor Change	Reason
		<p><del>2008)</del> <b><u>Preferred Options (January 2010)</u></b></p> <p>Update Column 2: Relevant Policies and Developments Update:</p> <p>The Core Strategy Preferred Options <del>Issues and Options</del> Report was published in January 2010 <del>June 2008 and although at an early stage in its production,</del> and states that the focus for future development will be Blackhorse Lane, Walthamstow Town Centre, and the Northern Olympic Fringe.</p> <p>A strategic employment area is identified in the west of the Borough, within the Lea Valley, to provide for future employment growth.</p>	