



## London Borough of Enfield

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<b>Report title:</b>	<b>Regulation 19 consultation on Proposed Submission version of Enfield Local Plan 2019-2041 and submission to Secretary of State</b>
<b>Report to:</b>	Full Council
<b>Date of Meeting:</b>	19 March 2024
<b>Cabinet Member:</b>	Cllr N. Caliskan
<b>Directors:</b>	Perry Scott, Executive Director of Environment and Communities Brett Leahy, Director Planning and Growth
<b>Report Author:</b>	May Hope, Head of Strategic Planning and Design
<b>Ward(s) affected:</b>	All
<b>Key Decision Number</b>	KD 5634
<b>Classification:</b>	Part I Public

**List of acronyms used:**

5YHLS	Five Year Housing Land Supply
EiP	Examination in Public
ELP	Enfield Local Plan
EqIA	Equalities Impact Assessment
DLUHC	Department of Levelling Up, Housing and Communities
HDT	Housing Delivery Test
HRA	Habitats Regulations Assessment
IIA	Integrated Impact Assessment
LP2021	London Plan 2021
NPPF	National Planning Policy Framework
Reg-19	Regulation 19 or Proposed Submission Plan
SA/SEA	Sustainability Appraisal/Strategic Environmental Assessment

## Purpose of Report

1. To approve the Proposed Submission (Regulation 19) Enfield Local Plan (ELP) 2019 to 2041 and associated documents, with a recommendation to publish them for a minimum six-week period of public consultation, followed by submission of the Plan and associated documents to the Secretary of State for the Department of Levelling Up, Housing and Communities (DLUHC) for independent public examination.

## Recommendations

Council is asked to:

- i. Approve the Proposed Submission Enfield Local Plan 2019-2041 (Appendix A) for publication for a minimum six-week period of public consultation pursuant to Regulation 19.
- ii. Approve the Integrated Impact Assessment and its Non-Technical Summary, and Habitats Regulation Assessment set out at Appendices B and C for publication for a minimum six-week period of public consultation pursuant to Regulation 19.
- iii. Note the content and conclusions of the Equality Impact Assessment (set out in Appendix D).
- iv. Note the legal and financial implications set out in paragraphs 43-71 of this report.
- v. Delegate authority to the Director of Planning and Growth to make minor amendments to the documents in Appendix A and Appendices B and C, following the resolution of Full Council and prior to commencement of the consultation period under Regulation 19, to address any editorial errors and to ensure consistency and clarity.
- vi. Delegate authority to the Director of Planning and Growth in agreement with the Leader of the Council to commence consultation under Regulation 19 on Thursday 28 March and conclude on Monday 20 May 2024.
- vii. Delegate authority to the Director of Planning and Growth in agreement with the Leader of the Council to make any appropriate and necessary minor amendments to the proposed submission version of the Enfield Local Plan 2019-2041 and supporting documents following consultation and prior to submission to the Secretary of State.
- viii. Following the period of public consultation, authorise officers to proceed under Regulation 22 to submit the Proposed Submission Enfield Local Plan 2019-2041 and associated documents (as set out in (ii) hereof) to the Secretary of State for the Department of Levelling Up, Housing and Communities for independent public examination, together with any Regulation 19 representations.

## Background and Options

2. The Council is required by legislation to review its Local Plan every five years with the current Development Plan comprising the Core Strategy (2010), Development Management Document (2014) and three Area Action Plans – North Circular Road (2013), North East Enfield (2016) and Edmonton Leaside (2020). Notably, the Core Strategy predates the introduction of the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG). Although the London Plan (LP2021) is part of the Borough's development plan, the absence of an up-to-date Local Plan presents significant risks. These risks include the ongoing absence of a five-year housing land supply and the implications of additional measures introduced through the Housing Delivery Test (HDT) on the determination of planning applications.
3. Local plans undergo rigorous examination to ensure compliance with legal and procedural requirements and to determine their soundness. A plan is considered 'sound' if it meets several criteria: Firstly, it must be positively prepared, meaning it provides a strategy to meet the area's objectively assessed needs and is informed by agreements with other authorities to accommodate unmet needs from neighbouring areas where practical and aligned with sustainable development goals. Secondly, the plan must be justified, demonstrating an appropriate strategy based on proportionate evidence and consideration of reasonable alternatives. Thirdly, it must be effective, ensuring deliverability over the plan period and grounded in effective joint working on cross-boundary strategic matters, as evidenced by the statement of common ground. Lastly, the plan must be consistent with national policy, enabling the delivery of sustainable development in line with the policies outlined in the Framework and other relevant national planning policy statements. During the examination phase, the determination as to whether a local plan is 'sound' is partially determined by whether it is 'consistent with national policy'. The revised NPPF published on 19 December 2023, plays a pivotal role in this evaluation, representing amendments to the version initially published in March 2012 and subsequently updated or revised on five occasions, most recently in September 2023.
4. The preparation of the ELP 2041 has progressed significantly, with alignment with the Revised NPPF being fundamental during the examination to determine its soundness. The draft ELP 2041 publication document (Appendix A) and the accompanying Integrated Impact Assessment (Appendix B) and Habitats Regulation Assessment (Appendix C) are the versions of the documents that Officers are recommending be published for consultation at the Regulation 19 stage, before submission to the Government for independent Examination in Public (EiP). As per recommendation iv) above, some minor amendments may be made to the referenced documents in light of the Revised NPPF following the meeting of full Council, and prior to the consultation, but any such changes will be limited.

### Enfield Local Plan

Regulation 19 Consultation on pre-submission of Local Plan 2019-2041,  
Integrated Impact Assessment and Habitats Regulation Assessment,  
and submission to Secretary of State

5. The publication version of the ELP 2041 represents the version of the Local Plan that Council intends to submit for examination and is the version of the Local Plan that the Council would ultimately wish to have adopted (subject to any potential modifications recommended by the Planning Inspector (or Inspectors) presiding over the Local Plan examination). All responses received during the Regulation 19 consultation are in effect made to the Inspector and will be passed on to the appointed Planning Inspector for their consideration once the Local Plan is submitted for examination.
6. The ELP 2041 publication document has built upon the extensive work which has taken place since 2015, when the process of reviewing the Local Plan began. The main stages of this have been as follows:
  - [Preliminary consultation on the Local Plan \(November 2015\)](#) which marked the first stage of the process and set out the scope of the Local Plan review and presented key issues along with a number of options;
  - [Regulation 18 Early Issues and Options consultation \(December 2018\)](#), which focused on exploring broad issues and options, but did not indicate the Council's preferred approach in terms of scale of growth to be planned for, or in terms of the proposed spatial strategy; and
  - [Regulation 18: Main Issues and Preferred Approaches 2021](#) which was a further Regulation 18 consultation document representing an advancement on the 2018 Early Issues and Options consultation, in that it identified a preferred level of growth and set out a preferred spatial strategy, related policies and site allocations for accommodating this growth. More specifically, the 2021 Regulation 18 Plan responded to changes in context, including government planning policy, the climate, and ecological emergencies, COVID and the new London Plan (2021).
7. The ELP 2041 publication document is the full version of the Local Plan, which takes into account the feedback received during the previous stages of consultation, and also takes into account the most recent evidence base updates. The ELP 2041 is a single (all in one) Local Plan (other than in respect of Gypsy and Traveller needs) that contains the spatial strategy, strategic policies, area-based policies, detailed development management policies and site allocations to guide how the Borough will change and develop over the plan period up to 2041. Upon adoption, the ELP 2041 will replace all of the current Development Plan Documents listed in paragraph 2 above.
8. The Council is preparing a separate Traveller Local Plan, with consultation on Issues and Options undertaken in October and November 2023.
9. The ELP 2041 sets out the spatial development strategy i.e., the what, where and when, including the level and location of development. It also proposes over 90 site allocations to contribute towards meeting development needs and sets out both strategic more details policies to support economic development in the Borough, ensure the delivery of the

right types and sizes of new homes to meet local needs, and to protect and enhance character and quality of the natural and built environment in the Borough.

10. As set out in paragraph 2 of this report there is a need for the Council to review its Local Plan, to accord with legislation, and to ensure that there is an up-to-date local policy framework in place to support the right types of development in the right locations, and to resist poor development proposals in the wrong locations. Once adopted, the ELP 2041 will ensure that the borough has an up-to-date plan for a number of years.
11. Members of the Council will also be aware of the proposals for a reformed planning system, which were introduced by the government's 'Planning for the Future' white paper in 2020.
12. Whilst the outcomes of the government's reforms are being finalised, it is worth noting that the adoption of the ELP 2041 would likely mean the Council benefits from 'transitional arrangements' once any newly reformed planning system is introduced, which will enable the Council to avoid incurring considerable additional costs that would occur if the plan had to be prepared under a new system. This will mean that the Council will be able to continue to progress and hopefully adopt the ELP 2041 under the current local plan-making requirements and processes. In the future, when the time came to prepare a replacement for the ELP 2041, this would in all likelihood need to be prepared as a new-style local plan under a new planning system.

### **Key areas of the Enfield Local Plan 2041**

13. This section of the report provides a brief overview and summary of the key elements of the draft ELP 2041. Members will note that the ELP 2041 (Appendix A) contains the detailed wording for all of the policies, site allocations and supporting explanatory text.

**Vision** – the vision statement for the Local Plan outlines the long-term aspirations and goals that the local authority seeks to achieve through its planning efforts. The headlines of the ELP's vision are set out below:

- **Enfield 2041: A vision of growing opportunity** – Enfield aims to become a thriving hub for future generations, emphasising family and affordable housing, new job opportunities, and community well-being.
- **Inclusive housing growth across the Borough** – new homes in existing communities and creation of an urban extension at Chase Park and a new settlement at Crews Hill, accommodating diverse housing types, for existing and new residents.
- **Economic expansion** – commitment to generating new employment space in town centres, existing employment areas and new locations, fostering growth in emerging sectors.

- **Diverse and vibrant town centres** – Enfield’s main town centres will be diverse, vibrant, and inclusive, contributing to the overall borough growth and prosperity.
- **Reducing disparities through the provision of infrastructure** – east-west disparities addressed through the infrastructure development, improved road safety, increased employment space and environmental enhancements.
- **Biophilic design and enhanced blue-green networks** – embracing biophilic design principles, connecting residents through walking and cycling in enhanced blue-green networks
- **Nurturing place for all** – Enfield aspires to be a nurturing place, providing quality homes, diverse employment opportunities, and excellent education and cultural experiences for all residents.
- **Deeply Green Enfield** – envisioning a deeply green place with enhanced open spaces, waterways, and biodiversity, actively addressing climate change, and aiming for carbon neutrality.
- **Workshop of London** – positioning Enfield as the workshop of London, leveraging logistics and manufacturing to create jobs, enhance business growth and diversify the economy.
- **Distinct and leading part of London** – aiming to be a distinct and leading part of London, celebrating unique character, heritage and natural settings with essential infrastructure, blue-green networks, and an exceptional quality of life.

**Spatial Strategy** – sets out a comprehensive and strategic approach to managing the physical development and land uses within the borough. The key components of ELP’s Spatial Strategy are set out below:

- **Sustainable growth and nature recovery** – expecting development to foster sustainable growth with robust infrastructure while promoting nature recovery and enhancing green and blue spaces.
- **Regeneration focus** – strong emphasis on regenerating previously developed land, especially in the east of the borough and London Plan Opportunity Areas like Meridian Water and New Southgate.
- **Affordable housing targets** – the framework to provide a target of 33,280 new homes by 2041, with a borough wide aim of delivering 50% as genuinely affordable homes.
- **Industrial and office space** – plans for a minimum of 304,000 sq m of industrial and logistics floorspace and 40,000 sq m of office floorspace to meet identified needs.
- **Diverse employment locations** – achieving employment growth through intensification of existing industrial areas and establishing

new sites in urban locations in the first instance and then rural locations.

- **Growth is focused around:**
  - Four main placemaking areas including Meridian Water, Southbury, an urban extension at Chase Park and a new settlement at Crews Hill that are connected by sustainable transport.
  - Town centres – such as Enfield Town and Meridian Water acting as hubs for high quality growth with diverse offerings in employment, retail, housing, and cultural activities.
  - Existing residential neighbourhoods, where they will be the focus of smaller scale developments and connectivity improvements.
- **Metropolitan Open Land and Green Belt** – safeguarding for recreational and cultural activities, maintaining its role in the ‘Green Chain’ connection. Managing rural areas for nature recovery and sustainable uses and improving accessibility. Specific sites released from the Green Belt for planned development.
- **Masterplanning for development** – requiring masterplans, especially for Chase Park and Crews Hill, before supporting development to ensure comprehensive planning and necessary infrastructure.
- **Compensatory measures** – offsetting Green Belt loss with major landscape restoration, a new country park at Enfield Chase, and enhancements to the Lee Valley Regional Park.
- **Green Belt protection** - protecting designated Green Belt areas from inappropriate development in alignment with national planning policy.
- **Transformation of employment areas** - upgrading designated employment areas for better environmental quality, amenities, and integration with surrounding neighbourhoods.
- **Effective infrastructure provision** – ensuring timely and proportional delivery of strategic and local infrastructure, services, and facilities to support planned growth, even for developments extending beyond the plan period.

### ***Housing requirement and development***

- The overall housing target is around 34,000 homes within the plan period (2019-2041). This target meets the London Plan housing requirement in the period to 2029. As the London Plan evidence would see a significant drop off in urban capacity beyond this, the ELP then proposes to exceed the urban capacity derived housing figures for the period post 2029, to better meet local needs for more



family housing and more affordable homes. This would principally be achieved through development at the two place-making areas at Crews Hill and Chase Park). The draft ELP policies require the provision of at least 35% homes being genuinely affordable. A stepped housing trajectory is included in the Plan (i.e., housing delivery will not be uniform across the Plan period) recognising the long lead in times for some new strategic sites.

- The housing requirement will be delivered through a combination of existing and committed developments and the strategic sites at the four main placemaking areas, which include the regeneration and intensification at Meridian Water, Southbury, an urban extension at Chase Park and a new settlement Crews Hill.
- The ELP includes a number of policies relating to the design and types of homes to be delivered within the Borough, including the level of affordable homes and the proportion of family homes which will be required from residential development.

### ***Employment and economic development***

- The ELP will provide for approximately 300,000 sq m of net additional industrial and logistics floorspace and around 39,000 sq m of net additional office floorspace – through the intensification of existing industrial areas in the east of the Borough and through new sites across urban and rural locations. A new logistics hub, close to Junction 24 of the M25 and an expanded hub close to the M25 north of Innova Park – will provide for a significant amount of the Borough’s employment needs in the Plan period.

### ***Town centres***

- Enfield Town, Edmonton Green, Palmers Green, Southbury, Southgate, New Southgate, Angel Edmonton, and Meridian Water will be major urban foci of high-quality growth, accommodating a range of employment, retail, leisure, housing, community, and cultural uses and enhanced public realm to support their roles as vibrant town centres.

### ***Residential communities***

- Existing residential neighbourhoods will be focus of smaller-scale developments and improvements to connectivity and local environmental improvements.

### ***Rural transformation***

- The plan provides support for the transformation of the rural areas for ambitious nature recovery and rewilding and the creation of a mosaic of sustainable countryside uses including food production, forestry, eco-tourism, recreation, education, leisure, sporting excellence and natural burial.

14. In order to accommodate this growth, the ELP proposes the release of land from the Green Belt. The exceptional circumstances to justify the proposed amendments to the Green Belt boundary are set out in the Plan and associated supporting Evidence Base (appendix E). The Integrated Impact Assessment considered a range of different levels of housing and employment growth, as well as different strategies for accommodating this growth, and the findings of this work helped inform the overall approach taken in the ELP. At a strategic level, the exceptional circumstances for the proposed Green Belt land releases include the acute housing need (including the need for more family and affordable housing), the need to support economic growth objectives (making sufficient land available to meet employment needs), and the need to promote sustainable patterns of development and avoid harmful impacts on the existing urban areas within the Borough.
15. Before concluding that there are the necessary exceptional circumstances for Green Belt land release, guidance in the NPPF was followed. As much use as possible has been made of suitable brownfield sites. Further, as part of the Duty to Cooperate, the Council has received confirmation from neighbouring authorities that they are unable to accommodate some or all of Enfield's identified needs for development.

### **Duty to Cooperate**

16. Throughout the preparation of the Local Plan, including the Integrated Impact Assessment (IIA) and Habitats Regulation Assessment (HRA), as well as the development of the supporting evidence base, the Council has actively engaged in discussions with neighbouring authorities, the adjoining county councils of Hertfordshire and Essex, the Greater London Authority, and relevant infrastructure providers and consultees. A Duty to Cooperate Compliance Statement is on the Council's to support the consultation process.

### **Integrated Impact Assessment**

17. Updates to the Integrated Impact Assessment (IIA) and Habitats Regulations Assessment (HRA) have been made by independent consultants Land Use Consultants (LUC) (Appendices B and C) and earlier versions of these reports are on the website<sup>1</sup> and their recommendations have informed the Regulation 19 pre-submission version of the Local Plan. The Strategy contained within the Local Plan has been assessed along with other growth scenarios (reasonable alternatives) through the IIA that is published alongside the ELP. Drawing from the outcomes of the IIA, the pre-submission version of the Local Plan provides a strong policy direction on the full range of local planning issues across the Borough, i.e. addressing the Borough's response to climate change, improving the environmental quality and social inclusivity of the Borough, creating healthier communities, planning for sustainable travel and connectivity, and seeking to reduce disparities between the east and west of the Borough. The proposed policies in the pre-submission version of the Local Plan have

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<sup>1</sup> <https://www.enfield.gov.uk/services/planning/new-enfield-local-plan#new-enfield-local-plan>

the potential to generate new significant positive changes for the borough across the range of sustainability issues tested in the IIA process, as shown in the number of positive cumulative effects summarised below:

### ***Climate change mitigation***

- Enfield's Local Plan prioritises climate change mitigation, particularly in the 'Climate Resilience' section, with policies such as SP SE1 and DM SE5 setting stringent standards for design and construction, requiring new developments to adhere to net zero carbon standards. The plan also addresses transport emissions by aligning with the Ultra Low Emission Zone expansion and promoting the transition to electric vehicles. Policies SP T1 and DM T2 aim to establish a sustainable transport system, encouraging walking and cycling. Despite challenges in placemaking areas like Chase Park, the spatial strategy focuses on urban development with easy access to public transport, aligning with Enfield's goal of achieving carbon neutrality by 2040. While the development of logistics hubs may pose challenges, place policies strive to encourage modal shift and offset transport-related emissions. Despite potential increased carbon emissions from overall growth, the Local Plan is expected to have a cumulative minor positive effect on climate change mitigation.

### ***Climate change adaptation***

- Enfield's Local Plan takes a proactive approach to climate change adaptation, with a primary focus on strategic objective 10 and policies within the 'Climate Resilience' section. Policy DM SE6 addresses the urban heat island effect by requiring developments to integrate measures preventing overheating and enhancing the microclimate. Another policy, DM SE4, promotes energy efficiency and low carbon energy supply through green roofs, contributing to regulated indoor temperatures and improved air quality. Placemaking areas, including Edmonton Green, Angel Edmonton, Meridian Water, Palmers Green, and Chase Park, face flood susceptibility, addressed by policies like DM SE7 for flood risk management and DM SE9 emphasising sustainable drainage systems. The protection and enhancement of green infrastructure, as highlighted in Policy SP BG1, play a crucial role in managing flood risk through permeable surfaces. In conclusion, the Local Plan has a cumulative minor positive impact in advancing climate change adaptation efforts.

### ***Housing***

- Enfield's Local Plan is to make a substantial contribution to addressing the area's housing needs, with Policy SP H1 allocating 75 sites for housing development, which are estimated to deliver over 26,000 new homes. The residential site allocations are expected to yield at least minor positive effects due to the proposed development nature. Under the 'Homes for all' section, collective policies ensure that housing on allocated sites adheres to high-quality standards, offering a diverse range of types and tenures,

including provisions for specific groups like the elderly and students. Requirements in Policy SP H2 for at least 35% of new homes to be affordable, along with Policy DM H10 addressing accommodation for Gypsies and Travellers, contribute to housing diversity. The Local Plan emphasises high standards of design and construction through the amended Building Regulations 2010 and policies from the 'Design and character' section. Notably, Policy DM DE13 outlines detailed criteria for new housing developments, preserving local amenity, appropriate scaling, and compliance with accessible housing standards. Additionally, Policy DM DE14 focuses on external amenity standards, crucial for suitable outside space, particularly in the context of the COVID-19 pandemic. In conclusion, the Local Plan is anticipated to have a cumulative and significantly positive impact in achieving the Borough's housing goals.

### ***Health and wellbeing***

- Enfield's Local Plan demonstrates a comprehensive approach to improving the health and wellbeing of local residents, directly and indirectly, through strategic objectives and various policies. Strategic objective 2 and Policy SP SC1 specifically target health improvement, requiring development proposals to contribute to healthy lifestyles, tackle health inequality, and undergo Health Impact Assessments. Indirectly, other policies promote active travel, walking, and cycling, reducing car use and associated pollutants. The spatial strategy's large-scale development potential includes the provision of new healthcare facilities and green infrastructure for recreational and travel purposes. Policies addressing open space protection and enhancement, particularly in the Blue and Green Enfield and Rural Enfield sections, ensure access to high-quality spaces for active outdoor recreation. Placemaking areas like Meridian Water and Rural Enfield prioritise public open space targets, and Chase Park includes green infrastructure improvements. The plan encourages healthy and affordable food production through Policy DM BG11. Despite potential pressure on existing healthcare facilities due to growth, the Local Plan addresses this through provisions in the Delivering and Monitoring policies. Overall, the Local Plan is expected to have a cumulative minor positive effect on achieving health and wellbeing objectives.

### ***Services and facilities***

- Enfield's Local Plan outlines provisions for new services, facilities, and infrastructure, leveraging the extensive scale of development to create substantial amenities. Major urban foci, including Enfield Town, Meridian Water, Edmonton, Southbury, Southgate, New Southgate, and Angel Edmonton, are designated for high-quality growth and diverse uses. The Delivering and Monitoring section addresses the pressure from new development, with Policy SP D1 securing contributions to fund essential infrastructure, such as parks, schools, and public transport improvements. Crucially, Policy DM D3 requires planning applications to detail phased developments and

**Enfield Local Plan**

Regulation 19 Consultation on pre-submission of Local Plan 2019-2041,  
Integrated Impact Assessment and Habitats Regulation Assessment,  
and submission to Secretary of State

associated infrastructure requirements, ensuring a well-paced development that prevents overloading existing services. Other policies in the Local Plan emphasise health and wellbeing improvements, protect social and community infrastructure, and focus on sport, recreation, and public house attraction. Overall, the Local Plan is expected to have a cumulative and significantly positive effect in achieving objectives related to services and facilities.

### ***Social inclusion***

- Enfield's Local Plan integrates a range of policies to advance social inclusion, in alignment with strategic objective 5. Policy DM DE3, emphasising inclusive design, requires development proposals create accessible and inclusive spaces, requiring an Inclusive Access Statement that highlights diversity, engagement with user groups, and adaptable spaces. Additionally, DM DE7 recognises the importance of developments enhancing the permeability and accessibility of public spaces. In the 'Homes for all' section, Policy DM H5 focuses on addressing housing needs, including supported and specialist housing, supporting diverse home types and affordable housing in sustainable and accessible locations. In summary, the Local Plan is expected to have a cumulative minor positive effect in achieving social inclusion through inclusive design, improved public spaces, and addressing diverse housing needs.

### ***Crime and community safety***

- Enfield's Local Plan incorporates a range of policies within the Design and Character section to effectively address the issues of crime and community safety. Notably, DM DE6 (Tall buildings) and DM DE7 (Creating liveable, inclusive, and quality public realm) implement measures aimed at reducing crime and enhancing safety. DM DE6 emphasises protection from emergencies like fires and advocates for increased visibility through the activation of street frontages to decrease crime. DM DE7 supports safety and counter-terrorism measures while promoting increased activity and natural surveillance at ground floor level for enhanced safety. Additional policies, including SP DE1, DM DE8, DM DE9, DM DE11, and DM DE12, contribute to creating safe and secure places or active frontages, further enhancing overall safety. Moreover, specific Place policies highlight safety considerations in new developments within distinct Borough areas. In summary, the Local Plan is anticipated to have a cumulative minor positive effect in reducing crime and enhancing community safety by incorporating targeted policies within the Design and Character section.

### ***Vision Zero target for road safety***

- Enfield's Local Plan features policies within the Movement and Connectivity section that set out comprehensive measures to enhance road user safety, with a particular focus on pedestrians and cyclists. SP T1 (Promoting sustainable transport) and DM T2

(Making active travel the natural choice) specifically target the safety of these road users. Moreover, SP DE1 (Delivering a well-designed, high quality and resilient environment) and DM DE7 (Creating liveable, inclusive, and quality public realm) are expected to significantly contribute to road safety by ensuring streets are safe, uncluttered, and suitable for their intended function, fostering safer cycling and pedestrian movement in town centres and transport nodes. The positive impact on road safety is further emphasised by various Place policies, collectively working towards the vision of zero road safety incidents. In summary, the Local Plan is anticipated to have a cumulative minor positive effect in advancing the vision of zero road safety incidents, primarily through specific policies in the Movement and Connectivity section and additional measures within Place policies.

### ***Economy***

- Enfield's Local Plan, particularly highlighted by Policy SP E1: Employment and Growth, strategically allocates seventeen sites for industrial development, including logistics hubs near the M25, with one site, R.02, involving collaboration with Hertsmere Council. The Economy section outlines the Council's strategies to stimulate the Borough's economy, emphasising high-quality workplaces in suitable locations and sustainable uses for rural areas. Town Centres and High Streets policies contribute by safeguarding and enhancing the vitality of Enfield's town centres. Although tensions may arise between environmental protection and economic priorities, exemplified by SP BG4: Green Belt and Metropolitan Open Land, the measures are expected to guide economic growth to optimal locations. Recognising the indirect benefits of environmental safeguards on the economy, the Local Plan is anticipated to have a cumulative significant positive effect in realising a strong, diverse, and resilient economy that offers opportunities for all.

### ***Town and local centres***

- The Town Centres and High Streets section of Enfield's Local Plan outlines policies explicitly targeting the vitality of the borough's town centres. Notably, Policy SP TC1: Promoting Town Centres focuses on ensuring long-term vitality by concentrating growth and investment, maintaining a balanced mix of uses, and preserving local character and built environment quality. Policy SP TC2: Encouraging Vibrant and Resilient Town Centres complements this objective by fostering economically successful hubs that cater to diverse user needs. Together, these policies aim to create high-quality environments in both new and existing town centres, with a well-distributed mix of businesses, services, and facilities. Additionally, other Local Plan policies that enhance the built environment quality further contribute to supporting the vitality of Enfield's town centres. The collaborative measures are expected to have a cumulative significant positive effect by creating appealing environments that

#### **Enfield Local Plan**

attract people, increasing footfall and spending in these crucial urban hubs.

***Minimising air pollution, minimising the need to travel and support a modal shift away from the private car***

- The Local Plan's spatial strategy prioritises development across the Borough, with a specific focus on urban areas near public transportation hubs, aiming to decrease reliance on private cars and reduce associated air pollution. Despite challenges in placemaking areas like Chase Park with limited public transport options, the Plan incorporates policies and strategic objectives to encourage modal shift and sustainable transport use, thereby decreasing air pollution from car use. These measures play a crucial role in mitigating potential negative impacts of proposed growth, particularly in the Movement and Connectivity section, such as SP T1 and DM T2, emphasising a sustainable transport system and a healthy, connected Enfield. Place policies further detail location-specific strategies to facilitate modal shift, offsetting potential increases in transport-related air pollution associated with overall growth. However, the acknowledgment of mixed-use development potentially attracting more residents and increasing cars on the road underscores the need for continued efforts to address air quality concerns. Overall, the Local Plan is expected to have a cumulative minor positive effect on air pollution by promoting sustainable transport and strategic development patterns.

***Delivering biodiversity net gain at an ambitious scale and mitigate impacts to valued habitats and ecological networks***

- The Local Plan incorporates several policies, particularly within the Blue and Green Enfield section, with a primary emphasis on conserving and enhancing biodiversity. Key policies like SP BG2 (Protecting nature conservation sites) and SP BG4 (Biodiversity net gain, landscape restoration, and offsetting) are anticipated to offer robust mitigation measures. Additional policies related to green infrastructure, urban greening, and watercourses are expected to contribute to averting potential adverse effects of development and, in some cases, result in improvements to biodiversity. The Environment Act 2021 further strengthens these efforts by requiring biodiversity net gain in most developments from 2024, addressing habitat loss and fragmentation. Collectively, these policies and legislative measures aim to manage and limit potential adverse impacts associated with the substantial new development outlined in the Local Plan.

***Sustain and enhance the significance of heritage assets***

- The Local Plan incorporates several policies dedicated to safeguarding and enhancing the historic environment, aiming to mitigate potential adverse effects of new development on cultural heritage. Notably, Policy SP DE4: Putting Heritage at the Centre of

Placemaking directs new development to integrate the cultural, built, and landscape heritage of existing communities into sustainable growth. It emphasises revealing heritage that may not be formally recognised, valued, or understood and requires the preparation of a heritage statement. Furthermore, Policy DM DE10: Conserving and Enhancing Heritage Assets outlines detailed criteria for new developments, requiring them to conserve and enhance the significance of heritage assets while ensuring viable uses consistent with their preservation. These policies seek to promote broader social, cultural, economic, and environmental benefits for affected communities, making positive contributions to local character and distinctiveness by drawing on the historic environment's role in shaping the identity of the place. Additionally, other policies addressing high-quality design more broadly are expected to provide mitigation for potential impacts of new development on cultural heritage features in and around the Borough.

### ***Protect and enhance the character, quality and diversity of the borough's landscapes and townscapes***

- The Local Plan incorporates several policies explicitly designed to preserve and enrich the quality and character of the area. These policies encompass the protection of the Green Belt (SP BG5: Green Belt and Metropolitan Open Land) and regulations for development in open countryside and greenspaces, including the Green Belt and Metropolitan Open Land (SP BG6). Policies centered around green infrastructure provision contribute to the overall character and appearance of Enfield, benefiting the setting of built development. Additionally, policies requiring high-quality design play a crucial role in offering mitigation. Given the predominantly urban nature of much of the Borough, policies in the Local Plan pertaining to the safeguarding and enhancement of the townscape and built environment assume particular significance in offsetting potential negative impacts of new development on this objective. Key policies in this regard include SP DE1: Delivering a well-designed, high-quality, and resilient environment, along with DM DE5: Strategic and Important Local Views. These policies collectively address the preservation and improvement of the area's aesthetic and structural aspects.

### ***Efficient use of land and materials***

- Enfield's spatial strategy follows a brownfield-first approach, concentrating on existing urban centres for development, except for a limited number of placemaking and site allocations within the existing Green Belt. Policies within the Town Centres and High Streets section of the Local Plan aim to direct development to town centre locations, where brownfield land is more likely available, promoting efficient use of land. Policy DM H4 focuses on small housing developments, encouraging efficient land use, while Policy DM SE3 emphasises whole-life carbon and the circular economy, prioritising the reuse and retrofitting of existing buildings before

**Enfield Local Plan**

Regulation 19 Consultation on pre-submission of Local Plan 2019-2041,  
Integrated Impact Assessment and Habitats Regulation Assessment,  
and submission to Secretary of State



considering new construction. In summary, the Local Plan is expected to have a cumulative minor positive effect in making efficient use of land and materials as it predominantly emphasises brownfield development, efficient land use, and the reuse of existing structures, despite some identified negative effects from specific policies.

### ***Managing and reducing the risk of flooding***

- The Local Plan incorporates several policies with the primary objective of preventing an increase in the risk of flooding from new developments. Notably, policies like DM SE7 (Managing Flood Risk) and DM SE9 (Sustainable Drainage Systems) specifically address this concern. Additionally, various other policies within the Plan, including certain Place policies, make references to the effective management of flood risk.
19. Drawing from the outcomes above, it can be seen that the preferred approach set out in the pre-submission Local Plan is likely to have an overall positive cumulative effect in relation to achieving the majority of the IIA objectives, covering social, economic, and environmental issues, health and equalities and community safety. Where there are potential negative effects identified (e.g., on biodiversity, historic environment, landscape/townscape, water quality), these are uncertain because they will depend on the detailed design and layout of new developments proposed on allocated sites, which are unknown at this stage.
20. It is considered that the preferred approach set out in the pre-submission version provides the optimal balance when assessed against social, environmental, and economic objectives. The IIA and HRA assessments will continue to be produced and impacts assessed as these pieces of work are iterative in nature, and must examine any new evidence base elements, along with any changes to the plan, even as part of the main modifications if needed. Elements of the work relevant to air quality are related to the transport assessment work.

### **Infrastructure Delivery**

21. The Council is currently in the process of updating the Infrastructure Delivery Plan (IDP). The IDP will outline the infrastructure requirements, including physical, social, and green / blue infrastructure, that is necessary to support the implementation of the emerging Enfield Local Plan. Within the IDP, expected initial costs associated with each type of infrastructure such as Education, Healthcare, Transport, Green, and Community Infrastructure will be specified. The updated IDP will be published for public consultation alongside the Local Plan, and the preliminary cost estimates are expected to undergo further refinement informed by feedback received during the Regulation 19 consultation period.

### **Next steps**

22. The Council is required to undertake a formal consultation on the ELP 2041 publication document, as required by Regulation 19 of the Local Plan

Regulations. All representations which are made during the consultation must be provided to the appointed Planning Inspector (or Inspectors) for consideration as part of the Examination in Public. Members should note that all representations made during the consultation are in effect made to the Planning Inspector rather than to the Council.

23. The Council has an adopted [Statement of Community Involvement](#) (SCI) which sets out the process for engagement at different stages of Plan Making. The Council's SCI was updated in 2023 to reflect current legislation, give greater emphasis to meaningful engagement and to address issues arising from the COVID-19 Pandemic.
24. In light of the Revised NPPF and the need to make very minor amendments to the ELP prior to consultation, it is recommended that consultation under Regulation 19 will commence on Thursday 28 March and conclude on Monday 20 May 2024 as set out in recommendation v.
25. The anticipated timescale for the consultation and submission of the ELP 2041, subject to the decision of Full Council, is set out in the [Local Development Scheme](#) (LDS).
26. An update to the LDS will be required to reflect the above prior to the submission of the ELP 2041 for Examination in Public.
27. Consultation on the publication document will be undertaken in accordance with the adopted SCI and legislation, and will include the following:
  - A minimum of six weeks consultation
  - Publish the document on the Council's website
  - Make available in alternative formats if requested and
  - Engage with stakeholders using a range of methods as set out in the SCI.

#### ***Drafting of the publication document***

28. Members will note that the ELP 2041 publication document represents a draft version of the document. Further work to finalise this document, including the addition of graphics, re-numbering of figures, footnotes and further formatting will be required. Additionally, further to the above it may be necessary to make some minor changes to the appearance, format, and text of the ELP 2041 publication document or the supporting documents prior to the consultation in the interests of clarity and accuracy. It is recommended that any such changes be agreed with the Leader of the Council in consultation with the Director of Planning and Growth and it is recommended that delegated authority be granted to do this as set out in recommendation vii.

#### **Possible alternatives to the recommendation**

29. Possible alternatives to the recommendation are set out in Table 1 below:

**Table 1: Options considered, and risks associated with each:**

Options	Risks
<p><b>Refuse</b> – the publication of the Proposed Submission Local Plan</p>	<p>If refused, the Council would be in a plan ‘hiatus’ with local planning decisions being determined under the ‘presumption in favour of sustainable development’ as set out in the National Planning Policy Framework and/or the London Plan, rather than the Local Plan.</p>
	<p>The Council will be reliant on outdated policies and targets, particularly in relation to carbon reduction, overall housing targets, types of homes required, design standards, and environmental protection.</p>
	<p>The Council will continue to have to address the policy consequences of not meeting the Housing Delivery Test. This is an annual measurement of housing delivery in the area. In recent years, housing delivery in the Borough has been less than required by the London Plan targets, increasing the likelihood of planning decisions being determined under the presumption in favour of sustainable development and with less emphasis on the Local Plan, in accordance with the requirements of the National Planning Policy Framework.</p>
	<p>The Council will not be able to demonstrate a 5-year land supply of housing sites, meaning that more applications will come forward on unallocated sites. Without a 5-year land supply, there is more chance that these developments will be approved.</p>
	<p>Development will still happen, but the Council will lose the ability to control where and how they are located, and what infrastructure will be required to support them.</p>
	<p>The Council will lose the ability to plan strategically, identify appropriate funding mechanisms, and ensure the most sustainable outcomes for our communities and environments.</p>
	<p>Out of date plans weaken the Council’s ability to apply for external funding for infrastructure and other associated projects.</p>

Options	Risks
<p><b>Delay</b> – the publication of the Proposed Submission Local Plan and ask officers to review the evidence base and bring forward a revised Submission Local Plan</p>	<p>If delayed, the earliest a revised plan could be brought back to Full Council would be later in 2024.</p>
	<p>The evidence used to inform the ELP will become out of date over time, and any delays in its implementation may require additional procurement and financing of updated evidence. It should be emphasised that evidence supporting the Local Plan must be both relevant and kept up to date to ensure accuracy and effectiveness. In the event of further delays to the plan, certain components of the existing evidence base may require refreshing, resulting in additional time and financial implications.</p>
	<p>Any significant revisions made to this Regulation 19 version, will require a step back in the process to consult on Regulation 18 again. This additional consultation stage, will inevitably add delay to the progress of finalising the Local Plan.</p> <p>Further delays would also give rise to the risks highlighted above.</p>

### Enfield Regulation 19 version of Local Plan

30. The Plan which is recommended to Full Council has been developed through extensive engagement with the community, infrastructure providers, stakeholders, internal departments, and the Cross-Party Member Local Plan working group. The draft ELP 2041 is supported by robust evidence and environmental appraisals and is in accordance with national policy requirements.
31. In this Plan, Enfield has taken a bold, ambitious, and forward-looking approach which will enable the provision of housing, employment, recreation/leisure, nature recovery and biodiversity, climate change adaptation and mitigation measures, burial needs and supporting infrastructure, over time. The plan seeks to provide a sustainable spatial response which balances the need for growth in a constrained, high-quality environment with the essential requirement to protect and enhance the borough's highly valued assets, character, and identity. It has not considered it acceptable to passively watch the current critical housing shortage get ever worse. The Plan has proactively considered new sources of housing supply, including a new settlement and urban extension. It has developed a strategy to offset the release of land from the Green Belt through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land, with a focus on creating a new country park at Enfield Chase including rewilding and restoration of the

#### Enfield Local Plan

Regulation 19 Consultation on pre-submission of Local Plan 2019-2041, Integrated Impact Assessment and Habitats Regulation Assessment, and submission to Secretary of State

Chase and improvements to both quality of and access to the Lee Valley Regional Park.

32. Officers consider the plan to be 'sound' and on this basis recommend that the plan and its supporting documents are published for Regulation 19 consultation, followed thereafter by submission to the Secretary of State for independent Examination.
33. The publication of this consultation ensures that the Local Plan remains on track to be submitted for examination in 2024 with a view to adoption in late 2025. The adoption of a new ELP will have significant benefits for the borough, enabling it to take full control about where and how future development in Enfield takes place.

### **Relevance to Council Plans and Strategies**

34. The Enfield Local Plan (ELP) is aligned with Enfield Council's priorities and strategies across several key areas. It significantly contributes to the Council Plan (2023 – 2026) under the priority of **'Clean and green places'** by emphasising biodiversity enhancement, cleanliness, active and low carbon travel promotion, waste reduction, and carbon emissions reduction.
35. Furthermore, the ELP Vision strongly supports environmental improvements, green urban environments, sustainable transport, climate crisis response, and effective flood risk management while aiming for a carbon-neutral borough.
36. Through its specific strategic objectives, the ELP aims to tackle health inequalities by promoting walkable communities, create a liveable and inclusive public realm, develop safe and sustainable active travel routes, maximise green experiences, mandate zero-carbon major developments, manage waste sustainably, address climate change, and conserve and enhance natural areas and habitats.
37. Additionally, it envisions a green infrastructure corridor in the north of Enfield to promote the Borough as a green destination and seeks to strengthen rural Enfield for nature-focused experiences and economic contributions.
38. The ELP also aligns with the Council's priority of **'More and Better Homes,'** focusing on building affordable and climate-resilient housing, improving neighbourhoods, and offering diverse housing options. It emphasises high-quality and affordable housing supported by necessary community facilities, infrastructure, and addressing spatial disparities.
39. For **'Strong, Healthy, and Safe Communities,'** the ELP envisions a diverse mix of housing types and tenures to meet residents' needs, offering excellent leisure and cultural opportunities, and enriching lives with nature while sustaining beautiful places. It places a strong emphasis on addressing health inequalities, promoting walkable communities, and enhancing infrastructure and community facilities.

40. Moreover, the ELP supports **'Thriving Children and Young People'** by using growth to create opportunities for better outcomes, prioritising access to nature and quality of life, and delivering high-quality, affordable housing with excellent education and community facilities.
41. Lastly, it effectively supports **'An economy that works for everyone'** by aiming to become a place of opportunity, creating diverse workspaces, leveraging Enfield's strategic position for job growth, utilising creative potential, and focusing on emerging economic sectors while maintaining existing employment spaces.
42. To achieve these goals, the ELP outlines specific strategic objectives such as addressing spatial disparities, reducing health inequalities, providing diverse housing options, celebrating local character and heritage, and supporting office development and vibrant town centres. These objectives are designed to create a holistic and sustainable vision for Enfield's future.

### **Financial Implications**

43. There are no direct financial implications as a result of this report. Local Plan funding has already been secured in terms of staffing within the Strategic Planning and Design service and funding for specialist external support in the preparation of technical evidence base documents.

### **Legal Implications**

44. This report seeks the approval of the Full Council for the proposed submission version of Enfield Local Plan 2019 – 2041 and its associated documents to proceed to public consultation under Regulation 19. The report also asks the Council to agree that, following the close of the consultation, the submission version of the proposed Local Plan and its associated documents be submitted to the Secretary of State for the Department of Levelling-Up Housing and Communities pursuant to Regulation 22 for independent examination.
45. The Council must be able to show, with an evidenced audit trail, that it has complied with the requirements set out in the Planning and Compulsory Purchase Act 2004 ('PCPA 2004') and the Town and Country Planning (Local Planning) (England) Regulations 2012 ('2012 Regulations'), as well as having regard to the relevant parts of the NPPF 2023 and associated PPG.
46. The process of developing a Local Plan involves a number of stages required by the PCPA 2004 and the 2021 Regulations. In summary, these include:
  - Public consultation by the LPA on the matters to be covered in the new Local Plan (Regulation 18). The LPA undertook 3 stages under Regulation 18. These took place in 2015, then between December-2019 to February 2020, and between June-September 2021.
  - Publication by the LPA of the proposed submission version of the plan, along with an open invitation to submit representations on the

soundness of the Plan (under Regulations 19 and 20). If approved by Full Council consultation under Regulation 19 will commence on 28 March and end 20-May 2024.

- Submission to the Secretary of State for examination (Regulation 22). It is anticipated that this will take place in Summer 2024.
- Independent examination by a planning inspector on behalf of the Secretary of State for Department of Levelling Up, Housing and Communities (Regulation 24). This involves a public hearing in which those who have made representations under Regulation 20 can be invited by the Inspector to participate.
- Consultation on Main Modifications recommended by the Inspector alongside an updated IIA.
- Publication by the LPA of the Inspector's report (Regulation 25); and
- Assuming the plan is found to be 'sound' by the inspector, adoption of the Plan by the LPA (Regulation 26).

### **Requirement for a Local Plan**

47. It is a statutory requirement under section 19 of the PCPA 2004 for a local planning authority (LPA) to prepare development plan documents that identify the strategic priorities for the development and use of land in the authority's area, and include policies to address those priorities, save where policies to address those priorities are set out in the spatial development strategy (i.e. the London Plan).
48. It is important to note that Section 20(2) of the PCPA states that the LPA must not submit the plan unless they think it is ready for independent examination. The plan that is published for consultation at Regulation 19 stage is therefore the plan that the LPA intends to submit to the Planning Inspectorate for examination and ultimately the one (subject to any modifications recommended by the Inspector) to see adopted.
49. Local Plans must undergo examination by an independent planning Inspector. The Inspector is tasked with establishing whether the draft Local Plan is legally compliant and 'sound'.
50. Regulation 22 prescribes that the following documents must be submitted along with the plan for examination:
  - The sustainability appraisal report (or IIA);
  - A submission policies map
  - A statement setting out: who was invited to make representations on the plan at Regulation 18 consultation stage, how those representations were invited, a summary of the main issues raised, and how the representations were taken into account; and - the number of representations made under Regulation 20 (in response to

consultation at Regulation 19 stage) and a summary of the main issues raised;

- Copies of all representations made under Regulation 20 (in response to consultation at Regulation 19 stage); and
  - Such supporting documents which the LPA considers are relevant to the preparation of the plan (these will include the evidence base).
51. As part of the Examination in Public (EiP) process the LPA can ask the inspector to recommend main modifications to the plan where necessary to make the plan sound and legally compliant. The EiP is a rigorous process, and it is highly likely that the Inspector will find that some modifications are required. This is entirely normal and adds to the robustness to the Plan. A Local Plan must be considered 'sound' in order for it to be formally adopted.
52. The inspector will be asked to recommend such modifications as part of examination of this Local Plan. The Inspector agrees the text of the proposed main modifications with the LPA, based in most cases on discussion at the hearing sessions. The LPA is then required to undertake sustainability appraisal as necessary and public consultation (minimum six weeks) on the proposed main modifications. The Inspector considers any representations on the main modifications as part of the examination. This includes being able to prepare and submit reports, technical papers, matter statements, statements of common ground, a schedule of modifications and other such documents required as part of the examination process. Any modifications proposed and accepted by the inspector would be consulted on as part of the main modifications.
53. At the end of the examination the Inspector produces a report for the LPA setting out recommendation(s) and the reasons for them. The LPA must publish this report. The report is not binding on the LPA, but the LPA may not adopt an unsound plan.
54. The legislation allows for three possible outcomes to the examination:
- The Inspector finds that the plan is sound and legally compliant as submitted: in these circumstances the Inspector must recommend that the plan is adopted;
  - The Inspector finds that the plan is unsound and/or legally non-compliant as submitted, but that it is possible to make it sound and legally compliant by making 'main modifications' to it. In these circumstances the Inspector must recommend the necessary modifications, if requested to do so by the LPA. The modifications must relate directly to the reasons why the Inspector has found the plan unsound or legally non-compliant; and,
  - The Inspector finds the plan unsound and/or legally non-compliant as submitted, and that it is not possible to make it sound and legally compliant by making modifications to it.



55. The ELP 2041 will, once adopted, along with the London Plan, form the Council's development plan (along with the proposed Traveller Local Plan which is in the process of being prepared).
56. Together these documents are the key planning policy against which planning applications will be assessed. Section 38(6) of the PCPA 2004 provides that, if regard is to be had to the development plan for the purpose of any determination to be made under the planning acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

### **General requirements for preparing Local Plan**

57. Section 19 of the PCPA 2004 sets out matters to which the LPA must have regard and with which they must comply in preparing local development plan documents. The NPPF Part 3 also sets out policies in respect of preparing a local plan.

### Statement of Community Involvement (SCI)

58. Pursuant to Section 18 of the PCPA 2004 the Council must prepare an SCI. Thereafter the Council must comply with the same. Each plan-making stage complied with the SCI.
59. An SCI is a statement setting out how the Council will involve those interested in the development of land in the area in the exercise of the Council's planning functions. The Council has an adopted SCI which sets out the process for engagement at different stages of the plan-making process. The Council's SCI was updated in 2023 to reflect current legislation, give greater emphasis to meaningful engagement, and address issues arising from the COVID-19 Pandemic.

### Appraisal of the sustainability of the proposals and report

60. The ELP 2041 needs to be informed and accompanied by a Sustainability Appraisal which allows the potential environmental, economic, and social impacts of the proposals to be taken into account during the plan-making process. This should incorporate a Strategic Environmental Assessment to meet the statutory requirement for certain plans and programmes to be subject to a process of 'environmental assessment'.
61. The Regulation 19 Plan is informed by an Integrated Impact Assessment (IIA) comprising Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Community Safety Impact Assessment (CSIA), of the Enfield Local Plan, as set out in Appendix B of this report.

### Duty to Co-operate

62. Under the PCPA 2004 and the 2012 Regulations, the Council is under a duty to cooperate with other local planning authorities or prescribed bodies in the process of preparing its development plan documents. This is reiterated in paragraph 24 of the NPPF 2023. In this case, the Council must

cooperate with the Environment Agency, Heritage England, Natural England, and the GLA (among other bodies).

63. Where appropriate in the body of this Report, reference has been made to how the Council has taken steps to comply with this duty to cooperate. The Council published its Duty to Cooperate Compliance Statement ahead of publishing the ELP 2041 for consultation under Regulation 19. This statement outlines how the London Borough of Enfield ('Enfield Council' or 'the Council') has prepared the Enfield Local Plan: Proposed Submission document (Regulation 19) in accordance with the Duty to Cooperate.

## **Procedure for the preparation of the Local Plan**

### Local Development Scheme

64. Under Section 15 of the PCPA 2004, the Council must put in place a Local Development Scheme ('LDS') which must specify the documents which, when prepared, will comprise part of the development plan for the area. The LPA should also include details of other documents which form part of the development plan for the area, or which may do. The LDS must also include a timetable for the preparation and revision of the development plan documents, which the Council must then comply with in the preparation of the ELP 2041. The LDS must be available publicly and must be kept up to date so that interested parties can keep track of progress.
65. The Council has complied with this requirement and document can be found [here](#). The LDS will be updated to reflect the decision made by Full Council.

### Consultation

66. There are two stages of statutory consultation as part of the preparation of a local plan prior to a local plan being submitted to the Secretary of State. The first stage of consultation for the ELP 2041, required under Regulation 18 of the 2012 Regulations, was carried out in 2018-2019 and a further round in 2020. This Report seeks permission for the second stage of consultation to commence, pursuant to Regulation 19.
67. Regulation 19 requires that the local planning authority:
- a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with Regulation 35; and
  - b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1) (first stage of consultation).
68. Consultation must be carried out in accordance with the 2012 Regulations and the Council's SCI (as set out above). During the consultation period

representations will be invited from the public and key stakeholders for a minimum of a 6-week period running from the date of local advertisement.

### **Submission to Secretary of State**

69. Following this consultation, the ELP 2041 will be submitted, along with its associated documents, and representations received during regulation 19 consultation to the Secretary of State for independent examination.
70. An inspector will be appointed by the Secretary of State who will determine whether the ELP 2041 satisfies the relevant statutory requirements, whether it is sound, and whether the Council has complied with the duty to cooperate. Following public examination, the Inspector will issue a report making recommendations as to the soundness of the ELP 2041 which the Council must publish. Following receipt of the report the Council will seek to formally adopt the final ELP 2041 in line with the Inspector's recommendation. Full Council will then be asked to formally endorse adoption.
71. The NPPF sets out that a local plan will be considered sound if it is a) positively prepared; b) justified; c) effective; and d) consistent with national policy.

### **Equalities Implications**

72. The Equality Act 2010 ('2010 Act') establishes the public sector equality duty which requires, that in the context of the local plan process, regard must be given to the need to eliminate unlawful discrimination, harassment and victimisation (and other conduct prohibited by the Act), advance equality of opportunity between people who share a protected characteristic and those who do not, and foster good relations between people who share a protected characteristic and those who do not. The requirement is to have due regard to achieve these goals, not an absolute duty to achieve them.
73. The extent of the duty, and the weight attached to it, will be dependent on the nature of each decision and the circumstances in which it is made. The Full Council is required to understand the impact or likely impact of the decision on those with protected characteristics who are potentially affected by the decision.
74. In respect of the Local Plan an Equality Impact Assessment has been carried out (see Appendix D).

### **Environmental and Climate Change Implications**

75. The Council's commitments to carbon-neutrality are embedded across the Enfield Local Plan.
76. Adopting the plan will significantly improve the performance of the new buildings going through our planning system. Requirements for energy efficiency of buildings will be aligned to best practice and updated to the latest evidence base.

77. The plan will help reduce embodied carbon in the borough by strengthening the requirement for assessment and setting targets, as well as facilitate the transition to a circular economy in the construction industry.
78. The plan will encourage connections to the expanding heat network, providing affordable low-carbon heat to more homes and generate renewable energy in the borough.
79. The plan includes carbon reductions from the shift to sustainable modes of transport and reducing waste and increasing recycling, and capture carbon by expanding our woodlands and creating more urban greening. The plan will also facilitate the adaptation to a changing climate making Enfield more resilient to flooding and extreme heat.

### **Public Health Implications**

80. Enfield's Local Plan provides a holistic approach towards enhancing the health and wellbeing of its residents, both directly and indirectly, through strategic objectives and a myriad of policies. Notably, Strategic Objective 2 and Policy SP SC1 are tailored to directly target health improvement, requiring development proposals to actively contribute to healthy lifestyles, combat health inequality, and undergo thorough Health Impact Assessments. Moreover, the plan indirectly promotes health through policies advocating for active travel, walking, and cycling, thereby reducing car dependency and associated pollutants. The spatial strategy's emphasis on large-scale development potential includes provisions for new healthcare facilities and green infrastructure, catering to both recreational and travel needs. Policies safeguarding open spaces, particularly in the Blue and Green Enfield and Rural Enfield sections of the Plan, provides access to high quality areas for outdoor recreation, promoting an active lifestyle. Placemaking initiatives like Meridian Water and Rural Enfield prioritise public open spaces, with Chase Park requiring development to integrate green infrastructure improvements. Furthermore, the plan encourages the production of healthy and affordable food production through Policy DM BG11. Despite potential strain on existing healthcare facilities due to growth, the Local Plan adequately addresses this concern through provisions outlined in the Delivering and Monitoring policies. In conclusion, the Local Plan is well placed to yield a positive impact through development on achieving health and wellbeing objectives, recognising the Council's commitment to fostering a healthy and thriving community.

### **Property Implications**

81. The submission recommends planning policies that, once adopted, could apply to a variety of properties/sites within the estate owned by the Council. The submission of the report itself for consultation and public examination is likely to have positive implications for some General Fund corporate property/sites in terms of the material weight attached to proposed policies. If the plan is adopted, there is likely to be positive future property implications arising on some properties/sites that would be considered on a case-by-case basis as and when future projects are developed.

### **Safeguarding Implications**

82. There are no safeguarding implications for this report.

### **Crime and Disorder Implications**

83. Enfield's Local Plan strategically integrates various policies within the Design and Character section to effectively tackle issues related to crime and community safety. Notably, policies such as DM DE6 (Tall buildings) and DM DE7 (Creating liveable, inclusive, and quality public realm) are designed to address these concerns comprehensively. DM DE6 recognises the importance of protection from emergencies like fires and advocates for increased visibility through activating street frontages to deter crime. Similarly, DM DE7 supports safety and counter-terrorism measures while promoting increased activity and natural surveillance at ground floor level, thereby enhancing safety. Moreover, additional policies such as SP DE1, DM DE8, DM DE9, DM DE11, and DM DE12 contribute significantly to creating safe and secure places or active frontages, further bolstering overall safety measures. Furthermore, specific Place policies highlight safety considerations in new developments across different Borough areas. In essence, the new Local Plan is expected to reduce crime rates and enhance community safety by incorporating targeted policies within the Design and Character section. These provisions demonstrate the Council's commitment to fostering a secure and resilient environment for its residents.

### **Procurement implications**

84. There are no procurement implications for this report.

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Date: 9 March 2024

### **Appendices**

- **Appendix A:** Enfield Local Plan – Regulation 19 pre-submission version – in 9 parts
  - Appendix A1: ELP Reg-19 Chapters 1 and 2
  - Appendix A2: ELP Reg-19 Chapters 3 to 6
  - Appendix A3: ELP Reg-19 Chapters 7 and 15
  - Appendix A4: ELP Reg-19 Appendices A and B
  - Appendix A5: ELP Reg-19 Appendix C Site Allocations Part 1
  - Appendix A6: ELP Reg-19 Appendix C Site Allocations Part 2
  - Appendix A7: ELP Reg-19 Appendix C Site Allocations Part 3
  - Appendix A8: ELP Reg-19 Appendix D

- Appendix A9: ELP Reg-19 Appendix E
- **Appendix B1:** ELP Reg-19 Integrated Impact Assessment (March 2024)
- **Appendix B2:** ELP Reg-19 IIA NTS (March 2024)
- **Appendix C:** ELP Reg-19 Habitats Regulations Assessment (March 2024)
- **Appendix D:** Enfield Council Equalities Impact Assessment (March 2024)
- **Appendix E:** Enfield Local Plan Evidence Base  
<https://www.enfield.gov.uk/services/planning/evidence-base>
- **Appendix F:** ELP Policies Map

### **Background Papers**

- Link to Evidence Base <https://www.enfield.gov.uk/services/planning/evidence-base>
- Local Development Scheme 2023  
<https://www.enfield.gov.uk/services/planning/local-development-scheme#local-development-scheme>
- Statement of Community Involvement 2023  
<https://www.enfield.gov.uk/services/planning/local-development-scheme#statement-of-community-involvement>
- Consultation Statement <https://www.enfield.gov.uk/services/planning/new-enfield-local-plan#new-enfield-local-plan>

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