



## London Borough of Enfield

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<b>Report Title</b>	Enfield Local Plan Regulation 22 Submission Update
<b>Report to</b>	Housing and Regeneration Scrutiny Panel
<b>Date of Meeting</b>	21 October 2024
<b>Cabinet Member</b>	Councillor Susan Erbil
<b>Executive Director / Director</b>	Perry Scott, Executive Director of Environment and Communities Brett Leahy, Strategic Director of Planning and Growth
<b>Report Author</b>	May Hope, Head of Strategic Planning and Design
<b>Ward(s) affected</b>	All wards
<b>Classification</b>	Part 1 Public

### Purpose of Report

1. This report provides an update on the Enfield Local Plan (ELP) 2019-2041 following its submission under Regulation 22. It addresses feedback from the Regulation 19 consultation, key challenges raised by Inspector Steven Lee's preliminary questions, and the next steps in the examination process.
2. Additionally, this report outlines how the Council has met its legal obligations under the Duty to Cooperate and the findings of the Integrated Impact Assessment (IIA), offering a structured response to some of the key objections raised by respondents.

### Submission and Examination Process

3. The Enfield Local Plan was submitted to the Secretary of State on 6 August 2024, and Inspector Steven Lee was appointed on 12 August. On 6 September, the Inspector issued his preliminary questions, focusing on key issues such as housing need, Green Belt release, and the deliverability of

infrastructure. This is a standard step that allows the Inspector to delve into the specifics of the Plan. The Council is required to respond to these questions to demonstrate that the Plan is justified, effective, and aligns with both national and regional policies.

4. The examination process will determine whether the plan meets the tests of soundness as outlined in the National Planning Policy Framework (NPPF). The Council is preparing detailed responses to the Inspector's questions and continues to engage with key stakeholders.

### **Key Issues Raised During Consultation**

5. Several respondents, including environmental groups and local residents, have raised concerns about the proposed release of Green Belt land for development, particularly in areas such as Crews Hill and Chase Park. Despite this, the Duty to Cooperate Statement highlights the Council's engagement with neighbouring authorities, the GLA, and statutory consultees like Natural England, demonstrating that, in the Council's view, exceptional circumstances justify the Green Belt release. Without releasing some Green Belt land, the Council would be unable to meet its housing needs, especially for family and affordable homes. Alternatives, including brownfield sites, were considered, but the assessment concluded that additional land was needed to meet the Boroughs housing needs.
6. Some respondents questioned the housing target of 33,280 homes, arguing that they were based on outdated data. In response, the Integrated Impact Assessment (IIA) reaffirms that the housing targets are aligned with both the London Plan and the government's Standard Method, taking into account projected population growth, affordability, and economic trends. The IIA also demonstrates how housing needs have been evaluated, ensuring that the targets are realistic and responsive to local demand.
7. Key stakeholders such as TfL and the GLA raised concerns about car dependency in rural developments like Crews Hill. Through the Duty to Cooperate, the Council worked collaboratively with TfL, Highways England, and neighbouring authorities to develop sustainable transport strategies. These include enhancements to public transport, cycling infrastructure, and road networks. The IIA further supports this by analysing the potential environmental impacts of increased car usage and outlining mitigation strategies, such as promoting active travel and securing infrastructure funding.
8. The Duty to Cooperate Statement demonstrates that the Council has met its legal obligation to collaborate with neighbouring authorities and statutory bodies. This includes rigorous discussions with Natural England and the GLA to assess the ecological and landscape impacts of Green Belt release, ensuring that biodiversity net gain policies are in place. The IIA reinforces this by examining the environmental impacts of Green Belt development and confirming that appropriate mitigation strategies have been integrated into the Local Plan.

9. Through close collaboration with authorities across North London, the Council has ensured that its housing and employment targets are supported by up-to-date evidence, as outlined in the IIA. The Duty to Cooperate Statement also highlights how joint efforts have ensured that these targets are deliverable and aligned with broader regional growth strategies.
10. The Council's engagement with Transport for London (TfL), Highways England, and local transport authorities has addressed the concerns raised regarding transport infrastructure in rural areas. The IIA includes a detailed assessment of potential transport challenges and car dependency, proposing sustainable transport solutions such as better public transport links and active travel networks. Additionally, the Duty to Cooperate outlines how infrastructure plans were developed in conjunction with key stakeholders to ensure the developments are sustainable and meet regional transport goals.

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

11. The Enfield Local Plan is closely aligned with the Council's Corporate Plan and the Climate Action Plan, supporting sustainable development, housing delivery, and the protection of green spaces. It also reflects the priorities set out in the London Plan and responds to Enfield's housing and infrastructure needs.

### **Next steps**

12. The Council will submit detailed responses to Inspector Steven Lee's preliminary questions, addressing concerns around Green Belt release, housing targets, and infrastructure planning. These responses will be grounded in evidence from the Duty to Cooperate Statement, the IIA, and ongoing collaboration with neighbouring authorities.
13. The Enfield Local Plan is moving forward through its examination phase, with hearings expected to take place in early 2025. Following the hearings, any proposed Main Modifications will undergo public consultation, with adoption of the Local Plan anticipated by 2025, as per the Council's Local Development Scheme.
14. Sticking to this timetable is critical, as the potential for a pivotal moment in March 2026 looms, where the current London Plan's housing targets will expire. This moment, driven by the adoption of the new standard method for calculating housing need, will leave boroughs with outdated targets and exposed to speculative planning applications. The urgency is heightened by the draft changes to the National Planning Policy Framework (NPPF) and the forthcoming review of housing targets.
15. Ensuring timely adoption of the Enfield Local Plan will protect the borough from policy gaps and allow for proactive planning to meet significantly increased housing targets, which are expected to rise to 80,693 homes per annum for London. Delays could create legal and strategic challenges, as developers may exploit outdated policies, leading to unplanned speculative

development across the whole borough that doesn't align with Enfield's long-term objectives.

## **Conclusions**

16. The Enfield Local Plan is at a crucial stage in the examination process. The Council has demonstrated, through the Duty to Cooperate Statement and Integrated Impact Assessment (IIA), that it has fulfilled its legal obligations and provided a sound, evidence-based plan. The next steps will involve responding to the Inspector's questions, participating in public hearings, and making any necessary modifications to ensure the Plan is adopted.

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## **Background Papers**

- a) Duty to Cooperate Statement and Statements of Common Ground  
[https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0012/62022/Duty-to-Cooperate-Statement-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0012/62022/Duty-to-Cooperate-Statement-Planning.pdf)
- b) Integrated Impact Assessment and Appendices  
[https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0014/55040/ELP-REG19-IIA-and-appendices-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0014/55040/ELP-REG19-IIA-and-appendices-Planning.pdf)
- c) Inspector's Preliminary Questions  
[https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0013/63400/Inspectors-initial-letter-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0013/63400/Inspectors-initial-letter-Planning.pdf)