

MEETING TITLE AND DATE:

Local Plan Cabinet Sub Committee
24th October 2018

REPORT OF:

Executive Director of Place
 Sarah Cary

Contact officers and telephone numbers:

Neeru Kareer, Head of Strategic
 Planning and Design.
 Telephone: 02083791634
 E-mail: neeru.kareer@enfield.gov.uk

May Hope, Local Plan Lead
 Telephone: 02083794839
 Email: may.hope@enfield.gov.uk

Agenda:	Item No: 4
Subject: Enfield's New Local Plan 2036 draft for public consultation Wards: ALL Key Decision No: 4686	
Cabinet Member consulted: Cllr Ahmet Oykenner (Property and Assets)	

1. EXECUTIVE SUMMARY

- 1.1 Progress on a new Local Plan for Enfield up to the period of 2036 (LP2036) is underway. The new LP2036 is required to establish a much-needed planning framework to provide the basis for good growth in Enfield including securing key infrastructure and investment projects.
- 1.2 This Regulation 18 public consultation document represents the first of two formal stages of consultation the new LP2036 will go through before it is submitted for independent public examination (anticipated in 2020).
- 1.3 The need to deliver for an ever-increasing population, and actually meet local housing delivery and employment opportunities will require a radical approach and challenge our thinking beyond any plans we have seen before.
- 1.4 The Council is being asked by the Mayor of London to provide three times the amount of housing each year than we currently do. The new Local Plan will need to make available land work harder and secure the physical and social infrastructure to support new communities and regenerate existing ones.
- 1.5 Our statutory obligation is to keep our Local Plan up-to-date and look at a 15-year time horizon as well as take account of longer term requirements.
- 1.6 The draft new LP2036 proposes spatial growth strategy options and preferred approaches to planning policies across the whole borough.

2. RECOMMENDATIONS

That the Local Plan Cabinet Sub Committee:

- 2.1 Approve the draft new Local Plan 2036 at Appendix 1 for the purposes of public consultation under Regulation 18 of the Town and Country Planning Local Plan Regulations 2012. Approval is sought to consult Enfield's residents, businesses, stakeholders and statutory bodies on the draft vision, objectives, growth options and planning policies.
- 2.2 Agree that the Executive Director for Place in consultation with the Portfolio holder for Property and Assets agree appropriate changes to the draft document, associated supporting documents and consultation material required in the run-up to and during the public consultation process.

3. BACKGROUND

Enfield's Existing Local Plan

- 3.1 Enfield's existing Local Plan comprises a number of documents that have been adopted by the Council:
- Core Strategy (November 2010);
 - Development Management Document (November 2014);
 - North Circular Area Action Plan (October 2014);
 - North East Enfield Area Action Plan (June 2016); and
 - Edmonton Leaside Area Action Plan (currently under examination).
- 3.2 The Core Strategy which set out a vision, strategic objectives and high-level policies for Enfield were consistent with the 2008 London Plan with housing targets equating to 395 dwellings per annum. Since adoption, London's population has continued to grow tremendously, the borough also been impacted by this and other challenges like housing delivery and in particular meeting affordable housing needs. Many of the regeneration approaches instigated by the Core Strategy are now either in place or in the process of coming forward.

Draft New London Plan

- 3.3 The London Plan (2011), and subsequent alterations in 2016, significantly increased Enfield's housing targets from 560 to 798 dwellings per annum. The latest draft London Plan issued in December 2017 is now proposing an even more substantial increase to the borough's housing target equivalent to 1,876 dwellings per annum. This figure is based on population growth, housing need and a strategic assessment of housing land availability. To ensure Enfield can sustainably plan to accommodate growth and infrastructure needs for the borough over the immediate plan period of the next 15 years, the Council is preparing evidence to respond to London Plan Examination in Public that will cover:
- Strategic Vision – Strategic Policy Optimisation;
 - Small Housing Sites Methodology – Delivery of Homes and impact on the Enfield's housing trajectory;
 - Managing Strategic Industrial Land Demand to achieve a future higher wage economy in Enfield;
 - Green Belt policy – need for consistency with the NPPF approach; and
 - Strategic Transport Infrastructure Investment and optimisation of associated growth.

National Planning Policy Framework (NPPF)

- 3.4 The Government's objectively assessed need for housing in the borough is 3,500 dwellings per year, equating to 35,000 for the same period. The new NPPF (July 2018) indicates that the Council must apply a new methodology in order to calculate local housing need. The Secretary of State has already indicated that the draft new London Plan's housing need assessment falls short of what would be required, and an immediate review of the London Plan will be required following its adoption in summer 2019.
- 3.5 Enfield's new Local Plan will accordingly now need to be prepared in accordance with the new national methodology and therefore the expectation is that the Council will have an even higher requirement than that currently being proposed in the draft London Plan.

Enfield's new Local Plan

- 3.6 Enfield's population projections are indicating that by 2036 Enfield's population could rise to around 380,000, compounding major housing pressures, particularly an acute need for affordable homes and a need for new and better paying job opportunities for residents. This needs to be balanced with providing the requisite education training & skills, new schools, commercial uses and improved transport infrastructure. To accommodate this will require associated improvements to our social and physical infrastructure.
- 3.7 The new Local Plan will now need to consider future housing targets and development needs in light of London's growing population and where necessary review and update current planning policies. It will be the primary strategic planning policy document that sets about establishing a vision, a growth strategy and the supporting planning policies to curate and guide development successfully up to 2036.
- 3.8 Through the delivery of its existing Local Plan and regeneration areas Enfield has not been able to accommodate the current London Plan's housing target (i.e. 798 homes). The reality is that Enfield has only delivered on average approximately 550 dwellings a year since the adoption of the Core Strategy in 2010.
- 3.9 Consequently, the 135% increase of Enfield's housing target over the next 15 years will present both challenges as well as opportunities and requires a step-change in response and a new strategy for growth across the borough. In line with the new London Plan, the Government's targets and meeting the borough's local housing need, the new Local Plan will have to plan for more housing in order to deliver more. Further, work is needed to assess Enfield's local housing need to understand what we plan to deliver over the minimum plan period of 15 years, which may well exceed both regional and national targets.

- 3.10 The Council has good records regarding the development opportunities of large sites across the borough. These are recorded in the London-wide Strategic Housing Land Availability Assessment (SHLAA) (2017) undertaken across the Greater London area in cooperation between various planning authorities. However, the Council is being faced with pressures to also ensure that as many small sites come forward for development. Based on past experience, evidence indicates that these are challenging targets to meet, therefore whilst the Council will need to plan for more housing, it will also need to plan differently.
- 3.11 Exhausting all reasonable opportunities on brownfield land, making underused land work harder and optimising densities remain the first principles of the new Local Plan. This is also a central premise on which sustainable development is reaffirmed in the new NPPF and the new London Plan. Consequently, the Council must test all brownfield opportunities for deliverability and a 'Call for Sites' will be undertaken through this consultation.

Achieving housing targets and meeting the 5-year supply

- 3.12 National policy requires Enfield to identify a housing supply over the next five years (i.e. 2018 to 2023), which meets the cumulative year on year targets and includes any shortfall from the previous year and buffer requirements. Whilst Enfield exceeded the current London Plan's target of 798 dwellings per year in 2015/16, there was a shortfall in the previous four years. The Housing Trajectory shows projected cumulative completions over the next five years to be 4,808, which is sufficient to meet the London Plan's current target of 3,990 units, as well as the required 5% buffer of the NPPF equating to 4,190 units. If a 20% buffer¹ were to be applied at 4,788 units, the Housing Trajectory shows this can also be met by the 5-year supply. Notwithstanding the need to plan for a new London Plan housing target, the new Local Plan will also need to have a sufficient buffer allowance to ensure delivery.

How We Got to a draft new Local Plan

- 3.13 Early Issues and Options public consultation was undertaken in late 2015/16 with local communities, residents' groups, Council services, partner organisations, developers, housing associations, landowners, younger, older and disabled people and community forums. This feedback was used to gauge the priorities of residents for future growth in the borough.
- 3.14 Last year, the Council undertook an initiative to promote and raise issues of growth with residents to test and challenge attitudes and assumptions about new housing and infrastructure via 'The Enfield Conversation'. Five pilot resident workshops were undertaken in September and November of

¹ 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of the achieving the planned supply.

2017 with approximately 50 attendees at each representing a diverse range of people more representative than those that traditionally engage with the Council. Participants were from diverse ethnic backgrounds, mix in age and gender with more female and under 35s. The workshops provided a method to ask respondents to consider a number of defined options and trade-offs which would then help to identify their priorities.

- 3.15 A resident consensus was to support the delivery of a higher number of homes if this meant meeting their actual needs and providing homes residents could afford. Building homes in the Lee Valley Corridor was the most popular new home area. Town centres, the A10 corridor and Council estates were the next most popular areas. Improving the A406 and overland train services were the most popular infrastructure investments. Improvements to cycle lanes and frequency of the Piccadilly tube service also featured. Participants residing in more suburban lower density areas of the borough had a higher priority to direct development towards the Lee Valley Corridor, conversely, those already living in more dense and compact neighbourhoods raised higher priorities to spread development across the borough and directed towards town centres and Green Belt locations.

New Local Plan Headlines

- 3.16 The key policy moves for this new Local Plan are highlighted below:
- Committed to a new borough-wide target of 50% affordable housing;
 - Prioritise securing social rented homes for those with the greatest affordability needs;
 - Address inequality and continue the regeneration of the borough's most deprived areas;
 - Prioritise the Council's public health agenda through good place-making principles in new development;
 - Securing higher wage jobs over the plan-period;
 - Securing infrastructure improvements;
 - Provide a plan-led and high safety and design quality approach to tall buildings;
 - Provide flexibility in some industrial areas for intensification and co-location areas for higher density employment and housing development;
 - Provide greater flexibility to retail policies to respond to the challenges facing our town centres and high streets; and
 - Encourage an appropriate vibrant night-time and evening economy in our town centres and at Meridian Water.

Proposed Growth Strategy for People and Places

- 3.17 The approach to accommodating development over the next 15 years requires good growth principles that will ensure residents have a share in the new social and community infrastructure, have access to a range of housing types, new schools, improved health and wellbeing and quality of

life, improvements to open spaces, as well as new employment opportunities – ensuring that the positive benefits of growth, regeneration and investment reach all residents of Enfield.

3.18 The Council has identified options how it can plan differently, which include:

- Directing new development opportunities into the town centres to help them thrive;
- Intensifying development areas around underground and overground stations;
- Promoting development above single storey retail, supermarkets and other commercial uses;
- Supporting the redevelopment of underutilised and low-density land such as surface car parks and underused highway land for housing and employment;
- Relaxing retail policies and promoting development within individual residential curtilages;
- Exploiting the opportunities around transport corridors such as the A10, A1010 and A406;
- Optimising the Council's land portfolio for new development including its Estate Renewal and Regeneration Programmes;
- Proactively relocating, consolidating, managing and intensifying, and efficiently optimising low density land to increase capacity for development for housing and employment; and
- Taking a strategic plan-led approach to Green Belt and looking at opportunities that provides accessible and sustainable options to meet growth.

3.19 Meeting as a minimum the draft London Plan target of 1,876 homes a year for the next ten years will mean that the Council need to consider all options.

3.20 The new Local Plan also looks to how new development in Enfield can help tackle climate change, ensure the timely delivery of community infrastructure, enhance our public realm, support our economy to grow and prosper, provide new homes and meet the challenge of population growth through looking towards new forms and areas of development in the growth and investment areas identified above.

3.21 Consultation and evidence gathering has been on-going over the past 18 months to inform the draft new Local Plan. This Regulation 18 public consultation document represents the first of two formal stages of consultation the new LP2036 will go through before it is submitted for independent public examination (anticipated in 2020). This first Regulation

18 draft will go forward for a borough-wide public conversation and formal public consultation from November to December 2018.

Consultation Strategy

- 3.22 The Localism Act 2011 puts the community at the forefront of the planning system. The NPPF requires plan-making to be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.
- 3.23 The Council already has a good track record of involving the community in planning, which will be continued and built on as part of the new Local Plan. The development plan making process will include the involvement of a number of stakeholders, with the emphasis being placed upon their input at an early stage. This should help to achieve greater consensus and ensure that the later stages of the plan making process will run more smoothly, with fewer objections or issues arising.
- 3.24 External stakeholders will be engaged at an early stage and will continue to be engaged at relevant public consultations stages throughout. It is worth noting that given the scope of the Local Plan it is proposed that at each main stage of preparation full consultation will take place in order to ensure that the Council reaches as many people and groups as possible. This will ensure a balance of views. All residents and community groups should have the opportunity to take part in consultation activities regardless of age, gender, gender reassignment, disability, ethnicity, race, religion, belief or sexual orientation. This means that consultation is not restricted to the specific and general consultees directly.

Methods of consultation and engagement

- 3.25 There are a variety ways in which people and groups can get involved during the main stages of preparation. In keeping with the Localism agenda and the Council's established approach to consultation and community engagement, the list below sets out suggestions on consultation and engagement, which are complementary and work alongside each other in order to reach out to as many people and groups as possible:
- Full statutory public consultation for at least a minimum 6 weeks and the Council propose 12 weeks consultation;
 - Use of digital engagement platform;
 - Digital campaign targeting key audiences in the borough;
 - Campaign strand targeting people in neighbouring boroughs;
 - Media relations – proactive and reactive throughout campaign
 - Other digital methods including social media and e-newsletters;

- Traditional methods such as 'Our Enfield', press adverts, ethnic press and posters; and
- Specific sessions/forums and panels.

3.26 A variety of consultation methods will be used in order to make the process of consultation as accessible as possible to a wide range of stakeholders. There will also be a number of exhibitions around the borough during the consultation period. These would include display boards summarising the main content of the Plan and for those exhibitions that are staffed, this will provide people with an opportunity to speak to officers about the proposals in the Plan.

4. ALTERNATIVE OPTIONS CONSIDERED

4.1 Without starting work on a new Local Plan the Council will not meet its statutory obligation to have an up to date Plan in place as directed by National Policy. The borough will not be able to meet its housing requirements which in turn will leave the local planning authority vulnerable to piecemeal and inappropriate development in unacceptable locations. This Local Plan consultation represents an important stage in the development of Enfield's new Local Plan. The Core Strategy (2010) is now out-of-date and it remains important to progress an up-to-date planning policy framework for the borough in order to meet development and growth needs, comply with Government policy to update plans every five years, ensure there is a five year housing supply, protect and enhance the environment of the borough, and avoid the risk of 'planning by appeal'.

5. REASONS FOR RECOMMENDATION

5.1 The Council is required by legislation to have an up-to-date Local Plan. Consultation and engagement with stakeholders and the public is integral to the Local Plan and will help inform and shape the planning policies and Enfield's spatial approach to the challenges up to 2036.

6. COMMENTS FROM OTHER DEPARTMENTS

6.1 Financial Implications

6.1.1 Provision for the cost of the preparation, consultation and examination of the new Local Plan is included in the Strategic Planning and Design budget.

6.1.2 The report does not commit the Council to additional expenditure. Any future proposals with cost implications would need to be subject to separate reports and full financial appraisal.

6.2 Legal Implications

6.2.1 The Planning and Compulsory Purchase Act 2004 (the Act) as amended and the Town and Country Planning (Local Planning) (England)

Regulations 2012 (the Regulations) require local authorities to prepare the local plan, which consists of the local development documents (LDDs).

- 6.2.2 The recommendation of this report to formally consult on the draft new Local Plan are in accordance with this function.

6.3 Property Implications

- 6.3.1 The new Local Plan should provide greater clarity and guidance for the development industry as a whole, particularly in assessing the viability of proposals and preparing planning applications in the borough, which is more closely related to the NPPF and the draft new London Plan. The overall effect should reduce planning and development risks associated with bringing new schemes forward.

7. KEY RISKS

- 7.1 Failure to produce an up-to-date Local Plan would not be in accordance with national planning legislation. Providing a plan-led approach to population growth and housing demand is a statutory planning function without which could lead to poor quality development and/or development in inappropriate locations and would significantly harm the Council's ability to meet its wider regeneration and inward investment objectives.

8. IMPACT ON COUNCIL PRIORITIES – CREATING A LIFETIME OF OPPORTUNITIES IN ENFIELD

8.1 Good homes in well-connected neighbourhoods

The new Local Plan will support population growth, the need for new affordable homes supported by employment opportunities to tackle inequality; and the continued regeneration of the borough's most deprived areas providing well connected neighbourhoods. New development will be planned alongside a range of social and community facilities and physical infrastructure investment.

8.2 Build our local economy to create a thriving place

The new Local Plan will provide a positive statutory framework for meeting the borough's growth in a sustainable and environmentally conscious way.

8.3 Sustain strong and healthy communities

The Plan will be supportive of strong communities, particularly in terms of ensuring consideration is given to addressing existing deficiencies and providing new infrastructure (physical, social and community).

9. EQUALITIES IMPACT IMPLICATIONS

- 9.1 The principles, strategies and proposals contained within the draft new Local Plan facilitate change in a way that has regard to positively impacting on equalities in general. To help evaluate and support this a Predicative EqIA will be prepared to support the plan making process. This process will ensure the Local Plan is positive for equalities groups, who will benefit from the new affordable homes, new job opportunities,

and new infrastructure such as improved public transport and quality place-making.

10. PERFORMANCE AND DATA IMPLICATIONS

- 10.1 The new Local Plan will provide clear policies for the assessing planning applications which will bring performance management improvements to the planning application process and better performance at appeal.

11. PUBLIC HEALTH IMPLICATIONS

- 11.1 The new Local Plan contains our draft approach to delivering good growth in the borough, policies covering a wide range of topics, all of which may have implications for public health, such as housing, transport, community facilities, environmental protection, and green infrastructure.