

**London Borough of Enfield  
Full Council**

**18 November 2020**

**Subject: Planning for the Future – Consultation**

**Cabinet Member: Cllr Nesil Caliskan**

**Executive Director: Sarah Cary, Executive Director of Place**

**Key Decision: N/A**

**Purpose of Report**

1. In August 2020 the government published a Planning White Paper “Planning for the Future”, which proposed a wide-ranging and fundamental series of reforms to the planning system, covering plan-making, community engagement, design quality and infrastructure funding.
2. The proposals have generated substantial interest across the country and within the professions which support development and regeneration.
3. The consultation closed on 29 October. This report informs full council of the submission by the Council.

**Proposal(s)**

4. To note the Council’s response to the Government’s consultation on the Planning White Paper “Planning for the Future”.

**Reason for Proposal(s)**

5. The response is provided for information for the benefit of all members and the public.

**Relevance to the Council Plan**

6. Good Homes in Well Connected Neighbourhoods: An appropriate and functioning planning system is critical to the Council’s ability to plan for more and better homes for local residents. The White Paper introduces a series of fundamental reforms to the planning system.
7. Safe Confident and Healthy Communities: An appropriate and functioning planning system helps provide the social infrastructure that supports communities, including healthy streets, parks and community spaces.
8. An Economy That Works For Everyone: An appropriate and functioning planning system is critical to providing employment land and space, and can support creating more high-quality employment and developing town centres that are diverse and inclusive.

## **Background**

9. In August 2020 the Government began a consultation on a Planning White Paper which set out a package of proposals for the reform of the planning system in England covering plan making, development management and development contributions. The consultation was open to all and sought views on its proposals to streamline and modernise the planning process, improve outcomes on design and sustainability, reform developer contributions and ensure more land is available for development where needed.
10. Given the radical and wide-ranging nature of the proposals, and potential impacts on the council and its future delivery of planning services, it was considered important to make a considered and detailed response to the consultation. The White Paper posed a series of detailed questions and it was felt that the most effective way for Enfield to contribute was to directly respond to the questions asked by Government. The Strategic Planning & Design Service co-ordinated the preparation of a cross council response over a number of weeks drawing upon officer expertise from a wide range of service areas, including amongst others, the housing, Meridian Water, and environmental services teams.
11. The proposals and their potential impacts on Enfield were also discussed with the Environment Forum and Scrutiny Committee and views incorporated into the response. Furthermore, the Council ran a website-based consultation in September seeking the local communities views on the series of planning changes being proposed by Government. Although the response was limited, the general findings were incorporated into the Council's response to the White Paper.
12. The response submitted to Government on 29 October was detailed, wide ranging and highly technical in nature. Although the Council was supportive of some of the government's proposals, concern was expressed over many of the proposed changes and how they would operate in the Enfield context.
13. An acknowledgement receipt for the Enfield response was received from Government on 29 October 2020. The consultation has now closed, and the Government is considering the responses it received.

## **Summary of LB Enfield Response**

14. The detailed response is provided in Appendix A.
15. The proposed reforms are rooted in what the Government sees as systemic faults with a planning system that is characterised in the White Paper as being complex, unpredictable and resulting in too few homes being built. This is a blunt and simplistic criticism of the existing system we and strongly disagree with the White Paper's implication that the planning system is the principal barrier to development.
16. Successive reforms and piecemeal attempts at tinkering with the planning system has caused much upheaval at a time when austerity has eroded the

capacities of local government. According to figures from the Home Builders Federation, 69,300 new homes were granted planning permission in London in the year to September 2019, which is higher than the annual target of 52,000 homes in the 'Intend to Publish' version of the London Plan. We need a better-informed response to the housing crisis, which includes proper consideration of wider barriers to delivery.

17. Whilst we welcome the focus on proactive plan-making and good design, this shift will have substantial resource implications. The production of design codes and guidance to support land designations will require design expertise. Local authorities need investment in in-house capacities to deliver on the White Paper's radical agenda.
18. We are concerned by the lack of substance on sustainability, which is at odds with the 25-year Environment Plan and forthcoming Environment Bill. The government urgently needs to set out an ambitious role for the planning system in mitigating and adapting to climate change. We need a step-change in approach which puts biodiversity, blue-green infrastructure and nature recovery at the heart of future growth. Green spaces are more important now than ever. The evidence shows that this year increasing numbers of people are spending time in green and natural spaces – almost half the adult population (45%) say that they are spending more time outside than before COVID-19.
19. We also consider that the reforms proposed:
  - Create uncertainties for London Boroughs on the role of the Mayor and the London Plan under any new arrangements.
  - Pares back community involvement to the bare minimum, when engagement and local democracy should be centre stage to both plan making and decision taking.
  - Are silent on measures to help revitalise town centres. A recent survey demonstrates Enfield residents' enthusiasm for creative community-centred approaches to town centre renewal.
20. As it stands there are many gaps with crucial details left to follow, not least the updated NPPF, national Model Design Code, and crucially proposals for resourcing planning departments. We look forward to seeing the detail as soon as possible so we can understand the implications.
21. In summary, the planning system needs to provide a solid foundation for investment and development to provide jobs, affordable homes and prosperity in a way that also addressed the climate emergency. The uncertainty that the White Paper introduces could hamper the growth that is vital to recovery from the pandemic. We are committed to positive and proactive planning in Enfield and will continue to work hard to plan for and deliver the homes, jobs and prosperity that our residents deserve.

### **Main Considerations for the Council**

22. The Council response to the White Paper sought to assist Government in understanding what Enfield's views were in relation to proposals that it felt could work, those that might need amendment to work, and those that it felt

had little or no merit. In making the response the Council sought to protect Enfield's interests, local character and the efficiency and quality of its spatial planning functions. It also provided local and specific information to aid government in its decision making.

23. The publication of the White Paper has introduced a considerable amount of uncertainty into the Planning system. Many of the Government's proposals for reform of the Planning system lacked detailed and draft legislation to enact the proposed changes was not published alongside the White Paper. This was one of the points made in the Enfield response. Much more detail will be needed from the Government before it is clear what the path ahead may be for the future operation of this council's spatial planning functions.
24. The Government has not indicated when it will publish its response to the material submitted to it during the consultation although at this point it is considered unlikely that a response would be forthcoming before Spring 2021. It is also unclear what the Government's next steps will be in introducing changes to the Planning system or how it will react to the comments Enfield and other bodies and individuals made.
25. The uncertainty introduced by the Planning White Paper will particularly impact on the plan making functions of the council but also potentially on the appetite of the development industry to bring forward new development in the borough in the short term.
26. It was important that the council made a detailed response to Government to represent Enfield's interest. It will also be important to keep the government's progress on introducing new planning reform under close review and continue to make detailed representations to government on their suitability for the Enfield context as opportunities arise.

### **Safeguarding Implications**

27. There are no safeguarding implications arising from the consultation response.

### **Public Health Implications**

28. There are no direct public health implications arising from the consultation response. However, the council was seeking to assist government in taking decisions about improvements to the planning system which could lead to better spatial planning responses to improve public health.

### **Equalities Impact of the Proposal**

29. The equalities impact of the Government's proposals on Enfield residents were considered as part of preparing the Councils response. The representations did highlight concerns in relation to several of the proposals,

particularly on those who may experience data poverty and have limited access to IT. In making such responses the council sought to assist government to enable improvements to the planning system which benefitted all.

### **Environmental and Climate Change Considerations**

30. There are no direct environmental and climate change implications arising from the consultation response. However, the response did consider the impact of the white paper on Enfield's ability to plan for, and mitigate, climate change.

### **Risks that may arise if the proposed decision and related work is not taken**

31. The decision is for noting and there are no risks arising.

### **Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks**

32. The decision is for noting and there are no risks arising.

### **Financial Implications**

33. There are no financial implications arising from the consultation response.

### **Legal Implications**

34. There are no legal implications arising from the consultation response.

### **Workforce Implications**

35. There are no workforce implications arising from the consultation response.

### **Property Implications**

36. There are no property implications arising from the consultation response.

### **Other Implications**

37. None

### **Options Considered**

38. To not submit a response to the consultation; this was not appropriate given the substantial nature of the reforms proposed.

### **Conclusions**

39. The Council's response to the consultation is provided for information to benefit of all members and the public.

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## **Appendices**

LB Enfield Detailed consultation response

## **Background Papers**

The following documents have been relied on in the preparation of this report:

“Planning for the Future”

<https://www.gov.uk/government/consultations/planning-for-the-future>