

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes   | Questions asked  | Our thoughts   |
|---|--|--|
| Pillar One – Planning for development   |  |  |
| A new approach to plan-making   |  |  |
| <p>Proposal 1: The role of land use plans should be simplified. We propose that Local Plans should identify three types of land – Growth areas suitable for substantial development, Renewal areas suitable for development, and areas that are Protected.</p> <p>Alternative options: Rather than dividing land into three categories, we are also interested in views on more binary models. One option is to combine Growth and Renewal areas (as defined above) into one category and to extend permission in principle to all land within this area, based on the uses and forms of development specified for each sub-area within it.</p> <p>An alternative approach would be to limit automatic permission in principle to land identified for</p> | <p>5. Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]</p> | <p>No. A system of firm area-based designations would not necessarily deliver development more effectively than the current discretionary system. The proposed system brings with it a range of challenges and resourcing implications – the process of defining area-based designations will require significant time and resource input up-front. This process is likely to be contentious, and experiences from other countries suggest that unforeseen opportunities also lead to the piecemeal revision of plans, which takes time and can reopen debates.</p> <p>Overall, we are concerned that the three area designations of Growth, Renewal and Protected are oversimplified for a London context – we need an approach which can address a varied and dense mixed-use context. We are mindful of the experience of the NPPF, where an initially simple framework had to be supplemented with very detailed requirements (contained in PPG) to deal with the complexity of real-life planning. Any area-based designation framework needs to provide appropriate guidance and clarity upfront.</p> <p>Categorising conservation areas as part of the Protected category will prevent development in a wide range of areas. For example, many town centres are covered by conservation area designation whilst also being places that can accommodate significant growth i.e. Enfield Town and Southgate in Enfield. We want to be able to sensitively manage change rather than simplistically restrict development across a significant proportion of the borough. The Government’s proposals go against our approach, set out in LB Enfield’s Heritage Strategy, of celebrating</p> |

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes  | Questions asked   | Our thoughts  |
|--|---|---|
| <p>substantial development in Local Plans (Growth areas); other areas of land would, as now, be identified for different forms of development in ways determined by the local planning authority (and taking into account policy in the National Planning Policy Framework), and subject to the existing development management process.</p> |   | <p>heritage in the context of growth as opposed to seeing it as a barrier. ‘Protection’ is not a helpful word as there are very few areas that should remain unchanged and that could not accommodate growth, some change or be improved in some way. The three categories are based on contrasting growth with protection, rather than promoting an integrated symbiotic approach.</p> <p>There may be a need to consider leaving "clear" undesignated areas in between these areas. For example, land that abuts a conservation area may not fall neatly into one of the three areas given the impact that its development may have on the conservation area.</p> <p>An alternative binary option of develop/ protect is a blunt instrument. This approach would be inappropriate for guiding development in a dense mixed-use context.</p> <p>Future proposals need to be clear on the government’s detailed intentions on how the area designation system would work in practice. A fundamental issue is the grain of area-based designations – LPAs need to understand whether a broad-brush approach is intended, or whether a mosaic of sub-zones (potentially down to the level of protecting domestic gardens) is envisaged.</p> <p>A short reference notes that Development Consent Orders could be used for “exceptionally large sites”. This process can be lengthy, so an extension of this regime is unlikely to be a quick fix to the delays in housing and infrastructure delivery.</p> |
| <p>Proposal 2: Development management policies established at national scale and an altered</p>  | <p>6. Do you agree with our proposals for streamlining the development management content of Local Plans, and</p> | <p>We offer some welcome to the use of national rather than local development policies insofar as this move would reduce the risk of repetition in Local Plans. However, the complete elimination of locally</p>  |

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes  | Questions asked  | Our thoughts   |
|--|--|--|
| <p>role for Local Plans.</p> <p>Alternative options: Rather than removing the ability for local authorities to include general development management policies in Local Plans, we could limit the scope of such policies to specific matters and standardise the way they are written, where exceptional circumstances necessitate a locally defined approach.</p> <p>Another alternative would be to allow local authorities a similar level of flexibility to set development management policies as under the current Local Plans system, with the exception that policies which duplicate the National Planning Policy Framework would not be allowed.</p> | <p>setting out general development management policies nationally?<br/>[Yes / No / Not sure. Please provide supporting statement.]</p>                                     | <p>defined DM policies would limit our ability to exercise focused control or effectively engage in local management. A key concern is the risk of stifling local innovation and ambition. Another is that local DM policies are subject to engagement and consultation with local communities in their production which leads to local specificity and ownership of policies – this would be lost.</p> <p>In Enfield, many of our Development Management policies are based on local evidence and tailored to local opportunities. For example, a number of our design policies such as design of civic development, the desire to open up access to the New River and Lee Valley Regional Park, paving over of front gardens etc. are based on local issues that are identified through our evidence base (e.g. LB Enfield Characterisation Studies).</p> <p>There is the danger that if DM policies are to be limited in length and set at a national level it will lead to more rather than less uncertainty over what can happen in growth/ renewal/ protection areas. If nationally set DM policies are vaguely defined in order to be universally applicable, they will require local elaboration, so this approach would not in reality simplify the policy framework but could conversely lead to more complexity.</p> <p>We therefore agree that local authorities should be allowed the flexibility to set DM policies except when they duplicate those set by the NPPF or (crucially) the London Plan.</p> |
| <p>Proposal 3: Local Plans should be subject to a single statutory “sustainable development” test, replacing the existing tests of</p>   | <p>7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would</p> | <p>We have concerns with the proposals.</p> <p>Losing Sustainability Appraisals could limit the scope for a robust and holistic appraisal of options. However, a new simplified ‘sustainability</p>  |

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes   | Questions asked   | Our thoughts   |
|---|---|--|
| <p>soundness.</p> <p>Alternative option: Rather than removing the existing tests of soundness, an alternative option could be to reform them in order to make it easier for a suitable strategy to be found sound. For example, the tests could become less prescriptive about the need to demonstrate deliverability. Rather than demonstrating deliverability, local authorities could be required to identify a stock of reserve sites which could come forward for development if needed.</p> | <p>include consideration of environmental impact?<br/>[Yes / No / Not sure. Please provide supporting statement.]</p>     | <p>test’ is cautiously welcomed if it maintains current standards whilst speeding and streamlining the process. It remains to be seen what this test will comprise and whether important safeguards included in the current SA/ SEA/ EIA approach will be carried forward. We will need to review the detail of these proposals to understand the implications.</p> <p>Existing arrangements offer a high degree of protection, and there are real dangers to ecosystems if existing safeguards are watered down. Opportunities for debate and scrutiny need to be built into the system to ensure that plans have a popular mandate to support ambitious levels of development.</p> <p>Engagement with key stakeholders will be crucial in ensuring the proposed single ‘sustainable development’ test is for purpose. Input from environmental bodies and expert groups are needed to make sure that the future planning system protects important species and habitats.</p> <p>More broadly, the IIA process and test of soundness and legality are important elements of the current system and any all-encompassing replacement approach will need to ensure that high quality credible plans can be delivered.</p> |
|   | <p>7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?</p> | <p>Current DtC requirements have in practice held up the adoption of much needed local plans, but this does not detract from the crucial need for coordination on strategic matters.</p> <p>In a London context greater coordination could be delivered through the Mayor, as the GLA has strategic oversight of local planning authorities – but further detail is needed to understand how the London Plan fits in with the proposed reforms. A steer on what White Paper proposals mean for the Intend to Publish London Plan would be welcome from government.</p>   |

## APPENDIX A

### LB Enfield detailed responses to Planning White Paper Consultation

| White Paper: Proposed changes  | Questions asked   | Our thoughts  |
|--|---|---|
| <p>Proposal 4: A standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst, to stop land supply being a barrier to enough homes being built. The housing requirement would factor in land constraints and opportunities to more effectively use land, including through densification where appropriate, to ensure that the land is identified in the most appropriate areas and housing targets are met.</p> | <p>8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced? [Yes / No / Not sure. Please provide supporting statement.]</p>                | <p>No. Whilst there are benefits in having a single standard method to decisively clarify housing requirements, the proposed approach is top-down, seeking to distribute the national housebuilding target of 300,000 new homes.</p> <p>The proposals raise a host of questions on how the standard approach will work in practice – further guidance is needed on the relationship with existing trajectories and land use commitments, and the frequency that the exercise will need to be carried out to generate up to date requirement figures. It remains to be seen what role planning judgement, anticipated infrastructure improvements and wider spatial objectives will play in the process.</p> <p>Crucially, the role of the Mayor of London needs to be clarified – boroughs need to understand whether the Mayor will continue to set their housing targets.</p> |
| <p>Alternative option: It would be possible to leave the calculation of how much land to include in each category to local decision, but with a clear stipulation in policy that this should be sufficient to address the development needs of each area (so far as possible subject to recognised constraints), taking into account market signals indicating the degree to which existing needs are not being met. As now, a standard method could</p>   | <p>8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated? [Yes / No / Not sure. Please provide supporting statement.]</p> | <p>Whilst affordability is a key consideration, care needs to be taken in addressing the issue through the standard method. Incorporating an adjustment for the change in affordability over 10 years (as is proposed by the ‘Changes to the Current Planning System’ consultation) fails to consider that wage increases in Enfield (1.5%) have not been able to keep pace with house price rises (82%). The proposed mechanism therefore unfairly penalises the borough and places a greater burden on our housing need calculation.</p> <p>The government need to make clear what the ‘extent of existing urban areas’ (or ‘size of existing urban settlements’ as is stated in the consultation document) means in a London context for us to respond meaningfully to this part of the question.</p>  |

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes  | Questions asked  | Our thoughts   |
|--|--|--|
| <p>be retained to underpin this approach in relation to housing; and it would be possible to make changes to the current approach that ensure that meeting minimum need is given greater weight to make sure sufficient land comes forward. However, we do not think that this approach would carry the same benefits of clarity and simplicity as our preferred option, and would also require additional safeguards to ensure that adequate land remains available, especially once the assessment of housing need has been translated into housing requirements. We would, therefore, propose to retain a five-year housing land supply requirement with this approach.</p> |  |  |
| <p>A streamlined development management process with automatic planning permission for schemes in line with plans</p>  |  |  |
| <p>Proposal 5: Areas identified as Growth areas (suitable for substantial development) would automatically be granted outline planning permission for the principle of development,</p>  | <p>9(a). Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent?<br/>[Yes / No / Not sure. Please provide</p> | <p>No. The separation of ‘in principle’ issues such as land uses and scale from ‘technical’ matters such as design ignores the real-world processes of property design and development. The design and arrangement of buildings on site is an iterative process – it is impossible to determine quantum and scale without seeing how this could be accommodated.</p> |

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes  | Questions asked   | Our thoughts  |
|--|---|---|
| <p>while automatic approvals would also be available for pre-established development types in other areas suitable for building.</p> | <p>supporting statement.]</p>   | <p>Greater certainty for major development can be gained with up to date area-based policies and designations – planning applications can then be assessed fully (through outline then reserved matters) with regards to this framework. Better resourcing and improved capacity for plan-making will help achieve this goal.</p> <p>Faster routes to detailed consent should not be used to reduce the scope for professional judgement. The opportunity for negotiation needs to be retained to make sure that high quality development appropriate to the area in question can be delivered.</p> |
|  | <p>9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?<br/>[Yes / No / Not sure. Please provide supporting statement.]</p>  | <p>No. As has been raised earlier, a dense urban context means that a fine-grained approach is needed to manage change and sensitively deliver ambitious levels of development. Automatic consent for specific development types (as is proposed for Renewal areas) is the wrong tool for this job.</p> <p>Adopting a planning application-based process for Protected areas is supported because it will allow each proposed development to be assessed holistically on its merits.</p>  |
|  | <p>9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?<br/>[Yes / No / Not sure. Please provide supporting statement.]</p> | <p>NSIPs could be used to speed the delivery of new settlements, but safeguards will need to be built in to ensure that local communities have a say in what are undoubtedly substantial developments.</p>  |
| <p>Proposal 6: Decision-making should be faster and more certain, with firm deadlines,</p>   | <p>10. Do you agree with our proposals to make decision-making faster and more certain?</p>   | <p>In terms of a streamlined development management system, there is the danger that increased automation will reduce the scope for professional planning judgement to be used to overcome obstacles and</p>  |

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes                     | Questions asked  | Our thoughts  |
|---|--|---|
| <p>and make greater use of digital technology</p> | <p>[Yes / No / Not sure. Please provide supporting statement.]</p> | <p>help find solutions tailored to specific sites. A blunt, automated approach that does not allow for localised judgement and negotiation could ultimately result in creating barriers to development.</p> <p>There is potential to speed and streamline processes by limiting the amount of planning application material and standardising required information, but careful consideration is required to ensure that any such measure allows professionals to adequately address the complexity of proposals. The key is to limit routine processes to free up professionals to use their skills on important matters. The proposed 50-page limit for a single standardised planning statement is somewhat arbitrary, though we welcome the principle that supporting information should be streamlined.</p> <p>The imposition of an automatic refund of the planning fee if there has not been a timely determination, or a successful appeal, is not supported. In some occasions, a comprehensive assessment may exceed the statutory timeframe of 8 or 13 weeks. The local authority should not be penalised where it has acted reasonably in carrying out its duties as a local planning authority.</p> <p>Another area of concern, relates to limiting the role for planning committees in the determination of planning applications, with the proposed <i>‘delegation of detailed planning decisions to planning officers where the principle of development has been established, as detailed matters for consideration should be principally a matter for professional planning judgment.’ (Para. 2.39)</i>. In the interests of local authority democratic accountability planning committees should not be constrained from considering often important detailed matters.</p> |

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes   | Questions asked   | Our thoughts   |
|---|---|--|
| A new interactive, web-based map standard for planning documents  |   |  |
| <p>Proposal 7: Local Plans should be visual and map-based, standardised, based on the latest digital technology, and supported by a new template.</p> | <p>11. Do you agree with our proposals for accessible, web-based Local Plans? [Yes / No / Not sure. Please provide supporting statement.]</p> | <p>Whilst we broadly welcome the move and even consider it overdue, the success of these structural reforms will depend on the quality, usability and accessibility of the digital solutions that are introduced.</p> <p>A map-based plan can be a useful format for engaging a wide range of professionals and non-professionals alike. Indeed, a clear map-based spatial vision can provide clarity and certainty. Standardised policies that facilitate automated assessment may deliver time and cost efficiencies, but they remove a crucial element of professional judgement and the ability to negotiate to help make proposals acceptable.</p> <p>Digital technologies will also be disruptive and there could be ‘teething’ problems. It is essential that pilots are undertaken to properly test proprietary platforms and data standards to ensure that issues are ironed out before systems are rolled out across England. Consideration needs to be given to the need for partnership working between local planning authorities and other local authority services such as housing and highways.</p> <p>In developing proposals the government needs to be mindful that not everyone is digitally literate – citizens who are not proficient in accessing or using digital material should not be excluded from democratic planning processes. A related point is digital poverty – not everyone has access to a smartphone or computer, or indeed broadband or mobile data. Consultation and engagement need to reach all parts of society to be meaningful, productive and worthwhile.</p> <p>As well as data literacy, language barriers, disability and visual impairment are key considerations. It is imperative to assess the communities and identify hard to reach groups to better understand</p> |

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes  | Questions asked  | Our thoughts  |
|--|--|---|
|  |  | <p>how to ensure inclusivity and accessibility for varied users and needs. This will likely involve deploying a variety of digital and non-digital tools. Community engagement specialists, engagement platform and community builders should be involved in ‘best in class’ pilot exercises to steer accessibility of digital tools and web-based content.</p> <p>The proposals suggest a standard approach will be rolled out across England – it’s not clear how this align with the ambitions for greater innovation and work with the PropTech sector, which implies a more varied approach. This move will require greater local authority capacity building to ensure that planners can deftly design and operate digital plans, and deal with the geospatial information the plans will depend on. This needs to be properly resourced.</p> |
| <p>A streamlined, more engaging plan-making process</p>  |  |   |
| <p>Proposal 8: Local authorities and the Planning Inspectorate will be required through legislation to meet a statutory timetable for key stages of the process, and we will consider what sanctions there would be for those who fail to do so.</p> <p>Alternative options: The existing examination process could be reformed in order to speed up the process. For instance, the automatic ‘right to be heard’ could be removed so that</p> | <p>12. Do you agree with our proposals for a 30-month statutory timescale for the production of Local Plans?<br/>[Yes / No / Not sure. Please provide supporting statement.]</p> | <p>If a statutory timescale is imposed, there needs to be a corresponding streamlining of procedural obligations and regulatory requirements incumbent on local plan-makers. Imposing timelines on Local Plan preparation is a good idea in principle, as it should ensure evidence is proportionate and up to date. However, the use of sanctions is not supported – if they are to be financial in nature they would penalise local authorities in a challenging financial environment.</p> <p>The proposed local authority self-assessment of plans risks undermining the credibility of local plans and raises a host of legal implications. There needs to be sufficient opportunities for debate and challenge built into any robust system of local plan examination.</p>  |

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes  | Questions asked   | Our thoughts   |
|--|---|--|
| <p>participants are invited to appear at hearings at the discretion of the inspector. Certain Local Plans, that are less complex or controversial, could also be examined through written representations only, as is usually the case with Neighbourhood Plans at present.</p> <p>A further alternative could be to remove the Examination stage entirely, instead requiring Local Planning Authorities to undertake a process of self-assessment against set criteria and guidance. To supplement this, the Planning Inspectorate could be utilised to audit a certain number of completed plans each year in order to assess whether the requirements of the statutory sustainability test had been met. However, there is a risk that this option wouldn't provide sufficient scrutiny around whether plans meet the necessary legal and policy tests.</p> |   |  |
| <p>Proposal 9: Neighbourhood Plans should be retained as an important means of community</p>   | <p>13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?</p> | <p>Yes. Neighbourhood Plans are an important means of establishing community aspirations and setting development guidelines for local areas. In Enfield, Hadley Wood Neighbourhood Forum are at an</p> |

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes   | Questions asked  | Our thoughts  |
|---|--|---|
| input, and we will support communities to make better use of digital tools. | [Yes / No / Not sure. Please provide supporting statement.]  | advanced stage of Neighbourhood Plan development. Assurances should be given as soon as possible that neighbourhood planning can continue under any new arrangements.   |
|   | 13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?  | <p>Whilst the use of digital tools is welcomed where they can enhance community involvement in neighbourhood planning, the shift to a new map based digitally enabled plan format should not exclude or alienate members of the community who face obstacles in accessing web-based technologies.</p> <p>Fundamentally, local people need to be given the assurance that the form and content of existing neighbourhood plans (as well as those nearing completion) will remain valid under the new system.</p> |
| Speeding up the delivery of development                                     |  |   |
| Proposal 10: A stronger emphasis on build out through planning              | <p>14. Do you agree there should be a stronger emphasis on the build out of developments?</p> <p>And if so, what further measures would you support? [Yes / No / Not sure. Please provide supporting statement.]</p> | <p>The ambition to speed delivery once proposals have been approved through the planning process is supported.</p> <p>We would welcome further evidence and engagement with the development industry to confirm whether design codes are the best means of achieving this aspiration.</p>   |
| Pillar Two – Planning for beautiful and sustainable places                  |  |   |
|   | <p>16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?</p> <p>[Less reliance on cars / More green and open spaces / Energy efficiency of new</p>             | <p>Enfield’s recently adopted Climate Action Plan sets out a clear vision to achieve a zero-carbon borough by 2040. We need financial resources so we can invest in energy efficiency measures and sustainable infrastructure. We would also welcome the powers to set ambitious energy efficiency standards in our Local Plan to help address local and</p>  |

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes  | Questions asked   | Our thoughts  |
|--|---|---|
|  | buildings / More trees / Other – please specify]  | <p>national priorities.</p> <p>We would welcome government incentives for the real estate industry to explore new low carbon options for development.</p>   |
| <p>Creating frameworks for quality</p>   |   |   |
| <p>Proposal 11: To make design expectations more visual and predictable, we will expect design guidance and codes to be prepared locally with community involvement and ensure that codes are more binding on decisions about development.</p> | <p>17. Do you agree with our proposals for improving the production and use of design guides and codes?<br/>[Yes / No / Not sure. Please provide supporting statement.]</p> | <p>The greater emphasis on the use of design codes and guidelines will require professional expertise to use these tools in plan making. This has significant resource implications for local authorities, especially as it is practically difficult to capture the range of appropriate design solutions upfront in a single document.</p> <p>There are problems with using codes to grant outline consent to certain predefined typologies – the acceptability of proposals, especially with infill development, requires a detailed understanding of and response to site context.</p> <p>Design codes are notoriously difficult to produce because they need to accommodate multiple possible future scenarios; providing both certainty and a degree of flexibility. Successful ones still rely on the judgement of the planning authority to assess the appropriateness of detailed proposals and therefore do not save time.</p> <p>Design codes customarily focus more on the building block scale. Trying to pre-determine design outcomes at this scale through the plan-making process is too great a level of detail in the majority of cases. For larger growth areas, a more appropriate level of detail is something akin to a ‘spatial framework’ which sets out broad urban design principles on a larger scale. Whilst the principle of LPAs proactively trying to establish design parameters is one we are supportive of, tool need to be</p> |

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes   | Questions asked   | Our thoughts  |
|---|---|---|
|   |   | <p>appropriate for local circumstance and – crucially – be flexible enough to evolve over time.</p> <p>The White Paper indicates that the National Model Design Code and a revised and consolidated Manual for Streets are due in the autumn – we will need to review these key documents before we can comment fully on the proposals.</p> <p>We welcome the aspiration that design guides and codes are to be brought forward with effective inputs from the local community. However, this needs to be tailored to ensure inclusive access specific to the community and to be properly resourced.</p>   |
| <p>Proposal 12: To support the transition to a planning system which is more visual and rooted in local preferences and character, we will set up a body to support the delivery of provably locally-popular design codes, and propose that each authority should have a chief officer for design and place-making.</p> | <p>18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?<br/>[Yes / No / Not sure. Please provide supporting statement.]</p> | <p>Yes. We support proposals for a new expert body. CABE was proactive and highly regarded and its example should be followed.</p> <p>We support the proposal that every local authority should have a chief officer for design and place-making. A single figurehead to drive forward design quality and positive placemaking within a local authority would be beneficial. However, this needs to be backed up by proper resourcing and in-house expertise to make sure good leadership can be supported by on-the-ground expertise.</p> <p>We would suggest that the remit of the chief officer for design and placemaking is extended to promote sustainability – these are all factors essential to good planning.</p> |
| <p>Proposal 13: To further embed national leadership on delivering better places, we will consider how Homes England’s strategic objectives can</p>   | <p>9. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?<br/>[Yes / No / Not sure. Please provide</p>   | <p>Yes.</p>   |

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes   | Questions asked  | Our thoughts   |
|---|--|--|
| give greater emphasis to delivering beautiful places.   | supporting statement.]   |  |
| A fast track for beauty   |  |  |
| <p>Proposal 14: We intend to introduce a fast-track for beauty through changes to national policy and legislation, to incentivise and accelerate high quality development which reflects local character and preferences.</p> | <p>20. Do you agree with our proposals for implementing a fast-track for beauty? [Yes / No / Not sure. Please provide supporting statement.]</p> | <p>Whilst we welcome the emphasis on good design and positive placemaking the term ‘beauty’ is subjective, and it remains to be seen how the proposals will definitively lead to the creation of beautiful places. We would welcome pilot projects to demonstrate how the proposed planning tools will enable to delivery of beautiful developments.</p> <p>We have a number of misgivings with regards to the specific proposals outlined in the White Paper. Preparing masterplans and site-specific codes for every designated Growth area is no small undertaking, and local planning authorities will need to be resourced properly to deliver on this ambition.</p> <p>The granting of permitted development rights in Renewal areas via pattern books is misguided. It is difficult to see how a pattern book approach could be applied to dense and constrained contemporary urban sites where mixed-use development is required. Intensification in a dense urban context requires planners to skilfully integrate range of housing types and tenures alongside other facilities and amenities. Pattern books are the wrong tools for achieving successful intensification, especially in a London context.</p> <p>We also raise concerns with White Paper’s approach of pursuing ‘gentle intensification’ of town centres – there are tensions here with achieving ambitious uplifts in density, which might be appropriate in certain circumstances in Enfield’s town centres. The ‘gentle densification’</p> |

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes   | Questions asked                   | Our thoughts  |
|---|-----------------------------------|---|
|   |                                   | <p>approach also appears to preclude tall buildings – town centres are in fact often the most sustainable locations for this form of development.</p> <p>Again, the proposals reference the National Model Design Code, which is yet to be formulated. We will need to see this key document before we can understand the implications of the proposals fully. We would welcome an explicit consideration of nature, green space and blue green networks as crucial contributors to landscape character and urban beauty.</p> |
| <p>Effective stewardship and enhancement of our natural and historic environment</p>  |                                   |   |
| <p>Proposal 15: We intend to amend the National Planning Policy Framework to ensure that it targets those areas where a reformed planning system can most effectively play a role in mitigating and adapting to climate change and maximising environmental benefits.</p> | <p>No specific question asked</p> | <p>Whilst we welcome the focus on climate change and the environment, we will need to see the detail of changes to the NPPF to comment.</p> <p>In a London context, given the strength of the climate change policies in the Intend to Publish London Plan, it can only be hoped that the NPPF is strengthened to reflect this example, or put in place measures which are more ambitious.</p>  |
| <p>Proposal 16: We intend to design a quicker, simpler framework for assessing environmental impacts and enhancement opportunities, that speeds up the process while protecting and enhancing the most valuable and important habitats and species in England.</p>        | <p>No specific question asked</p> | <p>We look forward to responding to the consultation on detailed proposals later this year. As a minimum, existing safeguards should not be compromised – there needs to be an appropriate level of scrutiny to protect existing natural resources.</p> <p>The framing of the proposal seems to indicate that only the most valuable and important habitats and species will be protected and enhanced. It is unclear how value and importance will be assessed.</p>  |

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes   | Questions asked                   | Our thoughts  |
|---|-----------------------------------|---|
|   |                                   | <p>In addition, there should be due regard paid to enhancement opportunities, such as the measures set out in LB Enfield’s Climate Action Plan which include new woodland and wetland creation.</p>   |
| <p>Proposal 17: Conserving and enhancing our historic buildings and areas in the 21<sup>st</sup> Century.</p> | <p>No specific question asked</p> | <p>We look forward to seeing the updated planning framework for listed buildings and conservation areas. We are concerned, however, about the aspiration to ‘enable local planning to concentrate on conserving and enhancing the most important historic buildings’ – conservation involves focusing on more than just ‘important historic buildings.’ Our work extends beyond this narrow focus to encompass townscapes, landscapes, and wider material heritage which is crucial to the collective memories of our diverse communities. This is evident in our Heritage Policy (2019) developed with local communities. This breadth of heritage should not be neglected in the updated NPPF.</p> <p>We have concerns too about the apparent opposition of growth and protection. A creative use of heritage is being used in Enfield to inform growth and through this to encourage a distinctive sense of place. Polarising the divide between growth and protection will miss opportunities for places to grow from established, cherished character.</p> <p>Whilst we welcome the emphasis on appropriately qualified professional guidance for proposals affecting the historic environment, we do not support the introduction of ‘approved consultants’ without a better understanding of the wider implications. This raises many questions around accreditation, monitoring, and necessary expertise in locally distinct structural or material vernacular traditions. It would also introduce a limiting ‘silo’ approach to managing historic assets, rather than embracing their potential for wider placemaking.</p> |
| <p>Proposal 18: To complement our planning reforms, we will</p>   | <p>No specific question asked</p> | <p>The government has restated its aim of delivering zero carbon development by 2050, though (like many other local authorities) LB</p>   |

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes   | Questions asked | Our thoughts  |
|---|-----------------|---|
| <p>facilitate ambitious improvements in the energy efficiency standards for buildings to help deliver our world-leading commitment to net-zero by 2050.</p> |                 | <p>Enfield has set a more ambitious target of zero carbon development by 2040. We are concerned that this lack of ambition will result in decades of missed opportunities, with low standards leading to higher whole life emissions from development that local authorities will subsequently have to mitigate.</p> <p>The government should engage with businesses and developers to build capacity for the transition to a low carbon economy, ensuring that the development industry is capable of addressing pressing matters such as whole life cycle carbon.</p> <p>The White Paper says little about the planning tools available to local authorities to make net-zero a reality. Currently it is unclear what scope local planning authorities will have to set carbon standards, or indeed to set local carbon pricing (especially if S106 is removed).</p> <p>The White Paper contains very little recognition of the impact of transport options on climate impact. It misses the opportunity to encapsulate within it a radical rethink of the emissions that will be produced as a result of future growth.</p> <p>There is little mention of biodiversity and nature recovery in the White Paper, and no acknowledgement of the multifunctional benefits that enhanced blue and green networks can play in supporting growth. As has been stated previously, area-based designations should address the blue green links which run through these areas so they are not considered in isolation.</p> |
| <p>Pillar Three – Planning for infrastructure and connected places</p>  |                 |   |
| <p>A consolidated Infrastructure Levy</p>   |                 |   |

## APPENDIX A

### LB Enfield detailed responses to Planning White Paper Consultation

| White Paper: Proposed changes   | Questions asked  | Our thoughts  |
|---|--|---|
| <p>Proposal 19: The Community Infrastructure Levy should be reformed to be charged as a fixed proportion of the development value above a threshold, with a mandatory nationally-set rate or rates and the current system of planning obligations abolished.</p> <p>Alternative option: The Infrastructure Levy could remain optional and would be set by individual local authorities. However, as planning obligations would be consolidated into the single Infrastructure Levy, we anticipate that there would be a significantly greater uptake. The aim of the <i>de minimis</i> threshold would be to remove the viability risk, simplifying the rate setting process, as this would remove the need for multiple charging zones within an authority. It would be possible to simplify further – for instance, for the Government to set parameters. There would be a stronger incentive for local authorities to introduce the new Levy, as they would not be able to use Section</p> | <p>22(a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold? [Yes / No / Not sure. Please provide supporting statement.]</p> <p>22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?</p> | <p>There could be advantages in moving to a simplified system, however the practical consequences of the change need to be addressed upfront. We would welcome further technical studies investigating how much a reformed system could raise, weighing the benefits and practical consequences. Knock-on implications for other council services, such as land charges, need to be considered.</p> <p>In general, the government should provide a clear vision for national infrastructure priorities which then feeds down into regional and local infrastructure priorities. In practical terms, local authorities need to have a clear and evidenced understanding of national priorities these can be accounted for in local Infrastructure Levy arrangements.</p> <p>We would welcome a series of pilots for the Infrastructure Levy so that practical issues can be addressed, and it can be demonstrated that the proposed system can raise more than current arrangements. We are mindful that it has taken 4 years for the CIL system to become embedded in LB Enfield, and action needs to be taken upfront to ensure the transition to the new system is made as smooth as possible. Lessons need to be learned from the experience of CIL to avoid the confusions, uncertainties and incremental ‘fixes’ which accompanied the introduction of CIL.</p> <p>There need to be safeguards built into the Infrastructure Levy to prevent local authorities having to face legal and valuation challenges as the new system beds in.</p> <p>If the Levy is introduced, a one size fits all approach (national standard rate) would be much less flexible than current system (e.g. S106) and means there will be less scope to take account of local circumstances and needs. Our preference is for a regionally set rate, allowing for sub</p> |

## APPENDIX A

### LB Enfield detailed responses to Planning White Paper Consultation

| White Paper: Proposed changes   | Questions asked  | Our thoughts  |
|---|--|---|
| 106 planning obligations to secure infrastructure or affordable housing. In addition, some local authorities have chosen not to introduce the Community Infrastructure Levy out of concern for the impact on viability of development. Because the new Infrastructure Levy would only be charged above a set threshold, these impacts would be mitigated. | [Nationally at a single rate / Nationally at an area-specific rate / Locally]  | regional variation.   |
|   | 22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities?<br>[Same amount overall / More value / Less value / Not sure. Please provide supporting statement.] | The Infrastructure Levy should demonstrably capture more than the current system. There is a worrying lack of technical evidence to back up proposals. As a minimum, we would welcome a technical paper setting out in detail how the government expects the new system to raise the anticipated funds.<br><br>Local authorities will need have sufficient capacity to undertake research to establish local priorities and understand how the proposed Infrastructure Levy can be used alongside other sources of funding. The rates set need to be realistic and flexible to adapt to changing market conditions. |
|   | 22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?<br>[Yes / No / Not sure. Please provide supporting statement.]   | The ability to borrow levy income to pay towards up infrastructure will be dependent on more accurate forecasting, especially as it is at the council's risk. We are concerned that there are a whole host of practical issues raised by forecasting anticipated income – past experience suggests that trend-based prediction is neither accurate nor reliable.<br><br>Proper safeguards should be built into any system to ensure that local authorities can properly mitigate the risks associated with borrowing so as not to hold up future infrastructure delivery.   |
| Proposal 20: The scope of the Infrastructure Levy could be extended to capture changes of use through permitted development rights  | 23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?<br>[Yes / No / Not sure. Please provide supporting statement.]   | Yes, we welcome the proposed reforms which will allow local authorities to seek Infrastructure Levy contributions on changes of use through PD. This measure would provide additional funding to address the infrastructure demands created by new development.   |
| Proposal 21: The reformed   | 24(a). Do you agree that we should aim   | Yes. It is essential that much more affordable housing is secured under   |

## APPENDIX A

### LB Enfield detailed responses to Planning White Paper Consultation

| White Paper: Proposed changes  | Questions asked   | Our thoughts  |
|--|---|---|
| <p>Infrastructure Levy should deliver affordable housing Provision</p> <p>Alternative option: We could seek to introduce further requirements around the delivery of affordable housing. To do this we would create a ‘first refusal’ right for local authorities or any affordable housing provider acting on their behalf to buy up to a set proportion of on-site units (on a square metre basis) at a discounted price, broadly equivalent to build costs. The proportion would be set nationally, and the developer would have discretion over which units were sold in this way. A threshold would be set for smaller sites, below which on-site delivery was not required, and cash payment could be made in lieu. Where on-site units were purchased, these could be used for affordable housing, or sold on (or back to the developer) to raise money to purchase affordable housing elsewhere. The local authority could use Infrastructure Levy funds, or</p> | <p>to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present?<br/>[Yes / No / Not sure. Please provide supporting statement.]</p>                       | <p>the Infrastructure Levy than is secured at present. This is necessary given the upheavals associated with implementing a new system.</p> <p>Any proposed levy arrangements need to be properly trialled and tested before being rolled out across England. We would welcome a technical paper setting out how the government anticipates the system will raise enough funds in comparison with current arrangements.</p> <p>We would also welcome further funding to speed and expand affordable housing delivery – including national housing infrastructure funding.</p> |
|  | <p>24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a ‘right to purchase’ at discounted rates for local authorities?<br/>[Yes / No / Not sure. Please provide supporting statement.]</p> | <p>On-site provision should be sought in the first instance. In-kind payment in the case of CIL have presented practical difficulties in terms of monitoring and enforcement. ‘Right to purchase’ options too raise practical issues of monitoring and transparency.</p>  |
|  | <p>24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?<br/>[Yes / No / Not sure. Please provide supporting statement.]</p>  | <p>If an in-kind delivery approach is taken, adequate safeguards should be built into the system to ensure that local authorities do not face overpayment risk. The developer should be required to meet the Council’s affordable housing policies regardless of the whether the Infrastructure Levy covers the cost of this.</p>   |
|  | <p>24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?<br/>[Yes / No / Not sure. Please provide supporting statement.]</p>                         | <p>The quality of affordable housing is paramount. We welcome the option to revert back to cash contributions in the event that no provider is willing to buy ‘in kind’ homes due to their poor quality.</p>  |

**APPENDIX A**

**LB Enfield detailed responses to Planning White Paper Consultation**

| White Paper: Proposed changes  | Questions asked  | Our thoughts  |
|--|--|---|
| other funds, in order to purchase units.   |  |   |
| Proposal 22: More freedom could be given to local authorities over how they spend the Infrastructure Levy.   | 25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?<br>[Yes / No / Not sure. Please provide supporting statement.] | Yes. Whilst we welcome greater scope for local authority discretion on how funds are spent, we need further guidance on the processes and checks which will need to be implemented to ensure that funds are spent properly on legitimate projects. Any system of checks and balances needs to provide flexibility for changes in local priorities.  |
|  | 25(a). If yes, should an affordable housing 'ring-fence' be developed?<br>[Yes / No / Not sure. Please provide supporting statement.]                            | Yes. The levy should ringfence affordable housing, but we note that London needs 43,000 affordable homes per year – the cost of meeting this scale of need are considerable. Any provisions need to address the reality that the income the levy generates it will not be sufficient to address future affordable housing needs without public subsidy.   |
| Delivering change  |  |   |
| Proposal 23: As we develop our final proposals for this new planning system, we will develop a comprehensive resources and skills strategy for the planning sector to support the implementation of our reforms. | No specific questions asked.   | <p>As has been flagged in our answers to previous questions, the proposed changes are likely to have substantial resource implications for local planning authorities. Proactive planning needs investment in people and infrastructure to make it work. The shift to digital map-based local plans, data-driven decision making, and digitally enabled approaches to community consultation will require proper resourcing and in-house expertise. The production of design codes and guidance to support land designations will also require design expertise.</p> <p>Whilst we welcome the government commitment to develop a comprehensive resources and skills strategy for the planning sector, we would emphasise that it is essential that we get the funding we need to develop in-house skills and successfully deliver on the ambitious agenda set out in the White Paper.</p> |

## APPENDIX A

### LB Enfield detailed responses to Planning White Paper Consultation

| White Paper: Proposed changes   | Questions asked   | Our thoughts   |
|---|---|--|
|   |   |  |
| Proposal 24: We will seek to strengthen enforcement powers and sanctions. | No specific questions asked.  | Enforcement is a crucial element of any effective planning system. We welcome the broad ambition to strengthen enforcement powers and sanctions, and we look forward to reviewing detailed proposals in due course.  |
| What happens next   |   |  |
|   | 26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010? | The introduction of map based digital plans risks leaving behind those less digitally agile. Care must also be taken in the introduction of new technologies to ensure that less digitally savvy residents are not excluded from being able to participate in the planning system. |