

Please reply to: Helen Murch

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Dear the Rt Hon Robert Jenrick MP

Re: London Borough of Enfield Response to the White Paper: 'Planning for the Future'

Thank you for the opportunity to respond to the consultation on the proposed reform of the planning system as set out in the "Planning for the Future" White Paper.

This letter sets out a summary of the London Borough of Enfield's response to the wide-ranging proposals contained in the consultation document. Please note that council officers have submitted detailed responses to the consultation questions separately via the consultation page.

Proposals Enfield Supports

There are a number of proposals in the Planning White Paper that Enfield Council positively supports. These include streamlining local planning processes, making maps the heart of local plans and increasing the focus and role of design in creating beautiful places.

White Paper Response is too Simplistic and Blunt

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. We think this is a blunt and simplistic criticism of the existing system and strongly disagree with the White Paper's implication that the planning system is the principal barrier to development.

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 housing delivery.

Lack of Focus on Non-Housing Issues

We are concerned that the White Paper focusses too narrowly on the role of Local Plans in housing delivery and neglects social, economic and environmental issues which also play a pivotal role in

delivering homes. These matters need to be given equal weight in the White Paper, to design and beauty.

Undermining Local Democracy

We have serious concerns with the White Paper's proposals for increased national control over local planning which would potentially undermine local democratic accountability and resident engagement in Enfield. One area of concern relates to the impact of the proposed mechanism for distributing nationally set housing targets between authorities. There is an urgent need for more detail on how local circumstances would be reflected in development. This is especially important in the London context where the proposed reforms create uncertainties for London boroughs, for the role of the Mayor and for the London Plan under any new arrangements. The uncertainty adds to the difficulties for London boroughs when planning for their communities and delivering growth in a timely manner.

Furthermore, we are worried that the proposals scale back community involvement to the bare minimum. Engagement and local democracy should be central to both plan making and decision-making and this scaling back would be detrimental and contrary to Enfield council's objectives and corporate strategy.

Impact on Resources and Finances

The Council has serious concerns over the impact of the proposals on council finances and resources. We are already experiencing difficulties with underfunding and resourcing of Planning Services in the current system. We are concerned that the significant additional burdens proposed in the White Paper would significantly worsen this situation. The Council would find it helpful for more detail to be provided on the level of burdens that the reforms will create for authorities and how the additional financial and resourcing burdens will be addressed so that we can deliver on the White Paper's radical agenda.

Sustainability, Climate Change, Biodiversity and Nature Recovery

We are deeply 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 are particularly concerned that the proposals will constrain this council's ability to meet low carbon targets and set more ambitious climate change policies.

We need a step-change in approach which puts biodiversity, blue-green infrastructure and investment in nature recovery at the heart of future growth. 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. Enfield is one of the front runners in nature recovery and water management in London and plans are afoot to achieve significant environmental net gains from woodland/habitat creation and open space in the Green Belt and threading into densely built-up-areas. More than half of the borough's land area is classed as open space or natural or semi-natural landscape. It is disappointing to see so little emphasis in the White Paper on these crucial matters.

Town Centres Revitalisation

The proposals are silent on measures to help revitalise town centres, which are often areas with quality heritage and great potential for growth. A recent survey demonstrates Enfield residents' enthusiasm for more creative, community-centred approaches to town centre renewal.

As it stands there are many gaps in the White Paper with crucial details left to follow, not least the updated National Planning Policy Framework, 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.

Concluding Comments

In the context of COVID-19, 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 addresses the climate, nature and health emergencies. The uncertainty that the White Paper introduces could risk investment and hamper the growth that is vital to recovery.

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.

We would welcome further clarity on the proposed reforms so we can plan effectively for the challenges that lie ahead.

Yours sincerely



Cllr Nesil Caliskan
Leader of the Council



Cllr George Savva
Cabinet Member for Licensing & Regulatory Services