

London Borough of Enfield

[Council] EGM

Meeting Date: 9 June 2021

Subject: Draft Regulation 18 Enfield Local Plan: 2019–3039

Cabinet Member: Cllr Caliskan

Executive Director: Sarah Cary

Key Decision: KD 5267

Purpose of Report

1. The council is in the process of preparing a new local plan for Enfield.
2. This report seeks approval to consult for a period of 6 weeks commencing in June on the next stage of the plan preparation process – the Regulation 18 Draft Enfield Local Plan (draft ELP)

Proposal(s)

3. Council is recommended to approve the Reg 18 Draft Enfield Local Plan 2019 – 2039 (at Appendix A) with accompanying supporting documents, including the Sustainability Appraisal, for statutory consultation for a period of six weeks commencing as soon as is practicable in June 2021.
4. Council is recommended to delegate to the Executive Director of Place, in consultation with the Portfolio holder for Strategic Planning, authority to make minor revisions as are necessary to the plan (including preparing a high-quality graphic layout) in advance of the consultation.

Reason for Proposal(s)

5. It is a statutory requirement for all Councils to prepare a Local Plan and ensure that it is up to date. Enfield's current Local Plan includes a Core Strategy published in 2010 and a Development Management Document published in 2014; as both are older than five years they are required to be reviewed.
6. By approving the Reg 18 Draft Enfield Local Plan for consultation the Council will be taking the next step in ensuring it has an adopted statutory plan in place by 2023/24 to help guide the development that the borough requires to 2039 and beyond to meet its growth needs.

7. Preparing a new Local Plan provides the Council with an opportunity to set out a positive vision for growth, ensuring that appropriate facilities and infrastructure are provided for future residents.

Relevance to the Council Plan

8. The draft ELP sets out how the spatial development needs of the borough will be delivered to 2039, and beyond. It is a vitally important tool for helping the council deliver its corporate priorities and delivering the spatial elements of the council's Corporate Plan.
9. The draft local plan has been prepared in light of the corporate priorities and embeds these in its spatial vision, objectives and policies. A key theme of the plan is providing a lifetime of opportunities for all and levelling up between eastern and western parts of the borough. The draft plan focusses on delivering high quality new homes at scale, ensuring good growth and delivery of safe and healthy places. The vision and policies for the economy form a key part plan and seek to create new and a more diverse range of employment opportunities, as well as improving the quality of the existing employment spaces of the borough.
10. The draft ELP contains a vision which extends from the Corporate Plan: By 2039 Enfield will be a place of growing opportunity for future generations, the green lung of London where new homes and jobs help all our communities thrive.

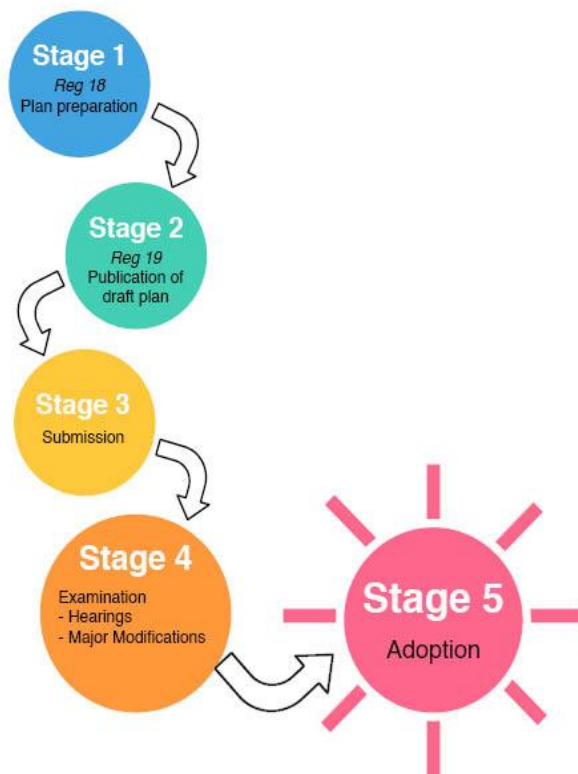
Background

11. The Council is required by law to produce a spatial plan know as a local plan. The purpose of a local plan is to set out how identified development needs in a local authority area will be accommodated spatially over a 15 – 20 year period and government sets out the requirements of plan making in policy and planning inspectorate procedures. The plan has to consider the amounts and type of development required over the plan period, how and when that development will be delivered and in what form.
12. The spatial plan must be prepared by the council in consultation with local communities, statutory stakeholders, the development industry and other interested parties. Before it can be formally adopted it must progress through several formal stages of plan production and consultation and will eventually be examined by the Planning Inspectorate on behalf of the Secretary of State to ensure that it is legally compliant and sound.

The Plan making process

13. The process for preparing a plan is set out by government in the Town and country (Local Planning) (England) Regulations. A summary of the process is below:

Fig 1: A summary of the Plan making process



14. Enfield is currently at Stage 1 – the plan preparation stage known as Regulation 18. Stage 1 involves:
 - collecting **evidence** about the borough’s needs
 - using the evidence to identify issues and ways that they could be addressed through the plan
 - Testing options

15. The Regulation 18 stage can be repeated a number of times with several rounds of public consultation and is a stage of the process that can run over several years.

Context for this Regulation 18 Draft Enfield Local Plan

16. Enfield prepared and consulted on a Reg 18 Issues and Options document from December 2018 to February 2019. This document focussed on exploring broad issues and options but did not indicate a preferred option for a spatial strategy.

17. In total, 1,712 unique responses were received, and a summary of the responses is provided in Appendix B. The consultation feedback received has informed the development of this version of the draft ELP.

18. A further Regulation 18 document and consultation is needed to:
 - Explore issues identified through the earlier Regulation 18 consultation,
 - Respond to changes in government planning policy, the climate and nature emergencies, COVID, and the recently adopted London Plan,
 - Reflect the new and updated evidence base

- Identify a preferred spatial growth strategy and preferred policy options.
19. This draft plan represents an advancement on the 2018/2019 Issues and Options consultation. Although the plan will contain issues and options, this time it identifies a preferred option.

Consultation arrangements

20. The plan and supporting documentation (including the Policies Map, Sustainability Appraisal, Habitats Regulation Assessment and full evidence base) will be consulted on for a period of 6 weeks commencing in June 2021.
21. The council’s published Statement of Community Involvement for Planning (KD 5021, December 2020) sets out how residents and others will be involved in consultation and plan making. Our ambition is to work to engage with residents, local groups, landowners and businesses as well as statutory bodies to ensure that many minds are drawn on in developing the next stage of the plan.
22. An engagement strategy has been prepared to support the consultation. The consultation will use a variety of methods to reach as wide an audience as possible which will include physical exhibitions, workshop events, drop in sessions as well as use of a range of digital and virtual channels. One of the ambitions of the consultation is to include younger generations and hard to reach groups in to the conversation about the choices that need to be made around development of the plan and the directions it needs to take.

Main Considerations for the Council

The need for a new spatial plan

23. The borough already has a number of adopted spatial plans:

Development Plan	Date of adoption	Geographic area of coverage
Core Strategy	2010	Borough wide
Development Management Document	2014	Borough wide
North Circular Area Action Plan	2014	Place specific
North East Enfield Area Action Plan	2016	Place specific
Edmonton Leaside Area Action Plan	2020	Place specific

24. The Core Strategy, which sets the strategic policies for the whole of the borough, is now 11 years old. A number of changes have taken place since the plan was adopted which has rendered many of its policies out of date. These contextual changes include new and updated government policy (including some significant changes to national planning policy and guidance), neighbouring authorities’ spatial plans changing, a new London Plan published March 2021, increasing growth and development pressure including a significant increase in housing delivery targets, the housing

crisis, the climate and nature emergencies and new directions set out in the corporate plan and strategies.

25. The Development Management Document (DMD) which contains many of Enfield's more detailed planning policies is also now 7 years old and in need of review and update for similar reasons.
26. The dated nature of the existing plan (particularly the Core Strategy and DMD) and its policies creates difficulties for the Council on a number of levels including:
 - Creating an uncertain policy environment, adding to complexity and difficulty when taking decisions on planning applications;
 - Increasing the likelihood of planning appeals and their associated costs;
 - Gives the Local Planning Authority, members and local communities less control over the form that development takes
 - Making it difficult to bring forward the levels of required development to address the housing crisis and meet the Housing Delivery Test
27. The out-of-date planning policies also create considerable levels of uncertainty for the development industry reducing willingness to invest in the borough and assist the council in addressing local needs.
28. Councils are required by government (via the National Planning Policy Framework and the Planning Practise Guidance) to keep their spatial plans up-to-date and to review them every 5 years. If we do not have an up-to-date local plan the council will face a number of significant possible penalties:
 - We could in effect be placed in special measures by Government;
 - Loss of local control over decision making;
 - Will struggle to deliver more housing to meet local needs;
 - Face increased legal costs from developer appeals
 - Increasing likelihood of poor quality piecemeal development coming forward in unplanned locations that does not adequately meet local needs
29. Some of the impacts of these are already being felt in the form of increasing appeal costs and a flow of planning applications for which our existing planning policies provide a less than adequate toolkit for negotiating the best outcomes for Enfield.
30. By agreeing to consult on the Regulation 18 Draft Enfield Local Plan the council will be taking the next positive step in preparing a new local plan to provide certainty, deliver good growth and ensure that we avoid the penalties associated with having out-of-date plans and policies.

Impact of the Planning White Paper and Planning Bill on Enfield's Plan making.

31. Under the Government's Planning White Paper proposals councils are expected to have an adopted local plan in place by 2023 based on the new planning system. It is anticipated that the Planning Bill will contain a similar requirement when it is laid before Parliament in autumn 2021. This is an ambitious Government expectation that is not without some significant challenges, especially for those authorities that are already well progressed with their plan making under the existing system (including Enfield). It has also created a climate of considerable uncertainty for local planning authorities however the Government has been clear that councils should continue to plan for their areas and progress with their plan-making under the current system despite the uncertainty.
32. It is expected that the Planning Bill will contain transitional arrangements to enable councils with plans already well advanced in preparation to continue to progress their plans to adoption under the current legislative system and policy framework. This avoids councils facing considerable cost and time implications from having to abandon work done on plans and start again from scratch. Ministers have also stated that local authorities who have an up to date plan in place will be in the best possible position to adapt to the new plan-making system. Previously this has been taken to where a plan has been published under the Regulation 19 stage (Stage 2 in Figure 1).
33. By taking the decision to consult on this Regulation 18 Draft Plan in June 2021, the council will be taking the next positive step towards preparation of a Regulation 19 Plan, which is currently programmed for production in autumn 2021 following consultation on the Reg 18 Draft Plan. Progressing with this Reg 18 consultation will enhance the chances of the council benefitting from any transitional arrangements that could be introduced by the Planning Bill.

Addressing the Housing Crisis

34. The borough is facing a serious housing crisis. Enfield has the 2nd highest number of households in the country living in temporary accommodation. Home ownership is beyond the reach of many with average house costs 13.7 times income and being above the London average of 12.5. Enfield has the highest eviction rate from rental property in London and rents have increased substantially in the last 5 years, with more significant rises amongst lower quartile rents (the cheaper properties on the rental market).
35. Via its standard methodology, Government has identified that we need to provide 4,397 new homes in the borough every year to meet need. At the London regional level, we are required to plan for 1,246 homes per year under the newly adopted London Plan. In addition, our own evidence finds that we have an affordable need of 1,407 affordable homes each year and need to provide a mix of sizes but with an emphasis on larger units for both market and affordable accommodation. At present Enfield is only building circa 500 homes per year on average and most of those are smaller homes.

36. Housing need is primarily being driven by a growing population arising from more births than deaths - more than double. Additionally, we have not built enough new housing in recent years – making housing scarce and unaffordable.
37. A Local Plan must address the amount, type, location and form of required housing growth. For legal and technical reasons (set out in detail in the Housing Topic Paper) the council has to consider three possible housing target options for the plan period (to 2039). These are:
 - a. Baseline – c.17,000 homes
 - b. High growth – c. 56,000 homes
 - c. Medium growth – c.25,000 homes
38. Although the plan is consulting on all 3 housing target options the medium growth scenario of providing 25,000 new homes over the plan period has been identified as the preferred option. Of the 3 scenarios it is considered the soundest approach to dealing with the acute housing need in terms of numbers and affordability while also enabling sufficient infrastructure to support existing and new communities.

Employment

39. The borough has one of the largest concentrations of Strategic Industrial Land (SIL) in London and it is an important location for manufacturing and logistics. The SIL designation is strongly protected via the London Plan due to the strategically important role that it plays to support London's economy. In addition to existing industrial space, the borough has a need to accommodate a further 56ha of additional industrial/logistics space and 37,000 sqm of office floorspace in the plan period. Around half of this need is expected to be accommodated through intensification (for instance multi-storey facilities) but new sites will also be required. The preferred option is to accommodate all of Enfield's need within the borough, identifying new SIL. Further details of the amounts, types of space requirements, site supply and approach to accommodating this need is set out in the Employment Topic paper (Appendix C).

Spatial distribution of future development

40. Enfield has to accommodate many different growth requirements over the plan period. These include housing, employment, retail, sport and recreation, nature recovery and biodiversity, tourism, community and cultural facilities, burial needs and infrastructure. The scale of the growth is significant and the council has made clear commitments through its plans and strategies to enabling positive growth that meets its needs.
41. One of the key roles of the Local Plan is to decide on how this growth should be spatially distributed around the borough. This is done through the over-arching Spatial Strategy policy which sets the strategic direction for the Plan. The preferred spatial strategy option involves both urban and rural areas to accommodate growth. Key elements of the policy include:
 - Two new placemaking areas in the existing rural areas focussed around Crews Hill and Chase Park together accommodating c. 6,000 new

homes in this plan period (See the Crews Hill and Chase Park Topic Papers in Appendix D & E for more detail).

- New employment sites in the form of SIL extensions and a new logistics site close to Junction 24
- Designations to enhance the quality and economic, recreational, cultural, food growing and biodiversity benefits of rural areas. This includes the creation of a Rural Enfield London National Park City designation
- As series of placemaking areas in urban areas to guide good growth and optimise high quality development in those locations, including Meridian Water and Edmonton and Enfield Town.
- Increasing density and focusing high quality development in sustainable locations such as transport nodes and town centres
- Transformation of Strategic Industrial Areas through intensification (e.g. multi-storey industrial or logistics facilities), environmental and public realm improvements, enhanced building quality and improvements to facilities to improve quality of life for those who work in, visit or live close to these areas
- Sustainable increases in density in Enfield's existing residential neighbourhoods through the development of small sites.

42. In addition to accommodating almost all growth requirements, the preferred spatial option provides a number of opportunities:

- Provides the conditions for greater affordable housing delivery and a wider mix of housing units including family homes with gardens and larger housing
- Reduces reliance on small housing units in higher density developments and tall buildings
- Enables the environmental enhancement of rural areas including the development of the Rural Enfield destination in the London National Park City. Supports long term protection plus improved access for existing residents to nature and facilities.
- Delivers on Climate change and Green/Blue Infrastructure Strategy commitments including improved access to green spaces across the Borough
- Supports the regeneration and improvement of industrial land
- Supports sustainable regeneration and enhancement of existing urban areas
- Ensures delivery is more certain due to a more viable approach and increase in private sector involvement (See Viability report in Appendix F)
- Promoting sustainable transport and active travel
- Facilitates long term strategic planning for borough
- Future proofing in anticipation of Government changes to the planning system

43. The preferred Spatial Option also carries a number of challenges. The option is contrary to London Plan policy regarding green belt and does not provide for all housing need as identified by the government methodology.. A complicating factor is that the draft Local Plan must plan to 2039 – 10 years beyond the London Plan target to 2029 and there is some uncertainty in the interpretation of the policies within the London Plan as to how to plan

for this later period. There is also a risk that the spatial strategy approach could be found unsound at Examination. However, of all the various spatial strategies identified this is the approach currently considered to be most sound and in officers' current view holds the strongest chance of success. The consultation will enable this view to be tested and to establish whether other options could be preferable.

Need to plan for the long term future

44. Some of the key growth areas identified in the draft ELP will not deliver all their development in the plan period up to 2039. These include Meridian Water (planned c 10,000 homes to 2045-55), Crews Hill (c 7,500 homes in total) and Chase Park (c 4300 in total). In addition, projects such as the new proposed employment land at Junction 24 and the rewilding plans to support the Rural Enfield London National Park City area will require a long-term view covering more than 15 years.
45. The draft ELP also needs to prepare for the potential of Crossrail 2, which is currently on hold but could come forward during the plan period. The plan and the topic papers will form a good basis for further consultation and reflection on this or other regional or national infrastructure projects.
46. It is important that the draft plan sets out a long term approach for these places to ensure that they are well planned and delivered in a high quality manner. This plan provides a unique and exciting opportunity to be visionary and plan for Enfield not only for the plan period but also with a view to the next 50 years.

Safeguarding Implications

47. There are no safeguarding implications associated with the consultation process. The draft ELP will ultimately lead to a direct positive impact on the lives of children, young people and vulnerable adults.
48. The draft Plan is seeking to introduce policies that will provide safe healthy and attractive places that will benefit all people including children, young people and vulnerable adults. A key part of the plan seeks to address housing deficiencies in terms of amount, quality, affordability, and type as well as improve working environments and access to nature. By consulting on the draft ELP further steps will be taken towards securing adoption of these policies to improve people's lives.

Public Health Implications

49. There are no public health implications arising from the consultation process.
50. The vision of the Draft Local Plan contains 4 key spatial themes: A nurturing place; a deeply green place; the workshop of London and a distinct and leading part of London. A series of strategic objectives and policies flow from these 4 vision themes. Taken together the Vision, objectives and policies will create a policy framework that seeks to improve the mental and

physical health and well being of those living, working and playing in Enfield.

51. Of particular importance is the focus on providing new public open space, urban greening, improving the quality of existing green spaces and providing enhanced access to them. Greener environments are associated with better mental and physical health and enhanced quality of life for both children and adults. Green space can help to bind communities together, reduce loneliness, and mitigate the negative effects of air pollution and excessive noise.
52. The draft ELP aims to deliver significant amount of quality new housing that meets local needs in terms of improved quality and affordability. It will also facilitate the regeneration and redevelopment of poor quality housing. Having access to affordable, high quality housing will improve the life chances and health of all residents.
53. The draft Plan also promotes healthy lifestyles through policies that expect development to be served by sustainable modes of transport and provide attractive and safe environments to encourage people to walk and cycle. Provision of local amenities and facilities close to where people live and work will encourage people to reduce car use and thus create environments less polluted by noise and poor air quality. This will have a beneficial effect, particularly on those affected by long term health conditions.
54. The focus on improving the environment and quality of employment opportunities will enhance the well-being of those working in industrial and other employment locations across the borough. New opportunities for different types of employment in areas such as that in the Rural Enfield London National Park City will enhance the life opportunities for young people in particular, improving physical and mental health outcomes.
55. The ELP seeks to direct new investment to deprived communities and poor-quality environments so that people can access quality affordable housing, education and other community facilities, open spaces and nature near to close to where they live and work.
56. Overall, the ELP will help narrow the gap between those with the best and the poorest physical and mental health and wellbeing and build a fairer Enfield.

Equalities Impact of the Proposal

57. The draft ELP contains specific policies to ensure that development addresses equality issues and improves health and wellbeing.
58. The council has produced a Statement of Community Involvement (SCI) 2021 that sets out the principles to be applied in involving the community in the preparation of the ELP. An Equality Impact Assessment has been undertaken on the consultation process. It explains how the consultation will be structured to respond to Equalities matters, such as reaching hard to

reach groups and monitoring responses to ensure adequate representation from Enfield's' diverse population.

59. In addition, an Equalities Impact Assessment of the Plan will be undertaken as part of the Integrated Impact Assessment (IIA) process. A summary of the Corporate Equalities Impact Assessment findings is available in Appendix G to this report.

Environmental and Climate Change Considerations

60. The proposals in this report, in respect of consulting on the draft ELP, do not in themselves have direct environmental and climate change considerations. However, the content of the ELP has been prepared in line with the Council's ambitious target of Enfield being a carbon neutral borough by 2040. Given that the use of buildings currently makes up around 60% of borough wide emissions, the Council must take action to ensure that new development is sustainable and ultimately has a net zero impact in terms of carbon.
61. Sustainable development is a fundamental objective of the draft ELP and a whole chapter of policies are concerned with ensuring new development responds to the Climate Emergency and the council's long term approach to climate change mitigation and adaptation as set out in the Climate Action Plan. It is accepted that the construction of new homes and employment facilities will require carbon emissions and that the energy needs of the borough as a whole will grow as we meet population demands.
62. However, the draft ELP also contains policies to help mitigate climate impact and to help the borough adapt to climate change. Policies cover such matters as responding to the climate emergency, decarbonising and managing energy, reducing greenhouse gas emissions, sustainable design, managing flood and heat risk and sustainable urban drainage (SUDS). Implementation of the draft ELP will make a significant contribution to achieving a climate neutral borough by 2040.
63. The draft Plan contains a series of strategic and detailed policies relating to blue and green infrastructure, biodiversity, re-wilding, protection of open space urban greening, biophilic design and environmental protection. Together these policies will have a significant positive impact on environmental outcomes, particularly:
 - reduction in air pollution;
 - reduction in flood risk as part of sustainable urban drainage systems;
 - improvement to water quality and efficiency;
 - enhancing and increasing habitat and wildlife;
 - improving the perceptions of the borough as aesthetically pleasing; and
 - amelioration of high summer temperatures arising from urban heat island effect and climate change; and
 - increasing tree canopy across the borough including urban areas and new woodland in the north, which could offset up to 230 tonnes of carbon dioxide each

64. The draft ELP also aligns with other strategies and plans, including the recently published Blue Green Strategy. In addition, there will be a new Infrastructure Delivery Plan, which will include a range of projects requiring investment to deliver sustainable growth.
65. The Integrated Impact Assessment interim findings (attached at Appendix H) contain further detail on this topic.

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

66. The decision is to proceed to consult on a Regulation 18 Draft Local Plan.

Risk category	Risks
Failure to progress with plan making	Unlikely to be able to adopt a new local plan by 2023 risking: <ul style="list-style-type: none"> • Government intervention • Loss of local control over decision making • Increasing speculative, poor quality development applications which will be difficult to resist • Greater costs associated with increased appeals
Potential loss of transitional arrangement benefits	Plan making may need to start again from scratch with associate costs and reputational creditability issues.
Failure to put policy in place to ensure local development needs are delivered in the next 15 – 20 years	Inability to address housing crisis and provide for local need in terms of affordable quality housing and size of units, including family homes with gardens. Continuing to fail Housing Delivery test and risks of poor quality development and associated costs Inability to deliver on climate change and environmental commitments reducing the quality of the borough and undermining ability to achieve a fairer Enfield
Reputational damage	Concerns and objection from residents and other organisations that development will not be planned for or properly managed. Creation of on-going uncertainty for the development industry potentially undermining confidence in the Borough and future investment

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

Risk category	Proposed mitigation
Significant concern from interested parties about the proposed options manifesting itself in information campaigns, spreading of disinformation, legal challenges and stalling of next stage of plan preparation	<ul style="list-style-type: none"> • Clear consultation strategy put in place to ensure communication with all parties is clear and consistent • Emphasising that the consultation is about options, no decisions have yet been taken on the final plan approach and the council wants to hear people’s views • Ensuring robust Comms messaging during the consultation process
Re-imposition of COVID restrictions limiting ability to hold physical workshops and other events	<ul style="list-style-type: none"> • Ensuring that the consultation can still be effectively carried out through virtual channels
Very large volumes of comments received significantly delaying preparation of next stage of Local Plan whilst they are processed and analysed.	<ul style="list-style-type: none"> • Ensuring that systems are set up early on in the consultation to enable processing to be efficient and effective • Ensuring adequate trained staff in place to handle processing and analysis of representations • Making sure that processing and analysis of representations is given top priority in the Plan making team workloads.
Very limited response to the consultation	<ul style="list-style-type: none"> • Preparation of a consultation strategy to ensure that responses are elicited from as wide a section of interested parties • Strong media campaign to generate interest. • Ensuring communications and channels for making comments are accessible, easy to understand and able to be completed quickly.

Financial Implications

67. The cost of preparing and consulting on the local plan for 2021/22 is contained within the approved budget for the planning service. For 2021/22 a one off addition of £0.300m was added to the base budget of £0.250m to address commitments in the current financial year. Further, there is £0.360m set aside in the Council’s Risk Reserve and £0.220m in the Planning and Neighbourhood Regeneration Reserve.

68. The service has recently been forecasting the costs associated with continued work on the Local Plan to 2028 and this cost is being worked into future updates to the Medium Term Financial Plan.
69. The draft ELP has significant financial implications for the boroughs' economy, household formation, social infrastructure as well as the Council's tax base and expenditure.
 - a. Borough Economy - increased business rates through provision of 56ha additional strategic industrial land as well as additional employment floorspace
 - b. Borough Population – increased council tax through 25,000 new homes, particularly larger family homes
 - c. Borough Social infrastructure – requirement for new schools, community facilities etc will be planned for and supported through planning contributions (S106 and CIL).
70. The draft Plan supports and enables considerable private sector investment into the borough, to deliver new homes and the supporting infrastructure. This will over time reduce reliance on the public sector to provide housing, such as temporary accommodation. Private investment may also be possible to support the National Park City designation, following the Government's Environment Bill provisions to introduce "net biodiversity" financial mechanism to investing in rewilding and green infrastructure.
71. As the plan works towards Regulation 19 submission stage, council officers will evaluate the preferred spatial strategy to confirm these financial implications and to integrate them into the councils' financial planning as appropriate.
72. The draft ELP supports and enables considerable private sector investment into the borough, to deliver new homes and the supporting infrastructure. This will over time reduce reliance on the public sector to provide housing, such as temporary accommodation. Private investment may also be possible to support the National Park City designation, following the Government's Environment Bill provisions to introduce "net biodiversity" financial mechanism to investing in rewilding and green infrastructure.
73. As the plan works towards Regulation 19 submission stage, council officers will evaluate the preferred spatial strategy to confirm these financial implications and to integrate them into the councils' financial planning as appropriate.

Legal Implications

74. The legal framework for the preparation, submission, examination and adoption of the draft Enfield Local Plan is set out in the Planning & Compulsory Purchase Act 2004 (as amended). Detailed regulatory requirements are also contained in the Town & Country Planning (Local Planning) (England) Regulations 2012. (2012 Regulations)

75. The first stage in preparing a Local Plan is to give notice of intent to prepare the plan in accordance with regulation 18 of the 2012 Regulations.
76. Regulation 18 requires that various bodies and stakeholders be notified that the council is preparing a plan and invites them to comment about what that plan ought to contain.
77. A failure to comply with these statutory requirements may result in the Local Plan being found unsound at the examination in public.
78. By carrying out the consultation as detailed in this report the Council is complying with regulation 18 of the 2012 Regulations.

Workforce Implications

79. There are no workforce implications arising from the preparation of or consultation on the draft ELP. The work to prepare the plan has been and will continue to be led by a dedicated team of officers and supported by external technical or specialist consultants as appropriate.
80. Should the draft Plan be taken forward in future decisions for adoption, there will be workforce implications arising from the need to service more households and a growing population, e.g. new school teachers and new waste management teams. This can be managed by the Council as the need arises and is planned for through the Council's Medium Term Financial Planning work.

Property Implications

81. This report does not of itself commit the council to any expenditure on its property portfolio, however a number of the policies in the plan will have an influence on the future development of the council's property portfolio where redevelopment or improvement works are proposed. Ultimately the latest standards set out in the draft plan policies will raise the bar in terms of the expected development quality on council owned sites and the contribution they will make to the creation of sustainable places.
82. The plan also identifies a number of council owned properties as allocated sites which are expected to help deliver the development requirements for the borough over the plan period.

Other Implications

83. The consultation will be relying heavily on the Council's website to promote the event and host the very large suite of consultation documents, including the draft Enfield Local Plan. Work has commenced with the webteam to prepare the consultation webpages.

Options Considered

84. Consideration was given in early autumn 2020 to pausing plan making process and wait until the uncertainty being created by the proposed changes to the Planning system and COVID was resolved. This option was not pursued as it would not help the council address the pressing housing crisis or deal with the on-going flow of piecemeal poor quality planning applications. Government also wrote to councils at this time advising them to not delay and to carry on with Plan-making despite the uncertainty and likely forthcoming changes.

Conclusions

85. Enfield faces complex and difficult choices when planning for Enfield's spatial development needs for the next 15 – 20 years.
86. This report sets out the intention to consult on the draft Enfield Local Plan that contains a series of options including a preferred option to address the challenges that the borough faces. The plan will address poverty, improve the natural environment and provide opportunities for residents. It has been prepared using up-to-date evidence, is based on national and regional planning policy, and responds to comments made on earlier drafts. To solve the challenges it takes an innovative, visionary approach that incorporates future proofing and plans for the spatial development of the borough for not only the plan period up to 2039 but, also for the next 50 years.
87. The plan, and the proposed consultation, is considered a sound approach and the best route to tackling difficult issues and choices facing the borough.

Report Author: Helen Murch
Head of Strategic Planning & Design
Helen.murch@enfield.gov.uk
Tel No: 020 8132 1714

Date of report: 28 May 2021

Appendices

- A. Regulation 18 - Draft Enfield Local Plan: 2019 - 2039
- B. Consultation Statement for 2018 Regulation 18 Issues and Options Document, 2021
- C. Employment Topic Paper
- D. Crews Hill Place Making Topic Paper
- E. Chase Park Topic Paper
- F. Whole Plan Viability Report
- G. Equalities Impact Assessment
- H. Integrated Impact Assessment Interim Findings

Background Papers

The following documents have been relied on in the preparation of this report and are available on the Council's website:

- Towards and New Local Plan 2036 Regulation 18 Issues and Options consultation document; 2018
- Local Development Scheme, Jan 2021
- Statement of Community Involvement December 2020
- Authorities Monitoring Report for 2019/20
- The Evidence Base to inform the Local Plan