

GREATER LONDON AUTHORITY

[REDACTED]
(By email)

Our Ref: MGLA100621-5401

6 July 2021

Dear [REDACTED]

Thank you for your request for information which the Greater London Authority (GLA) received on 9 June 2021. Your request has been dealt with under the Environmental Information Regulations (EIR) 2004.

You have asked for any correspondence this calendar year between the GLA Planning Team and The London Borough of Enfield in respect of their draft Local Plan, and in particular the proposal to allow housing on green belt land in the north of the Brough (Vicarage Farm and Crews Hill).

I attach all relevant correspondence held by the GLA Planning Team. Any referenced attachments which have not been included can be found at: [Evidence base · Enfield Council](#). Please note that the attached March and April Briefing presentations reflect situations at the time and do not necessarily reflect the final position of LB Enfield.

The names of members of staff are exempt from disclosure under Regulation 13 (Personal information) of the EIR. Information that identifies specific employees constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely

[REDACTED]
Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at: [Freedom of information | London City Hall](#)

[REDACTED]

From: [REDACTED] <[REDACTED]@Enfield.gov.uk>
Sent: 26 May 2020 15:10
To: [REDACTED]
Subject: RE: meeting thursday [SEC=OFFICIAL]

Classification: OFFICIAL

Hi [REDACTED]
I hope you are well.
I am going to cancel this occurrence given where our programme is. Is there any key updates on the GLA side?
London Plan discussions with MHCLG?
Best
[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 26 May 2020 13:59
To: [REDACTED] <[REDACTED]@Enfield.gov.uk>
Subject: meeting thursday

Hi [REDACTED]
We have a meeting in the diary for Thursday – is this still going ahead?
Thanks
[REDACTED]

NHS health information and advice about coronavirus can be found at [nhs.uk/coronavirus](https://www.nhs.uk/coronavirus)

[REDACTED]

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 20 July 2020 16:24
To: [REDACTED]
Subject: RE: Strategic Meeting - Enfield | GLA Planning [SEC=OFFICIAL]

Classification: OFFICIAL

Hi [REDACTED]
I hope you are well.
We have a further provisional slot in the diary this week, I am going to cancel this slot but would be helpful to have a brief call to provide an update and discuss setting up a corporate session that has been suggest by our Director for around September.
Please let me know your availability?
Best
[REDACTED]

From: [REDACTED]
Sent: 25 June 2020 10:41
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Strategic Meeting - Enfield | GLA Planning [SEC=OFFICIAL]

Classification: OFFICIAL

Hi [REDACTED]
I hope you are well
Not a worry, the 23 July is our next slot that would be better to take up. Prior to that a short call would be helpful, what would work for you over the next few working days?
Best
[REDACTED]

-----Original Appointment-----
From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 24 June 2020 10:13
To: [REDACTED]
Subject: Declined: Strategic Meeting - Enfield | GLA Planning [SEC=OFFICIAL]
When: 25 June 2020 10:00-11:30 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.
Where: City Hall

Hi [REDACTED]
I now have a clash, can we rearrange
Thanks
[REDACTED]

NHS health information and advice about coronavirus can be found at nhs.uk/coronavirus

[REDACTED]

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 10 August 2020 17:07
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: GLA/Enfield local plan meeting [SEC=OFFICIAL]

Classification: OFFICIAL

Many Thanks [REDACTED]

Best
[REDACTED]

From: [REDACTED] <[REDACTED]@tfl.gov.uk>
Sent: 10 August 2020 15:05
To: [REDACTED] <[REDACTED]@enfield.gov.uk>; [REDACTED] <[REDACTED]@tfl.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA/Enfield local plan meeting [SEC=OFFICIAL]

Hi [REDACTED]

Sorry, I forgot to turn my ooo off. 7th October is still fine so let's go for it.

Many thanks
[REDACTED]
[REDACTED]

PA to Lucinda Turner, Director of Spatial Planning
Transport for London
9th Floor, 5 Endeavour Square | Westfield Avenue |
London E20 1JN
[REDACTED] tfl.gov.uk
Tel: 020 3054 [REDACTED] (auto [REDACTED])

PA to Lucinda Turner, Planning
GREATER LONDON AUTHORITY
City Hall, The Queen's Walk, London
SE1 2AA
[REDACTED] london.gov.uk

london.gov.uk

[Register here](#) to be notified of planning policy consultations or sign up for GLA Planning News

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 10 August 2020 14:50
To: [REDACTED] <[REDACTED]@tfl.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@tfl.gov.uk>
Subject: FW: GLA/Enfield local plan meeting [SEC=OFFICIAL]

Classification: OFFICIAL

Hi [REDACTED]

I hope you are well.

Please see the email trail below in relation to the above. I thought I would forward on as direct by [REDACTED] out of office message.

Best
[REDACTED]

From: [REDACTED]
Sent: 10 August 2020 14:37
To: [REDACTED] <[REDACTED]@tfl.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA/Enfield local plan meeting [SEC=OFFICIAL]

Classification: OFFICIAL

Hi [REDACTED]

Wed 7th Oct – 10am -12 would be great. I will circulate a diary invite.

Best

[REDACTED]

From: [REDACTED] <[REDACTED]@tfl.gov.uk>

Sent: 05 August 2020 11:51

To: [REDACTED] <[REDACTED]@Enfield.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: GLA/Enfield local plan meeting [SEC=OFFICIAL]

Absolutely, please see below.

Wed 7th Oct – any time between 10am- 1.30pm

Thurs 8th Oct – 1-3pm

Fri 9th Oct – 1.30-3pm

Please let me know if you need any other options.

Kind regards

[REDACTED]
[REDACTED]

PA to Lucinda Turner, Director of Spatial Planning

Transport for London

9th Floor, 5 Endeavour Square | Westfield Avenue |
London E20 1JN

[REDACTED] [tfl.gov.uk](mailto:[REDACTED]@tfl.gov.uk)

Tel: 020 3054 [REDACTED] (auto [REDACTED])

PA to Lucinda Turner, Planning

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SE1 2AA

[REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

london.gov.uk

[Register here](#) to be notified of planning policy consultations or sign up for GLA Planning News

From: [REDACTED] <[REDACTED]@Enfield.gov.uk>

Sent: 04 August 2020 18:34

To: [REDACTED] <[REDACTED]@tfl.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: GLA/Enfield local plan meeting [SEC=OFFICIAL]

Classification: OFFICIAL

Thanks [REDACTED] early Oct is fine, if you can please suggest a few 1.5 Hr options, that would be great.

Best

[REDACTED]

From: [REDACTED] <[REDACTED]@tfl.gov.uk>

Sent: 04 August 2020 14:29

To: [REDACTED] <[REDACTED]@Enfield.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: GLA/Enfield local plan meeting [SEC=OFFICIAL]

Hi [REDACTED]

Just to make you aware, Lucinda is on leave 14th Sept-2nd October so perhaps we can look at beginning of October instead?

Kind regards

[REDACTED]
[REDACTED]

PA to Lucinda Turner, Director of Spatial Planning

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9th Floor, 5 Endeavour Square | Westfield Avenue |
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PA to Lucinda Turner, Planning

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[redacted] [tfl.gov.uk](mailto:[redacted]@tfl.gov.uk)

Tel: 020 3054 [redacted] (auto [redacted])

[redacted] [london.gov.uk](mailto:[redacted]@london.gov.uk)

london.gov.uk

[Register here](#) to be notified of planning policy consultations or sign up for GLA Planning News

From: [redacted] <[redacted]@enfield.gov.uk>

Sent: 04 August 2020 12:58

To: [redacted] <[redacted]@london.gov.uk>

Cc: [redacted] <[redacted]@london.gov.uk>

Subject: RE: GLA/Enfield local plan meeting [SEC=OFFICIAL]

Classification: OFFICIAL

Hi [redacted]

Likewise good to catch-up the other week. Many thanks, [redacted] I will follow-up with proposed dates for a mid to late Sept meeting.

Best

[redacted]

From: [redacted] <[redacted]@london.gov.uk>

Sent: 23 July 2020 15:15

To: [redacted] <[redacted]@enfield.gov.uk>

Cc: [redacted] <[redacted]@london.gov.uk>

Subject: GLA/Enfield local plan meeting

Hi [redacted]

Good to speak just now. In regard to your suggestion of a meeting with Lucinda and the planning team, I've cc'd Lucinda's PA, for you to make contact on arranging this. For the GLA – we would invite [redacted]

Thanks

Growth Strategies and Urban Design Manager, London PlanTeam

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

T: 020 7983 [redacted]

london.gov.uk

[\[redacted\]@london.gov.uk](mailto:[redacted]@london.gov.uk)

[REDACTED]

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 15 October 2020 17:32
To: [REDACTED]
Subject: RE: GLA/Enfield local plan meeting 7th Oct [SEC=OFFICIAL]

Classification: OFFICIAL

Hi Both

I hope you are well.

The corporate session in the diary for 25th Nov will have to be rearranged due to other diary commitments. I will cancel the diary invite and come back with suggested dates.

Best

From: [REDACTED]
Sent: 28 September 2020 17:48
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@tfl.gov.uk>
Subject: RE: GLA/Enfield local plan meeting 7th Oct [SEC=OFFICIAL]

Classification: OFFICIAL

Thanks both, not a worry, I will be looking to share a draft agenda and any other material in advance.

Best

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 28 September 2020 17:31
To: [REDACTED] <[REDACTED]@tfl.gov.uk>; [REDACTED] <[REDACTED]@enfield.gov.uk>
Subject: RE: GLA/Enfield local plan meeting 7th Oct [SEC=OFFICIAL]

I'm happy with the 25th, could we limit to 90 mins max?

[REDACTED] – would be good if you could send any material beforehand for us to review

Thanks

From: [REDACTED] <[REDACTED]@tfl.gov.uk>
Sent: 28 September 2020 17:22
To: [REDACTED] <[REDACTED]@enfield.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA/Enfield local plan meeting 7th Oct [SEC=OFFICIAL]

Hi [REDACTED]

Oops, thanks for noticing my error re Wednesday 25th (not 23rd!) I should double check my emails before I send them!

Yes let's go with that unless @ [REDACTED] has any objections? Will we also need the full 2 hours?

Kind regards

[REDACTED]
PA to Lucinda Turner, Director of Spatial Planning

Transport for London

9th Floor, 5 Endeavour Square | Westfield Avenue |
London E20 1JN

[REDACTED] [tfl.gov.uk](mailto:[REDACTED]@tfl.gov.uk)

Tel: 020 3054 [REDACTED] (auto [REDACTED])

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SE1 2AA

[REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

[Register here](#) to be notified of planning policy consultations or sign up for GLA Planning News

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 28 September 2020 17:17
To: [REDACTED] <[REDACTED]@tfl.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA/Enfield local plan meeting 7th Oct [SEC=OFFICIAL]

Classification: OFFICIAL

Hi [REDACTED]
I hope you are well.
The following dates work:
Wednesday 18th Nov – anytime between 12pm-4.30pm – 12 - 4pm - Yes
Tuesday 24th Nov – anytime 9am-11am - Yes
Wednesday 23rd (25)?? Nov – anytime between 2pm-4.30pm - Yes
Shall we go with wed 25th – 2pm -4pm, I am happy to circulate the invite.
Best
[REDACTED]

From: [REDACTED] <[REDACTED]@tfl.gov.uk>
Sent: 24 September 2020 11:59
To: [REDACTED] <[REDACTED]@tfl.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA/Enfield local plan meeting 7th Oct [SEC=OFFICIAL]

Classification: OFFICIAL

Many thanks [REDACTED] I will come back to you on these options.
Best
[REDACTED]

From: [REDACTED] <[REDACTED]@tfl.gov.uk>
Sent: 24 September 2020 11:47
To: [REDACTED] <[REDACTED]@enfield.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA/Enfield local plan meeting 7th Oct [SEC=OFFICIAL]

Hi [REDACTED]
Please see some new dates for November as requested:
Tuesday 10th Nov - anytime 9am-11am, 12pm-1.30pm or 4pm-5.30pm
Wednesday 11th Nov – anytime between 12pm-4.30pm
Wednesday 18th Nov – anytime between 12pm-4.30pm
Tuesday 24th Nov – anytime 9am-11am, 12pm-1.30pm or 4pm-5.30pm
Wednesday 23rd Nov – anytime between 2pm-4.30pm
These look suitable for Lucinda and [REDACTED] Hopefully one works but I can offer some dates in December if not.
Kind regards
[REDACTED]

PA to Lucinda Turner, Director of Spatial Planning
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9th Floor, 5 Endeavour Square | Westfield Avenue |
London E20 1JN
[REDACTED]@tfl.gov.uk
Tel: 020 3054 [REDACTED] (auto [REDACTED])

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City Hall, The Queen's Walk, London
SE1 2AA
[REDACTED]@london.gov.uk

[Register here](#) to be notified of planning policy consultations or sign up for GLA Planning News

From: [REDACTED]
Sent: 22 September 2020 13:27
To: [REDACTED] <[REDACTED]@enfield.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA/Enfield local plan meeting 7th Oct [SEC=OFFICIAL]

Hi [REDACTED]
No problem at all. Leave it with me and I will come back to you with some dates shortly.
Kind regards
[REDACTED]

PA to Lucinda Turner, Director of Spatial Planning
Transport for London
9th Floor, 5 Endeavour Square | Westfield Avenue |
London E20 1JN
[REDACTED]@tfl.gov.uk
Tel: 020 3054 [REDACTED] (auto [REDACTED])

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[REDACTED]@london.gov.uk

london.gov.uk

[Register here](#) to be notified of planning policy consultations or sign up for GLA Planning News

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 22 September 2020 12:53
To: [REDACTED] <[REDACTED]@tfl.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA/Enfield local plan meeting 7th Oct [SEC=OFFICIAL]

Classification: OFFICIAL

Good Afternoon [REDACTED]
I hope you are well.
Regarding the above session, I have been asked by our Director to rearrange this for mid-late November given ongoing discussions internally on forward programme and consideration of potential impact of proposed Government changes to the planning system.
If you can please suggest a few 1.5 Hr options, that would be great.
Best
[REDACTED]

From: [REDACTED] <[REDACTED]@tfl.gov.uk>
Sent: 10 August 2020 15:05
To: [REDACTED] <[REDACTED]@enfield.gov.uk>; [REDACTED] <[REDACTED]@tfl.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA/Enfield local plan meeting [SEC=OFFICIAL]

Hi [REDACTED]
Sorry, I forgot to turn my ooo off. 7th October is still fine so let's go for it.
Many thanks
[REDACTED]

PA to Lucinda Turner, Director of Spatial Planning
Transport for London
9th Floor, 5 Endeavour Square | Westfield Avenue |
London E20 1JN
[REDACTED]@tfl.gov.uk

PA to Lucinda Turner, Planning
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[REDACTED]@london.gov.uk

Tel: 020 3054 [redacted] (auto [redacted])

london.gov.uk

[Register here](#) to be notified of planning policy consultations or sign up for GLA Planning News

From: [redacted] <[redacted]@enfield.gov.uk>
Sent: 10 August 2020 14:50
To: [redacted] <[redacted]@tfl.gov.uk>
Cc: [redacted] <[redacted]@london.gov.uk>; [redacted] <[redacted]@tfl.gov.uk>
Subject: FW: GLA/Enfield local plan meeting [SEC=OFFICIAL]

Classification: OFFICIAL

Hi [redacted]

I hope you are well.

Please see the email trail below in relation to the above. I thought I would forward on as direct by [redacted] out of office message.

Best

[redacted]

From: [redacted]
Sent: 10 August 2020 14:37
To: [redacted] <[redacted]@tfl.gov.uk>; [redacted] <[redacted]@london.gov.uk>
Cc: [redacted] <[redacted]@london.gov.uk>
Subject: RE: GLA/Enfield local plan meeting [SEC=OFFICIAL]

Classification: OFFICIAL

Hi [redacted]

Wed 7th Oct – 10am -12 would be great. I will circulate a diary invite.

Best

[redacted]

From: [redacted] <[redacted]@tfl.gov.uk>
Sent: 05 August 2020 11:51
To: [redacted] <[redacted]@enfield.gov.uk>; [redacted] <[redacted]@london.gov.uk>
Cc: [redacted] <[redacted]@london.gov.uk>
Subject: RE: GLA/Enfield local plan meeting [SEC=OFFICIAL]

Absolutely, please see below.

Wed 7th Oct – any time between 10am- 1.30pm

Thurs 8th Oct – 1-3pm

Fri 9th Oct – 1.30-3pm

Please let me know if you need any other options.

Kind regards

[redacted]

[redacted]

PA to Lucinda Turner, Director of Spatial Planning

Transport for London

9th Floor, 5 Endeavour Square | Westfield Avenue |
London E20 1JN

[redacted]@tfl.gov.uk

Tel: 020 3054 [redacted] (auto [redacted])

PA to Lucinda Turner, Planning

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London
SE1 2AA

[redacted]@london.gov.uk

london.gov.uk

[Register here](#) to be notified of planning policy consultations or sign up for GLA Planning News

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 04 August 2020 18:34
To: [REDACTED] <[REDACTED]@tfl.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA/Enfield local plan meeting [SEC=OFFICIAL]

Classification: OFFICIAL

Thanks [REDACTED] early Oct is fine, if you can please suggest a few 1.5 Hr options, that would be great.

Best

[REDACTED]

From: [REDACTED] <[REDACTED]@tfl.gov.uk>
Sent: 04 August 2020 14:29
To: [REDACTED] <[REDACTED]@enfield.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA/Enfield local plan meeting [SEC=OFFICIAL]

Hi [REDACTED]

Just to make you aware, [REDACTED] 14th Sept-2nd October so perhaps we can look at beginning of October instead?

Kind regards

[REDACTED]

[REDACTED]

PA to Lucinda Turner, Director of Spatial Planning
Transport for London
9th Floor, 5 Endeavour Square | Westfield Avenue |
London E20 1JN

[REDACTED]@tfl.gov.uk

Tel: 020 3054 [REDACTED] (auto [REDACTED])

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[REDACTED]@london.gov.uk

london.gov.uk

[Register here](#) to be notified of planning policy consultations or sign up for GLA Planning News

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 04 August 2020 12:58
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA/Enfield local plan meeting [SEC=OFFICIAL]

Classification: OFFICIAL

Hi [REDACTED]

Likewise good to catch-up the other week. Many thanks, [REDACTED] I will follow-up with proposed dates for a mid to late Sept meeting.

Best

[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 23 July 2020 15:15
To: [REDACTED] <[REDACTED]@enfield.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: GLA/Enfield local plan meeting

Hi [REDACTED]

Good to speak just now. In regard to your suggestion of a meeting with Lucinda and the planning team, I've cc'd [REDACTED] Lucinda's PA, for you to make contact on arranging this. For the GLA – we would invite [REDACTED]

[REDACTED]

Thanks

[REDACTED]

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 10 February 2021 10:51
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: GLA/Enfield Local Plan meeting - Recent DTC correspondence on Need [SEC=OFFICIAL]

Classification: OFFICIAL

Dear [REDACTED]

Ahead of our meeting this morning and I'm not sure if my colleague [REDACTED] has sent anything through, but we thought it would be useful to pull an agenda together from our side to cover the following:

- ☐ Brief intro
- ☐ Enfield's LP programme
- ☐ Where things are with the London plan
- ☐ Need vs target in planning for housing delivery in Enfield to 2039– London view & emerging Enfield view
- ☐ Employment evidence of need
- ☐ Enfield's evidence on land supply pipelines
- ☐ GLA's views on an appropriate buffer
- ☐ Update from LBE on Duty to Cooperate
- ☐ Meeting LBE unmet need – emerging spatial options
- ☐ Mayor's initial view on the options

We look forward to seeing you shortly.

With kind regards

[REDACTED]
[REDACTED] | Plan Making Team
Strategic Planning and Design | Planning Service
Place Department
Direct Line: 020 8132 [REDACTED]
Team number: 020 8379 [REDACTED]

From: [REDACTED]
Sent: 09 February 2021 19:39
To: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED]
<[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@enfield.gov.uk>
Subject: RE: GLA/Enfield Local Plan meeting - Recent DTC correspondence on Need [SEC=OFFICIAL]

Classification: OFFICIAL

Hi [REDACTED]

Further to my email yesterday, it will be my colleagues joining the call tomorrow who have been focused on the needs work related to housing and employment.

Happy to follow-up as required.

Best

■

From: ■ ■

Sent: 08 February 2021 16:00

To: ■ <■ [london.gov.uk](mailto:■@london.gov.uk)>

Subject: RE: GLA/Enfield Local Plan meeting - Recent DTC correspondence on Need [SEC=OFFICIAL]

Classification: OFFICIAL

Hi ■

Re our session later this week, draft agenda below, welcome any thoughts? More a discussion with a few slides thrown in.

Re update on publication of technical evidence, we're targeting to release a few key pieces of evidence (LHNA, Employment related work, SHLAA) on 1 March 21. Happy to send copies of unpublished evidence under the proviso that they're in draft next week.

For info, meeting notes attached from our session in Feb 2020.

Best

■

Agenda:

1. Introductions
2. Enfield's LP Programme
3. Where things are with the London plan
4. Need vs target in planning for housing delivery in Enfield to 2039– London view & emerging Enfield view
5. Employment evidence of need
6. Enfield's evidence on land supply pipelines
7. Meeting LBE unmet need – emerging spatial options
8. GLA's initial view on the options

From: ■ ■

Sent: 04 February 2021 13:21

To: ■ <■ [london.gov.uk](mailto:■@london.gov.uk)>

Subject: RE: GLA/Enfield Local Plan meeting - Recent DTC correspondence on Need [SEC=OFFICIAL]

Classification: OFFICIAL

Hi ■

Not a worry, wed 10th 11-12:30 would be good, I will circulate a diary invite. Please forward on to colleagues on your side.

Re the need evidence, please see the link below to the emerging evidence base. I will also check if we can confidentially make available any other emerging evidence outputs that would be helpful to our catch-up.

<https://new.enfield.gov.uk/services/planning/evidence-base/>

Best

■

From: ■ <■ [london.gov.uk](mailto:■@london.gov.uk)>

Sent: 03 February 2021 13:02

To: ■ ■ <■ [enfield.gov.uk](mailto:■@enfield.gov.uk)>

Subject: RE: GLA/Enfield Local Plan meeting - Recent DTC correspondence on Need [SEC=OFFICIAL]

Hi ■

Sorry for the delay, we've been busy with local plan responses

I can offer the following dates:

Tues 10th 9-11.30

Wed 11th 9-1 PM

Fri 12th AM

I also note that your letter includes a statement that you have identified that you cannot meet all your housing and employment needs in the borough. Could you send us the relevant evidence that supports this, so we can review in advance of the meeting.

Thanks
[REDACTED]

From: [REDACTED] [REDACTED] <[REDACTED]@enfield.gov.uk>

Sent: 01 February 2021 17:33

To: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: GLA/Enfield Local Plan meeting - Recent DTC correspondence on Need [SEC=OFFICIAL]

Classification: OFFICIAL

Hi [REDACTED]

I hope you are well.

Great milestone re London Plan! Just following up re dates for a meeting re the above?

Look forward to hearing from you.

Best
[REDACTED]

From: [REDACTED] [REDACTED]

Sent: 25 January 2021 16:57

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@enfield.gov.uk>; [REDACTED]@enfield.gov.uk>

Subject: RE: GLA/Enfield Local Plan meeting - Recent DTC correspondence on Need [SEC=OFFICIAL]

Classification: OFFICIAL

Hi [REDACTED]

Please see attached DTC letter sent to adjoining boroughs, it may have gone a miss with the emails sent earlier in the month. We have formally reached out to adjoining authorities, including HMA and those new authorities identified in our FEMA in relation to the Duty to Cooperate and put forward a request to consider unmet housing and employment need in our borough.

Look forward to hearing from you re dates.

Best
[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 25 January 2021 14:54

To: [REDACTED] [REDACTED] <[REDACTED]@enfield.gov.uk>

Subject: RE: GLA/Enfield Local Plan meeting - Recent DTC correspondence on Need [SEC=OFFICIAL]

Hi [REDACTED]

Happy new year to you , too. I'm happy to set up a meeting, but can you remind me of the correspondence?

Thanks
[REDACTED]

From: [REDACTED] [REDACTED] <[REDACTED]@enfield.gov.uk>

Sent: 22 January 2021 20:42

To: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: GLA/Enfield Local Plan meeting - Recent DTC correspondence on Need [SEC=OFFICIAL]

Classification: OFFICIAL

Good Evening [REDACTED]

Happy New Year! I hope you are well.

I wanted to set up a session early next month to discuss the above, it would be myself, [REDACTED] and [REDACTED] on the LBE side.

Let me know of availability your side and happy to circulate a teams invite.

Have a great weekend.

Agenda

Date/Time27th February 2020 | 15:00-16:30

Venue

City Hall

Attendees:

Enfield Council

[REDACTED] – [REDACTED] and Design

– Principal

- Growth Strategies and Urban Design Manager– Chair

██████████ – London Plan Team

**Greater London Authority
(GLA)**

██████████ - Team Leader - Local Plans

██████████ – Policy Team Leader – Economy, Culture & Social Infrastructure, London Plan Team

IT No.

Agenda

Lead

1.0	Introductions Purpose of the Meeting
-----	--

ALL

2.0 New London Plan – Update and Forward Programme

3.0 New Enfield Local Plan | Strategic Programme

ALL

Technical Evidence Development:

■ | ALL

4.0	<ul style="list-style-type: none"> a) Industrial Intensification b) Housing Need c) Functional Economic Market Area d) Green Belt & Metropolitan Open Land (MoL)
-----	--

5.0	a) Next Steps Ways of Working – Establishing a Memorandum of Understanding
-----	--

ALL

6.0	A.O.B / Close
-----	---------------

Meeting Notes

Draft New London Plan (DNLP) – Update (Lisa)

- Cabinet reshuffle, Secretary of State decision now due 16 March, GLA is not ruling out a further extension;
- Mayoral purdah period begins 23 March 2020;

Agenda

- Post mayoral-election decision on London Plan anticipated;
- Specificity of changes whether minor/major are unknown at present;
- **Unknowns:** budget announcement; Planning White Paper; Changes to the Government's Housing Methodology;
- **For boroughs:** Which housing target do we pursue? Scale of change; uncertainty with infrastructure? Maintaining a 5-year housing supply; But must keep on planning
- LBE's Housing Delivery Test result was 77%, application of 20% buffer; acknowledge that a buffer has been applied already;
- Looking at past housing delivery, how can LBE do more?
- Concerns expressed by LBE on the 5-year housing supply position;
- Imperative to move forward the preparation with a New Local Plan

Enfield's New Local Plan

- Targeting a Draft New Enfield Local Plan by winter 2020;
- On technical evidence base, LBE has several evidential studies in train now;
- Thematic work underway based on DNLP's intend to publish version (December 2019);
- Working on single Local Plan with site allocations/area-based policies;
- No intention to have AAPs/Area based plans, currently, a move towards consolidation. The intention that these will fall out of Opportunity Areas and/or Masterplans to secure investments and confidence;
- Planning Performance Agreements (PPAs)/pre-applications in progress, some of the interest will help to inform evidence as part of a 2-way process between LPA and developers;

Evidence base

Industry + Industrial Intensification and Functional Economic Market Area – studies

- On Industry + Industry – LBE draft scope encompasses the whole borough, want to have a consistent dialogue with the GLA, take on board guidance, importantly have an open dialogue with GLA officers;
- AECOM's work at LB Wandsworth - GLA is familiar with the approach; acknowledge Wandsworth and Enfield are different boroughs (characteristics and geographically i.e. inner and outer London borough) but both Wandsworth and Enfield are 'provide capacity' boroughs;
- GLA is happy to feed in at appropriate time;
- LBE would welcome GLA to feed in right at the start of the studies; **ACTION: [REDACTED] to speak to [REDACTED] (AECOM) to arrange a session in the diary with [REDACTED] Discussion around strategy accommodating demand, GLA-steer, technical detail and specific numbers (including [REDACTED])**
- LB Bexley was mentioned. Bexley is undertaking industrial capacity work in-house; [REDACTED] suggested LBE also speak to LB Bexley on their approach;
- GLA is developing 2x pieces of SPG: 1) design and how to accommodate co-locate/high density; 2) How to identify capacity? Drafts likely to be out for consultation after Mayoral elections;
- London Industry and Logistics Sounding Board (LISB) and London First - where we could test ideas but noted these are quite general, so we may need to pick out organisations;

Agenda

- Outside London? Can other boroughs help us? LSCC Corridor? Noting new Meridian Water station open, providing better connections into London-Stratford/Liverpool Street; From initial meeting with Mark Bradbury (LBE's Director of Property and Economy) could the FEMA be looking south (i.e. Stratford and beyond)?
- Enfield is 'provide capacity' but who are we providing for? London? and? Need to think about supply chains/freight network;
- Noted Enfield's SME accommodation vacancy levels low = 1.8%;
- Distribution/logistics, making it more of sustainable modes of travel i.e. rail and river freight (New Southgate) LBE to give some thought on above;
- Strategic road network and interaction with industrial areas: LBE will be undertaking a Strategic Integrated Transport Study looking at impacts on land-use changes;
- North London Waste Plan Land Apportionment – To be explored through evidence aligned with the Waste Plan;

Housing Needs & Capacity

- LBE discussed Enfield's assessment of local housing needs and approach towards capacity; in line with NPPF, Standard Methodology and PPG guidance – leaving no stone unturned; happy to share presentation findings with GLA. **ACTION: [REDACTED] to share housing needs & capacity presentation (one that was prepared for Leader's briefing) with GLA colleagues;**
- GLA sites received (from datastore) and London-SHLAA; some received as a set of points (not polygons) which show GLA assets, LFB (London Fire Brigade) assets, LLDC (London Legacy Development Cooperation) assets, MPS (Metropolitan Police Service) assets, and TfL (Transport for London) assets in Enfield;
- London SHLAA site polygons, some of which were not actually submitted to the SHLAA Call for Sites but selected for inclusion in the SHLAA by the GLA with no availability information;
- LBE/AECOM urgently needs to speak to someone within SHLAA team to inform the capacity work. **ACTION: GLA happy to share SHLAA contact, assumptions taken and database relating to Enfield;**
- **ACTION: [REDACTED] to share with [REDACTED] executive summary of draft Local Housing Needs Assessment to sense check the older persons/specialist housing numbers; Note: [REDACTED] is tied up currently; quick response to LBE's LHNA by mid-March would be useful so consultants can finalise the report;**

GB/MOL

- LBE explained approach to assessing GB and MOL
- GLA acknowledge NPPF approach; London Plan gives a clear position.

MOU

- Agreed initial Memorandum of Understanding (MoU) to be drafted that would form the basis of Statement of common/uncommon ground; GLA's role re: 'general conformity' **ACTION: [REDACTED] to draft a MOU for GLA officers to consider;**

Meetings

- In the diary as monthly and will be taken up as require; [REDACTED] to liaise with [REDACTED]
- Considering HDT results, [REDACTED] mentioned there is a PAS conference (6 March);

Sent via email

Please reply to:

E-mail:  enfield.gov.uk

Phone: 020 8132 

Textphone:

Fax:

My Ref: Duty to Cooperate – unmet needs

Your Ref:

Date: 7 January 2021

Dear,

Enfield's Local Plan

The London Borough of Enfield is currently progressing work on its new Local Plan which will cover the period up to 2039. We have been actively engaging with all of our neighbours and stakeholders through the Duty to Co-operate for several years and now wish to deepen this process as we consider how Enfield will meet its own identified housing and employment needs.


Our evidence base production has progressed significantly in the last few months and we have identified that we will not be in a position to meet all of our housing and employment needs in the borough. As you will be aware, Enfield is a constrained borough with around 40% of its area covered by Green Belt and a further 300 hectares (5%) designated as Strategic Industrial Location (SIL). Other significant constraints such as SSSI, MOL, Registered Parks and Gardens and Ancient Woodland affect large areas of the borough. These constraints affect our land supply and our ability to meet the borough's growth requirements. The council is continuing to use its best efforts to meet its needs within the urban and brownfield areas of the borough but unfortunately the supply evidence is indicating that it will not be able to do this, despite maximising the urban site pipeline and increasing supply through intensification and creative design solutions.

The purpose of this letter therefore is to formally ask if your council would be in a position to assist Enfield in meeting some or all of its unmet employment and housing requirements.




Executive Director Place
Enfield Council
Civic Centre, Silver Street
Enfield EN1 3XY

www.enfield.gov.uk

 If you need this document in another language or format contact the service using the details above.

To assist you in coming to view on Enfield's request I have set out below a summary of the evidence and scale of shortfall relating to the housing and employment requirements:

Housing

Enfield's housing requirements are set by the London Plan. The adopted 2016 London Plan will shortly be out-of-date and is due to be replaced by the new London Plan. The latest version (Published London Plan (Dec 20)) has a housing requirement for Enfield of 1,246 dwellings per annum which equates to a total of 18,690 over a 15 year plan period. Our current urban and brownfield site pipeline is not sufficient to meet this requirement and we currently estimate we could be up to 4,000 dwellings short of the target over the plan period.

The council does have a supply of sites in Green Belt/MOL areas that might potentially be used to meet housing needs based on the 1,246 target, although there is further work to be done on this. However, we recognise the very strong policy constraints relating to use of Green Belt/MOL land to meet unmet housing need and are adopting a 'no stone unturned' approach before turning to this supply. This approach includes establishing whether Duty to Co-operate partners would be able to assist us in meeting our unmet housing need.

It is important at this point to note that the Published London Plan target is not adopted and is still subject to considerable uncertainty as a result of discussions between the Mayor and Secretary of State. Furthermore, the targets in that plan are only applicable for 5 years from the date of adoption and any new London Plan that is developed will be expected to be based on the new Standard Methodology (December 2020) for calculating housing need. Applying the methodology to Enfield alone would leave us with a housing need of up to 65,955 new homes over a 15 year plan period. It is clear that we would be unable to provide for this level of need even if we were to use our entire site supply (including Green Belt/MOL and other policy constrained sites).

Employment

The council's employment evidence indicates that we have a need in the borough for 53ha of additional industrial/distribution land. Utilising intensification and new employment sites in urban areas we estimate we can provide for 30ha of this. This leave us with a significant unmet industrial/distribution need of around 23ha.

The council does have a very small supply of sites in the Green Belt/MOL that could potentially be used for industrial/distribution uses but this is not expected to make significant in-roads to the 23ha unmet need. We are seeking your assistance with meeting this need.

We are expecting to publish the next stage of our local plan in summer 2021 and thus there is some degree of urgency for us in understanding whether or not your council would be in a position to take some of Enfield's unmet housing and employment needs. **Accordingly, I would be grateful for a response to this letter by the end of January 2021.**

In the meantime, if you feel you need more information, including detailed evidence of our supply pipeline and constraints, or would like to discuss the matter with us before formally responding please let me know as soon as possible so that we can arrange a meeting in early January.

For your information, a similar request has also been sent to all neighbouring authorities and other authorities within our Housing Market Area and Functional Economic Market Area.

Yours sincerely



Head of Planning

IMPORTANT – Enfield residents should register for an online Enfield Connected account. Enfield Connected puts many Council services in one place, speeds up your payments and saves you time – to set up your account today go to www.enfield.gov.uk/connected

[REDACTED]

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 05 March 2021 13:42
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Enfield's emerging evidence base [SEC=OFFICIAL:PRIVATE AND CONFIDENTIAL CORRESPONDENCE]

Classification: OFFICIAL - PRIVATE AND CONFIDENTIAL CORRESPONDENCE

Hi [REDACTED]
Thank you for getting back to me.
Tuesday 23 March 2-3:30 would be great, I'll pop a meeting invite through shortly.
Please feel free to extend to members of your team.

[REDACTED] | Planning Service
Direct Line: 020 8132 [REDACTED]

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 05 March 2021 13:35
To: [REDACTED] <[REDACTED]@enfield.gov.uk>
Cc: [REDACTED] <[REDACTED]@enfield.gov.uk>; [REDACTED] <[REDACTED]@enfield.gov.uk>
Subject: RE: Enfield's emerging evidence base [SEC=OFFICIAL:PRIVATE AND CONFIDENTIAL CORRESPONDENCE]

Hi [REDACTED]
Of those dates, we could make:
22nd at 4
23rd 2-3.30
Thanks
[REDACTED]

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 26 February 2021 10:26
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@enfield.gov.uk>; [REDACTED] <[REDACTED]@enfield.gov.uk>
Subject: RE: Enfield's emerging evidence base [SEC=OFFICIAL:PRIVATE AND CONFIDENTIAL CORRESPONDENCE]

Classification: OFFICIAL - PRIVATE AND CONFIDENTIAL CORRESPONDENCE

Dear [REDACTED]
Further to my email below, I'm not sure if you have had the time to go through the material yet, but just to follow, please see attached a copy of our Green Belt assessment. As I mentioned in my email below, the file is large and I can only squeeze get an executive summary through (for now). I hope it is legible.
As discussed, we are moving quickly to a Reg 18 for approval to consult in June, with a substantial package of evidence being published in the next few weeks. We've always had a good relationship with the GLA and want continue to working closely with you and officers as we firm up our position and develop options for our Reg-18 plan.
To that end, could I schedule a meeting with you (and please extend to colleagues) for the w/c 22 March. [REDACTED] and I are available:

- ☐ Monday 22-March – 10-11:30 or 4pm
- ☐ Tuesday 23-March – 11-12:30 or 2-3:30pm
- ☐ Wednesday 24-March – from 2pm onwards
- ☐ Thursday 25 March – from 10 to 12

Happy to discuss and look forward to hearing from you
With kind regards
[REDACTED]

[REDACTED] | Planning Service

Direct Line: 020 8132 [REDACTED]

From: [REDACTED]

Sent: 19 February 2021 18:28

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@enfield.gov.uk>; [REDACTED] <[REDACTED]@enfield.gov.uk>; [REDACTED] <[REDACTED]@enfield.gov.uk>; [REDACTED] <[REDACTED]@enfield.gov.uk>

Subject: Enfield's emerging evidence base [SEC=OFFICIAL:PRIVATE AND CONFIDENTIAL CORRESPONDENCE]

Classification: OFFICIAL - PRIVATE AND CONFIDENTIAL CORRESPONDENCE

Dear [REDACTED]

It's great news to hear (today) that formal publishing of the London Plan is now scheduled for Tuesday 2 March. Very exciting and what a milestone!

Thank you for meeting with officers last week. As discussed, I am sharing copies of our emerging evidence base studies we were referring to in advance of formal publication on 1 March. Please bear with us, as some of the numbers in our SHLAA are still moving and likely to change when we publish.

Housing:

- ☐ A copy of Enfield's draft SHLAA (LBE-in house) with supporting appendices
- ☐ Local Housing Needs Assessment (AECOM and Arc4) (November 2020)
- ☐ Gypsy and Travellers Assessment (AECOM and Arc4) (2020)

Employment:

- ☐ Enfield's FEMA (AECOM) 2020
- ☐ Industrial Intensification Market Deliverability Assessment plus appendix (Stantec) 2021

Green Belt and MOL assessment – this is a large file (!), I will send this under separate cover, somehow!

I trust you'll receive these safely and shortly. I will check diaries on our end for a time to meet around mid-March and get a few dates over to you next week.

Have a lovely evening.

With kind regards

[REDACTED] | Plan Making Team
Strategic Planning and Design | Planning Service

Place Department

Direct Line: 020 8132 [REDACTED]

Team number: 020 8379 [REDACTED]



Visit: <https://www.gov.uk/coronavirus>

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[REDACTED]

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 22 March 2021 15:24
To: [REDACTED]
Cc: [REDACTED]
Subject: Meeting with officers tomorrow afternoon [SEC=OFFICIAL]
Attachments: GLA meeting 23 March_for circulation.pdf; 210316_Enfield housing need_CLEAN.docx; Enfield SHLAA compared with London SHLAA Paper_MH.docx

Classification: OFFICIAL

Hi [REDACTED]
[REDACTED] and I are looking forward to seeing you tomorrow. Ahead of the meeting, we thought it would be helpful to take officers through the following

- ☐ Emerging vision
- ☐ The challenges we're grappling with
- ☐ Urban supply of sites
- ☐ 2017 SHLAA compared to Enfield's SHLAA
- ☐ Emerging spatial options and feedback from Members (which will be happening this evening)
- ☐ Making an exceptional circumstances case

If there is anything I have missed off and you would like us to cover, please let me know.

I attach a few slides so we can point to, and 2x further pieces of evidence that we've been working on for your info and run through tomorrow.

'see you' tomorrow.

Regards

[REDACTED]
[REDACTED] | Plan Making Team
Strategic Planning and Design | Planning Service
Place Department
Direct Line: 020 8132 [REDACTED]
Team number: 020 8379 [REDACTED]



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Enfield Local Plan Advice

Housing numbers in the emerging plan

On behalf of **London Borough of Enfield**

Client Logo

Project Ref: 12345/001 | Rev: AA | Date: January 2013

Registered Office: Buckingham Court Kingsmead Business Park, London Road, High Wycombe, Buckinghamshire, HP11 1JU
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Document Control Sheet

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Date:

	Name	Position	Signature	Date
Prepared by:	HDH/RJP	DIR/DIR	HDH/RJP	080321
Reviewed by:				
Approved by:				
For and on behalf of Stantec UK Limited				

Revision	Date	Description	Prepared	Reviewed	Approved

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1 Introduction

Background

- 1.1.1 Enfield is required, as with most Councils in England, to publish and keep up to date a Local Development Plan. As with every Council the development plan must follow national policy and guidance as set out in the most recent version of the National Planning Policy Framework (NPPF). However, in London the local plan also needs to be in '*general conformity*' with the London Plan. In London, unlike the rest of England, a two tier plan system remains¹.
- 1.1.2 The London Plan is a statutory strategy required by the Greater London Authority Act 1999. It is prepared by the Mayor of London and published by the Greater London Authority. The first London Plan was published in 2004, replacing previous strategic planning guidance for London known as RPG3. The latest edition was published in March 2021.
- 1.1.3 The most recent version of the London Plan was ultimately found sound and published in March 2021. However; it is fair to say that the Plan had a troubled Examination and was subject to major modification on the advice of the Planning Inspectors and ultimately Government. As we discuss in more detail below the plan, as submitted, had broadly enough housing land supply to meet the Mayors view of 'need'. But as the plan passed through examination it became clear that the GLAs estimate of supply was not robust and the final version of the Plan has fewer homes than 'needed'. The Plans employment land strategy was particularly challenged because many occupied sites were proposed to be used for housing exacerbating the shortage of industrial sites in London.
- 1.1.4 The latest version of the London Plan covers the period up to 2041 but as we note in section 2; only provides housing targets for the first 10 years of the London Plan period. Even these targets are due to be reviewed within 5 years of the plan adoption.
- 1.1.5 A general principle of plan making is that we should always seek to provide sufficient land to meet housing and economic needs in full. However, for London it is generally accepted that the London Plan fails to balance the need for new homes in London with supply. This is even on the Mayor's own assessment of 'need' (as set out in the 2017 SHMA). But the London Plan also fails to meet economic needs with the Inspectors concluding that the Industrial Strategy was unsound and the Mayor should start to consider Green Belt releases to address both economic and housing need. (Greenbelt releases are generally considered to be a strategic, so London, matter – rather than something on which the boroughs should go their own way).
- 1.1.6 Finally; it is also the case that the London Plan predates the most recent set of national policy and guidance and was examined under now superseded guidance. This is important for the future consideration of housing numbers because the London Plan, and ultimately the housing target 'awarded' to Enfield (1,248 dpa over the 2019-2029 period) was 'framed' by an assessment that had concluded London 'needed' 66,000 dpa per annum. But in December 2020 Government increased this to 95,000 and it is this higher number that the Mayor will need to start considering as part of the legal duty to review, and keep up to date, the London Plan.

Our Brief

- 1.1.7 We have been asked to advise on the future housing target for the Enfield Plan which takes into account conformity with the London Plan but also the NPPF and associated guidance.

¹ Two tier plans were common before the abolition of the Regional Spatial Strategies

- 1.1.8 As noted above the London Plan had a troubled examination with housing and economic at the core of the problem. Until very recently it was unclear whether the Plan would pass examination and if so with what housing targets for the Boroughs.
- 1.1.9 The London plan was originally submitted in 2017 with 1,876 dwellings per annum (dpa) as a draft target for Enfield (2019/29). The overall London Plan targets were actively challenged with some arguing for more homes, others for fewer. But in October 2019, for Enfield (and other boroughs), the Inspectors recommended a reduction in housing targets due to concerns that the GLA had erred in their assessment of supply. In summary the Councils could not deliver the number of homes in the draft plan because the GLA's assessment of available supply was not sound. As a result, Enfield's target was proposed to be reduced to 1,246 dpa.
- 1.1.10 Between October 2019 and February 2021 there was a series of formal letters being passed between the Mayor and the Secretary of State and formal 'directions' being issued by the SoS. This reduction to 1,248 dpa for Enfield was confirmed in March 2021 with the publication of the London Plan.
- 1.1.11 Now the Plan has been published some of the future uncertainty has reduced. But, for reasons we discuss below, the London Plan does not provide a clear answer to the 'critical issue' of how many homes Enfield needs to identify in its next 15 year plan period. This is because the London Plan only provides targets for Boroughs up to 2029.
- 1.1.12 In this note we look at two particular issues relevant to the emerging plan. Firstly, the potential Enfield housing target – recognising that the London Plan provides targets for only 10 years of the London Plan period.
- 1.1.13 Secondly the need, rationale and practical implication of a Local Housing Needs assessment. We understand that the GLA have queried why the Borough, in 2019, commissioned a Local Housing Needs assessment for Enfield (from AECOM & Arc 4 Consultants) where the London Plan *suggests* this evidence is not needed and the Council should instead look to rely on alternative evidence from the GLA's strategic 'suite'.

2 London Plan Targets for Enfield

- 2.1.1 On 29th January 2021, the Secretary of State for Housing Robert Jenrick approved the Mayor's New London Plan. The Mayor formally published the Plan on 2nd March 2021.

Need vs requirements and targets

- 2.1.2 Before looking in detail at Enfield's housing requirement it is important to set out the difference between a housing need figure and a requirement or target. Also to set out how the Borough plan needs to 'conform' with the London Plan.

Housing Need

- 2.1.3 When arriving at a housing target in a development plan (including the London Plan) the starting point is an assessment of 'need'. This is a 'policy off' assessment of how many homes are 'needed'. This assessment is driven by demographic projections and other adjustments as prescribed in the Planning Guidance.
- 2.1.4 The London Plan assessed its need, including that of the Boroughs, using a process called 'Objectively Assessed Need' or OAN. This process was replaced by the 'Standard Method' shortly after the London Plan was submitted for Examination – but the London Plan was allowed to proceed under transitional arrangements.

The assessment of OAN is blind as to a councils ability to meet its need via a supply of sites.

2.1.5 Housing Requirements (or plan 'targets')

- 2.1.6 Once the Council (or the Mayor in London) has identified the correct 'need' this is used as the starting point for identifying a supply of sites. This includes 'flexing' local policies to close any gap between 'need' and supply.
- 2.1.7 The final 'number' set out in the Plan is the 'Target' or 'Requirement'. This should ideally be the same as the starting 'need' figure. But this is not always the case. Where the target is adopted below 'need' Planning Policy and Guidance encourages early review of plans to try, as quickly as possible, to ensure that need is met in full².
- 2.1.8 In summary, the London Plan provides the Borough with a 'requirement' or 'target' up to 2029 and arguably (as discussed below) beyond. It does not provide the boroughs with any view of Borough level 'need' up to 2029 or beyond.

Conformity (and General Conformity)

- 2.1.9 In this note we discuss the need to for the Enfield Plan to 'conform' with the London Plan. This flows from a legal requirement for the Enfield Plan to be in 'general conformity' with the Strategic London Plan.
- 2.1.10 There is no requirement for the Plans to perfectly conform with each other. But there is also no statutory definition of 'general conformity'; whether or not a plan generally conforms is a matter of judgement.

² There are occasions where a target can be in excess of 'need'. For example, where a Council may wish to build more market housing to secure more affordable housing.

- 2.1.11 For the purposes of this paper we focus on how the Borough should look to apply the London Plan housing targets while not speculating how much leeway may be available to depart from these while still 'generally' conforming.
- 2.1.12 In our view the housing targets in the London Plan are a key policy that is both quantified and also detailed. The scope to adopt a dramatically different number, while still looking to 'generally conformity' is likely to challenging.

London Plan approach to housing targets

Introduction

- 2.1.13 As noted above; the London Plan proceeded to assess its starting point (its 'need' for housing) using a process called Objectively Assessed Need (OAN).
- 2.1.14 For London as a whole the 2017 London Strategic Housing Market Assessment (SHMA) calculated the OAN as 66,000 dpa.
- 2.1.15 This number was calculated, presented and used at a London wide level. The Mayor maintained that London was one 'Housing Market Area' and need could and should be distributed according to planned supply across the Boroughs. The published 2017 SHMA provides no borough level 'need' figures. Only the London wide 66,000 is presented.
- 2.1.16 Once this OAN was determined the Mayor, following the two step approach above, looked for supply. This was done through the 2017 Strategic Land Availability Assessment (SHLAA).
- 2.1.17 Importantly; the reconciliation process of 'need' and 'supply' was not undertaken at the Borough level. For London as a whole the SHLAA identified capacity for most, but not all of the 66,000 homes 'needed' for first 10 years of the plan period. As submitted the separate Borough targets roughly summed to the 66,000 homes (1.5% short over the London Plan period).
- 2.1.18 This process is summarised the SHMA (para 0.2):
- "All of these estimates [of London Need] are provided at the Greater London level only. Local housing provision targets are set out in the London Plan, based on the estimated capacity for new homes in each London borough as reported in the accompanying Strategic Housing Land Availability Assessment (SHLAA)*
- 2.1.19 While the submitted plan broadly balanced need/supply the Inspectors found elements of the 2017 SHLAA unsound (part of the allowance for 'small sites'³) and ultimately removed this component of supply. The Inspectors then adjusted borough targets downwards.
- 2.1.20 So, as drafted the submitted London Plan supply summed to 40,000 dpa on large sites and 24,500 on small sites (i.e. just short of the 66,000 dpa need). But following the Panel report the London small site supply, the component based on GLA modelling, was deleted and the small site supply cut to 12,000 dpa.
- 2.1.21 So, even were the Mayor satisfied that the submitted London Plan had enough supply to meet need. With the Inspectors reducing the SHLAA supply – removing part of the modelled small sites allowance - the final London Plan can no longer claim to meet 'need' in full even on its own terms.

³ See paragraph 170 of the Panel Report: "Briefly the modelling of small sites is insufficiently accurate to give a true picture of the likely available capacity. As such, it does not provide a reliable input to the overall targets"

10 Year Targets and the London SHLAA

- 2.1.22 Plans are generally expected to provide sufficient supply to cover their plan period. I.e. upto 2041. But there is provision in the NPPF for Councils only to identify sites upto year 10. The NPPF states that Councils should allocate sites post year 10 'where possible'⁴
- 2.1.23 When assessing supply the London SHLAA looked over the whole London Plan period (up to 2041) but focused only on the first 10 years (2019/29). In response the London Plan only provides Borough level targets up to 2029 – aligning with the detailed part of the SHLAA.
- 2.1.24 This is justified by the Mayor (para 0.0.13) because:

"This London Plan runs from 2019 to 2041. This date has been chosen to provide a longer-term view of London's development to inform decision making. However, some of the more detailed elements of the Plan, such as the annual housing targets, are set for only the first ten years of the Plan. This reflects the capacity of land suitable for residential development and intensification identified in the 2017 Strategic Housing Land Availability Assessment (SHLAA) which, due to the dynamic nature of London's land market, does not attempt to robustly identify capacity beyond 2029."

- 2.1.25 In summary the Mayor declined to provide Borough level targets post 2029 because the 2017 SHLAA could not confirm the supply of sites due to the 'dynamic nature' of the London Market.

Targets post 2029

- 2.1.26 Borough level targets are not provided in the London Plan post 2029. But the Boroughs are required, following National Guidance, to address a 15 year period from the point of plan adoption. Even were a Council to adopt a new plan today the London Plan targets don't even last 8 or so years of the 15 year period.
- 2.1.27 This presents all Boroughs with a challenge: *how much land to allocate post 2029 and on what basis should these allocations be made?* The London Plan provides no Borough 'need' figure post 2029 and the SHLAA, as clearly set out, only focused on the period up to 2029.
- 2.1.28 Some limited guidance is provided in the London Plan where the supporting text states (4.1.11):

"If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites."

- 2.1.29 The paragraph could be viewed as slightly disingenuous because at the Borough level local plan Inspectors have concluded a target post year 10 (2029) is required. Setting this aside- paragraph 4.1.11 would suggest that Enfield can derive its post 2029 targets by interrogating the 2017 SHLAA, supplemented with additional local evidence, and carrying forward the remaining (sound) element of the original SHLAA small sites adjustment.

Enfield's Housing Target in the London Plan 2019 - 2029.

- 2.1.30 As noted above only 10 year (2019/29) targets are provided for Boroughs in the London Plan. The initial 10-year housing target for the London Borough of Enfield was for a total of

⁴ NPPF Paragraph 67.

18,760 (1,876 per annum). Of this total 9,047 dpa were on 'large sites' (over 0.25) ha and the balance on small sites.

- 2.1.31 Following the Inspectors Panel report, and the removal of one element of the small sites assessment Enfield's target falls to 12,460 over the 10 year period.
- 2.1.32 As a recently adopted, sound Plan, there is little scope for Enfield to query this target. In *theory* the 2017 SHLAA confirmed the supply up to 2029 and the London Plan confirmed the requirement for homes in Enfield up to 2029.
- 2.1.33 To remain in conformity with the London Plan at least these many homes are needed over this period; including any backlog being 'made good' within this period.
- 2.1.34 We understand the Borough raised a number of objections to the SHLAA as part of the London Plan examination and despite the SHLAA showing theoretical supply testing at the Borough level suggests this may not be case. But the case remains that the London Plan has now set the requirement and if the ultimate Enfield plan cannot provide 12,480 homes by 2029 the local plan would fail to conform and could be found unsound at local examination.

Post 2029

- 2.1.35 It is useful to break paragraph 4.1.11 into its constituent components and remember that the London Plan is directing Borough housing targets (requirements) and NOT 'need'. Boroughs do not consider 'need' as part of the paragraph 4.1.11 assessment.

A) "boroughs should draw on the 2017 SHLAA findings [for large sites]"

- 2.1.36 For London as a whole the SHLAA focused on the period up to 2029 but also provided indicative capacity for the post 2029 periods (Phase 4 & 5 of the SHLAA).
- 2.1.37 But; for Enfield, the SHLAA shows almost zero supply in these later phases.
- 2.1.38 The table below is taken from the London SHLAA (table 10.1). It shows the profile of the large site supply across the London Plan period.
- 2.1.39 Phases 4 & 5 are post 2029 and so can be used to estimate the post 2029 target. Phase 4 is 5 years long (April 2029/ March 2034) while phase 5 covers 7 years (2034-2041)

London Plan SHLAA Supply by Phase (large sites – table 10.1)

	Phase 1	Phase 2	Phase 3	Phase 4	Phase 5	Total
Enfield	731 7%	4,049 37%	4,638 42%	761 7%	814 7%	10,993
London	79,609 12%	224,154 33%	176,489 26%	122,233 18%	72,202 11%	674,687

Source: 2017 SHLAA.

- 2.1.40 This would suggest that there is only capacity for 761 homes for Enfield to roll into the paragraph 4.1.11 assessment for the 5 years post 2029.
- 2.1.41 For the phase 5 period there are 814 homes.
- 2.1.42 Per annum this would provide for 152 for the five years April 2029 – March 2034 and 116 dpa for the seven year period ending March 2041.

B) and any local evidence of identified capacity, in consultation with the GLA

- 2.1.43 Turning to this 'step' the Boroughs are expected to 'top up' their supply using local evidence.
- 2.1.44 To do this a local SHLAA is needed – because as noted above- the GLA effectively only focused on the period up to 2029 on the basis that post 2029 the market was 'too dynamic'. Our reading of the Panel Report would also suggest that they expected local SHLAAs to be undertaken (para 151⁵)
- 2.1.45 But; as we discuss in more detail below, the London Plan is so constructed to make it very hard for the Boroughs to identify additional supply within the strategic constraints of the London Plan. Most obviously new Greenfield and Green Belt sites.

Enfield SHLAA

- 2.1.46 The London Plan is explicit that the 2017 GLA SHLAA should be used when applying paragraph 4.1.11. But this can be 'topped up' by local evidence of additional capacity.
- 2.1.47 In the Enfield context local evidence struggles to confirm sufficient supply to meet the London plans 10 year targets. It is very unlikely significant additional supply can be identified over and above this. The main reason is that the adopted London Plan constrains the Councils ability to identify more sites.
- 2.1.1 The Borough SHLAA concludes that there is a 10 year supply of deliverable and developable sites, plus windfalls, for 10,475 homes. But this SHLAA period runs from 20/21 up to 30/31 whereas the London Plan target commences in 2019/20.
- 2.1.2 We understand that once 'backlog' is considered from the start of the London Plan period (19/20) the gap between the SHLAA supply and the London Plan requirement will be even larger. We understand that the Housing Delivery Test recorded 19/20 completions were 429 homes. So in one year alone the Borough has developed a 1,000 dwelling backlog against the London Plan. Outside London Councils have the 'ability' to reset their base date and so reset any backlog. But this route would not appear to be available to a Borough that needs to conform with the London Plan where the housing targets clearly commence in 2019.

Greenbelt and other constraints

- 2.1.3 As noted above the Boroughs SHLAA struggles to identify additional housing supply in the context of the London Plans strategic policy constraints.
- 2.1.4 Here the most obvious constraint is the Greenbelt and Metropolitan Open Land (MOL).
- 2.1.5 The Greenbelt was an ongoing point of disagreement between the Mayor and the Inspectors examining the plan. Greenbelt is a highly charged issue and the Mayor, when drafting the Plan, looked to accommodate London's growth without using greenbelt land. The original drafting of Policy G2 (the London Plan Green Belt policy) would have prevented Boroughs even considering releasing Greenbelt land.
- 2.1.6 In theory; because of the way the London plan targets were derived boroughs should be able to accommodate their targets without using new land and without resorting to Green Belt sites. But the Inspectors removed the Mayors original policy wording – replacing it with text more in line with the NPPF. This allows for the release of greenbelt in 'exceptional circumstances'.

- 2.1.7 Very little, if any further guidance is given in the London Plan as to when Boroughs may move into Greenbelt. However, in the economy chapter of the London Plan the text reads (paragraph 6.4.8):

“Boroughs proposing changes through a Local Plan to Green Belt or MOL boundaries (in line with Policy G2 London’s Green Belt and Policy G3 Metropolitan Open Land) to accommodate their London Plan housing target should demonstrate that they have made as much use as possible of suitable brownfield sites and underutilised land, including – in exceptional circumstances – appropriate industrial land in active employment use. Where possible, a substitution approach to alternative locations with higher demand for industrial uses is encouraged.”

- 2.1.8 This was a very late change to the plan and was required to be added by the SoS in December 2020. This may explain why this is the only mention of Boroughs releasing land to meet housing needs. But it confirms that regardless of the main ‘no greenbelt release’ thrust of the London Plan Boroughs may be required to review their strategic constraints (inc. Green Belt) if they cannot meet their London Plan targets.
- 2.1.9 In 2021, a further call for sites exercise was undertaken. Some limited additional capacity that is not within the greenbelt or on greenfield sites have been identified. This will be considered through the borough’s HELAA. Initial estimates suggest that these sites may have capacity for an additional 1,500 homes. A more accurate estimate will be calculated as part of the HELAA update.

C) should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements

- 2.1.10 Regarding the committed transport improvements Cross Rail 2 was expected to pass through Enfield and also result in an increase in capacity along the West Anglia Line (four tracking the line). This may have provided additional capacity that could be applied as part of a 4.1.11 assessment but we understand the project is ‘shelved’ as part of TfL’s Covid response and gap in funding.

D) and roll forward the housing capacity assumptions applied in the London Plan for small sites

For Enfield the London Plan (table 4.2) shows 3,530 ‘small sites’ homes or 353 per annum.

The Enfield Target post 2029: A+B+C+D

- 2.1.11 There are two components of post 2029 targets prescribed by paragraph 4.1.11 directly drawing on the London SHLAA.
- 2.1.12 Component ‘A’ is the 2017 SHLAA residual. This is 152 dpa for the first five years post 2029 falling to 115 dpa thereafter. This may be supplemented by additional local evidence for component B & C where the Borough SHLAA or other evidence identifies more supply. But at the moment this appears unlikely.
- 2.1.13 Component D is also drawn from the London SHLAA and London Plan policy regarding small sites. This shows 352 dpa post 2029.
- 2.1.14 This suggests; in the absence of additional local evidence, the housing requirement for Enfield post 2029 falls from 12,460 homes up to 2029 and thereafter 504 per annum or, post 2034, 467 homes per annum.
- 2.1.15 Following the logic set out in the GLA SHLAA and London plan this should be achievable and deliverable within the strategic constraints set out in the London Plan. The reason the Enfield target falls is directly related to the lack of supply in the 2017 SHLAA.

- 2.1.16 But paragraph 6.4.8 would still suggest that if this is not the case than additional land may be needed to meet the London Plan targets. The December 2020 Ministers Direction clearly raises the prospect of a local Green Belt review “to accommodate their London Plan housing target”.

Employment need

- 2.1.17 Before concluding it is worth briefly considering economic needs and specifically industrial land. When making their Direction in December 2020 the SoS justified the paragraph 6.4.8 amendment to provide Councils with the option to use employment land to meet housing need. This was given as an option alongside Green Belt release:

“Boroughs facing decisions about releasing Green Belt or MOL to accommodate housing need, should have the option of allocating industrial land to meet these needs”⁶

- 2.1.18 However; what is not said that what the Borough should do if this then results in a shortfall of land to meet economic needs? We understand that here the Councils Employment Land Review identified a need for employment land/floorspace in excess of supply – even before consideration is given to releasing protected industrial land for housing.
- 2.1.19 In essence – if the Borough decides to use this flexibility to boost the supply of housing on active employment sites this may reduce (remove) the need to consider Green Belt for housing need to meet the London Plan housing targets. But may exacerbate the need to release land for economic needs. The use of active employment land to meet housing need may solve one problem but creates another.

2.2 Summary

- 2.2.1 Enfield is one of the few Councils where a two tier plan making system remains. Here the London Plan has considered ‘need’ and supply and ultimately directed Borough targets – including 12,480 homes to Enfield up to 2029.
- 2.2.2 Post 2029 the GLA provides no Borough Need figure to consider and requires Boroughs to roll forward only their assessment of supply – based on the GLAs 2017 SHLAA.
- 2.2.3 This process, as set out in paragraph 4.1.11, results in a target around 500 dpa post 2029. This is significantly below the 1,246 dpa London Plan 10 year period. It is also below the c. 1,900 in the original plan and only a fraction of the most recent Standard Method number of Enfield.
- 2.2.4 The reason for this ‘cliff edge’ is simply that the GLA, in their 2017 SHLAA, could not identify large site supply for Enfield post 2029. Following the paragraph 4.1.11 method the Councils target post 2029 is almost all a product of the small sites element (table 4.2 of the London Plan).
- 2.2.5 More recent evidence from the Enfield SHLAA shows that the Borough may struggle to meet even this low, cliff edge, target. If this continues, and additional supply cannot be identified the SoS would appear to require a local review of the Green Belt. Or the use of occupied (active) employment sites – but this in turn may also justify a Green Belt review because, as with housing, Enfield struggles to meet its economic needs in full.

⁶ SoS justification 10th December 2020
https://www.london.gov.uk/sites/default/files/201210_sos_annex_b_further_directions.pdf

3 Other Considerations

3.1 Introduction

- 3.1.1 Above we have found that following the London Plan paragraph 4.1.11 method Enfield's future housing target may fall from 1,240 dpa to around 500 dpa. This is the strict reading of the paragraph and the London SHLAA.
- 3.1.2 The main reason this falls so much from 1,246 dpa, is simply because the GLA failed to identify supply in Enfield post 2029 (because there is very limited capacity). For most boroughs the SHLAA identified supply in phase 4 and 5 of the Plan – which allows most boroughs to maintain a post 2029 target at least similar to the London Plan. This is not the case in Enfield.
- 3.1.3 There is however reason, in our opinion, to treat this number (~500 dpa) with care when progressing the plan.
- 3.1.4 Firstly, no housing target should be applied as an absolute minimum – the London Plan and the Panel Inspectors both encourage the Borough to look for additional supply outside of that identified in the London SHLAA.
- 3.1.5 Secondly; while only recently adopted, the Mayor is required to review the plan and adopt a new version within 5 years. This means that the evidence base must commence very shortly. The Mayor has been directed to use the Standard Method to inform the next London Plan and will no longer be permitted to use OAN. It is even possible that a new London Plan may be out for consultation in some form whilst the Enfield Plan is being examined.
- 3.1.6 Thirdly; progressing a plan with a declining housing target – where housing delivery in Enfield falls by 2/3rds post 2029 runs directly against national housing policy in general and at least the spirit of the NPPF which is designed to facilitate a 'boost' in delivery.
- 3.1.7 We have suggested Enfield takes legal advice over how to apply 'strategic' constraints in its paragraph 4.1.11 assessment and when ultimately identifying its next target post 2029. This needs to consider the interplay between the London Plan concluding no greenbelt review would be supported in the London Plan period (up to 2040) and the Borough's duty to progress a minimum 15-year plan. In summary; if the Borough cannot 'flex' some of the London Plan policy constraints, particularly the Greenbelt but also MOL and industrial land policies, it will be impossible to avoid the London Plan 'cliff edge' discussed above.
- 3.1.8 An added complication is that were the Borough required to release Green Belt land to meet the minimum London Plan targets discussed above - should only sufficient land be released to meet only the London Plan target? Or should additional land be released to ensure the longevity of the new boundaries.
- 3.1.9 So pragmatically we set out two other possible groups of scenarios for testing as the plan progresses. These are set out to help future proof the evidence base because they are not constrained by the London Plan assessment, which in turn, was bound by the supply identified in the 2017 London SHLAA.
- 3.1.10 Firstly we discuss the scale of new housing supply needed to simply 'roll on' the 1,246 dpa target in the London Plan. Secondly we discuss the new Standard Method,

A roll on London Plan target (1,246 dpa)

- 3.1.11 It would appear sensible to test whether at least the London Plan rate of delivery can be projected forward.

- 3.1.12 So we suggest testing the Boroughs ability to roll forward the 1,246 target post 2029.
- 3.1.13 There is no evidence that 1,246 represents or reflects any assessment of need. As set out above it reflects supply as established in the 2017 SHLAA for the period upto 2029.
- 3.1.14 Its purpose as a scenario der is simply that it avoids the 'cliff edge' and, while not 'boosting' delivery, housing targets in Enfield are not seen to fall.

3.2 Standard Method

- 3.2.1 There is no London need number for Enfield in the London Plan. But MHCLG do publish the Standard Method 'need' figure for the Borough.
- 3.2.2 As of December 2020 – when the Method was last updated by MHCLG – the Government provided a 'data table' setting out the Method by district. This showed 4,397 dpa for Enfield⁷.
- 3.2.3 In January 2021, for the purposes of the Method, the 'current year' (used in Step 1 of the Method) rolled to 2021 which slightly reduces the calculation to 4,373 dpa.
- 3.2.4 The table below shows the two calculations. The first calculation (4,397) aligns with published MHCLG data table while the second (4,373) rolls this on to 2021.

TABLE – Standard Method – Without London Plan 'cap'

	2020-2030	2021-2031
Step 1	23,267	23,139 (10 years Household Growth)
Step 2	32,574	32,395 (Affordability uplift - 40% cap)
Step 3	N/A	N/A (London Plan Cap)
Step 4	43,975	43,733 (Urban Uplift - 35%)
Per annum	4,397	4,373

- 3.2.5 These two numbers (4,397 and 4,373) are so high because the starting point for the Standard Method calculation, the 2014 based household projections, already exceed Enfield's London Plan number. Added to this the lack of affordability (Step 2) increases this by the maximum permitted (40%) and as a London Borough this is again increased by 35% as part of the new 'urban boost' added to the Method in December 2020.
- 3.2.6 In the table above the Step 3 cap is not applied because the London was not published until March 2021. Also; in any event MHCLG discourage the use of a plan 'cap'. As set out in the PPG the 'cap' does not reduce 'need' (the need is always uncapped) and if the cap is used then plans should be reviewed even quicker to reach the uncapped number. It is therefore important that a 'uncapped' figure is also considered alongside any capped number.
- 3.2.7 The table below updates the calculation with a London Plan cap applied at step 3. This cap limits the assessment (at step 3) to 40% above the current London Plan target.

TABLE – Standard Method – With London Plan 'cap'

⁷

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/944896/Indicative_Local_Housing_Need_Publication_Table_ods

2021-2031	
Step 1	23,139 (10 years Household Growth)
Step 2	32,395 (Affordability uplift - 40% cap)
Step 3	17,444 (London Plan Cap - 40% above LP target - 12,460)
Step 4	23,549 (Urban Uplift - 35%)
Per annum	2,355

- 3.2.8 Unfortunately, this number is not fixed – as noted above the ‘current year’ moves forward and each year the Step 1 starting number falls slightly. Also each year the affordability ratio is recast (Step 2) and this can also change the assessment slightly. However, the ‘cap’ can mask any changes to Stage 1 or 2 where they above the ‘capped’ number.

Should Enfield consider the Standard Method (as part of the local plan review)

- 3.2.9 As regards the application of the Method to Enfield it is debatable to what extent it is relevant to the Borough.
- 3.2.10 When the Standard Method was recently updated in late 2020 the Government updated the Planning Guidance. They also provided a formal response to the 2020 Standard Method Consultation.
- 3.2.11 The merits of the 2020 consultation are not material here – the Method is effectively now ‘as is’. But as regards the ‘old’ London Plan targets and the new Method MHCLG stated:

“This new plan [London Plan], when adopted, will set London’s housing requirement for the next 5 years. The local housing need uplift we are setting out today will therefore only be applicable once the next London Plan is being developed⁸”

Further the PPG was updated to state:

“...., it should be noted that the responsibility for the overall distribution of housing need in London lies with the Mayor as opposed to individual boroughs so there is no policy assumption that this level of need will be met within the individual boroughs.” ID: 2a-034-20201216

- 3.2.12 This confirms that Government does not expect the Boroughs to look to apply the Standard Method. The Method must first be ‘translated’ via the Mayor and the next round of the London Plan before being applied. This will not happen until the Plan is reviewed.
- 3.2.13 This is echoed at paragraph 1.4.4 of the London Plan which says “Boroughs can rely on these targets [London Plan targets] when developing their Development Plan Documents and are not required to take account of nationally-derived local-level need figures.”

Pragmatically: Should Enfield consider the Standard Method?

- 3.2.14 It is clear that the Method will need to be translated into targets by the Mayor. There is no suggestion in National Policy that Enfield should look to apply the Method as a target in the next Enfield Plan.

⁸ <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system>

- 3.2.15 But as published the Method is the best estimate of Enfield's housing need available. It represents the Boroughs share of the national housing target (300,000 new homes per annum) and the Boroughs share of the need the Mayor will shortly need to consider.
- 3.2.16 Also knowing the *direction of travel* for the Boroughs housing target implied by the Method may be important should the Borough need to review the Green Belt as part of this plan review. If a review of the Greenbelt is required national policy (NPPF 139) would suggest that it is not limited just to meeting short term needs. The Council would need a view as to the likely long term need for housing land in the Plan area.
- 3.2.17 Finally; in our experience it is common for Councils not to explore or examine possible development sites in the Green Belt. This means that they can be unprepared should the circumstance arise where additional land is needed. By suggesting the Council should test the Method does not mean that we are recommending the Council is required to meet the number of homes in the Method. Only that it would be helpful for the plan making process to understand if or how higher housing targets could be delivered in the Borough. Also understand why additional housing can only be delivered alongside major infrastructure etc.

3.3 Summary and Scenarios

- 3.3.1 Drawing on the above we have developed a number of scenarios for testing. Two London Plan scenarios and two Standard Method scenarios. For the Standard Method there is a variant depending on when the London Plan is reviewed.

London Plan scenarios

- 3.3.2 The first scenario (core scenario) follows the London Plan paragraph 4.1.11 method. Following the paragraph this is based on the London Plan SHLAA (2017) for the 'large site' component (table 10.1 of the SHLAA) with the Small Sites component taken from London Plan table 4.2.
- 3.3.3 This results in a total requirement, over the London Plan period of 18,249 dwellings. This falls slightly if 2039 is used as the end data (as proposed for the Enfield Plan - 17,315)
- 3.3.4 Post 2029 the 'per annum' target falls to around 500 dpa – because the GLA SHLAA has almost no 'large site' supply post 2029.
- 3.3.5 We also show a second London Plan scenario – where the London Plan target is rolled forwards. This avoids the 'cliff edge' and essentially assumes that the Borough can identify a new round of large sites – not identified in the GLAs SHLAA. As noted above this is illustrative only because it is not based on any need of supply assessment. For Enfield the London Plans supply is largely exhausted by 2029.
- 3.3.6 This scenario shows 27,414 homes over the London Plan period and 24,920 for the shorter Enfield Plan period.

Standard Method scenarios

- 3.3.7 It is important to remember that, at the moment there is one London Plan compliant number – the scenario that meets the 10 year targets and thereafter follows the approach set out at paragraph 4.1.11. (London Plan Core Scenario).
- 3.3.8 But this results in a sharp declining target post 2029 because the 2017 SHLAA has little or no large sites supply for Enfield post 2029. The paragraph 4.1.11 assessment would encourage the Council to boost its supply using local evidence to boost supply post 2029. .

- 3.3.9 For the purposes of this paper we take the Standard Method as a indication of the scale of housebuilding National Government would like Enfield to accommodate. But we fully recognise that ultimately it will be for the Mayor to undertake the translation of need into a requirement as part of the next London Plan review. Any Standard Method number can only give Enfield at indication of the direction of travel for the Boroughs housing targets and the size of the 'gap' between known supply and full housing need.
- 3.3.10 In the Standard Method scenarios we always assume that the London Plan targets will remain for the next 5 years. At that point the London Plan will have been reviewed and the Mayor should ideally be looking to accommodate the 'full' method (4,373 for Enfield) but more likely will apply the London Plan 'cap' (2,355 for Enfield). This results in a 'need' for 80,571 homes over the London Plan period (71,824 for the Enfield period) and a lower (capped) need of 46,262 (41,555) .
- 3.3.11 But; it is likely that the Enfield Plan will be adopted before the Mayor completes the review of the London Plan. In which case the Borough could look to apply the current London Plan targets until 2029 and then, departing from the London Plan paragraph 4.1.11 method, look to accommodate a higher Standard Method derived number in policy preference to the London Plan 'cliff'. In which case it would be sensible to consider only the London Plan capped number on the basis that the London Plan will be less than 5 years old at the time.
- 3.3.12 This generates a need of 40,720 (36,010) homes in Enfield for testing. This is still double the target generated following 4.1.11.
- 3.3.13 Of the three Standard Method scenarios we suspect this is the most sensible – it assumes the Enfield Plan is examined, found sound, and adopted before the London Plan is reviewed. As such the Enfield Plan is able to carry forward the London Plan target until 2029. But, as an alternative to the London Plan 'cliff edge', the simple 'London plan continued' scenario the Borough looks to boost delivery in 2029 and tests meeting its 'share' of the London Plan total.
- 3.3.14 Arguably the Borough should look to test the full, uncapped, number post 2029 on the basis that the PPG is clear that this cap is less than ideal (64,936 / 56,190).

Conclusions

- 3.3.15 The London Plan promotes a target for the next Enfield Plan period of 17,315. But this means that post 2029 housing delivery in Enfield falls – the opposite of the National 'boost'.
- 3.3.16 So; the Council ought to consider alternatives – reflecting the fact the London Plan provides only minimum targets and when looking for sites the Borough should not constrain its self only to these minimum.
- 3.3.17 But it is difficult to generate alternatives for testing because the most obvious, continuing the London plan per annum target has no evidence base. It is not 'need' or 'supply' nor a target itself. It is simply a convenient number whereby housing delivery is not falling.
- 3.3.18 The second alternative is the Standard method. But the Standard Method should not be directly applied by Boroughs. As published it is a 'raw' need figure that has yet to be translated (by the next London Plan) into Borough targets.
- 3.3.19 However; taken as a 'need' figure, an estimate of Enfield's share of housing need in the next London Plan review and the Boroughs share of the national 300,000 dwelling target, it is sensible to test the Boroughs ability to deliver this higher target.
- 3.3.20 The Method is complicated by the London Plan caps and when the London Plan is reviewed. But the most likely scenario is that the Enfield Plan will be adopted in advance of the London Plan review and can apply the London Plan target until 2029.

- 3.3.21 Post 2029 the most likely alternative need number will be capped to the London Plan. This provides a need⁹ roughly double the London Plan (4.1.11) method – 36,010 dwellings in the next Enfield Plan period. Were the Council to look to see how to meet the full Standard Method need figure it would be required to test 56,190 homes over the Enfield Plan period.
- 3.3.22 We have developed alternative scenarios where the London Plan is reviewed earlier and the Method needs to be considered post 2026. These generate even higher estimates with the highest over 71,000 homes in the Enfield plan period. These estimates are 'valid' in that they are based on the Standard Method and they are a view of how many homes may be needed post 2026. But they are unlikely to be applicable given the timing of the Enfield Plan.
- 3.3.23 In summary we suggest the Borough considers testing:
- A) The London Plan Target (4.1.11) – 17,315 dwellings (in the Enfield Plan period). This is a minimum and should additional local supply be identified this should be used to inform a higher target. It should always be the 'core' scenario even through housing delivery falls.
 - B) The London Plan Target 'rolled' on – 24,930 dwellings
 - C) London Plan until 2029 then Standard Method – 36,010 (with cap) up to 56,190 (without cap).
- 3.3.24 We have also developed scenarios where the London Plan is reviewed by 2026 and the London Plan moves to an alternative Standard Method number. But given the timing of the Enfield Plan we don't think these will apply. But they remain useful scenarios to note because they illustrate the scale of housing need the Mayor will be considering when reviewing the London Plan. This review is likely to emerge alongside the Enfield Plan so GLA evidence relating to a Standard Method commencing in 2026 may emerge.

⁹ Strictly this a combination of London Plan Target and Standard Method Need. Here we simplify this to 'need' as opposed to the London Plan 100% Target approach.

4 The need for a Housing Needs Assessment

4.1.1 The NPPF sets out the context for the amount of housing to be planned for:

60. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

61. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

4.1.2 The detail is then provided in three chapters of the PPG:

Chapter 2a Housing and economic needs assessment. This covers the overall housing requirement, including the need to adjust the amount planned for to help meet the need for affordable housing.

Chapter 67 Housing Needs of different groups. This covers the needs of those in the PRS, the needs for self and custom build, student housing, and repeats much of the affordable housing section included in Chapter 2a.

Chapter 63 Housing for older and disabled people. This considers the needs of these two groups.

4.1.3 The 2017 London SHMA predates the current guidance for undertaking a housing needs assessment. It does not contain the required outputs, based on up to date evidence. It is highly unlikely that a Local Plan hearing carried out in 2022 could successfully rely on a housing evidence that will then be at least 5 years old. An inspector would, quite reasonably, as if the data was sufficient for local plan making. This is likely to be particularly important when it comes to meeting the needs of particular groups.

4.1.4 As discussed elsewhere in this note, the London Plan number is a supply based number, the standard method is a needs based number, which, at least in part, is locally derived.

4.1.5 Historically London has carried out sub-regional housing research, which often provide further detail. Enfield is not part of the 2016 North East London SHMA (Barking and Dagenham, Havering, Newham, Redbridge, along with Waltham Forest) or the 2018 West London SHMA (Barnet, Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon, Hounslow). Neither of these include Enfield, the Council's most recent local information is now six years old, being their 2015 SHMA update (DCA, 2015), again predating the PPG.

4.1.6 The Council needs to develop local policies to meet local need, this information is not available from other sources, so it is necessary to develop that part of the evidence base here.

Appendix A

Report Name
Job Name



Enfield Strategic Housing Land Availability Assessment (SHLAA)

The SHLAA is part of the evidence base which forms a key part of the emerging Enfield Local Plan. It is a technical document which aims to identify land that might have potential for housing in the 15-year Local Plan period or beyond as required by the National Planning Policy Framework (NPPF). NPPF states that a housing assessment should be used to establish realistic assumptions about the availability, suitability and the likely achievability (economic viability) of land to meet the identified housing need. As the London Plan SHLAA was carried out in 2017 and the likely adoption of our Local Plan won't be until 2024 the robustness of housing land evidence was something that we had to assess earlier on in the process.

The Government's national planning practice guidance advises that Housing and Economic Land Availability Assessment methodology should be followed in preparing a SHLAA. It breaks the process into five broad stages and summarises these using a flowchart¹. We have adopted this broad methodology and the published Enfield SHLAA (2020) describes in more detail how each stage of the Enfield Assessment was undertaken. In preparing the SHLAA, we also consulted on the methodology with the industry, a copy of the consultation statement and how comments were taken into account can be found here: <https://new.enfield.gov.uk/services/planning/draft-shlaa-methodology-consultation-statement-2020-planning.pdf>

The Enfield SHLAA methodology aligns with the Planning Practice Guidance methodology and broadly builds upon the work done for the London SHLAA, though there are a number of ways in which our methodology varies from the London SHLAA (2017).

Firstly, the London SHLAA study uses a bespoke system which includes assessing housing potential on large sites using a 'constraints model,' which "establishes probability based housing capacity estimates for each site based on the number and severity of planning policy, environmental and delivery constraints affecting it." This differs from the guidance set out within the PPG and the assessment of availability and deliverability is not robust enough. For example, when we followed the national guidance a significant proportion of Enfield housing sites identified in the GLA SHLAA were assessed as not available or deliverable reducing our ability to meet borough housing targets identified in the 2021 London Plan.

Secondly, the size threshold varies from the approach taken by the London Plan SHLAA (2017) which estimated capacity on sites above 0.25ha. Due to the high proportion of small sites that come forward in the borough the Enfield SHLAA considered any sites which is greater than 0.05ha or with potential to deliver more than 5 homes.

Looking at the ten year targets and the London SHLAA, plans are generally expected to provide sufficient supply to cover their plan period – for us, it is up to 2039. But there is provision in the NPPF for Councils only to identify sites up to year ten. The NPPF states that Councils should allocate sites post year 10 '*where possible*'².

When assessing supply, the London SHLAA looked over the whole London Plan period (up to 2041) but focused only on the first 10 years i.e. 2019 to 2029. In response the London Plan only provides Borough level targets up to 2029 – aligning with the detailed part of the London SHLAA.

This is justified by the Mayor (para 0.0.13) because:

¹ Paragraph: 005 Reference ID: 3-005-20190722

² NPPF Paragraph 67.

“This London Plan runs from 2019 to 2041. This date has been chosen to provide a longer-term view of London’s development to inform decision making. However, some of the more detailed elements of the Plan, such as the annual housing targets, are set for only the first ten years of the Plan. This reflects the capacity of land suitable for residential development and intensification identified in the 2017 Strategic Housing Land Availability Assessment (SHLAA) which, due to the dynamic nature of London’s land market, does not attempt to robustly identify capacity beyond 2029.”

In summary the Mayor declined to provide Borough level targets post 2029 because the 2017 SHLAA could not confirm the supply of sites due to the ‘dynamic nature’ of the London Market.
Targets post 2029

Borough level targets are not provided in the London Plan post 2029. But the Boroughs are required, following National Guidance, to address a 15 year period from the point of plan adoption. Even were a Council to adopt a new plan today the London Plan targets don’t even last 8 or so years of the 15 year period.

This presents all Boroughs with a challenge: *how much land to allocate post 2029 and on what basis should these allocations be made?* The London Plan provides no Borough ‘need’ figure post 2029 and the SHLAA, as clearly set out, only focused on the period up to 2029.

Some limited guidance is provided in the London Plan where the supporting text states (4.1.11):

“If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.”

The paragraph could be viewed as slightly disingenuous because at the Borough level local plan Inspectors have concluded a target post year 10 (2029) is required. Setting this aside- paragraph 4.1.11 would suggest that Enfield can derive its post 2029 targets by interrogating the 2017 SHLAA, supplemented with additional local evidence, and carrying forward the remaining (sound) element of the original SHLAA small sites adjustment.

Finally, within the London Plan SHLAA, the methodology used in determining housing delivery potential on sites smaller than 0.25ha was estimated through a modelling exercise where average annual trends in housing completions were adjusted to take into account the expected impact of planning policy changes in the draft London Plan. Both the London Plan SHLAA and the Enfield SHLAA, in years 6-15, provide windfall’ assumptions for the projected rate of housing delivery on unidentified small sites as there is ‘compelling evidence’ based on historic windfall delivery rates that such sites have consistently become available in Enfield and will continue to provide a reliable source of housing. It is however our opinion that in order to have a robust housing land evidence the assumptions should be based on local and up to date evidence and they should be realistic. For that reason our assessment on small sites and windfalls rely heavily on past performance, planning applications and sites submitted by land owners or other interested parties as part of our call for sites.

Vision, evidence and spatial options

Meeting with GLA officers
March 2021

What we are going to look at today

- **Vision** – what people said and how we responded
- **Spatial Options**
- **Making choices** – feedback from Members
- **Exceptional Circumstances**

Vision – what people were saying

Engagement workshops – February

Members: Enfield offers the best of town and country. Needs to remain a place of green attractive neighbourhoods with a good quality of life. Growth should focus on quality and be supported by infrastructure.

Enfield Youth Parliament: Enfield should be a place of future opportunity, with east-west disparities addressed. Enfield should be a green place, with access to nature.

Officers: There is the opportunity for Enfield to be an intergenerational place where growth delivers multiple benefits – housing, jobs and environmental improvements.

Vision – what people were saying

Survey:

- 278 responses. 65% were aged over 50, and the same proportion identified as White British.
- 72% see Enfield's role as a **deeply green London**.
- **Sustainable movement a clear priority** - 67% want to see Enfield highly connected by networks of walking, cycling, bus and train routes.
- 66% would like Enfield to provide for **all or some of our identified housing need**. More people (45%) than not (41%) would like Enfield to meet the Mayor of London's housing target up to 2039.
- More (41%) think **employment needs should be met in full** than not (35%).
- **Environmental aspirations are strong** – 68% want the borough to be a clean and unpolluted place where water and air quality is prioritised and protected.

The emerging Vision

By 2039 Enfield will have grown to be a place of opportunity for future generations, the green heart of London where new homes and jobs help all our communities thrive.

The four threads - draft

A deeply green place

- A growing place where enhanced green open spaces and waterways permeate through the urban fabric from the wild places in the rural north. A place that leads London in providing access for all to nature on their doorstep. A place where people can live in and escape to nature. A borough that is carbon neutral.



The workshop of London

- A place that accommodates growing hubs of productivity, innovation and creativity across the borough. A place of quality work environments knitted into the borough's green networks. A place that capitalises on Enfield's strategic position in the UK Innovation Corridor. Enfield's hot house of creativity encompasses our homes, town centres and industrial heartlands.



The four threads - draft

A distinct and leading part of London

- A place of growing neighbourhoods whose valuable character, heritage and natural environments have been enhanced and celebrated. A place which offers the best of town and country. A place that leads London in terms of intergenerational communities, and access to nature, diverse economic opportunities and quality of life.



A nurturing place

- A place that provides people with the ingredients for good life – healthy communities, beautiful places, more quality affordable homes and jobs, community facilities and excellent education, leisure and cultural opportunities. A more equal place where growth delivers better outcomes for all.



What are we doing?

- Commissioning specialist consultants to gather and analyse a range of baseline data and evidence
- Calculating the minimum requirement for new housing according to national government's 'standard method' and the jobs it would support
- Calculating what the housing levels would be to support those growth;
- Identifying a range of possible broad locations for new development, illustrating deliberately diverse approaches
- Testing the possible growth levels across each of the different locations
- Asking our specialist consultants to assess how well each of these strategic spatial options performs

Evidence – *Published*



Housing

- Strategic Housing Market Assessment (2015)
- Housing Capacity policy review (2020)
- Local Housing Needs Assessment & Exec. Summary (2020)
- Gypsy and Travellers Needs Assessment (2020)
- Strategic Housing Land Availability Assessment (2020)
- SHLAA Methodology (2020)
- SHLAA Consultation Statement (2020)

Employment

- Employment Land Review (2018)
- Industry in Enfield (2017)
- Socio-Economic Assessment (2017)
- Functional Economic Market Assessment (2020)
- Industrial Intensification Report (2021)

Integrated Impact Assessment

- Scoping report (2020)

Other

- Burial Needs Assessment (2020)

Evidence

WORK IN PROGRESS



Housing and Employment

- Housing Topic Paper
- Housing & Employment Land Availability Assessment
- Housing target paper
- Site Selection

Retail

- Retail and Leisure Needs Assessment
- Town Centre Health Check

Green and Blue

- Green Belt and MOL Assessment (part 1)
- Green Belt and MOL Assessment (part 2)

Environment & Sustainability

- Level 1 SFRA
- Sequential/Exception Test

Infrastructure

- Infrastructure Delivery Plan
- Infrastructure Capacity Study
- Green and Blue Infrastructure Assessment

Evidence

WORK IN PROGRESS



- Strategic Transport Assessment
- Whole Plan Viability
- **Integrated Impact Assessment** – SA/SEA, HRA, EqlA, CSIA...
- Detailed EqlA
- Authority Monitoring Report inc. Five Year Housing Land Supply and Housing Trajectory

Place Making

- Character of Growth Study & areas appropriate for tall buildings
- Tall Buildings Paper
- Place Making Study for 2x major sites
- MW masterplan
- Edmonton Vision

Housing numbers

Stantec report (2021)

- London Plan – published March 2021, confirms our housing requirement as 1,246 homes per year
- Not simple calculation – *can't just apply 1,246 for whole plan period*
- What needs to be considered?
 - London Plan ten year duration i.e. 2029 and what we do after 2029?
 - Flaws in London Plan and its 2017 SHLAA
 - Situation by the time we get to Examination, when the London Plan is half way through and becomes out of date
 - Government's housing need figure i.e. 2,335 homes per year

Housing numbers for Enfield

Not simple

A) Medium to low growth – London Plan up to 2029 then applying c.500 homes up to 2039 = **17,315 homes**

B) Medium growth – continued growth with the London Plan = **24,920 homes**

C) High growth – by using a combination of London Plan and the Government's Standard Methodology = **36,010 to 55,390 homes**

Pros and cons associated with each set of numbers

Housing types and total landtake over 15 years (Medium growth option – 24,920)

Tall Buildings

77 ha

Blocks of Flats

244 ha

Urban Terraces

491 ha

Modern Semi-Detached

617 ha



Employment

What level of growth is needed to meet our needs?

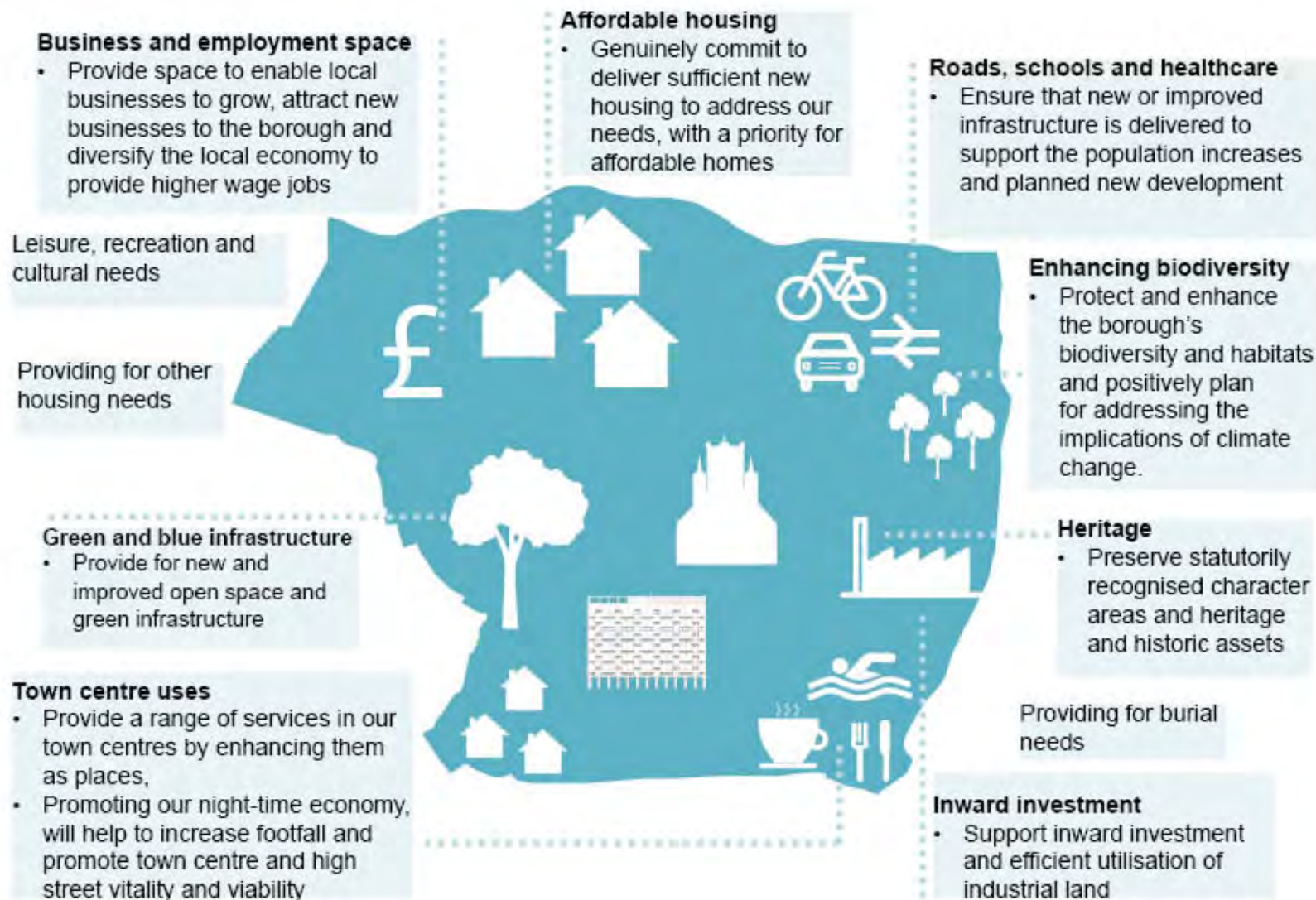
- The Employment Land Review (2018) indicates that up to 2036 we have a net requirement of:
 - 48.6ha of industrial/logistics land, and
 - 32,200 sq.m. of office floorspace.
- Over the plan period (2039) this equates to:
 - **56 ha** of industrial/ logistics land
 - **37,000 sq m** of office floorspace.

Potential options

1. Meet all our needs ourselves
2. Set a reduced target
3. Meet all our needs with assistance from DTC partners

Pros and cons

Other land uses and matters



London Plan 2017 SHLAA and Enfield's 2020 SHLAA

Why are we doing a local SHLAA and what are the differences between the London and Enfield's SHLAA?

London Plan SHLAA (2017)	Enfield's SHLAA (2020) and emerging HELAA (2021)
Published in 2017, based on information pre-2017	Forms an up to date picture based on call for sites 2018-2019 and more recent 2021
	Builds on the London SHLAA, but is in line with NPPF and aligns with PPG methodology
Based on a constraints model which establishes probability based on housing estimates	Based on availability and deliverability – a lot of the London SHLAA sites assessed as 'not available' or deliverable
Threshold used estimated capacity on sites above 0.25ha	Threshold used 0.05 or ability to deliver more than 5 homes –
Looked at the whole plan period i.e. up to 2041 but focused on first ten years i.e. 2019-2029	No borough targets post 2029, but could use para 4.1.11 to roll on.

What is our current housing supply?

Published a Local SHLAA Dec-20

Call for sites exercise (3) Jan-Feb-21

Our housing supply position is in 2-parts

- Urban areas
 - Unconstrained supply i.e. free from restrictions and policy implications
- Urban and rural areas
 - i.e. policy-off approach

Current urban supply – free from policies

329 sites

14,237 homes

- from urban brownfield (deliverable and developable supply only - policy and other constrained sites excluded)

1,980 homes

- historical windfall with 20% uplift (based on fact only approving approx. 40% of minor dwelling applications)

TOTAL unconstrained urban supply

16,217

Current constrained supply 'policy-off'

160 sites — as 'potentially developable'

Contains urban and rural sites and includes: Green Belt and Strategic Industrial Land sites that are currently considered unavailable

Total supply = 25,000 homes but only 18,000 homes in the plan period

Assumptions and flexibility needed

- the reality is that not all of the sites will come forward in practice
- some landowners will ultimately decide not to release their land, for any number of reasons
- some sites that appear to be good candidates for housing might actually be brought forward for mixed uses, or for non-residential uses, or not at all.
- Even for sites that do come forward for development, previously unforeseen constraints may hinder their progress
- They might not deliver units at the rates envisaged in the SHLAA –
 - which is a high-level study that cannot foresee all scenarios and possible issues

Need to ensure there is sufficient flexibility in the supply of potential housing sites to compensate for non-delivery and/or non-implementation.

Is the urban unconstrained supply sufficient to meet our target scenarios?

No

- Scenario A: shortfall = 1,098
- Scenario B: shortfall = 8,703
- Scenario C: shortfall = 19,793 to 39,173

If we use employment land, will this help us meet our housing target?

No

Where?	Capacity	Approx. breakdown
Unconstrained urban supply	16,217	
Employment land comprising LSIS and some SIL	3,369	Brimsdown Southbury station Southbury A10 strip Harbet Road Redburn Trading Estate
Total	19,586	
Shortfalls		
Scenario A	None	
Scenario B	5,374	
Scenario C	16,424 to 35,804	

Can our Green Belt/MOL supply help us?

Yes

We have a range of sites consisting of:

- Small edge of settlement sites
- A cluster of sites around Crews Hill station area
- A cluster of sites around Vicarage Farm



Could Green Belt supply help us to address shortfall?

Crews Hill	Capacity
Vicarage Farm Cluster – urban extension?	2,791 <i>(but could achieve 5,121 longer term)</i>
Regeneration of Crews Hill area	1,441
Scattering of small sites	596
TOTAL	4,828
Shortfall	
Scenario B	506 <i>almost...</i>
Scenario C	14,965 to 34,345

Employment options: industry and logistics

Intensification of existing sites could deliver approximately **110,000 sq m**, or **50%** of our identified needs.

BUT a lot of this potential is in Meridian Water:

- East Bank - potential for 70,214 sq m additional floorspace through intensification (or 67% of total borough potential)
- Consistent with SIL designation
- MW masterplan earmarks East Bank for 5,000 new homes.

Urban industrial locations

Employment Land Needs Assessment (ELAA) findings suggest that urban sites can provide **29%** of need

- Most potential identified at Ravenside Retail Park (c. 21,645 sq m) – in Meridian Water.
- A rough initial analysis of Call for Sites round 3 submissions suggests these sites could meet a further **11%** of need.
- Still need to find 4.76 ha through green belt sites or DtC.

Key challenges

- The scale of our growth requirements for next 15-20 years are challenging!
- In regional and national policy terms we are expected to meet all our growth requirements in urban areas.
- We could try and accommodate all our requirements in urban areas but this would require some significant increases in density and changes to the character of many parts of the Borough. This would have major character, environmental, infrastructure and political implications.
- However, this option is not really open to us as our urban land supply is limited and insufficient to meet our requirements.
- We have also asked neighbouring authorities to help us out but this has not been successful

Difficult choices to make

1. Not meet our full growth requirements

- conflict with the requirements of the Mayor and national government and possible unsound plan;

2. Meet all our growth requirements using employment land, MOL and Green Belt, as well as the urban areas

- conflict with the requirements of the Mayor and national government and possible unsound plan

Additionally, all options identified are likely to attract significant concern from developers, statutory stakeholders, local community and Members.

Emerging

SPATIAL OPTIONS

Options rejected

- Do nothing
- High growth
- Medium to low growth
- Duty to cooperate

Do nothing

- Continue to apply existing policies
- Facilitate existing delivery rates i.e. 500 homes a year
- Green Belt boundary unchanged
- Keep densities of development in urban areas at current levels

Not considered as an option for a number of reasons

- Government will intervene and prepare a plan on behalf of that local authority or instruct the council to prepare a joint plan with another authority
- **Not having a Local Plan is not an option:**
- Would lead to unplanned development that fails to take account of the cumulative impacts on our infrastructure, such as schools and roads
- The longer we do not have an up to date plan – the less control we have

NOT RECOMMENDED BY OFFICERS

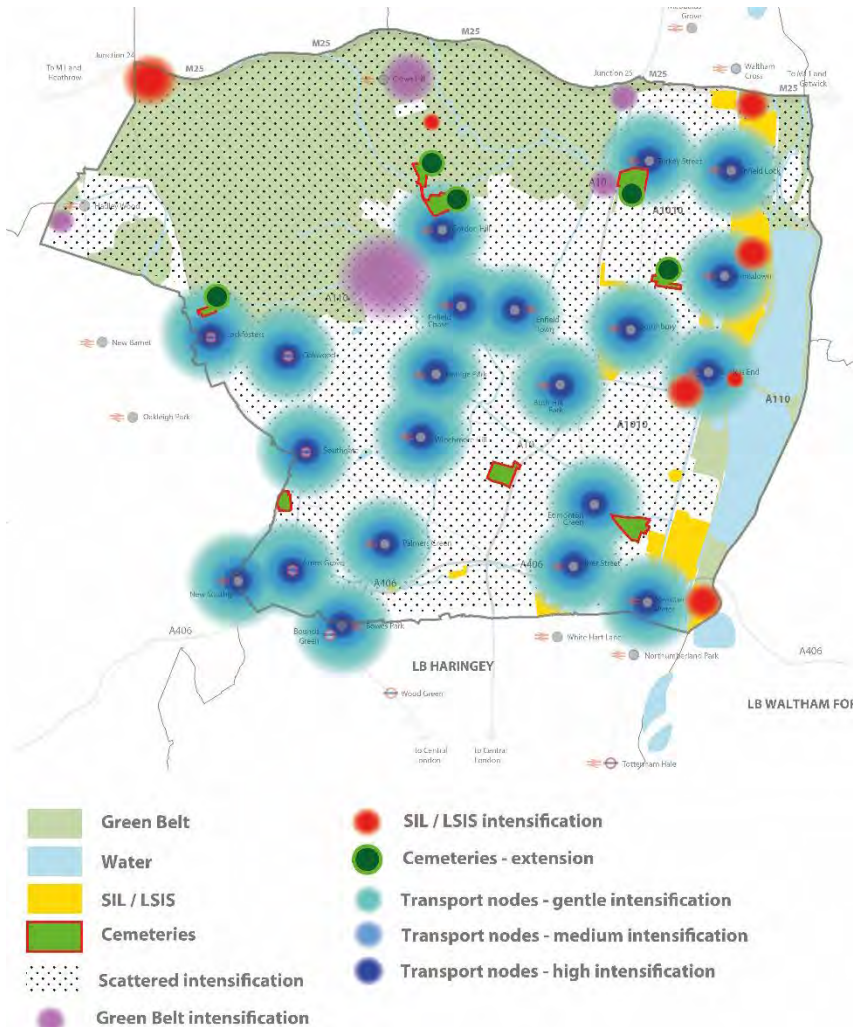
High growth

Opportunities

- Achieves **36,000 to 55,000 homes**
- Meets all housing and employment requirements

Challenges

- Growth spread across the whole borough
- Would significantly alter the character and appearance of the townscape and landscape
- Significant investment in new infrastructure – roads, utilities and school etc.. required
- Very likely to exceed environmental capacity with significant impact on the reservoirs, LVRP and nature conservation sites
- Extreme pressure on and risk of significant loss of Green Belt, parks and open spaces and heritage assets
- Direct conflict with all corporate strategies, national and London policies
- Local Plan will be found unsound

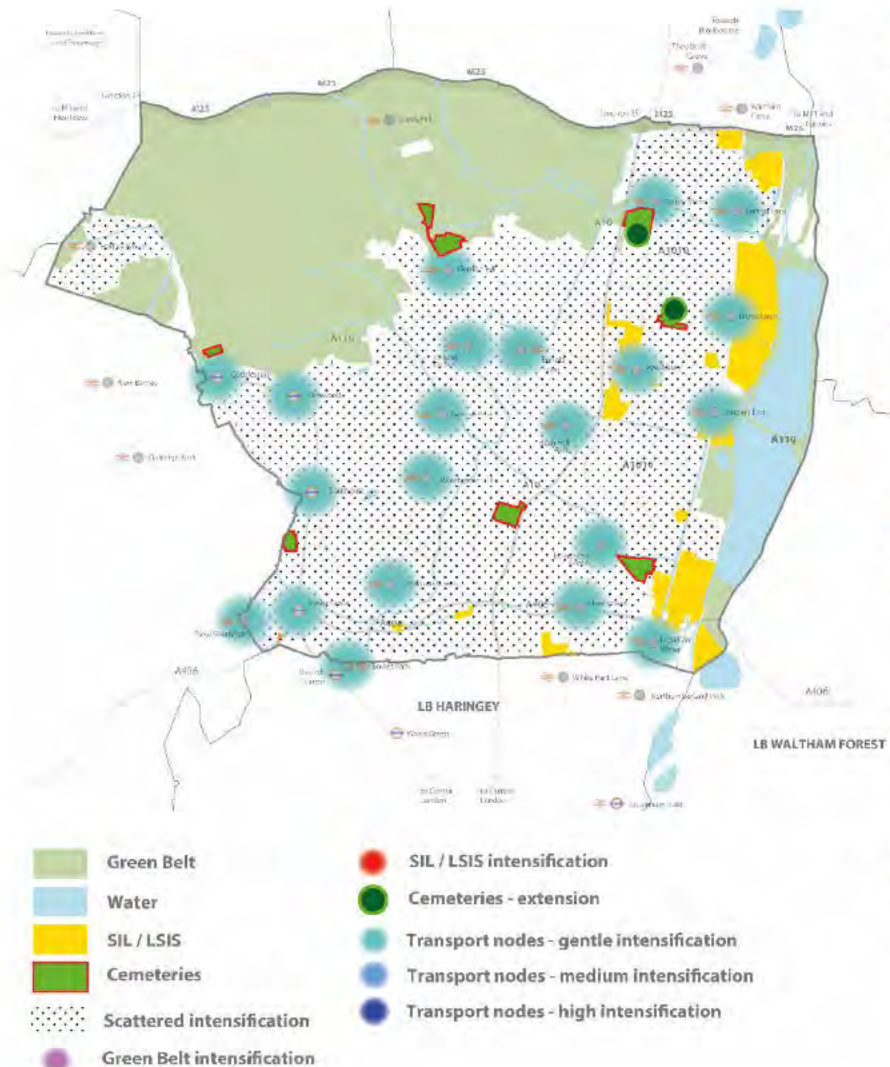


NOT A REALISTIC OPTION



**NOT A REALISTIC OPTION
NOT RECOMMENDED BY OFFICERS**

Medium to Low – urban area only



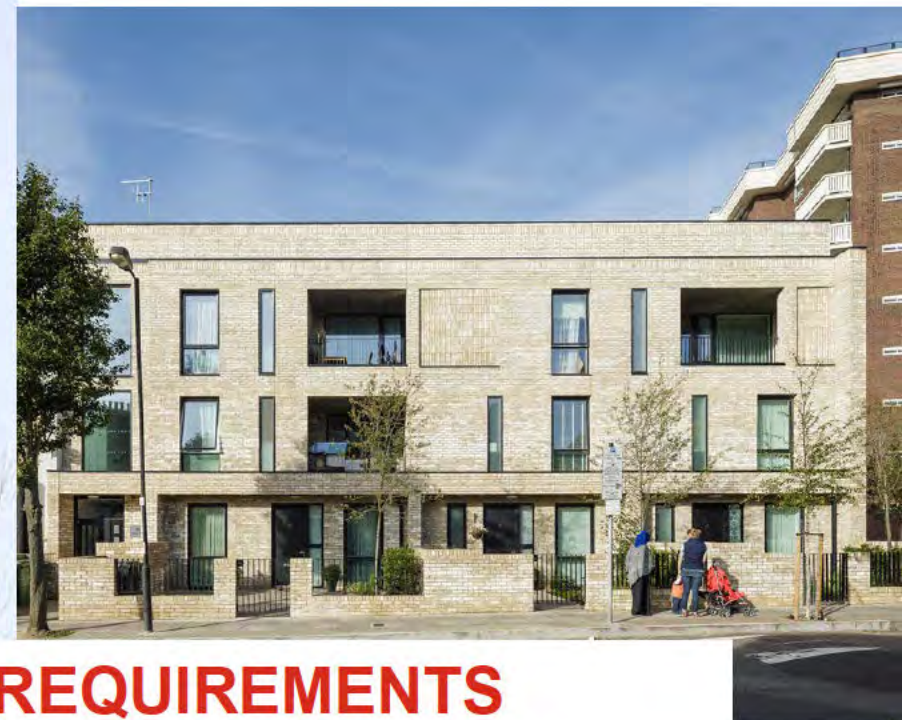
Opportunities

- Achieves **17,215 (plan period)**
- Intensification in the urban area for housing and employment
- Focus growth in town centres, stations and transport corridors
- Regeneration and re-use of urban land
- Intensive development in the suburban areas through small sites development

Challenges

- High density and tall / large developments in urban area and general increase in density across the Borough
- Impact on / change in character of some places
- Potential over reliance on flats – lots of studios and 1-bed flats, does not meet local needs
- Unable to secure large provision of affordable homes

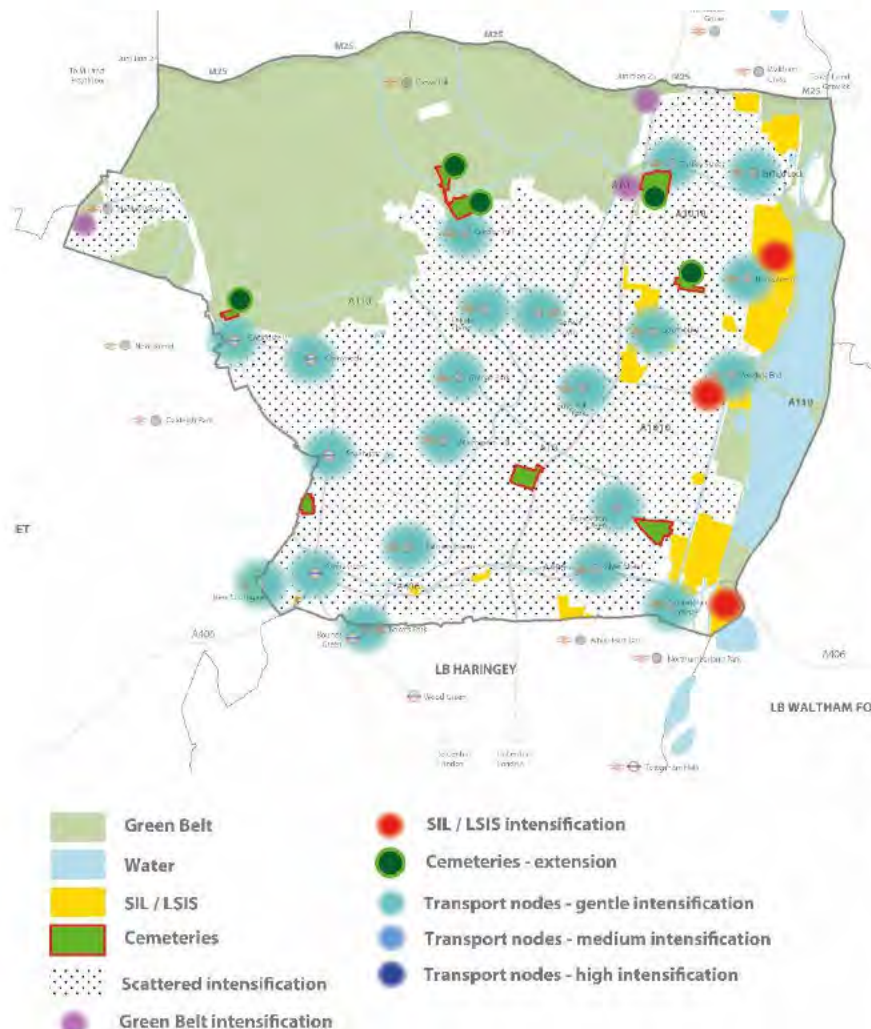
CANNOT MEET ALL REQUIREMENTS



**CANNOT MEET REQUIREMENTS
NOT RECOMMENDED BY OFFICERS**



Medium to low – urban area, industrial areas & edges of Green Belt



Opportunities

- Achieves **17,215 (plan period)**
- Gentler intensification in the urban area
- Growth in town centres, stations, transport corridors, regeneration and re-use of urban land
- Spread growth to industrial areas and edges of the Green Belt

Challenges

- x Loss of LSIS and SIL – not compliant with our own policies and London Plan
- x Isolated sites not in close proximity to existing centres, employment locations or transport corridors and hubs
- x Lead to an increase in journeys and car use
- x Impact on Green Belt and MOL

**CANNOT MEET ALL REQUIREMENTS
NOT RECOMMENDED BY OFFICERS**

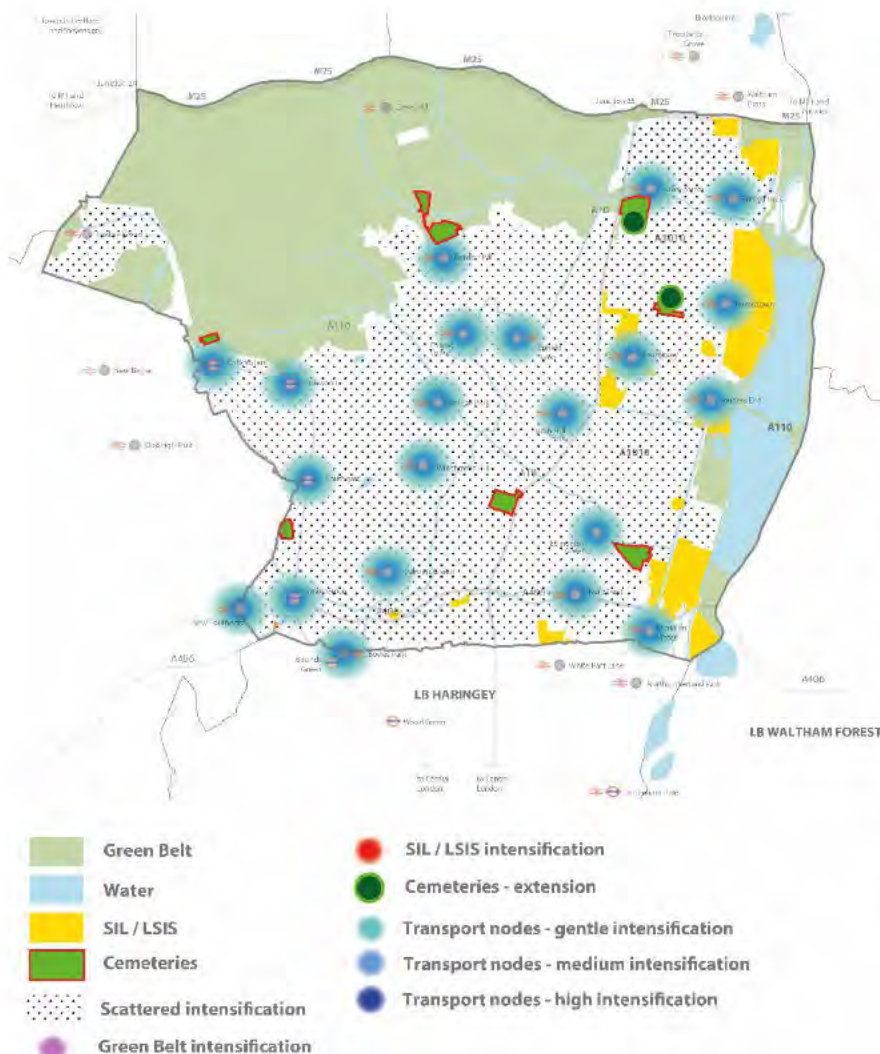
Potentially reasonable options

- Medium growth i.e. continued growth using the London Plan

Possible scenarios

- Focus growth in the urban area
- Focus growth in the urban area and employment land
- Focus growth in the urban, employment land and some areas in the Green Belt

Medium growth – urban area only



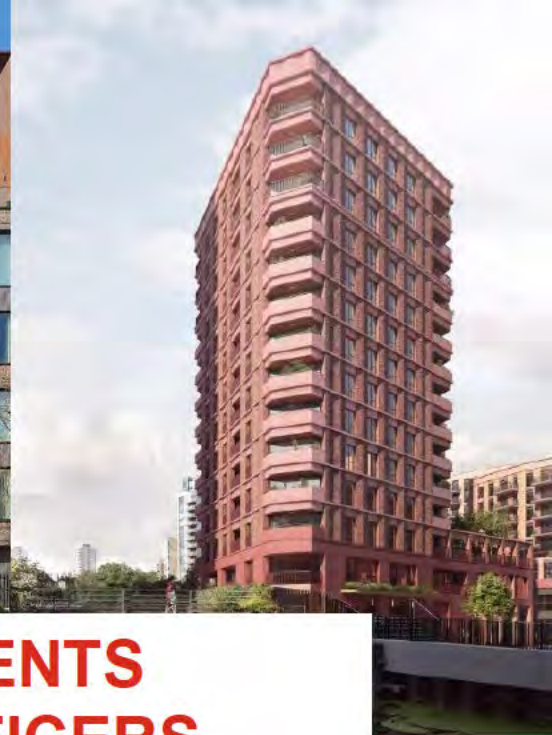
Opportunities

- ✓ Achieves **24,920 homes (plan period)**
- ✓ Significant intensification in the urban area for housing and employment
- ✓ Intensify the regeneration and renewal areas
- ✓ Redevelops derelict and vacant sites
- ✓ Supports the regeneration and re-use of existing land and property in the urban area

Challenges

- x Big reliance on small scale sites
- x Very dense development including taller buildings spread across the urban fabric
- x High build costs impact viability and acceptability
- x Higher densities not in keeping with existing character
- x Potential over reliance on flats – lots of studios and 1-bed flats, does not meet local requirements
- x Does not meet employment requirements

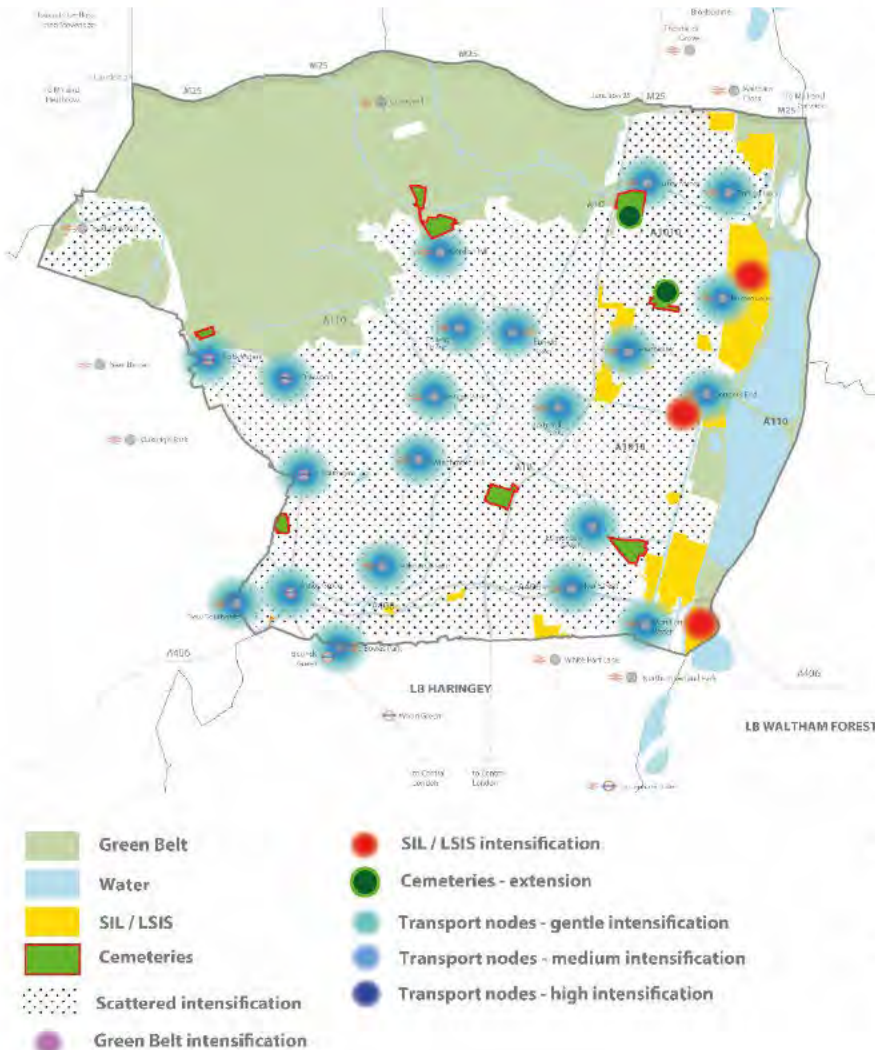
CANNOT MEET ALL REQUIREMENTS



**CANNOT MEET REQUIREMENTS
NOT RECOMMENDED BY OFFICERS**



Medium growth – urban area and industrial land



Opportunities

- ✓ Achieves **24,920 homes (plan period)**
- ✓ High levels of intensification in the urban area for housing and employment
- ✓ Intensify the employment areas to meet requirements
- ✓ Intensification of the employment areas by introducing residential

Challenges

- x Higher density development some including taller buildings in urban areas
- x Slightly denser development across the Borough
- x Some employment areas not compatible with residential
- x Loss of employment land – not compliant with our own policies and London Plan
- x Overall, not in general conformity with the London Plan
- x Plan found unsound

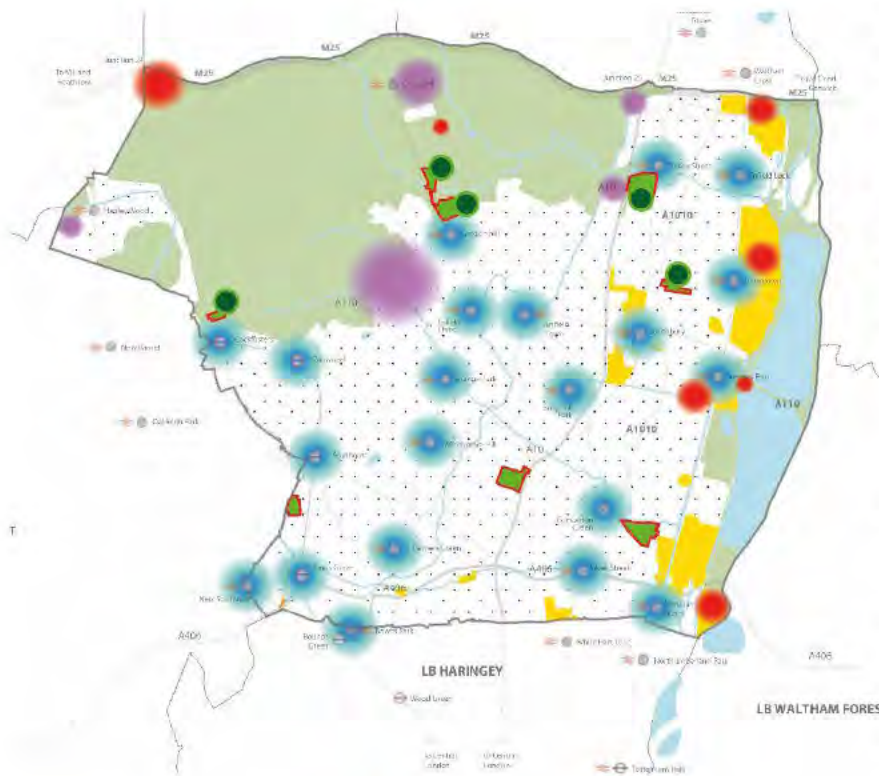
CANNOT MEET ALL REQUIREMENTS



**CANNOT MEET REQUIREMENTS NOT
RECOMMENDED BY OFFICERS**



Medium growth – urban area, industrial land & GB



Opportunities

- ✓ Achieves **24,920 homes (plan period)**
- ✓ Gentle intensification of urban area for housing and employment with some higher density development including some taller buildings in urban areas
- ✓ Lesser impact on the townscape
- ✓ Some residential provided intensified employment areas to encourage mixed uses
- ✓ Green urban extension, new settlement and redevelopment edge of GB – for family housing with gardens, affordable housing and improving access to green space
- ✓ Offers the potential to deliver a mix of housing types i.e. larger units with gardens and provide affordable housing
- ✓ Intensification of employment areas and new sites in the urban and GB areas – meet most requirements
- ✓ Significant environmental benefits
- ✓ Ability to lever in funding for infrastructure

Challenges

- x Impact on the Green Belt and other environmental constraints will need to be addressed
- x Not in conformity with the London Plan

LIKELY TO MEET MOST REQUIREMENTS



**LIKELY TO MEET MOST REQUIREMENTS
CURRENT OFFICER RECOMMENDATION**



Feedback from Members – to follow

Next steps

- None of the options are fixed
- Still testing and seeking views
- Final set of options will be in draft Plan brought to Members in June
- Further views sought through Reg 18 consultation
- Further review, discussion, testing before final decision of targets and spatial strategy between summer-autumn 2021
- Decision in 2022 on preferred option to take into full plan that will submit to SoS for Examination

Exceptional Circumstances

- Scale of housing and employment need
- Housing and employment land supply
- House prices and affordability
- Scale of affordable housing
- Imbalance in housing mix
- Viability
- Sustainability and impact on the Epping Forest Zone of Influence
- Access to open space
- Land ownership
- Provision of other land uses including burial and gypsy and traveller needs
- Land supply – within adjoining boroughs and districts and ‘duty to cooperate’

[REDACTED]

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 24 March 2021 21:12
Cc: [REDACTED]
Subject: RE: LB Enfield - Whole Plan Viability Consultation [SEC=OFFICIAL]

Classification: OFFICIAL

Dear Sir/Madam,

LB Enfield Whole Plan Viability – Reminder to submit consultation response

Further to the below email, we are writing to remind you that the deadline for comments supported by evidence on the draft Whole Plan Viability findings is next week on **31 March at midday**. Your input will be very valuable in informing the emerging Local Plan. We hope to hear from you. Thank you for help in advance.

Kind Regards,

[REDACTED]
[REDACTED] MRTPI
[REDACTED] | Plan Making Team
Strategic Planning and Design | Planning Service | Place Department

Direct Line: 0208 078 [REDACTED]
Team number: 020 8379 [REDACTED]
Email: [REDACTED]@enfield.gov.uk
Web: www.enfield.gov.uk

Visit: <https://www.gov.uk/coronavirus>

Enfield Council is committed to serving the whole borough fairly, delivering excellent services and building strong communities.

From: [REDACTED]
Sent: 01 March 2021 17:15
Cc: [REDACTED] <[REDACTED]@enfield.gov.uk>; [REDACTED] <[REDACTED]@hdhplanning.co.uk>; [REDACTED] <[REDACTED]@enfield.gov.uk>
Subject: FW: LB Enfield - Whole Plan Viability Consultation [SEC=OFFICIAL]

Classification: OFFICIAL

Dear Sir/Madam,

LB Enfield Whole Plan Viability – Invitation to submit consultation response

Further to our previous invitation to join the Whole Plan Viability consultation workshop on Thursday last week, we are now inviting comments on this. For those who were unable to attend the session slides from the session are also attached.

As you know, the Council is preparing a new Local Plan and is planning to publish a draft Local Plan (Regulation 18) later this year. In order to support this, the Plan Making Team has been working on a number of evidence base documents, including appointing HDH Planning & Development Ltd to prepare a new borough-wide viability

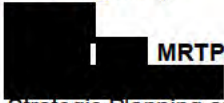
assessment. A pre-consultation draft report has been prepared for comment. It is an early working draft setting out the proposed methodology, modelling and assumptions. It is inevitable that some of these will change as a result of the consultation. We would like to invite you to provide comment and evidence on the emerging findings. It is important that responses submitted through this consultation are supported by evidence. Comments that simply observe a particular assumption is too low are too high are not helpful in establishing the correct assumption. Responses need to be supported by evidence, or alternatively point to sources of evidence that HDH can draw on and use to evidence the changes made in the next iteration of this viability assessment.

Please find attached the following information:

- ☐ A copy of the presentation from Friday's session;
- ☐ A copy of the draft report for consultation;
- ☐ A copy of the questionnaire inviting your feedback.

Responses are requested by **midday on Wednesday 31 March 2021**. Please submit these to localplan@enfield.gov.uk If you have any questions please do not hesitate to get in touch.

Kind Regards,

 MRTPI
| Plan Making Team
Strategic Planning and Design | Planning Service | Place Department

Direct Line: 0208 078 
Team number: 020 8379 
Email:  enfield.gov.uk
Web: www.enfield.gov.uk

[REDACTED]

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 08 April 2021 13:55
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: GLA meeting with officers Mar-21 [SEC=OFFICIAL:PRIVATE AND CONFIDENTIAL CORRESPONDENCE]

Classification: OFFICIAL - PRIVATE AND CONFIDENTIAL CORRESPONDENCE

Thank you [REDACTED] I'll pop an invite into our diaries for Friday 23. See you then.

[REDACTED] | Planning Service
Direct Line: 020 8132 [REDACTED]

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 08 April 2021 12:25
To: [REDACTED] <[REDACTED]@enfield.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@enfield.gov.uk>; [REDACTED] <[REDACTED]@enfield.gov.uk>; [REDACTED] <[REDACTED]@enfield.gov.uk>
Subject: RE: GLA meeting with officers Mar-21 [SEC=OFFICIAL:PRIVATE AND CONFIDENTIAL CORRESPONDENCE]

Hi [REDACTED]
Can we go for Fri 23 at 2

Thanks
[REDACTED]

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 07 April 2021 09:55
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@enfield.gov.uk>; [REDACTED] <[REDACTED]@enfield.gov.uk>; [REDACTED] <[REDACTED]@enfield.gov.uk>
Subject: RE: GLA meeting with officers Mar-21 [SEC=OFFICIAL:PRIVATE AND CONFIDENTIAL CORRESPONDENCE]

Classification: OFFICIAL - PRIVATE AND CONFIDENTIAL CORRESPONDENCE

Hello [REDACTED]
Hope you had a good Easter break.
Just following up on my email below, could I pencil a meeting in with you either on:

- ☐ Tuesday 20 April, 12 noon or 2pm
- ☐ Thursday 22 April, 2pm
- ☐ Friday 23 April, 2pm

I look forward to hearing from you
[REDACTED]

[REDACTED] | Planning Service

Direct Line: 020 8132 [REDACTED]

From: [REDACTED]

Sent: 26 March 2021 10:02

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@enfield.gov.uk>; [REDACTED] <[REDACTED]@enfield.gov.uk>; [REDACTED] <[REDACTED]@enfield.gov.uk>

Subject: GLA meeting with officers Mar-21 [SEC=OFFICIAL:PRIVATE AND CONFIDENTIAL CORRESPONDENCE]

Classification: OFFICIAL - PRIVATE AND CONFIDENTIAL CORRESPONDENCE

Hi [REDACTED]

Thank you for meeting with [REDACTED] and myself this week on our emerging Local Plan. We acknowledge comments given between now and the Mayoral elections are officer level, but we really appreciated the positive feedback. Thank you very much.

As discussed, we reached out to our neighbouring boroughs and those within our HMA and FEMA to consider our unmet housing and employment needs in January 2021, but this has not been successful. As requested, the responses from each of the boroughs that did respond are attached in the combined file – for your information.

There was a lot to take away from the meeting this week, and we hope to continue our positive dialogue with officers suggesting we meet in a month's time. Looking at diaries, how would the following dates/times work?

- ☐ Tuesday 20 April, 2pm or
- ☐ Thursday 22 April, 2pm

I can look for alternative days, if the above doesn't work.

I look forward to hearing from you and continuing positive dialogue.

With kind regards

[REDACTED]

[REDACTED]
[REDACTED] | Plan Making Team
Strategic Planning and Design | Planning Service

Place Department

Direct Line: 020 8132 [REDACTED]

Team number: 020 8379 [REDACTED]

From: [REDACTED]
To: [REDACTED]
Subject: FW: Enfield's Local Plan - Unmet housing and industrial land needs [SEC=OFFICIAL]
Date: 11 January 2021 13:20:35

Classification: OFFICIAL

FYI

[REDACTED]

From: [REDACTED]
Sent: 11 January 2021 13:20
To: [REDACTED] <[REDACTED]@brent.gov.uk>
Cc: [REDACTED] <[REDACTED]@brent.gov.uk>
Subject: RE: Enfield's Local Plan - Unmet housing and industrial land needs [SEC=OFFICIAL]

Classification: OFFICIAL

Dear [REDACTED]

Many thanks for clarifying Brent's position in relation to our unmet housing and employment need. The speed of your response is much appreciated.

Kind regards,

[REDACTED]
[REDACTED] *and Design*
Planning Service
Enfield Council

Direct Line: 020 8132 [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED]@enfield.gov.uk
Web: www.enfield.gov.uk

From: [REDACTED] <[REDACTED]@brent.gov.uk>
Sent: 11 January 2021 12:00
To: [REDACTED] <[REDACTED]@enfield.gov.uk>
Cc: [REDACTED] <[REDACTED]@brent.gov.uk>
Subject: RE: Enfield's Local Plan - Unmet housing and industrial land needs

Dear [REDACTED]

I respond in respect of the letter sent by [REDACTED] dated 7th January about the ability of LB Brent to accommodate some of LB Enfield's housing and industrial land needs, which LB Enfield identifies it cannot meet for the 15 year period from 2019/20. LB Brent is subject to examination of its submitted draft Local Plan.

Whilst the Council has been able in its draft Local Plan housing trajectory to identify potential to deliver more than the Intend to Publish London Plan target, this is considered necessary to provide an acceptable national housing delivery test derived "buffers" in relation to future 5 year housing land availability assessments. The examination process has not yet provided clarity from the Inspectors on what Brent's housing requirement post 2028/29 is. Whilst 'over delivery' might be possible against the intend to publish London Plan target 2019/20-2028/29, the Council cannot be certain that this will occur and thus make up for any potential shortfalls in other London boroughs against London Plan or standard national objectively assessed housing need requirements.

With regards to industrial land, the Council considers that it has no additional capacity that it can make available to meet Enfield's needs. Similar to Enfield the Intend to Publish London Plan evidence base has identified a significant need for additional industrial land within the borough. Our own evidence base commissioned in association with other west London boroughs indicates that this need is much smaller. The Council has proposed an industrial land target in its Local Plan consistent with the west London study. Again the draft Local Plan examination process has not yet clarified what the Council's industrial land requirement is. Nevertheless, local plan viability assessment work, together with other evidence base work related to likely availability of sites, indicates opportunities to intensify industrial land to the extent required to surpass the Intend to Publish London Plan evidence base targets is unlikely.

Regards

[REDACTED]
[REDACTED] icity
Regeneration & Environment
Brent Council

[REDACTED]

www.brent.gov.uk

[@Brent_Council](#)

We are working hard to maintain high standards of service delivery, but due to the impact of the Covid-19 virus, please be patient as there could be an impact on our ability to respond in the usual manner.

From: [REDACTED] <[REDACTED][enfield.gov.uk](mailto:[REDACTED]@enfield.gov.uk)>

Sent: 07 January 2021 14:28

To: Local Development Framework <LDF@brent.gov.uk>; [REDACTED] [REDACTED]

<[REDACTED][brent.gov.uk](mailto:[REDACTED]@brent.gov.uk)>

Subject: Enfield's Local Plan [SEC=OFFICIAL]

Classification: OFFICIAL

Dear [REDACTED]

Please find enclosed a letter from [REDACTED] in relation to the Duty to Co-operate and a

request to consider unmet housing and employment need in our borough.

Kind regards

[REDACTED]

[REDACTED]

| Plan Making Team

Strategic Planning and Design | Planning Service

Place Department

Direct Line: 020 8132 [REDACTED]

Team number: 020 8379 [REDACTED]

Many thanks for your time on Friday 22 January to discuss opportunities to fulfil the duty to co-operate with neighbouring boroughs. The specific area of discussion related to the potential for Hackney to support Enfield in meeting its housing need.

You explained that Enfield was experiencing various constraints which prevent it from meeting its housing needs. These constraints include large areas of the borough falling under Green Belt and London Strategic Industrial Land. Hackney also faces constraints, albeit of a different nature, which constrains its ability to meet its own housing need.

The Hackney Local Plan was adopted in July 2020 with a view to delivering 26,250 over the plan period to meet housing need as identified in the borough's SHMA equates to 1,750 pa. Our London Plan target is 19,950 homes over the plan period, equating to 1,330 pa. The Local Plan identifies capacity for 15,000 in the growth areas of Shoreditch, Woodberry Down and Stamford Hill, Dalston and Hackney Central. This leaves us with a shortfall of 5,000 homes for which we need to identify land as per the London Plan and 11,000 short of our OAN. As such we are unable to support other boroughs to meet their housing needs.

We discussed Hackney's approach to identifying additional capacity and we explained that in order to maximise opportunities for growth in the identified growth areas we carried out extensive characterisation and tall buildings studies to inform our design-led approach to intensification and growth. We are currently working with consultants on urban design options for these areas which will in turn inform their respective AAPs and SPDs, giving confidence to developers that we are a pro-growth borough and have clear expectations of and guidance for them.


This is underpinned by extremely extensive public consultation which has enabled us to bring councillors, residents and businesses along with us in shaping the vision and benefits of growth. We are very fortunate to have aligned, progressive and forward-thinking Cabinet, Planning Committee and ward councillors who understand the growth challenges that Hackney faces, having one of the highest levels of poverty in London whilst having one of the highest property price rises compounded by a small geographical area with intense competition between different land uses.

We are also undertaking development capacity studies, funded by the GLA, to explore the intensification along our key transport corridors, again working with urban design consultants to identify sites for future redevelopment particularly around our overground stations as well as opportunities for upwards extensions.

As the biggest developer in the borough, the Council has recently restructured its various housing workstreams and will soon deliver a new Housing Strategy encompassing the Asset Review, Estate Regeneration and Housing Supply workstreams to support the delivery of significantly more new homes in the boroughs to meet need.

Given the above, it is clear Hackney is unable to support Enfield in meeting its housing need. It's a challenge we are all facing but we hope this gives you confidence that we are not able to assist you.

Yours sincerely



Strategic Planning
Neighbourhoods and Housing.
LB Hackney

By email

[REDACTED]
Enfield Council

Date: 28 January 2021

Contact: Planning Policy Team

Direct dial: 020 8489 5965

Email: [REDACTED]@haringey.gov.uk

Dear [REDACTED]

Re: Enfield Local Plan – Unmet needs

Thank you for your letter received via email on 7 January 2020.

I note Enfield's progress towards its new Local Plan and the findings of recent evidence work which indicate that Enfield is not able to meet its full needs for housing and employment within the borough. This letter addresses your request for Haringey to consider if it is able to assist Enfield in meeting some or all of its unmet employment and housing requirements.

Haringey is at an early stage of preparing its New Local Plan and has not reached any conclusions as to the borough's future housing and employment needs nor whether it is able to meet the housing target set out in the Publication London Plan. This means that Haringey is not currently in a position to accommodate part of the housing shortfall of any other London borough.

Much like Enfield, Haringey faces significant housing delivery challenges. This is particularly evidenced by Haringey's Housing Delivery Test 2020 measurement of 60% which means that the Haringey Council is now subject to the Presumption in Favour of Sustainable Development. I note that Enfield scored 56% and will also be subject to the same.

Based upon Haringey's recent housing delivery performance, current known housing supply in the borough, and the direction of travel for the next London Plan in terms of being expected to be based on the new Standard Methodology for calculating housing needs, it is unlikely Haringey would be able to assist Enfield with its unmet needs in the future. Haringey's Local Housing Need Figure far exceeds our capacity-based London Plan target and as such we are likely to continue to have unmet housing need.

Notwithstanding this, we recognise that there will be strategic implications if Enfield is unable to meet its housing and employment needs in full. We would welcome further engagement about the cross-borough impacts this could have, particularly in terms of the delivering the London Plan objectives for the Upper Lee Valley Opportunity Area.

Haringey is currently carrying out a New Local Plan First Steps Engagement consultation closing 1 February 2021. We would welcome your formal response to this and a follow up meeting to discuss this letter and our respective emerging Plans.

Yours sincerely,



Inclusive Economy and Housing

Newham Dockside (W1)
1000 Dockside Road
London, E16 2QU

FAO [REDACTED]
Planning Dept.
London Borough of Enfield
By email

[REDACTED] [@newham.gov.uk](mailto:[REDACTED]@newham.gov.uk)

27th January 2021

Dear [REDACTED]

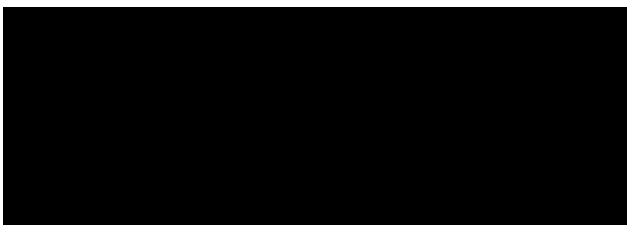
Thank you for your letter to my colleague [REDACTED] regarding your local plan targets, our duty to cooperate and your formal request for us to consider meeting some or all of your unmet employment and housing requirements.

Thank you for providing a summary of the evidence which has led you to this ask and I understand the scale of your planning challenge.

It is a challenge which Newham is also facing, in terms of both a high Publication London Plan target and even higher need resulting from the Standard Methodology (December 2020). Our current Local Plan established a lower housing target and we are currently just meeting that target through delivery. At this stage in our planning policy cycle we are unable to confirm site availability for further delivery. Even once we commence the process of identifying further housing capacity, should this capacity be higher than our required target, it is our view that this would be to meet London's unmet need, as opposed to addressing any specific borough's unmet need.

We are in a similar position regarding our industrial employment land. Our Local Plan evidence base demonstrates (and contrary to the GLAs industrial demand evidence) high occupancy rates and demand for our industrial land. As such our demand evidence concludes that the Borough does not presently have significant 'industrial' capacity to assist other Boroughs by taking cross-boundary demand. Our policy therefore retains key locations for industrial functions, whilst supporting intensification and co-location with a no net loss position on functionality. Where we have some limited areas of plan-led release, this is required to address wider plan objectives, including our housing need. Again, at this stage of our planning policy cycle, we do not consider there to be any available capacity to meet neighbouring need. Irrespective of this position, we would also question the extent to which we are part of the Lee Valley FEMA and would meet the requirements of Publication London Plan E7 for a suitable substitution location.

While we are unable to help with your specific request, I hope this provides a sufficient response. However please do get in touch if you have any further questions.



Regeneration and Culture

Lynton House,
255-259 High Road
Ilford,
Essex IG1 1NY

Sent via email
London Borough of Enfield

[REDACTED]
Email:

[REDACTED] [redbridge.gov.uk](mailto:[REDACTED]@redbridge.gov.uk)

Our ref
11th January 2021

Dear [REDACTED]

I am writing in response to your letter dated 7th January related to the duty to cooperate and needs (Housing and Employment) and the request to Redbridge to accommodate some or all of your unmet requirements.

Redbridge like yourself and the majority of London boroughs are also struggling to find sites to develop the required housing numbers and pressure will only increase once the new London Plan is formally adopted. Therefore, Redbridge is not in a position to accommodate any of your unmet housing need.

Further, the capacity-based approach to the setting of London Plan targets means that further identification of land would result in a higher target for ourselves to contribute towards London-wide need, rather than providing capacity to accommodate a specific borough's unmet housing need.

In terms of employment land, Redbridge has a limited supply of both designated and non-designated employment land, especially compared with other outer East London boroughs, with low vacancies on our Strategic Industrial Locations, so again with this request we are unable to accommodate any of your unmet employment land requirements.

Yours sincerely

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Enfield Local Plan [SEC=OFFICIAL]
Date: 02 February 2021 09:13:16

Hi [REDACTED]

I refer to your letter of 7 January 2021 enquiring whether this Council (LB Waltham Forest) would be able to assist your borough (LB Enfield) in meeting some or all of its unmet employment and housing requirements. Please accept our apologies for the delay in responding to you.

LB Waltham Forest recognises the severe constraints on LB Enfield as outlined in your letter and how these circumstances affect land supply and ability to meet growth requirements. As you may know, there are similar constraints in Waltham Forest. Our borough has 27% of land area covered by Green Belt and Metropolitan Open Land. We have designated environmental protection areas in the form of SSSI, SAC, SPA and SINC as well as the presence large expanses of open water including Banbury and the Walthamstow Reservoirs. Furthermore, much of the western side of the borough lies in Flood Zone 2, with some areas also classified as Flood Zone 3. These are equally significant constraints on development. Our borough is heavily built up and severely constrained by land availability.

Waltham Forest Council is committed to meeting in full its housing and employment growth needs. As you will note, the Council's emerging new Local Plan (Proposed Submission version, October 2020) states an aspiration to provide 27,000 new homes over the plan period (2020 to 2035). This is a challenging aspiration intended to satisfy our housing target from the London Plan (1264 per year), also taking account of our housing requirement of 1770 per year (Government standard method) as well our own local requirement of 1810 per year from our SHMA evidence. We face similar challenges on employment land after having lost significant floorspace in previous years to residential use. Our Employment Land Review (2019) has identified an objectively assessed need for 8100 jobs equating to 52,000 sqm of employment floor space over the plan period which must be found.

In responding to this challenge, the Council's Local Plan strategy seeks to significantly increase densities in a number of sustainable locations. We have been exploring through our Site Allocations Document how best to deliver character-led intensification in different parts of the borough. However, this has been challenging for our local residents. Clearly, taking on additional requirements from neighbouring boroughs would be a greater challenge impossible to deliver.

Mindful of the above circumstances, LB Waltham Forest is unlikely to be able to meet any demonstrated unmet housing or employment need from LB Enfield or other neighbouring boroughs, given the significant housing capacity identified through our Reg 19 Local Plan that is required to fully respond to locally identified housing need. That said, the Council would welcome the opportunity to continue our positive dialogue on other cross boundary strategic matters.

Yours sincerely

[REDACTED]



Planning and Development

Your Ref:

My Ref:

Extension:

Please ask for:

Date:

25/01/2021

Mr [REDACTED], Enfield Council

By email to [REDACTED] [enfield.gov.uk](mailto:[REDACTED]@enfield.gov.uk)

Dear [REDACTED],

Re: Enfield's Local Plan

Thank you for your letter dated 7 January 2021 regarding Enfield's Local Plan unmet housing and employment needs, in particular for help with assistance in identifying locations outside Enfield to accommodate unmet need for 23 hectares of land for industrial distribution uses and and 4,000 homes. I understand that a similar letter has been issued to all the Local Planning Authorities in the Housing Market Area and the Functional Economic Market Area.

Broxbourne's Local Plan 2018-2033 (adopted in June 2020) establishes sufficient land to meet Broxbourne's needs for 15 years, and therefore Broxbourne is not proposing a Local Plan review for some considerable time. All of the opportunities identified in the Local Plan are needed to meet Broxbourne's needs. You will be aware of the conclusions of Enfield Council's Functional Economic Market Area Study (Aecom, 2020) that *"there is assessed to be no potential for Broxbourne to accommodate additional industrial land demand from Enfield."*

I understand from your letter that Enfield's growth options are constrained by a number of designations including Green Belt. Like Enfield, all Broxbourne's non-urban land is designated Green Belt. Broxbourne Council undertook a thorough evidence-based approach to identifying areas where 'exceptional circumstances' might exist to justify Green Belt releases in sustainable locations. This resulted in the release of 419 hectares of land from the Green Belt within the Borough of Broxbourne. Having so recently completed this comprehensive exercise, it is very unlikely that a further review would identify land that could be released sustainably.

Therefore I regret to inform you that Broxbourne Council is not in a position to assist.

Yours sincerely,

Policy and Implementation

■ [REDACTED]
■ www.eastherts.gov.uk
■ East Herts Council, Wallfields, Pegs Lane, Hertford, SG13 8EQ

f EastHertsDC
t EastHerts
@ easthertscouncil



[REDACTED]
[REDACTED]
Enfield Council
Civic Centre
Silver Street
Enfield, EN1 3XY

Our Reference :

Please ask for :

[REDACTED]

[REDACTED]

Tuesday, 26 January 2021

Dear [REDACTED]

Enfield's Local Plan

Thank you for your letter dated 7 January 2021 regarding your Council's housing and employment needs and the Duty to Co-operate.

As you will be aware, the Housing Market Area which includes Enfield does not extend to the area covered by East Herts. In light of this and given our own housing pressures and Green Belt constraints, I would advise that this Council would be unable to assist in accommodating any of Enfield's housing needs.

Similarly, whilst it is acknowledged that Enfield's FEMA has now been extended to include East Herts (ref. Enfield FEMA Study, 2020) given our own employment pressures and Green Belt constraints, I would again advise that this Council would be unable to assist in accommodating any of Enfield's employment needs. This position reflects the conclusion set out in the FEMA Study itself which states that East Herts has no potential to cater for additional land demand from Enfield.

Yours sincerely

[REDACTED]



Date: 15 March 2021

Planning Directorate
Civic Offices, 323 High Street,
Epping, Essex CM16 4BZ

Sent via email: [REDACTED] [enfield.gov.uk](mailto:[REDACTED]@enfield.gov.uk)

Georgina Blakemore
Chief Executive:

Planning Policy Team

Email: LDFConsult@eppingforestdc.gov.uk

Web: www.eppingforestdc.gov.uk/planningourfuture

Dear [REDACTED]

Re: London Borough of Enfield's Housing and Employment Needs for its new Local Plan up to 2039

I am writing further to your letter dated 07 January 2021 in respect of the above. Thank you for your helpful update on the recent progress of Enfield's new Local Plan.

Your letter outlines that due to numerous land use constraints and because of the scale of the Borough's housing and employment requirements over the Plan period to 2039, Enfield is not in the position to meet its growth needs within its own boundaries. Your letter is therefore formally asking whether Epping Forest District Council might be in a position to assist in meeting some, or all, of Enfield's unmet housing and employment requirements. You indicate that a similar request has been issued to all neighbouring authorities and other authorities within your Housing Market Area and Functional Economic Market Area.

I outline briefly below the challenging landscape in which Epping Forest District Council is working to progress its own Local Plan towards adoption and to implement the growth contained therein. I am afraid that within this the Council is not in a position to be able to assist in meeting any of Enfield's unmet housing or employment requirements.

Epping Forest District's Local Plan 2011-2033 is currently under Independent Examination. The emerging Plan provides for less than the District's share of the Housing Market Area's housing requirement at approximately 11,400 dwellings reflecting the District's infrastructure constraints. The Local Plan Inspector has considered all evidence, and in her post hearings advice note of 2 August 2019 (ED98), confirmed acceptance of the District's housing requirement of 11,400 and that the requirement of 11,400 dwellings should not be increased.

Epping Forest District is substantially constrained in land use terms with more than 90% Green Belt, as well as the presence of the Epping Forest Special Area of Conservation (EFSAC) and the likely significant effect of growth in respect of both atmospheric pollution and disturbance from recreation/urbanisation.

One key matter that we are continuing to work to resolve within the Examination is to enable the Inspector to conclude beyond reasonable scientific doubt that the emerging Plan would not adversely affect the integrity of the EFSAC. This has entailed extensive work including the development of an Interim Air Pollution Mitigation Strategy adopted by the Council on 8

February 2021. This Strategy is necessary to re-commence the issuing of planning permission for new development locally and to inform an updated Habitats Regulations Assessment for the emerging Local Plan which will enable the Examination of the Plan to move forward.

We would like to take this opportunity to stress the importance of future strategic joint working between our authorities where there is a cross boundary issue. A key example of this being the EFSAC Oversight Group, which with the support of Natural England is looking to put in place appropriate governance arrangements in order for the Conservators of Epping Forest to implement the SAMMS measures.

Your sincerely,

A black rectangular redaction box covering the signature area.

Environment and Planning

Harlow Council
Civic Centre
The Water Gardens
Harlow
Essex CM20 1WG

www.harlow.gov.uk
Date: 29/01/2021

██████ ██████
Place Services
Enfield Council
Civic Centre
Silver Street
Enfield
EN1 3XY

Enfield's Local Plan

Dear ██████

Thank you for your letter of the 7th January 2021 in respect of your new Local Plan and the Duty to Co-operate.

The purpose of your letter was to formally ask if Harlow Council would be in a position to assist Enfield in meeting some or all of its unmet employment and housing requirements.

Firstly I would advise you that this Council has only formally adopted the new Harlow Local Development Plan on the 10th December 2020. This Plan was a number of years in preparation and now forms the development plan for the District until 2033. This sets out a clear strategy and spatial approach to meet locally identified development needs together with the provision of supporting infrastructure.

Secondly this Plan at Examination was found to have satisfied the tests of soundness in respect of the Duty to Co-operate, having regard to the fact that it met the housing need established through the joint SHMA and employment need, established through the joint FEMA, both prepared in conjunction with East Hertfordshire, Epping Forest and Uttlesford Councils.

Notwithstanding this and given the fact that Harlow has tight administrative boundaries, surrounded by Green Belt, this necessitated the release of some Green Belt land in order to secure more sustainable, spatial patterns of development. The evaluation of opportunities of re-assessing the existing extent of the Green Belt to determine whether it fulfils its key purposes should, therefore, be rigorously undertaken before it is attempted to meet needs elsewhere.

In the circumstances, therefore, I would advise that this Council would **not** be in a position to assist Enfield meeting some or all of its unmet employment and housing requirements.

In addition it is not clear how displacing residents from Enfield to Essex, remote from existing local connections and synergies, would avoid generating further unsustainable transport movements across the area, as well as putting pressure on existing community and social services in Harlow.

Harlow Council is already struggling to address issues arising from displacement of Enfield residents to the District as a consequence of the unplanned office to residential conversions afforded by the Government's GDPO changes.

Yours faithfully,





Planning and Economic Development

[REDACTED]
[REDACTED]
Enfield Council
Silver St
London
EN1 3XA

Your Reference:
Our Reference:
Contact: [REDACTED]
Date: 04 February 2021

Dear [REDACTED]

Enfield's Local Plan

Thank you for your letter of 7 January 2021 requesting consideration of the unmet development needs in Enfield.

Please note that this letter represents an informal response based on Officer opinion only, and should therefore be considered as such. The purpose of the letter is to help inform Enfield Council of the process being conducted in Hertsmere to meet its own development needs, and whether we have the capacity and capability to meet some of your identified unmet development needs.

Hertsmere is currently progressing work on its own Local Plan which will cover the period from 2018 to 2036. As part of the duty to cooperate process, we have been actively engaging with all of our neighbours and stakeholders to consider how Hertsmere will meet its own identified housing and employment needs. Documents summarising the responses to our previous consultations from the both the general public and, site promoters, statutory bodies, and local interest groups can be found online: <https://www.hertsmere.gov.uk/Planning--Building-Control/Planning-Policy/Local-Plan/New-Local-Plan/New-Local-Plan-Planning-for-Growth.aspx>

Housing

The Borough's adopted Local Plan is made up of the Core Strategy (adopted in January 2013), the Elstree Way Corridor Area Action Plan (adopted in 2015) and most recently, the Site Allocation and Development Management Plan (adopted in 2016). The Local Plan sets out the requirement for housing provision for the Borough between 2012 and 2027, which equates to 266 dwellings per annum. The Council's strategic policies were five years old as of January 2018, towards the end of the 2017/18 monitoring year.

The government recently advised that the 2014 sub-national population projections are to be used as the basis for calculating housing need equating to 716 homes per year or 14,250 homes over an 19 year plan period (including a 5% buffer). Hertsmere's housing capacity is considered to be solely that which can be developed on urban land and includes all sources on land not covered by Green Belt designation. There is greater emphasis in the NPPF on making effective use of land (chapter 11) and maximising densities (chapter 13). This new advice applies in any event to ensure the most effective use of land and applies as a preliminary requirement prior to assessing where the Green Belt land needs to be taken and whether exceptional circumstances exist for doing so.

Given this consideration, and the requirements within the NPPF Feb 2019, the updated HELAA (2019) reassessed the council's brownfield land allocation, to ascertain Hertsmere's housing capacity and ensure that urban land was maximised. This included:

- 1) Reviewing the densities and capacities of all potential sites located within major settlement boundaries, and applying a significant uplift in the average density of residential development in accordance with paragraph 123 of the NPPF.
- 2) Assessing the utilisation of local vacant housing stock as a source of untapped brownfield housing supply.
- 3) Reviewing the achievability and deliverability of Hertsmere's owned assets.
- 4) Contacting owners/occupiers of major brownfields sites who have not yet submitted any of their land holdings.

This process concluded that there is still a significant shortfall between the potential capacity of Hertsmere's urban land and the level of identified need. Hertsmere is therefore unable to consider Enfield's unmet housing needs as this capacity is not sufficient to meet our own needs.

It is only once we identified this shortfall against housing need that the Council has considered looking at Hertsmere's Green Belt to see whether "exceptional circumstances" exist to justify release. There remains the possibility of asking neighbouring authorities to take some of the growth shortfalls identified within Hertsmere but it is recognised that most authorities within the SW Herts Housing Market Area (HMA) are already having to consider Green Belt release to meet demand. We have previously written to Enfield Council, as well as the London Boroughs of Harrow and Barnet to enquire whether there is any additional capacity in north London to meet Hertsmere's identified need. To date, the responses have shown that no such capacity exists.

In the absence of a joint plan for the South West Herts Authorities which would involve a comprehensive and comparative assessment of Green Belt land, the Council considers that exceptional circumstances do not exist for Hertsmere to release some of its Green Belt to meet the housing requirement of neighbouring authorities.

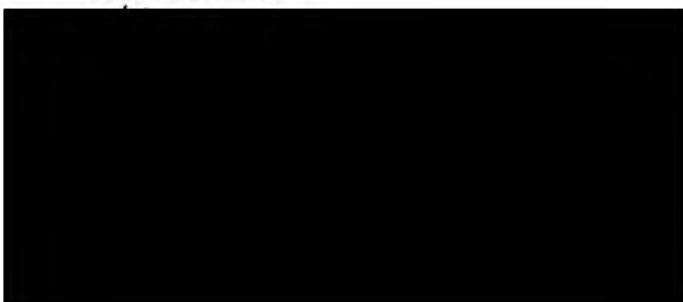
Employment

Your letter identifies that Enfield has a shortfall of around 23ha of industrial/distribution land, notwithstanding a small supply of sites in the Green Belt/MOL. Given that our HELAA also identified a shortfall of urban sites to meet future jobs growth within Hertsmere, based on the findings of the SW Herts Economic Study Update (2019), we will need to demonstrate that exceptional circumstances exist to justify green belt release for economic development.

The scope, scale and location of employment-led development is still being considered but deliverable land has been promoted on the edge of Hertsmere's designated employment areas for the potential allocation of any additional employment land for B class and other employment generating land uses. Please also note that the Council has just opened a new Employment Call for Sites as we have been made aware of a number of new sites being promoted for economic development which have not previously been submitted to us for assessment.

This informal letter provides a direction and basis for discussions going forward and we look forward to further engagement with Enfield in relation to the production of both authorities' Local Plans.

Yours sincerely





Reply to: address as below

Date 28th January 2021

Direct Tel: [REDACTED]

Email: [REDACTED]

[REDACTED]
Head of Planning
Enfield Council

FAO [REDACTED]
Sent via email

Dear [REDACTED]

Duty to Co-operate: Enfield's Local Plan

I refer to your letter dated 7th January 2021 advising this Council of your ongoing work preparing a new local plan for the borough for the period to 2039.

I understand that you have progressed your evidence base and have concluded that you will not be able to meet all of your housing and employment needs without releasing land from your Green Belt.

You will recall Welwyn Hatfield Borough Council wrote to you on 11th April 2017 asking if you could assist in meeting our need for housing. The borough is similarly constrained with 79% of the area being designated as Green Belt as well as a number of SSSIs, Ancient Woodland and Registered Park and Gardens. The examination of our Local Plan commenced in 2017 and is ongoing. The Inspector has asked Welwyn Hatfield to propose additional sites to meet the OAN. These will shortly be considered at hearing sessions in February and March.

With regards to employment land the Council has lost significant employment floorspace under permitted development rights and now finds itself in a position of struggling to meet its own needs.

The evidence indicates that any further releases from the Green Belt over and above what has already been proposed for release to meet the borough's needs is likely to result in high harm to the Green Belt.

I can confirm, therefore, that Welwyn Hatfield Borough Council does not have the capacity to meet your unmet housing and employment needs.

Yours sincerely

[REDACTED]



UTTLESFORD DISTRICT COUNCIL

Council Offices, London Road, Saffron Walden, Essex CB11 4ER

Telephone [REDACTED]

Email uconnect@uttlesford.gov.uk Website www.uttlesford.gov.uk

Chief Executive: Dawn French

Enfield Council

Attention c/o [REDACTED]

Date 1 February 2021

Our ref:

Please ask for [REDACTED]

Enfield's Local Plan – DTC Uttlesford

Dear [REDACTED]

Thank you for your letter of 7 January seeking assistance from Uttlesford District Council (UDC) in helping to accommodate Enfield Council's employment and housing requirements. In response to your request I set out:

- An update on the progress of the UDC Local Plan; and
- Comments on the request to accommodate some of Enfield Council's employment and housing requirements.

The draft UDC Local Plan is at a formative stage, and is now in the middle of the first consultation. This first consultation is structured around nine different themes with each theme kicked off with a meeting of an independent Community Stakeholder Forum. Each theme is asking a number of questions that are designed to encourage input from residents and other stakeholders before any decision on the new Local Plan have been made. This consultation is due to run until 21 April, and no decisions will be made on the strategy, policies and sites in the Local Plan until the representations received in this consultation have been considered.

In an officer meeting in July 2020 it was explained that UDC was likely to be asked to assist Enfield Council to meet their employment requirements, no mention was made of helping to meet the housing requirements as well. In the discussion at this meeting it was explained that Uttlesford was identified as potentially having capacity to help with meeting employment needs, in particular the strategic employment allocation north of Stansted Airport in the



UTTLESFORD DISTRICT COUNCIL

Council Offices, London Road, Saffron Walden, Essex CB11 4ER
Telephone [REDACTED]
Textphone Users 18001
Email uconnect@uttlesford.gov.uk Website www.uttlesford.gov.uk

Chief Executive: Dawn French

withdrawn Local Plan. Uttlesford asked for further evidence to support the justification of meeting Enfield's requirement in Uttlesford. Uttlesford's administrative area is not closely related to Enfield administrative area, either in economic or housing terms.

Given the UDC draft Local Plan is at an early stage and no decisions will be made on the strategy and sites within it until the after the end of the first consultation (21 April 2021), UDC is unable to agree to assisting with meeting Enfield's employment (or housing) needs. UDC will give it due consideration at the appropriate stage when formulating the plan after the close of the first consultation. However, as mentioned in the meeting in July 2020, UDC maintains that it has concerns about the appropriateness of assisting with meeting Enfield's employment (or housing) needs. These concerns relate to the lack of evidence around whether businesses who want to locate in Enfield would realistically chose Uttlesford, and how they would sustainably operate in terms of employee and business travel patterns.

Yours Sincerely

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 23 April 2021 13:42
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Meeting with GLA CONFIRMED [SEC=OFFICIAL]

Classification: OFFICIAL

Hi [REDACTED]

Agenda for this afternoon's meeting:

- ☐ Direction of travel
- ☐ Sites, selection method, reasons for exclusion
- ☐ GLA's 2017 SHLAA sites
- ☐ Forward programme
- ☐ Consultant team & summit – showstarters and showstoppers
- ☐ Park Plaza, Broxbourne
- ☐ Next steps

See you at 2pm

[REDACTED] | Planning Service
Direct Line: 020 8132 [REDACTED]

-----Original Appointment-----

From: [REDACTED]
Sent: 08 April 2021 13:57
To: [REDACTED]
Cc: [REDACTED]
Subject: Meeting with GLA CONFIRMED [SEC=OFFICIAL]
When: 23 April 2021 14:00-15:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.
Where: Microsoft Teams Meeting

[REDACTED] as per email on 8 April. Please feel free to extend to your colleagues/team.

[REDACTED]

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 24 April 2021 11:59
To: [REDACTED]
Cc: [REDACTED]
Subject: GLA meeting 23 April [SEC=OFFICIAL]
Attachments: GLA meeting 23 April_for circulation.pdf

Classification: OFFICIAL

Hi [REDACTED]

Thank you for taking the time to meet with [REDACTED] and myself yesterday and we're pleased to know that you find these sessions helpful.

As discussed, I attach a copy of the slides that were discussed yesterday for your information with higher resolution plans provided, particularly on the map showing appropriate locations for tall buildings.

As mentioned, [REDACTED] [REDACTED] [REDACTED] who is preparing our Whole Plan Viability, will be reporting towards the end of April and that is when I hope to get our report over to you. Watch this space!

Meanwhile, it would great if I could get another meeting in with you, say around mid May. Subject to your availability, [REDACTED] and I are available:

- ☐ 12 May, 2-3pm
- ☐ 13 May, 2:30 to 3:30
- ☐ 14 May, 10-11 or 11-12

Happy to pop something in the diary.

I look forward to hearing from you

Regards

[REDACTED]

[REDACTED]
[REDACTED] Plan Making Team
Strategic Planning and Design | Planning Service

Place Department

Direct Line: 020 8132 [REDACTED]

Team number: 020 8379 [REDACTED]

Local Plan update

**Meeting with GLA officers
April 2021**

What we are going to discuss today

- Direction of travel
- Sites – our method, reasons why sites are discounted
- GLA's 2017 SHLAA sites
- Forward programme
- Consultant summit
- Showstoppers and showstarters
- Park Plaza – Broxbourne

Our direction of travel

1. **High growth** – incorporating the standard methodology

- ❑ 1A: all growth in the unconstrained urban area + SIL + Green Belt

2. **Baseline growth** – London Plan housing policy compliant

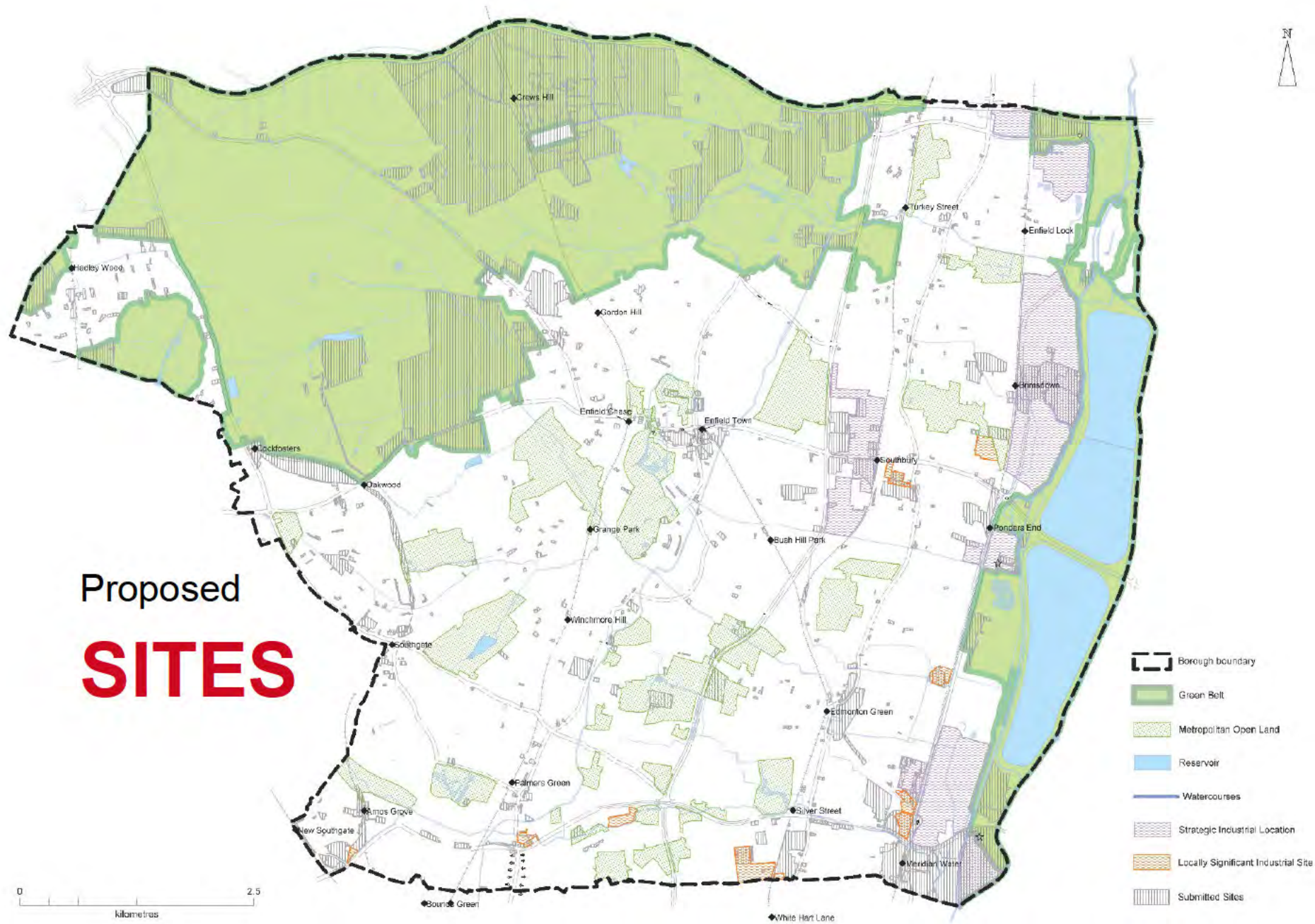
- ❑ 2A: all growth in the unconstrained urban area only
- ❑ 2B: all growth in the unconstrained urban area + SIL

3. **Medium growth** – continued growth using London Plan housing requirements post 2029

- ❑ 3A: all growth in the unconstrained urban area only
- ❑ 3B: all growth in the unconstrained urban area + SIL
- ❑ 3C: all growth in the unconstrained urban area + SIL + GB

Consult on six spatial strategy options with all options on the table

No preferred option, but indication of the 'preferred approach'



Site Selection process

Site Assessment Process Overview	
Stage 1: Identification and initial sift of sites	<ul style="list-style-type: none"> • Stage 1a: Identification of sites • Stage 1b: Assessment of absolute constraints • Stage 1c: Size threshold (50 homes+ or 0.25ha / 500sqm or 0.25ha)
Stage 2: Promoting a Sustainable Pattern of Development	<ul style="list-style-type: none"> • Stage 2: Sites considered on a sequential approach directing growth to specific locations, based on the overall hierarchy which: <ul style="list-style-type: none"> ○ Prioritises land in the urban area, then ○ Prioritises brownfield land in the Green Belt, then ○ Prioritises lower performing land in the Green Belt
Stage 3: Detailed Planning Assessment	<ul style="list-style-type: none"> • Stage 3a: Consideration of technical constraints (e.g. highways) • Stage 3b: Consideration of other non-absolute constraints (e.g. historic/ecological etc.)
Stage 4: Integrated Impact Assessment	<ul style="list-style-type: none"> • Stage 4: Identify any significant negative effects that may require mitigation if site is put forward for allocation
Stage 5: Deliverability	<ul style="list-style-type: none"> • Stage 5: Does the evidence indicate that the site could be delivered within the plan period?
Stage 6: Overall Conclusion	<ul style="list-style-type: none"> • Stage 6: Identification of preferred site allocations.



Reasons why sites have been discounted

- Level 1 constraints (e.g. Flood Risk 3, SSSI etc.)
- Outside of the urban area, not in a sustainable location
- Does not meet size threshold (e.g. below 5 homes for inclusion in SHLAA, or below 50 for consideration as a site allocation).

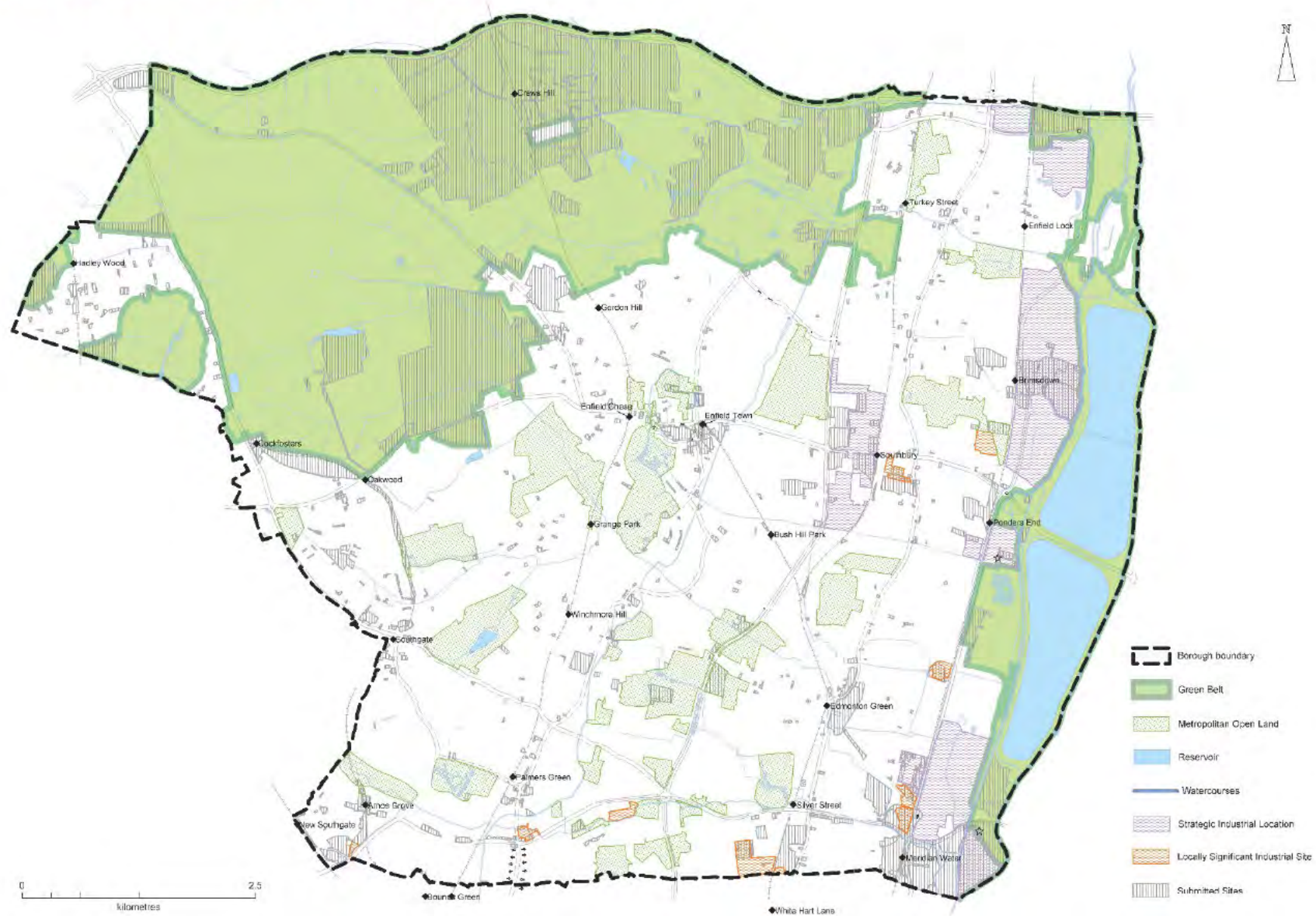
GLA's 2017 SHLAA sites

- Total of **33 sites** considered in SHLAA 2020
- **4 sites** considered as potential site allocations:
 - Pearglow & Queensway Estates
 - New Southgate gasholders
 - Upton and Raynham

27 sites discounted – reasons:

- 1 x MOL site within an area of open space deficiency; - i.e. not suitable;
- 4 x sites overlapping with other sources
- 9 x sites below 50 dwellings have not been included as potential site allocations, does not preclude them coming forward – but considered does not warrant a 'site allocation'.
- 6 x sites not available (i.e. already developed)
- 6 x sites - availability unknown
- 3 x sites not suitable for redevelopment – listed buildings on site / isolated GB location.

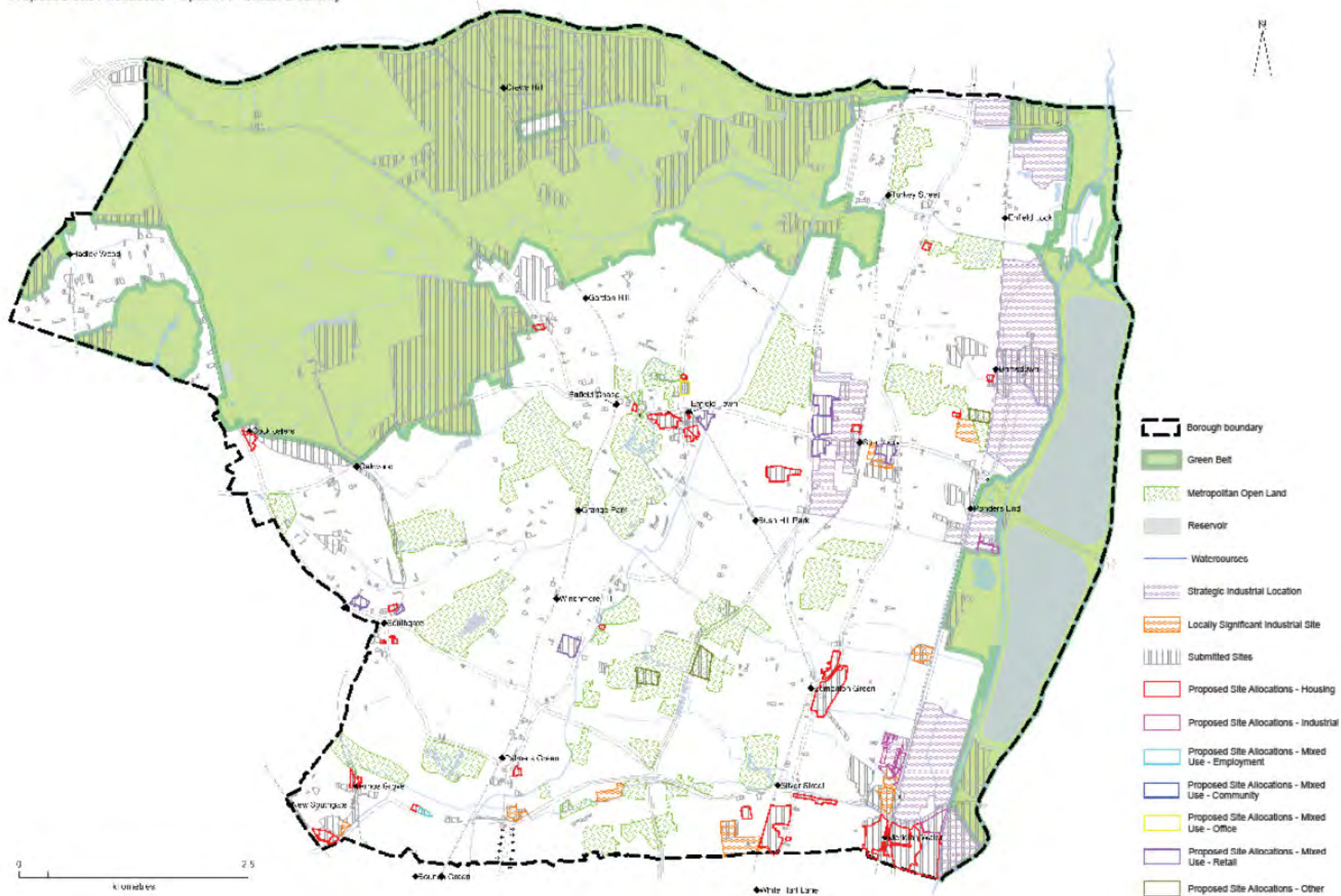
Total = 631 sites



Urban area only

		Baseline growth	Medium growth
	Number of sites	Number of homes	
Residential	32	10,809	10,809
Mixed use	10	5,004	7,975
Employment	4	n/a	n/a
Other (including leisure, burials and gypsy and travellers)	3	n/a	n/a
Total	49	15,813	18,784
Adding windfall @110 dpa (over plan period)		17,463	20,434

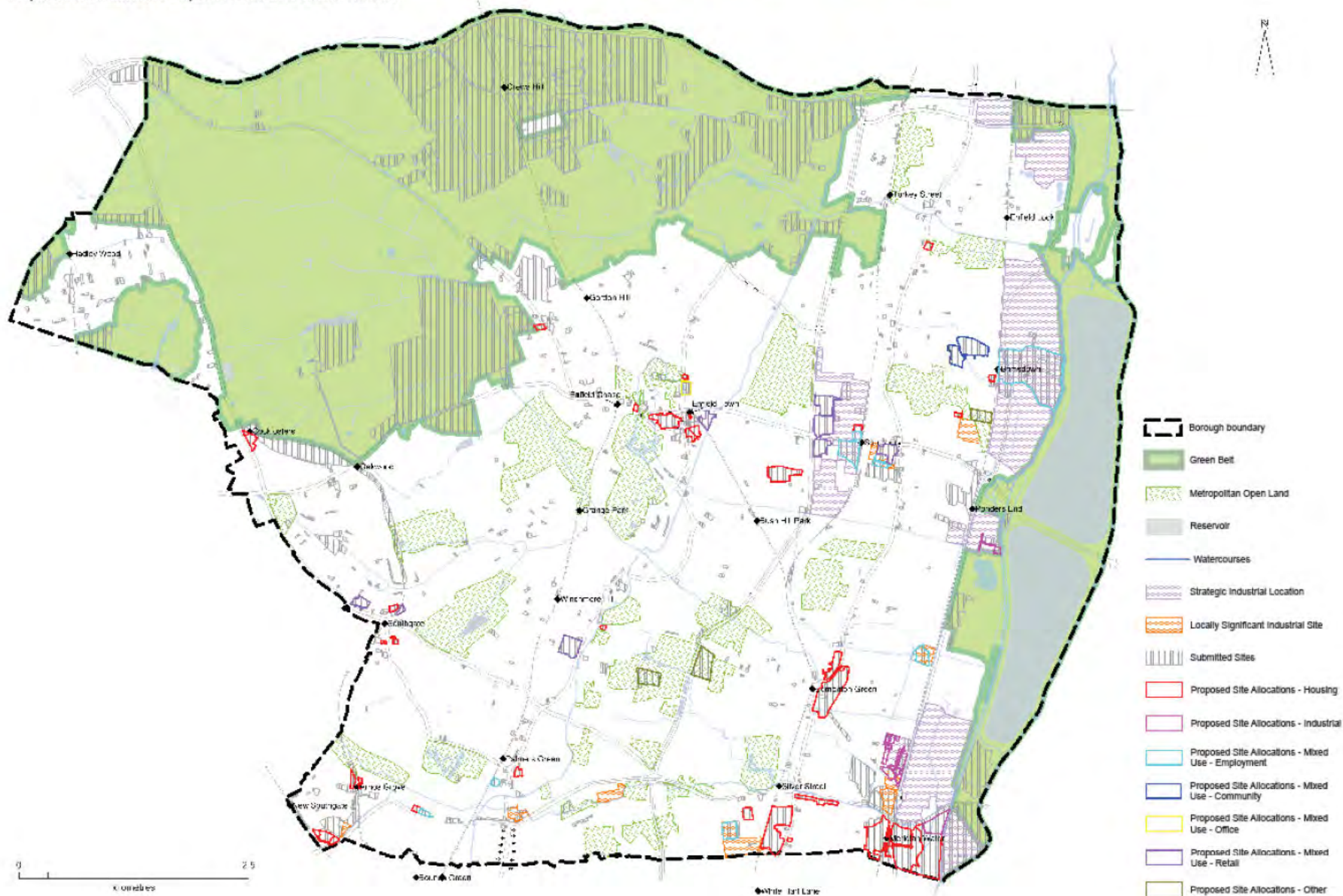
Proposed Site Allocations - Option A - Urban area only



Urban area plus employment land

		Baseline growth	Medium growth
	Number of sites	Number of homes	
Residential	32	10,809	14,521
Mixed use	19	7,975	10,212
Employment	4	n/a	-
Other (including leisure, burials and gypsy and travellers)	3	n/a	-
Total	58	18,784	24,733
Adding windfall @110 dpa (over plan period)		20,434	26,383

Proposed Site Allocations - Option B - Urban area and SIL/LSIS

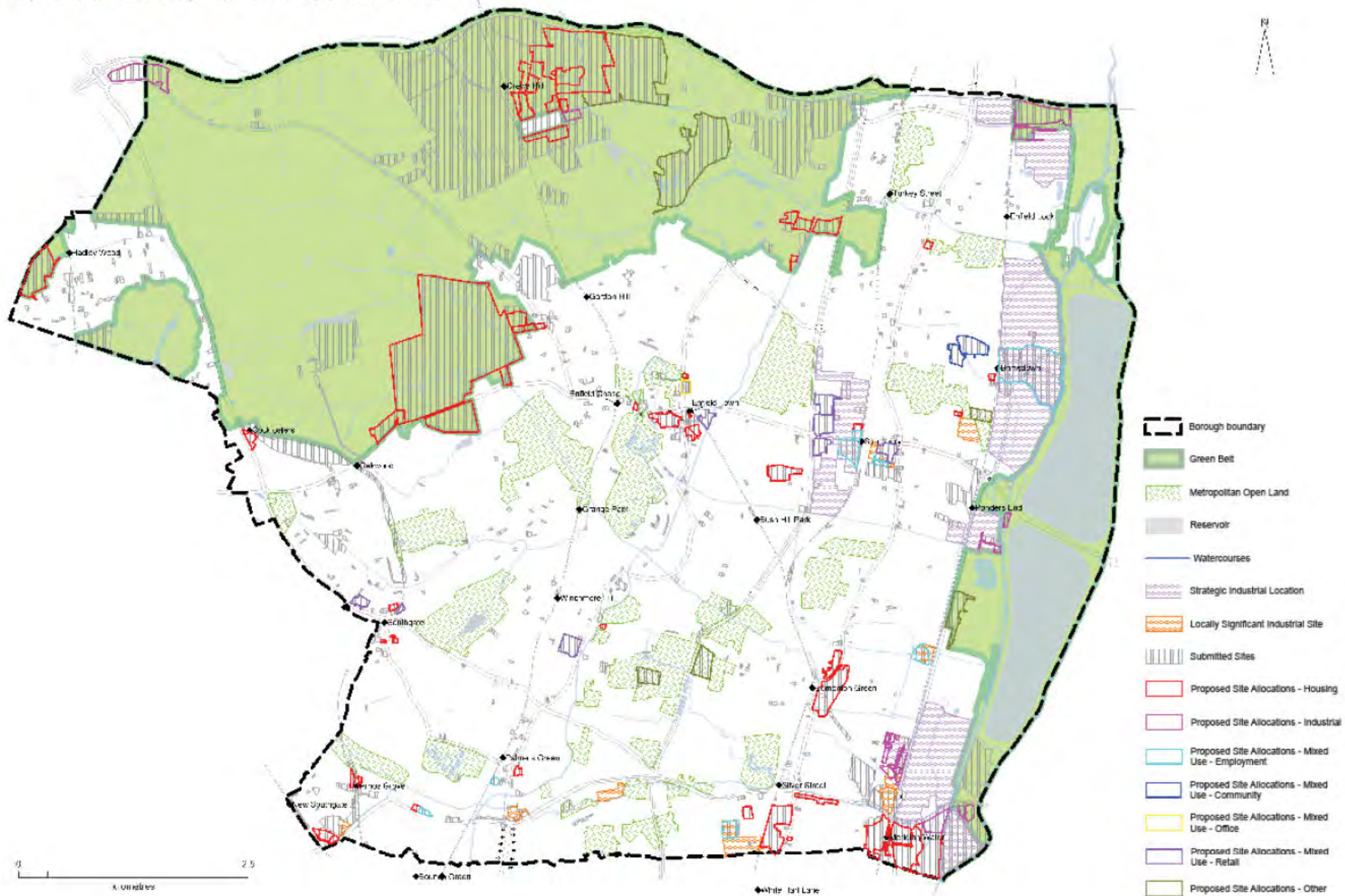


Urban area, employment land and areas of the Green Belt

		Baseline growth	Medium growth
	Number of sites	Number of homes	
Residential	52		15,248
Mixed use	19		7,975
Employment	10		-
Other (including leisure, burials and gypsy and travellers)	6		-
Total	- 87		1,650
Adding windfall @110 dpa (over plan period)			24,873

Proposed site allocations = 87

Proposed Site Allocations - Option C - Urban area, SIL/LSIS and Green Belt.



Summary of options

- Series of options to be presented in the emerging Local Plan
- No preferred option but an indication showing a 'towards a preferred approach' i.e. **3C**
- Still testing and seeking views with officers and consultant team
- Final set of options will be in draft Plan brought to Members in June
- Further views will be sought through Reg 18 consultation
- Further review, discussion, testing before final decision of targets and spatial strategy between summer-autumn 2021

Keep calm and keep on planning

- Be pragmatic and 'keep on planning'
- 9 June full council meeting to agree the plan for consultation is immovable
- Strong desire to get a range of options tested through the IIA process and consult on potential options – get more people thinking
- 'Towards a preferred approach'
- Written responses until we formally go out with the Local Plan consultation

The show must go on..

Consultant team

Local Plan

- LUC –Integrated Impact Assessment and Green Belt Assessments (Stages 1 and 2)
- Stantec –Housing and employment numbers –*not easy!*
- WSP –Transport Planning and Air Quality management
- Inner Circle –infrastructure planning
- BMT Global in collaboration with LBE team –strategic flood risk
- [REDACTED] [REDACTED] [REDACTED] (££££) –on whole plan viability

Place making

- Hyas–2 strategic sites in Green Belt

Consultant summit – 19 April

- An outline of the work undertaken to date
- Key issues identified – good and not so good
- Critical dependencies

Show stoppers or show starters

- IIA/HRA – none apparent
- Stage 2 Green Belt Assessment – show starter, with opportunities for improvements to the GB/MOL
- SFRA Level 2 - show starter, with opportunities for improvements
- Transport – no surprises, impact on all transport modes but especially north-south road connections
 - Crews Hill, further engagement with TfL re: accessibility and sustainability undertaken
- Air quality – none apparent

Emerging viability findings – the show starters

- Higher value in the western and northern part of the borough
 - Able to bear higher levels of affordable housing up to 50%
 - Confident that development that is planned for will be deliverable and forthcoming
- Medium value
 - Tall buildings are likely to be deliverable at 35% affordable housing
 - Build-to-Rent – not viable, but viability of such development will be tested at the development management stage
 - Most development will be deliverable and forthcoming

Emerging viability findings – the show stoppers

- Low value – eastern part of the borough
 - Significant concerns in the eastern part of the borough to bring forward development - low value
 - 50% affordable housing and industrial intensification difficult to achieve
 - Will need substantial public intervention by the council and/or government
 - Cautious about relying on development in this area
 - Particular regard will need to be given to public intervention
- Tall buildings and the ability to deliver affordable housing
 - Don't rule it out, but is not the only option

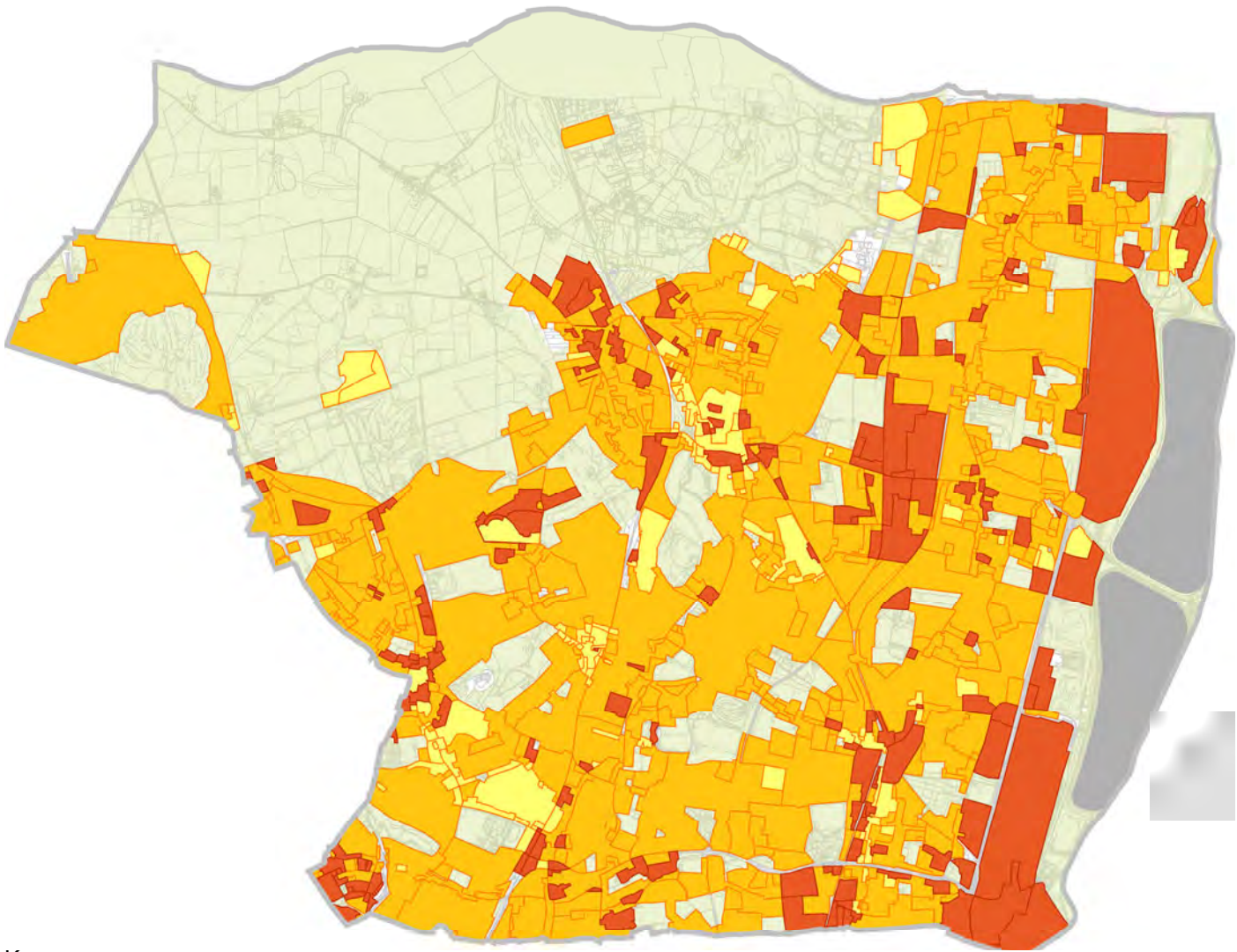
Draft findings

Draft report due 30 April

Tall buildings

- Supported in appropriate locations
- Different definitions of 'tall buildings' are used throughout the borough
- Reflect local context
- Appropriate locations for tall buildings – along with indicative heights
- Not a blanket height across the borough
- Reflects sensitivities relating to heritage assets

Scale of change Recommendation



Key

Non Urban

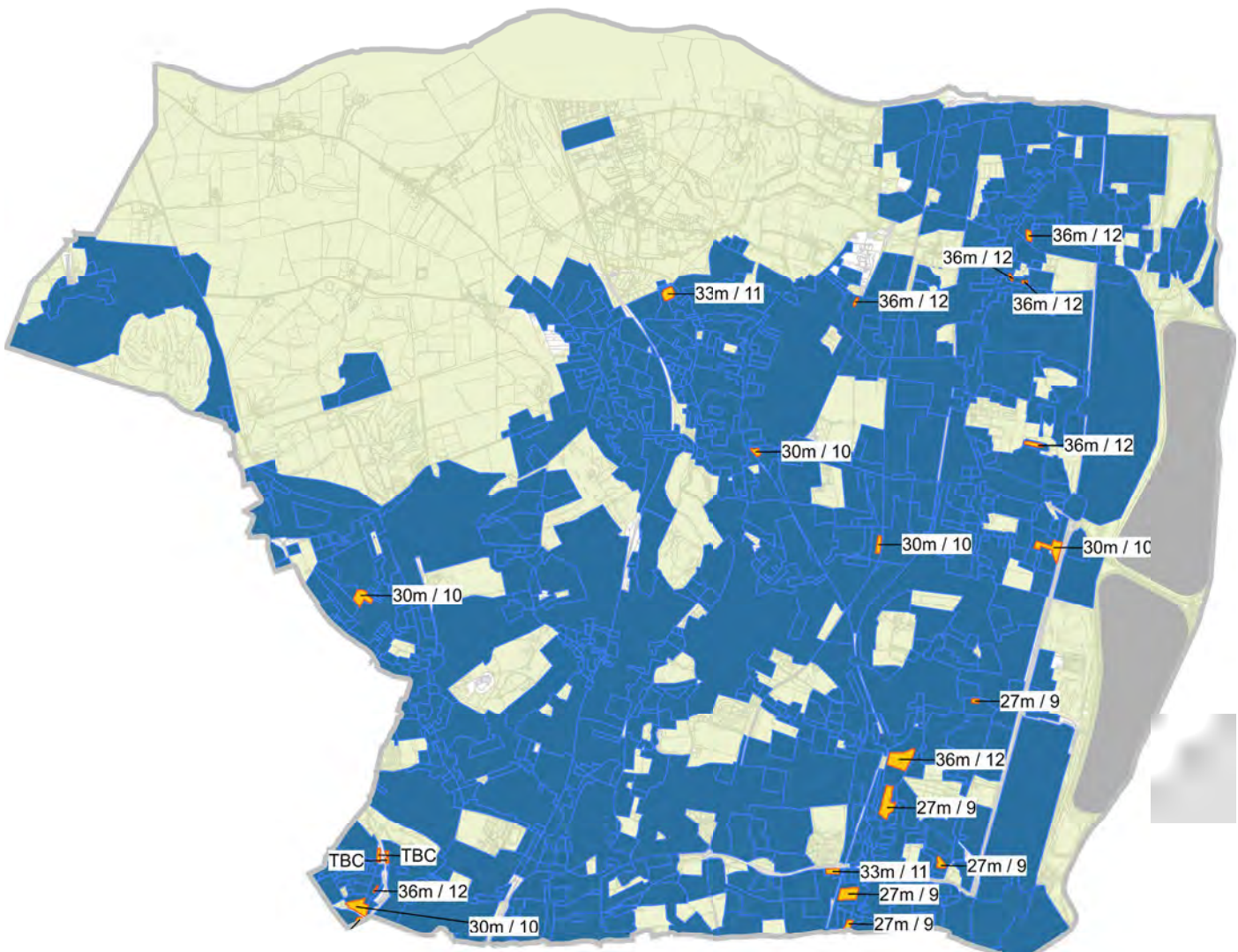
- Reservoirs
- Landscape Typology

Level of change

- Transformative
- Medium
- Limited



Tall Building Definition



Key

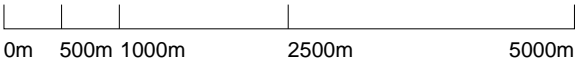
Non Urban

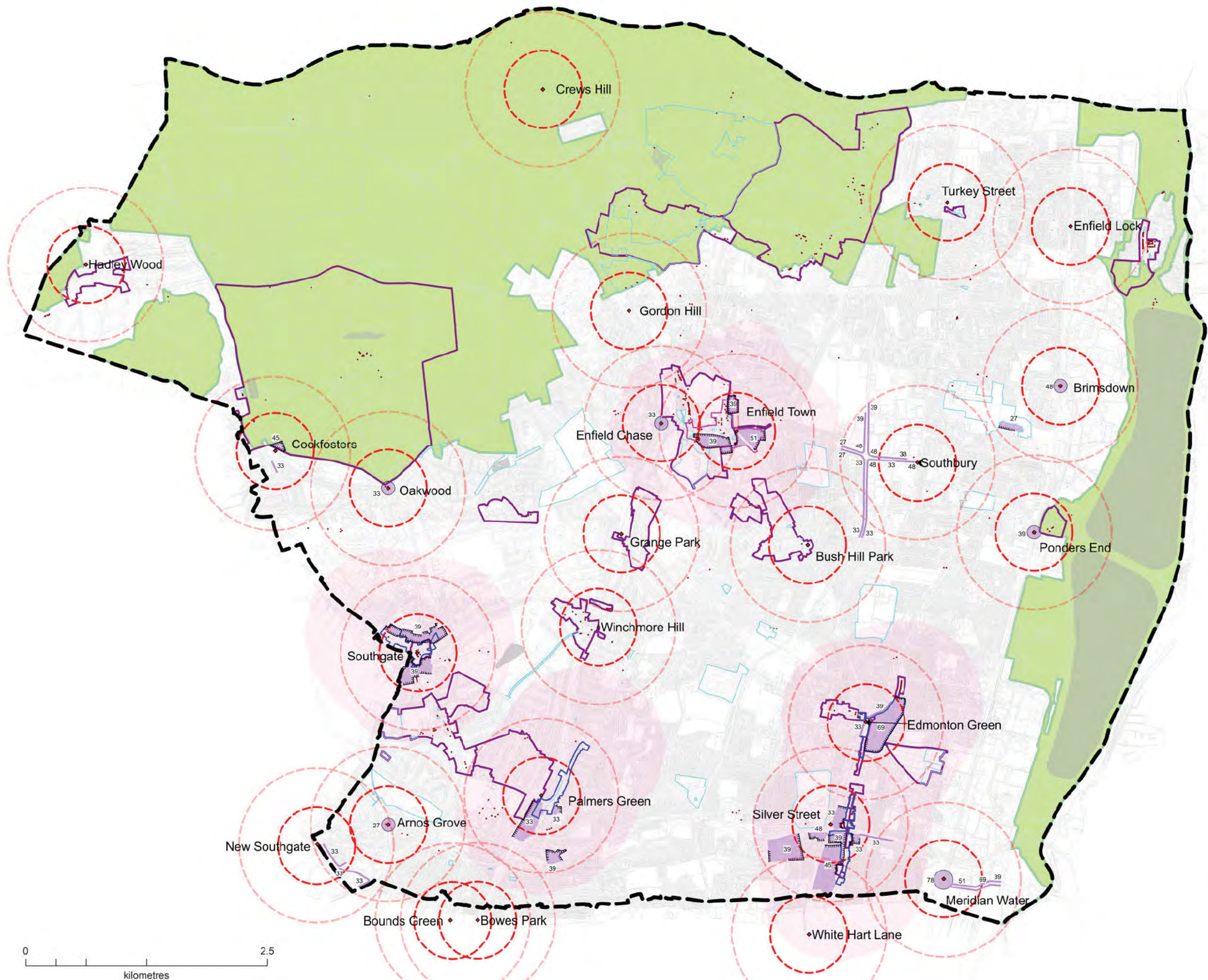
Reservoirs

Landscape Typology

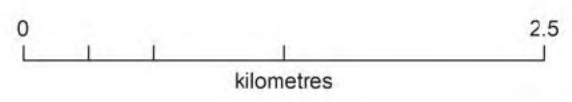
Context Specific Definition

- Greater than London Plan Definition
(XXm / no. 3m standard residential storeys)
- London Plan Definition
21m - (7 no. 3 m standard Residential Storey Equivalent)





- Borough boundary
 - Green Belt
 - Station
 - 800m radius (10 min walk)
 - 400m radius (5 min walk)
 - Conservation Area
 - Listed Buildings
 - Local Heritage Assets
 - Major Centre
 - District Centre
 - Reservoirs
 - 800m buffer from town centre
 - Appropriate location for tall buildings to mark station
 - Appropriate location for tall buildings frontage
 - Appropriate area for tall buildings
 - Sensitive edges
- 39** Maximum height in meters
This is the total height of the building and includes an allowance at roof level for roof parapets, plant rooms, lifts overruns, etc.
- Maximum heights have been calculated assuming a 3m floor to floor standard height.



Park Plaza West and Brookfield – Broxbourne

- Currently being promoted as a 'suitable HQ location for technology, research and development, life sciences and creative sectors'
- No sign of occupiers
- A development agreement (between Broxbourne Borough Council, Hertfordshire County Council, Sovereign Centros and Peveril Securities) has been signed for [Brookfield Riverside](#), and is apparently due to be completed by the end of 2022.



Next steps

- None of the options are fixed
- Still testing and seeking views with officers and consultant team
- Officer draft on circulation **14 to 30 April**
- Final set of options will be in draft Plan brought to Members in June
- Further views will be sought through Reg 18 consultation
- Further review, discussion, testing before final decision of targets and spatial strategy between summer-autumn 2021
- Decision in 2021/22 on preferred option to take into full plan that will submit to SoS for Examination

THANK YOU

[REDACTED]

From: [REDACTED] <[REDACTED]@enfield.gov.uk>
Sent: 08 June 2021 17:10
To: [REDACTED]
Cc: [REDACTED]
Subject: Enfield's next Draft Local Plan [SEC=OFFICIAL]
Attachments: Enfield Council: Enfield's plan to become the green heart of London and increase opportunities for all

Classification: OFFICIAL

Dear [REDACTED]

I hope you're well and enjoying the sunshine. I wanted to give you a short heads up that Enfield has pre-published a Regulation 18 Draft Local Plan for consideration at our Full Council on 9 June.

The press release is attached, and papers below on the following link. For Enfield, this is an ambitious plan for 25,000 new homes – particularly family homes - and it provides additional Strategic Industrial Land along with a new policy designation supporting rewilding and biodiversity enhancements across large areas of the borough.

<https://governance.enfield.gov.uk/ieListDocuments.aspx?CId=108&MId=13694&Ver=4>

We expect consultation to start later this month and are targeting a Regulation 19 for this time next year. Please do let me know if it would be helpful to meet (virtually) to discuss.

Kind Regards

[REDACTED]

[REDACTED]
[REDACTED] | Plan Making Team
Strategic Planning and Design | Planning Service

Place Department

Direct Line: 020 8132 [REDACTED]

Team number: 020 8379 [REDACTED]