

**Examination of London Plan 2017 as proposed to be modified**

**Statement of the London Borough of Enfield on Matter 65**

**1 Background**

- 1.1 In preparing its Regulation 18 Consultation Document for its Local Plan 2036<sup>1</sup>, London Borough of Enfield (“Enfield”) became aware that the spatial approach proposed in the London Plan 2017 (“the Plan”)<sup>2</sup> would constrain its ability to deliver Good Growth.
- 1.2 Therefore Enfield intends to propose amendments at Examination aimed at facilitating Good Growth delivery. These amendments, set out here and in other Matter Statements, are evidenced by research recently undertaken or commissioned by Enfield.
- 1.3 One of Enfield’s particular concerns is whether it is realistic that the Council will be able to achieve the Plan’s required approach to Good Growth, including: housing delivery; industrial capacity; Opportunity Areas; and, addressing the impact of inequality - within the preferred spatial strategy in the Plan. This concern is set out in the Council’s statement on Matter 1 which highlights a particular shortcoming in the Integrated Impact Assessment (IIA), in particular whether adequate consideration and assessment has been given to reasonable alternatives including the potential need for selective Green Belt release.

**2 Meeting the Plan priorities in Enfield**

- 2.1 Paragraphs 2.2, 2.3 and 2.4 in the Council’s statement on Matter 20 sets out how the Plan proposes to more than double the borough’s housing target to 1,876 dwellings per annum. Over the five year period 2018/19 to 2022/23 known sites could deliver approximately 4,808 new homes which equates to an annual average of 962 per year. Up until 2032/33 the Trajectory shows 15,650 additional new homes could be delivered or an annual average of 1,043. However this is significantly fewer than the 1,876 dwellings per annum in the Plan. Reaching 1,876 homes per annum will require a 79% increase on housing trajectory predictions.
- 2.2 The Secretary of State has allowed the London Plan (and some other plans) to move forwards to Examination despite not being prepared on the basis required by NPPF 2018. However, unless NPPF 2018 is further modified any London Borough which is at an earlier stage in Local Plan preparation will need to show that it can deliver sufficient housing to meet Objectively Assessed Need (OAN) based on the NPPF 2018 methodology.

<sup>1</sup> Enfield Towards a New Local Plan 2036 Issues and Options Public Consultation (Regulation 18) December 2018 [www.enfield.gov.uk/newlocalplan](http://www.enfield.gov.uk/newlocalplan)

<sup>2</sup> Like the Panel we refer to the Plan as comprising London Plan 2017 incorporating the Mayor’s Minor Suggested Changes (August 2018)

2.3 Based on past experience, evidence<sup>3</sup> indicates that these are challenging targets for Enfield to meet, therefore whilst the Council will need to plan for more housing, it will also need to plan differently. For this reason, the Council has identified seven broad locations in their Regulation 18 Local Plan consultation where the majority of new development could be accommodated. These are:

- Our main town centres and areas around all stations;
- Transport corridors;
- Existing estate renewal and regeneration programmes;
- Eastern corridor and low density industrial areas;
- Future Crossrail 2 Growth Corridor;
- The New Southgate and Upper Lee Valley Opportunity Areas; and
- Strategic plan-led approach to Green Belt.

2.4 Enfield needs to have realistic options in the context of the Council's national and regional obligations in preparing its Local Plan. Accordingly, meeting as a minimum the draft new London Plan target of 1,876 homes a year for the next 10 years, and a prospect of Government assessed OAN need of 3,330 homes a year, will mean that we need to consider **all** these sources of new development.

### **3 Green Belt in Enfield**

3.1 About one third of the Borough's 50 square km is designated Green Belt; used for farming, country parks and horticulture. There are two distinct areas of Green Belt in the Borough: the majority covers the north- western part of the Borough, between the metropolitan edge and the M25, and a smaller though still substantial area covers the Lee Valley along the Borough's eastern edge. Continuous urban development between Enfield and Cheshunt separates the two areas of Green Belt.

3.2 Beyond the Borough boundaries the Green Belt continues: West into Hertsmere District and the northern fringe of the London Borough of Barnet; North beyond the M25 into Welwyn Hatfield District and Broxbourne District; and, East from the Lee Valley into Epping Forest District and a narrow strip of the Lee Valley within the London Borough of Waltham Forest.

<sup>3</sup> As set out in the Council's matter statements 11, 14 and 20.

Figure 2.2 Growth Options diagram from Enfield Towards a New Local Plan 2036 Issues and Options Public Consultation

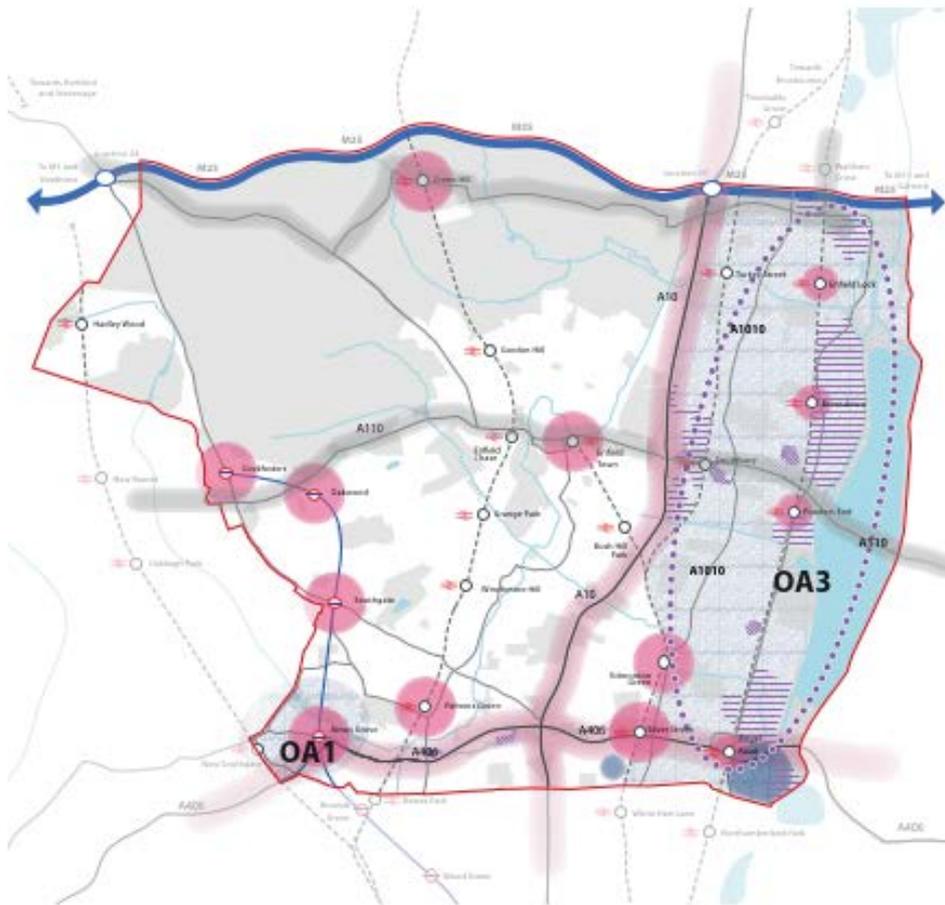


Figure 2.2: Enfield 2036 Growth Options Diagram

- Key**
- Enfield borough boundary
  - Railway
  - Primary road
  - National Rail station
  - London Underground station
  - Piccadilly line
  - Open space
  - Water body
  - Town Centres and areas around stations
  - Movement corridors and linear gateways
  - East west connectivity
  - Eastern Corridor
  - Strategic Industrial Location
  - Locally Significant Industrial Site
  - Estate renewal and regeneration programmes
  - Opportunity Areas** (as identified in the draft new London Plan (2017))
  - OA1** New Southgate
  - OA3** Upper Lee Valley

### **The underlying need for flexibility in the Plan**

3.3 Policy G2 (B) states that de-designation of the Green Belt will not be supported. The genesis of this position is explored in Matter 1 and GLA Officer's professional judgement (as guided by results in the Integrated Impact Assessment (IIA)) that Green Belt release is not required to meet London's growth target<sup>4</sup>. A clear statement of the Mayor's position on Green Belt is given in NLP/MS/01:

*"As such, my draft Plan uses all the potential source of available housing capacity set out in the new NPPF: increasing densities around well-connected places; enhancing the role of small sites; and encourage mixed use developments through intensification and co-location. The only available land we have not investigated is protected open space, which as Mayor I would not seek to bring forward for development. Please could you clarify whether you are suggesting that Green Belt and other protected green space should be a source of land supply for the purposes of the Plan?"*

3.4 Plan policy G2 is inconsistent with 2012 NPPF as it does not a) allow for Green Belt boundaries to be altered in exceptional circumstances, through the preparation or review of the Local Plan or b) allow for 'very special circumstances' to be applied in the assessment of planning applications in the Green Belt.

3.5 Given that this is one of the largest land assets within Enfield, it is not sensible to rule out the use of this option, expecting instead significant additional housing plus new Strategic Industrial Land to be accommodated wholly within the urban area<sup>5</sup>. Instead, Enfield considers it is essential that there is a planned approach to any question of development of current Green Belt land. New Green Belt boundaries would need to be reviewed in accordance with the principles set out in the 2018 NPPF<sup>6</sup>, and Enfield will be able to consider whether exceptional circumstances exist to justify changes to Green Belt boundaries and compensatory improvements to remaining Green Belt land<sup>7</sup>.

3.6 The Mayor's responses to the Panel's Preliminary Questions<sup>8</sup> points to the relationship of the Plan to NPPF 2012 and the further context that the NPPF provides in: defining Green Belt boundaries; altering boundaries in exceptional circumstances; and, using sustainable patterns of development (for example to channel development to urban areas and towns and villages inside/inset within the Green Belt boundary). This reflects Enfield's proposed strategic plan-led approach to Green Belt<sup>9</sup>. Notwithstanding a firm protection of Enfield's Green Belt there is the possibility within our Green Belt to provide an accessible and sustainable option or options to help meet our growth challenge.

<sup>4</sup> In Matter 1 Enfield have already commented on whether the IIA process to rule out an option of selective Green Belt review is justified.

<sup>5</sup> As set out in the Council's matter statements 11, 14, 20 and 62.

<sup>6</sup> Enfield Local Plan 2036 will be considered against NPPF 2018.

<sup>7</sup> NPPF 2018, paragraphs 138 and 139.

<sup>8</sup> NLP/EX/03, PQ6, paragraphs 18 to 23.

<sup>9</sup> Enfield Towards a New Local Plan 2036 (Regulation 18) paragraph 2.12.

- 3.7 Whilst the Mayor's response is a clarification, it is not accompanied by any further suggested modifications to the Plan. Therefore it does not help address a key issue which Enfield may well face in developing the Local Plan 2036 – that of a London Plan which rejects the need for Green Belt land to deliver its objectives; with a Policy statement that de-designation of Green Belt will categorically not be supported; and, therefore the prospect of the Enfield Local Plan 2036 not being in general conformity with the Plan. The Mayor does not acknowledge<sup>10</sup> the very real prospect that Policy will have immediately moved on and that boroughs will face challenging positions at Examination of 'general conformity' to the Plan linked to NPPF 2012 and tests of soundness against National Policy as set out in NPPF 2018.
- 3.8 Unless modified, Enfield will be left with a strategic planning framework which is not fit for purpose, based on:
- i) An IIA which has failed to engage with the political hard choice of the possible need for selective Green Belt release; and
  - ii) A Plan that does not even purport to provide strategic guidance in the short-medium term.
- 3.9 For the reasons set out above, it is essential that Enfield, through its Local Plan, is able to look at **all** its land resource which includes the extensive Metropolitan Green Belt, and devise a strategy appropriate to the borough which will help meet both housing and employment land needs, create the pre-conditions for successful WAML four-track and Crossrail 2 outcomes and use a wide range of development opportunities to address the impact of inequality.

#### **4 Conclusions**

- 4.1 These are the responses to the Panels questions.
- 4.2 Would Policies G2 and G3 provide an effective strategic context for the preparation of local plans and neighbourhood plans? Are the policies and detailed criteria justified and necessary and would they provide an effective basis for development management?
- 4.3 As explained in sections 2 and 3 above Enfield does not believe that the strategy in Policy G2 will be effective in facilitating a deliverable solution to Good Growth in Enfield over the Plan period. The critical point is that unless greater flexibility is built into the Plan<sup>11</sup>, it will impede the delivery of the growth that Enfield needs rather than facilitate it. Enfield will need to consider **all** potential growth options sources of new development in order to meet as a minimum the Plan target of 1,876 homes a year for the next 10 years and the prospect of the Government assessed OAN need.

<sup>10</sup> In NLP/AD/31 RT Hon James Brokenshire states that *"It remains crucial however that you bring forward a revised London Plan that has regard to new national policies at the earliest opportunity"*. The Mayor's response NLP/MS/01 does not specifically address this point.

<sup>11</sup> Across Small Sites, Industrial Land and Green Belt policies.

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- 4.4 In particular: a) Is Policy G2 on London's Green Belt consistent with national policy and, if not, is this justified?
- 4.5 Plan policy G2 is inconsistent with 2012 NPPF as it does not a) allow for Green Belt boundaries to be altered in exceptional circumstances, through the preparation or review of the Local Plan or b) allow for 'very special circumstances' to be applied in the assessment of planning applications in the Green Belt. The policy is not justified as the reasonable alternative of selective Green Belt release has not been investigated.
- 4.6 b) Is the 'swapping' of Metropolitan Open Land (MOL) referred to in paragraph 8.3.2 and allowed for by Policy G3 AC justified? Do the other detailed criteria provide sufficient clarity about inappropriate development and how any boundary alterations should proceed? Should parts of the River Thames be designated as MOL?
- 4.7 No comment.

**5 Proposed Drafting Changes to London Plan**

5.1 The proposed changes to London Plan are set out in the table below.

Reference	Text Change	Reason
New Policy G2 C	Where a borough's housing or employment land needs cannot be satisfied within the built up area in very special circumstances the boundary of the Metropolitan Green Belt may be redefined in the Borough Local Plans to provide for sustainable extensions to the urban area.	To allow flexibility to the Boroughs in determining when Sustainable Intensification will not deliver all the land required and for consistency with NPPF 2012 and 2018.