

Examination of London Plan 2017 as proposed to be modified

Statement of the London Borough of Enfield on Matters 93.

1 Background

1.1 Within its various submissions to the Panel, Enfield has been calling for more flexibility in London Plan 2017 in order that Enfield can meet the challenges particularly of delivering sufficient housing within the Borough to meet both its own needs and the wider needs of London.

1.2 In this Statement, in relation to Matter 93 the concerns of the Borough focus on the lack of flexibility. It is concerned that Policy DF1 will act as a further barrier because of an implied “one size fits all”. The Borough Council considers that it should set its local priorities and the Mayor should confine his control to strategic transport priorities.

2 M93. Is Policy DF1 justified and consistent with national policy, and would it be effective? In particular: a) Would the policy be effective in helping to ensure the timely delivery of infrastructure to support development proposed in the Plan?

2.1 Enfield is not convinced that DF1 will ensure the timely delivery of infrastructure to support development proposed in the plan for the following reasons.

2.2 Timely infrastructure delivery is much more complex than a set of rules dealing with capturing funds, particularly because there are now so many agencies delivering the infrastructure. The solution is likely to lie within the individual infrastructure plans within and between Boroughs where more detailed issues can be looked at in the round.

2.3 Policy DF1 does not help in this respect. Given that the Mayor and TfL are such major players in this in relation to provision of transport infrastructure it would have been helpful as per Enfield’s comments on Matter 76 if the Mayor had been more explicit about his priorities between different transport projects within the plan.

2.4 Enfield therefore sees little benefit arising from Policy DF1 in relation to actual delivery of infrastructure. It considers that that priorities are far better worked out based on actual proposals.

b) Is the approach to viability assessments set out in parts A, B and C consistent with national policy and is it necessary for this to be set out in the Plan rather than left to be determined at the local level?

- 2.5 Enfield supports an approach which moves away from the current position where the starting point for each development is a challenge to the policy requirements (and essentially the amount of affordable housing).
- 2.6 On the other hand it recognizes that there is a trade off in terms of the rigid enforcement of policy and achieving other objectives such as increasing the overall amount of housing delivered in the London.
- 2.7 It has not undertaken a detailed analysis of compliance of this policy and the Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) with the updated national guidance of July 2018 because its focus will be on preparing its own viability assessment for the purposes of the Enfield Local Plan. However, in this context it believes that it should have the right to choose whether to adopt the Mayor's suggested approach or its own approach.
- 2.8 Therefore, Enfield is content with parts A and B or Policy DF1 but would like to see more flexibility in relation to part C such that the final line of that part of the policy should be amended to say, "with National Policy and Guidance, as amplified through either the Borough's own detailed guidance or if this is not in place the Mayor's Affordable Housing and Viability SPG."

c) Is the infrastructure prioritization set out in part D justified?

- 2.9 No. Neither is there any justification given for the prioritization within the subsequent explanatory text in the plan, nor in principle should these priorities be adopted by Boroughs. Clearly the Mayor has a policy stance on giving transport a particularly high priority because of his control over this. However, Enfield considers that it should be able to determine the priorities according to the particular circumstances it finds weighing up individually those priorities in accordance with representations made during both the plan making and development management processes.
- 2.10 This goes back to the need for flexibility to address particular circumstances, which has been the Enfield approach towards the London Plan. In this last matter statement, the issue has come to the fore again. Rigid prescription from the Centre is more likely to act as a brake on delivery. Enfield wants to have the flexibility to maximize the good growth it can secure through the Borough including flexibility in terms of

determining planning gain priorities. In this respect, the plan's rigidity again undermines rather than promotes the potential of Enfield to deliver the much needed growth that Enfield and London as a whole need.