Please reply to: Plan Making team

Email: localplan@enfield.gov.uk
Date: 19 October 2026

**London Borough of Enfield Council Response to the Draft London Plan**

Dear Sir/Madam,

Thank you for the opportunity to comment on the draft London Plan.

Enfield Council recognises the importance of a clear strategic planning framework for London and supports the delivery of homes, jobs, infrastructure and environmental improvements across the capital. We support growth, regeneration and investment where they are sustainable, deliverable and supported by the necessary infrastructure.

**Enfield is actively driving delivery**
Enfield is a proactive borough. In the first six months of the current administration, the Council has taken action to stimulate small-sites delivery, accelerate council housebuilding and support the better use and intensification of industrial land.

In addition, officers have identified brownfield sites across the borough that could be unlocked to deliver 28,000 without having to permit development on our much-loved Green Belt.

We are working to increase housing supply through direct council delivery, regeneration, planning permissions, strategic sites and smaller development opportunities. At the same time, we are seeking to protect and grow employment, create jobs and secure investment in difficult economic and market conditions.

We are not questioning London's need for growth, nor avoiding difficult decisions. Our concern is that strategic targets must be grounded in credible evidence and matched by the infrastructure, funding and delivery arrangements needed to achieve them. In addition, any plan must be mindful of the impact that development has on existing communities and seek to ensure that growth is not to the detriment of those who already call Enfield their home.

The draft Plan asks too much of Enfield without demonstrating how that growth can realistically be delivered. It too often appears to adopt a development-first, infrastructure-second approach, with ambitious targets and land-use assumptions proposed without sufficient confidence that the necessary transport, utilities, schools, healthcare, community

facilities and funding will be in place.

The test of a successful London Plan is not how many homes or jobs can be allocated on paper. It is whether the homes, jobs, infrastructure and communities can actually be delivered.

**Enfield's proposed housing requirement is not justified**
The draft Plan proposes an overall ten-year housing requirement of 21,062 homes for Enfield. This includes a separate 7,000-home greenfield component.

The Council has significant concerns regarding this component. The draft London Plan does not provide a sufficiently transparent explanation of how the 7,000-home figure has been derived, nor does it demonstrate how development at this scale could be delivered within the proposed timeframe.

The figure appears to be based on strategic assumptions that have not been adequately tested against infrastructure requirements, environmental constraints, delivery arrangements and realistic market conditions. The additional 7,000-home component materially increases Enfield's overall housing requirement and associated infrastructure burden.

The GLA should therefore either publish a robust, transparent and deliverable evidence base for the 7,000-home component or remove it from the Plan.

**The draft London Plan's Green Belt assumptions are not justified**
The Council does not support the draft London Plan's approach to strategic Green Belt growth in Enfield. Decisions affecting the Green Belt carry lasting consequences for communities, landscapes and infrastructure and should be subject to the highest level of scrutiny.

The London Plan should provide strategic direction, but it should not predetermine Green Belt boundaries, development capacities or future planning outcomes through assumptions that have not been demonstrated to be justified or deliverable. Nor should the identification of a Broad Location for Growth establish the principle of development or bypass local consultation, democratic decision-making and independent examination.

**Enfield's withdrawal from the New Towns Programme**
Enfield's withdrawal from the Government's New Towns Programme is directly relevant. The draft London Plan should not rely on assumptions associated with the former New Town proposal unless the GLA can clearly demonstrate why those assumptions remain applicable and deliverable following the Council's withdrawal from the programme.

**Metropolitan Open Land requires robust protection**
Metropolitan Open Land is one of London's most important environmental and community assets. It supports recreation, biodiversity, climate resilience, landscape character and public wellbeing.

The final Plan must distinguish clearly between Metropolitan Open Land and Green Belt. Its wording should not create uncertainty or weaken the long-established protection afforded to Metropolitan Open Land.

Any change affecting Metropolitan Open Land must remain exceptional, clearly justified and supported by robust evidence.

**Brownfield land must remain the first priority**
The Council strongly supports a genuine brownfield-first approach to growth and regeneration.

Previously developed land should remain the primary focus for housing and economic development wherever realistic opportunities exist. Strategic industrial land also plays a vital role in supporting jobs, logistics, services and London's wider economy and should not be displaced without clear evidence and a deliverable alternative strategy.

The Council is concerned that elements of the draft approach could result in industrial capacity being released elsewhere while increasing pressure for development on Green Belt land in Enfield.

**Infrastructure must lead, not follow**
Substantial growth cannot be delivered on the assumption that the necessary infrastructure will emerge later.

Where major development is proposed, the Plan must identify the transport and utility improvements required, how schools, healthcare and community facilities will be secured, who will lead delivery, how infrastructure will be financed, and how development and infrastructure will be phased.

Growth should follow a credible infrastructure pathway. Infrastructure should not be left to catch up after development has taken place.

**A stronger partnership with boroughs**
Enfield supports a London Plan that is ambitious for the capital, but ambition must be grounded in evidence, infrastructure and delivery.

Boroughs must retain the ability to shape sustainable growth through locally prepared evidence, meaningful public consultation and independently examined Local Plans.

Enfield's record demonstrates that boroughs are not obstacles to growth. The best outcomes for London will be achieved through collaboration rather than prescription.

**Conclusion**
Enfield supports the ambition of building a prosperous, sustainable and inclusive London.

However, the Council has significant concerns regarding:

- the proposed 7,000-home greenfield component;
- based upon current assumptions;
- the lack of supporting infrastructure and delivery evidence; and
- insufficient weight being given to borough-level evidence and democratic plan-making.

We therefore seek:

- a justified and deliverable housing requirement for Enfield;
- removal of the proposed 7,000-home greenfield component unless supported by compelling, transparent and deliverable evidence;
- stronger protection of Green Belt and Metropolitan Open Land;
- a genuine brownfield-first approach;
- infrastructure commitments matched to the scale and timing of proposed growth; and
- a partnership approach that treats boroughs as essential delivery partners.

The Council's detailed officer representations provide the supporting technical evidence and proposed modifications. I ask that they are given full and careful consideration as the Plan progresses to Examination in Public.

Yours faithfully,

**Cllr Michael Rye OBE**
**Deputy Leader of the Council and Cabinet Member for Planning and Regeneration | London Borough of Enfield**