Please reply to: Plan Making team

Email: localplan@enfield.gov.uk
Date: 15 October 2026

London Plan Team,
Planning & Regeneration,
City Hall,
Kamal Chunchie Way,
London,
E16 1ZE

London Borough of Enfield Council Response to the Draft London Plan

Dear London Plan Team,

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

Enfield Council supports the continued role of the London Plan as London's strategic spatial development strategy and welcomes its ambition to plan positively for growth, housing delivery, economic development, environmental improvements and the transition to a low-carbon future.

The Council strongly supports the principles of sustainable and infrastructure-led growth, urban regeneration, good design, inclusive development and the effective use of land. We also support the overall objective of meeting London's housing and economic needs whilst enhancing quality of life and environmental outcomes.

However, the Council has significant concerns regarding aspects of the draft Plan's proposed growth strategy and supporting evidence, particularly where strategic growth expectations are not yet matched by sufficient clarity regarding infrastructure, delivery, viability, funding and implementation.

In particular, the Council's representations focus on the following strategic issues:

Spatial strategy and housing growth

The Council supports the need for a strategic approach to accommodating growth. However, we are not satisfied that the borough-specific assumptions underpinning Enfield's proposed housing requirement and associated growth expectations have been demonstrated with sufficient clarity.

The Council is particularly concerned by the proposed 7,000-home greenfield component attributed to Enfield. The evidence base does not currently provide a

sufficiently transparent explanation of how this figure has been derived, how it relates to the emerging Enfield Local Plan, or how it would be delivered within the London Plan period.

Infrastructure-led delivery

A recurring concern throughout Enfield's response is the relationship between growth and infrastructure delivery.

The draft Plan identifies significant housing, employment and industrial growth expectations. However, the Council considers that the evidence currently provides insufficient certainty regarding:

- transport interventions and funding;
- utilities capacity and network reinforcement;
- social infrastructure provision;
- delivery responsibilities;
- land assembly;
- implementation timescales; and
- the relationship between infrastructure delivery and housing delivery.

The Council considers that strategic growth locations should be supported by a clearer and more transparent delivery framework.

Role of borough Local Plans

The Council strongly supports the strategic role of the London Plan. However, it is important that the Plan does not inadvertently blur the distinction between strategic direction and local plan-making.

The Council seeks greater clarity regarding the status and function of Broad Locations for Growth, future candidate growth locations and associated capacity assumptions. The London Plan should establish strategic direction without predetermining allocations, Green Belt decisions, infrastructure requirements or detailed development capacities that remain matters for borough Local Plans.

Outer London circumstances

Several aspects of the draft Plan rely upon London-wide methodologies and assumptions.

Whilst these strategic tools are valuable, the Council considers that greater recognition should be given to the differing circumstances of Outer London boroughs, including:

- family housing needs;
- suburban character;
- industrial and logistics functions;
- orbital travel patterns;
- infrastructure constraints;
- viability considerations; and
- locally derived evidence.

The Council therefore seeks greater flexibility for boroughs to apply local evidence in areas such as housing mix, parking standards, optimisation, tall buildings and growth management.

Industrial land and economic growth

Enfield supports the continued protection of strategically important employment land and welcomes recognition of the role of industrial land in supporting jobs, logistics and economic growth.

However, the Council has concerns that elements of the proposed approach could increase pressure for industrial development on Green Belt land, including through Property Market Area requirements and assumptions regarding industrial release and reprovision elsewhere.

The Council considers that previously developed land should remain the primary focus for growth and that strategic industrial needs should be supported through realistic and deliverable evidence.

Gypsy and Traveller accommodation

Enfield Council supports the draft Plan’s approach to Gypsy and Traveller accommodation and has not identified any soundness concerns requiring modification.

Enfield is taking proactive steps to address identified accommodation needs through its dedicated Traveller Local Plan. The Plan has been informed by local evidence

and consultation and is being prepared for submission to the Secretary of State for independent examination no later than 31 December 2026.

Participation in Examination in Public

The Council would welcome the opportunity to participate in the Examination in Public should the Inspectors consider this helpful.

In particular, the Council would be pleased to assist discussion regarding:

- the spatial strategy;
- housing requirements and delivery assumptions;
- Broad Locations for Growth;
- infrastructure and transport delivery;
- viability and implementation;
- optimisation and tall buildings; and
- the relationship between the London Plan and borough Local Plans.

The Council looks forward to continuing to engage positively with the Greater London Authority as the Plan progresses and would welcome further discussion on the modifications proposed within our detailed representations.

Yours faithfully,



May Hope MRTPI
Programme Director
Strategic Planning, Design and Inclusive Growth