

Enfield Local Plan

Spatial Strategy and Overall Approach Topic Paper

March 2024



Background Topic Papers

A series of background topic papers have been prepared to support the proposed Submission Version Enfield Local Plan (Regulation-19). These are as follows:

- Spatial Strategy and Overall Approach Topic Paper
- Exceptional Circumstances Topic Paper
- Site Allocations Topic Paper
- Housing Topic Paper
- Employment Topic Paper
- Crews Hill Topic Paper
- Chase Park Topic Paper

These papers are intended to help explain the Local Plan spatial strategy, policies and associated allocations, with reference to the Local Plan evidence base.

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1. Introduction

New Local Plan

- 1.1 London Borough Enfield (LBE) has prepared a new Enfield Local Plan (ELP). The ELP sets out the vision for the Borough in the period 2019 to 2041, to help shape how the area will evolve to meet the needs of its residents and businesses. The ELP provides a spatial strategy and associated site allocations to accommodate this change and growth and includes a range of policies to manage the form and quality of new development. The ELP also sets out how growth will be delivered in a sustainable manner, that maintains and enhances the quality of the many unique urban and rural places in the Borough.
- 1.2 Once adopted, the ELP will fully replace and consolidate the policies and site allocations in many of the Borough's previously adopted Local Plan documents. The ELP will not replace the North London Waste Plan 2022, but it will replace the Core Strategy (2010), the Development Management Document (2014), the Edmonton Leaside Area Action Plan (2020), the North East Enfield Area Action Plan (2016) and the North Circular Area Action Plan (2014).

Purpose of this Topic Paper

- 1.3 The purpose of this Topic Paper is to provide the background to the preparation of the ELP and to summarise the key policies, evidence and other factors that have shaped and informed the Spatial Strategy in the publication draft ELP. The Spatial Strategy is presented in Policy SS1 and sets the strategic direction for other policies in the ELP, including the site allocations.
- 1.4 The key considerations that have been taken into account in developing the Spatial Strategy, include:
 - National Planning Policy and Guidance (both in relation to the process of preparing a Local Plan, and in relation to policy matters, such housing, employment land and protection of the environment);
 - The London Plan;
 - Other Borough strategies and associated priorities, including as set out in the Enfield Council Plan 2023/26¹ and the Enfield Climate Action Plan;
 - The representations to the Local Plan consultations;
 - Ongoing engagement with key stakeholders in meeting the Council's obligations under the Duty to Cooperate (DtC);
 - The findings of the Integrated Impact Assessment (IIA) comprising Sustainability Appraisal (incorporating Strategic Environmental Assessment), Health Impact Assessment, Equalities Impact Assessment and Community Safety Impact Assessment; and
 - Habitats Regulations Assessment.
- 1.5 This Topic Paper seeks to provide a succinct explanation of the choices made in determining the most appropriate Spatial Strategy for the Borough. It provides only

¹ https://www.enfield.gov.uk/data/assets/pdf_file/0022/34087/Enfield-Council-Plan-2023-2026-Your-Council.pdf

headline information in terms of the evidence base, consultation feedback and content of national and strategic policy documents – making use of “sign-posting” to these and other documents as necessary.

2. Shaping of the Enfield Local Plan

What has shaped the Enfield Local Plan

- 2.1 The Council is committed to promoting a sustainable pattern of development that seeks to meet the development needs of the area, aligns growth and infrastructure, improves the environment, and mitigates and adapts to the effects of climate change (in accordance with NPPF paragraph 11).
- 2.2 In determining the spatial strategy for the draft Local Plan, the Council took into account the matters listed under paragraph 1.4 above. Inevitably there were some tensions between competing priorities and policy objectives, and the Council has therefore had to make some difficult but informed decisions. The Integrated Impact Assessment (IIA)² process supported this decision making, by identifying the impacts of different spatial strategy options, and recommending potential mitigation measures. Further detail is provided below.
- 2.3 The ELP must comply with legal and procedural requirements and must meet the test of soundness. This is set out in the NPPF at paragraph 35 and requires that the ELP be (a) positively prepared (b) justified, (c) effective and (d) consistent with national policy. National planning policy is primarily set out in the NPPF and PPG. Relating to part of London, the ELP must also be in general conformity with the London Plan.
- 2.4 The Localism Act 2011 places a statutory duty (the ‘duty to cooperate’) on local planning authorities to work constructively with neighbouring authorities and other prescribed bodies in preparing a Local Plan. A written record of the process and outcomes of engagement with our neighbours, partners and infrastructure providers has been detailed in a Duty to Cooperate Compliance Statement³.
- 2.5 The Duty to Cooperate discussions have addressed a wide range of issues, including whether any of the adjoining authority areas are able to assist in meeting any of Enfield’s development needs (for example, in relation to housing and employment needs).
- 2.6 The Council has a strong commitment to community consultation and engagement, and this has played an important part of the plan-making process. The consultations throughout the process have provided a real opportunity to gain views on what really matters to local residents and local civic groups representing residents and what the ELP should include. The representations received in response to the consultations have been considered at each stage of the plan preparation process and have been used to inform further consultations and then the publication draft ELP itself.
- 2.7 The Local Plan has been informed by up to date evidence prepared by Council Officers and consultants appointed by the Council. The evidence base⁴ addresses a wide range of topics, and has helped in understanding future development needs, planning constraints, and the viability and deliverability of proposed development. Further consideration is given to development needs (or ‘growth requirements’) in the Section 5 below.

² https://www.enfield.gov.uk/data/assets/pdf_file/0027/49239/Enfield-Reg-19-IIA-Main-report-Reg-19-Planning.pdf

³ <https://www.enfield.gov.uk/services/planning/evidence-base>

⁴ <https://www.enfield.gov.uk/services/planning/evidence-base>

2.8 Finally, the ELP does not sit in isolation, and across the Borough there are a range of wider strategies which have helped shape the direction of the ELP. These include the Council Plan 2023-26 and Climate Action Plan, as well as strategies relating to the economy, transport, housing, culture, open and green spaces, and health. The IIA (Chapter 3) includes a comprehensive list of the international and national policies, plans and programmes of relevance to preparation of the ELP.

Governance and Decision-making throughout the Plan-making process

2.9 To oversee the preparation of the ELP a Local Plan Cabinet Sub-Committee was formed. More recently (in 2022) this was replaced by a Cross-Party Working Group (CPWG), that was tasked with considering issues relating to the content of the proposed site allocations in the ELP. Elected Members have been kept informed of progress with the ELP through regular updates at: the Environment Forum, Regeneration and Economic Development Scrutiny Panel, Planning Committees, Cabinet and Full Council. More generally, Members have been briefed and engaged on progress with the ELP through bulletins and bespoke email communications, and through Officer led workshops.

2.10 The key governance and decision-making arrangements for the ELP are summarised below:

Table 1: Governance and Decision-making arrangements for the ELP

Stage	Member Input	Approving Body
Issues and Options Consultation 2015 (Regulation 18)	Requested to approve the Reg 18 Issues and Options Local Plan for statutory consultation.	Local Plan Cabinet Sub Committee (5 th November, 2015). Agenda ⁵
The 'Enfield Conversation' 2018 (Regulation 18)	Requested to approve the Reg 18 Local Plan Growth Scenarios and Call for Sites for statutory consultation.	Local Plan Cabinet Sub Committee (24 th October, 2018). Agenda ⁶
Enfield Local Plan – Main Issues and Preferred Approaches 2021 (Regulation 18)	Requested to approve the Reg 18 Draft Local Plan (with accompanying supporting documents) for statutory consultation.	Council (9 th June 2021). Agenda ⁷

⁵ <https://governance.enfield.gov.uk/documents/g9545/Agenda%20frontsheet%2005th-Nov-2015%2019.00%20Local%20Plan%20Cabinet%20Sub-Committee.pdf?T=0>

⁶ <https://governance.enfield.gov.uk/documents/b18599/TO%20FOLLOW%20AGENDA%2024th-Oct-2018%2019.30%20Local%20Plan%20Cabinet%20Sub-Committee.pdf?T=9>

⁷ <https://governance.enfield.gov.uk/documents/s87758/PL%2020.145.%20Council%20-%20Reg%2018%20Enfield%20Local%20Plan.pdf>

Stage	Member Input	Approving Body
Pre-submission draft ELP 2024 (Regulation 19)	Opportunity for Members to consider a pre-publication draft of the Local Plan 12-weeks prior to the meeting of Council on 6 th March 2024. Decision to approve publication draft ELP for consultation and following this consultation, submit the ELP for examination.	Council (March 2024). Agenda ⁸
Adoption of Local Plan document following receipt of Inspector's Report.	Decision to adopt Plan, following receipt of Inspector's Report and associated Main Modifications.	Cabinet and Council (TBC)

⁸ <https://governance.enfield.gov.uk/mgCalendarMonthView.aspx?GL=1&bcr=1>

3. Policy Context

- 3.1 As set out above, the ELP has been prepared in the context of national, regional and local policies. The elements of this policy framework of particular relevance to the ELP and its spatial strategy are summarised below⁹.

National Planning Policy Framework (December 2023)

- 3.2 In preparing Local Plans, Local Planning Authorities must address the requirements set out in national planning guidance, namely in the National Planning Policy Framework (NPPF) and supporting National Planning Policy Guidance (NPPG).
- 3.3 The latest version of the NPPF was published in December 2023. Annex 1 (Implementation), paragraph 230, confirms that the policies in the latest version of the Framework will apply for the purpose of examining plans, where those plans reach Regulation 19 state after 19th March 2024. The ELP will be published for pre-submission (Regulation 19) consultation on 28 March 2024, and therefore will be examined under the December 2023 version of the NPPF. The NPPF paragraph references below are from the December 2023 version¹⁰.
- 3.4 The purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 7). This means pursuing economic, social and environmental objectives in mutually supportive ways, including through the preparation and implementation of Local Plans.
- 3.5 Paragraph 11 requires that plans should promote sustainable patterns of development, which seek to meet the development needs of the area, align growth and infrastructure, improve the environment, and mitigate and adapt to the effects of climate change.
- 3.6 Local Plans should provide a positive vision for the future of the area, address housing needs and other economic, social and environmental priorities, and provide a platform for local people to shape their surroundings (paragraph 15). Local Plans should be aspirational but deliverable (paragraph 16).
- 3.7 Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:
- Housing, employment, retail, leisure and other commercial development;
 - Infrastructure;
 - Community facilities; and
 - Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure (paragraph 20).
- 3.8 Importantly in relation to the ELP, paragraph 22 of the NPPF advises that strategic policies should look ahead over a minimum 15-year period from adoption, to

⁹ Note, Appendix C of the Integrated Impact Assessment (IIA)⁹ provides a comprehensive summary of international, national and local plans, policies and programmes of relevance to the ELP - https://www.enfield.gov.uk/data/assets/pdf_file/0026/49238/Enfield-Reg-19-IIA-appendices-A-to-I-Planning.pdf

¹⁰https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf

anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

- 3.9 Chapter 5 of the NPPF addresses housing matters and confirms the Government's objective to significantly boost the supply of homes. Paragraph 60 advises that the overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.
- 3.10 Paragraph 63 advises that planning policies should reflect the housing needs of different groups in the community in terms of size, type and tenure (including, but not limited to, those who require affordable housing, families with children and older people).
- 3.11 Paragraph 74 advises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.
- 3.12 Chapter 6 of the NPPF addresses the economy. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (paragraph 85).
- 3.13 Chapter 7 focuses on town centres, urging plan-makers to take a positive approach to their growth, management and adaptation. Chapter 8 promotes healthy and safe communities, including through the provision of safe and accessible green infrastructure.
- 3.14 Chapter 9 promotes sustainable transport. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (paragraph 109). Chapter 11 sets out how planning policies should promote the effective use of land, including in terms of achieving appropriate development densities.
- 3.15 Chapter 12 places significant emphasis on the creation of high quality, beautiful and sustainable buildings and places.
- 3.16 The approach to protection of Green Belt land is set out in Chapter 13. Green Belt boundaries are only to be altered where exceptional circumstances are fully evidenced and justified (paragraph 145). Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the local planning authority must demonstrate that it has examined fully all other reasonable options for meeting its identified development needs (paragraph 146). In particular, consideration needs to be given to whether the Local Plan strategy:
 - a) *“makes as much use as possible of suitable brownfield sites and underutilised land;*
 - b) *optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”

- 3.17 Chapter 14 addresses the challenges of climate change and flooding. The planning system is charged with supporting the transition to a low carbon future.
- 3.18 Chapter 15 deals with conservation and enhancement of the natural environment. Planning policies should protect and enhance valued landscapes and sites of biodiversity value (paragraph 180). Planning policies should also ensure that new development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment (paragraph 191). Chapter 16 addresses conservation and enhancement of the historic environment, stating that plans should set out a positive strategy for the conservation and enjoyment of the historic environment.

National Planning Practice Guidance

- 3.19 National Planning Practice Guidance (PPG)¹¹ supports the implementation of the NPPF, giving further guidance and details of the requirements both in terms of plan preparation and the content of a Local Plan.
- 3.20 PPG advises that local planning authorities “preparing local plans should assess future needs and opportunities for their area, explore and identify options for addressing these, and then set out a preferred approach”. This involves gathering evidence, carrying out a Sustainability Appraisal to inform the preparation of local plans and effective engagement and consultation with local communities, businesses and other interested parties (Paragraph: 034 24 Reference ID: 61-034-20190315).
- 3.21 The guidance also advises that a local plan may also require a Habitats Regulations Assessment (HRA) if it is considered likely to have significant effects on habitats sites or species located in the local planning authority’s area or in its vicinity, as set out in the Conservation of Habitats and Species Regulations 2017 (037 Reference ID: 61-037-20190315).
- 3.22 Regarding the content of a Local Plan, PPG states they must set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure. This includes conserving and enhancing the environment, mitigating and adapting to climate change, and achieving well designed places.

London Plan (2021)

- 3.23 The London Plan¹², prepared by the Mayor of London, was adopted in March 2021. The Greater London Authority (GLA) Act 1999 (as amended) requires Local Plans (including the ELP) to be in ‘general conformity’ with the London Plan.
- 3.24 The London Plan should only deal with things of strategic importance to Greater London, taking account of the principal purposes of the GLA, which are:
- Promoting economic development and wealth creation in Greater London;

¹¹ <https://www.gov.uk/government/collections/planning-practice-guidance>

¹² https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

- Promoting social development in Greater London; and
 - Promoting the improvement of the environment in Greater London.
- 3.25 At the heart of the London Plan is the concept of ‘Good Growth’ – which is growth that is socially and economically inclusive and environmentally sustainable. The principles of Good Growth underpin the whole of the London Plan and each policy.
- 3.26 The London Plan sets out some of the most serious challenges facing London today (paragraph 1.0.8). The growth in population and jobs has not been matched by the growth in the number and type of homes London needs, driving up rents and house prices to levels that have priced many Londoners out of the market. A focus on large multinational businesses in the centre of London has not been matched by economic development in other parts of the city. Further, a failure to consider the wider implications of London’s growth has increased car dependency, leading to low levels of physical activity, significant congestion, poor air quality and other environmental problems.
- 3.27 To ensure that London’s growth is Good Growth, each of the policy areas in the Plan are informed by six Good Growth objectives:
- Building strong and inclusive communities;
 - Making the best use of land;
 - Creating a healthy city;
 - Delivering the homes Londoners need;
 - Growing a good economy; and
 - Increasing efficiency and resilience.
- 3.28 The London Plan includes policies covering a wide range of topics, which emphasise the importance of good design, making efficient use of land, and ensuring development is supported by necessary new social and physical infrastructure. Policy H1 addresses the need to increase housing supply, and sets ten-year targets for net housing completions for each Borough.
- 3.29 The ten-year target for Enfield Borough is 12,460 dwellings. In relation to the period post 2029, paragraph 4.1.11 of the London Plan states:
- “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.”*
- 3.30 London Plan Policy G2 (London’s Green Belt) addresses the role of the London Green Belt and reaffirms that exceptional circumstances are required to justify the de-designation of Green Belt land. The supporting text to the Policy states that the Mayor strongly supports the continued protection of the Green Belt (paragraph 8.2.1) and will work with Boroughs to enhance access to the Green Belt and to improve the quality of these areas (paragraph 8.2.2).

- 3.31 Policy E1 (Offices) supports an increase in the stock of offices, including in town centre locations. Policy E4 (Land for Industry and Logistics) states that a sufficient supply of land and premises to meet current and future demands for industrial and related functions should be provided and maintained, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution. Policy E5 (Strategic Industrial Locations) requires Local Plans to include policies that protect and intensify the function of Strategic Industrial Land.
- 3.32 The London Plan also promotes the conservation and enhancement of heritage assets, green spaces and biodiversity, and includes a range of policies that encourage the use of more sustainable modes of transport.

Other Borough Strategies and Associated Priorities

- 3.33 Table 1.1 of the ELP lists the non-planning plans and strategies that have influenced preparation of the ELP, including the Council Plan.
- 3.34 The Enfield Council Plan 2023-26¹³, identifies five priorities for the Borough, and a series of actions to address the priorities. The priorities are:
- Clean and green places;
 - Strong, healthy and safe communities;
 - Thriving Children and young people;
 - More and better homes; and
 - An economy that works for everyone.
- 3.35 Appendix 1 of this Topic Paper provides a table that summarises the relationship between the Council Plan's Priorities and Actions, and the Vision and Strategic Objectives included in the ELP. The development of the Vision and Strategic Objectives is discussed in Section 6 below.
- 3.36 Enfield Council has declared a climate emergency, and in July 2020 adopted a Climate Action Plan¹⁴. The ELP has a central role in delivering a number of the aims set out in the Action Plan.

¹³ https://www.enfield.gov.uk/data/assets/pdf_file/0022/34087/Enfield-Council-Plan-2023-2026-Your-Council.pdf

¹⁴ https://www.enfield.gov.uk/data/assets/pdf_file/0011/4610/enfield-climate-action-plan-2020-environment.pdf

4. Local context and key challenges

Enfield Borough

4.1 The ELP (Chapter 2) includes a Spatial Portrait of the Borough. This confirms that Enfield is located in the northern part of outer London, with its northern boundary formed by the M25. The Spatial Portrait provides details of the main transport infrastructure within the Borough, describes the varied urban and rural environments, and provides a demographic overview.

Development 'Constraints'

4.2 NPPF policy objectives constrain the supply of developable land in the Borough (and the capacity of some sites that are developable). In brief summary:

- Approximately one third of Enfield is designated as Green Belt. Under NPPF policy, the construction of new buildings in the **Green Belt** is restricted, and exceptional circumstances must be demonstrated where a Local Plan proposes amendments to Green Belt boundaries (including that the authority has examined fully all other reasonable options for meeting its identified need for development);
- The Borough lies in close proximity to nationally and internationally significant nature conservation sites (including the Epping Forest Special Area of Conservation), and within the Borough there 41 sites of Metropolitan, Borough and Local importance for Nature Conservation. Seeking to conserve and enhance the **biodiversity** is a core NPPF planning principle;
- There are over 1,000 hectares of **open space** within the Borough, comprising parks and gardens, natural and semi-natural green space, amenity green space, allotments, cemeteries and outdoor sports and recreation areas. Open spaces are afforded protection in the NPPF;
- Enfield is home to 22 conservation areas, expansive historic parks and numerous listed buildings. Local Plans should set out a positive strategy for the conservation and enjoyment of **heritage assets**, which will impact on whether land is developable, and in many cases also, the form and scale of development that is appropriate. It is important to note that all of the borough's town centres, towards which growth would typically be expected to be directed, are also partially covered by conservation area designations – to varying degrees;
- Different places within the Borough have their own distinctive characters that have evolved over time and that are part of the heritage of the area (see Character of Growth Study¹⁵). Taking into account the **character** of different areas will, in some circumstances, but not all, impact on the capacity of development opportunities.

4.3 There are also policies in the London Plan that serve to constrain the supply of developable land, for example the policies that seek to protect Strategic Industrial Land.

¹⁵ <https://www.enfield.gov.uk/services/planning/evidence-base>

Key Challenges and Opportunities

- 4.4 The ELP outlines the key challenges and opportunities facing the Borough, which include:
- Addressing the Climate Change emergency;
 - The need to protect invaluable species and habitats;
 - Changing patterns of work and shopping (and the resulting impacts, including on the Borough's town centres);
 - House prices, and the need for more family and affordable housing;
 - Disparities between the eastern and western parts of the Borough, and the need for better access to public parks and open spaces;
 - Accommodating development whilst conserving the unique and distinctive qualities of the Borough;
 - Diversifying the economy and capitalising on the Borough's strategic location within the UK Innovation Corridor; and
 - Creating healthier places, that offer a good quality of life.
- 4.5 Appendix D of the IIA¹⁶ includes a more comprehensive summary of the baseline position in the Borough, in terms of matters including air quality, biodiversity, climate change adaptation and mitigation, communities and equalities, housing, landscape and green infrastructure, transport and the economy and employment. Part of the purpose of the baseline information included in the IIA is to allow an assessment to be made of the likely evolution of the Borough (in relation to social, environmental and economic matters) without implementation of the ELP.
- 4.6 In addressing the challenges outlined above (and in the IIA), the Council has drafted a Local Plan that it believes strikes an appropriate balance between often competing priorities. The ELP is considered by the Council to be positively prepared and effective, justified and consistent with national policy. It seeks to deliver 'good growth' (sustainable development), that benefits existing and future residents and builds on the prosperity of the Borough.

¹⁶ https://www.enfield.gov.uk/data/assets/pdf_file/0026/49238/Enfield-Reg-19-IIA-appendices-A-to-I-Planning.pdf

5. Growth Requirements

- 5.1 In accordance with paragraph 11 of the NPPF, Local Plans should promote sustainable patterns of development, which seek to meet the development needs of the area, align growth and infrastructure, improve the environment, and mitigate and adapt to the effects of climate change. These requirements are reinforced in the London Plan.
- 5.2 Future housing needs and employment land needs are key considerations, and these are addressed in some detail in a separate Housing Topic Paper¹⁷ and Employment Topic Paper¹⁸. There are also other development needs in the Borough, which mainly relate to the need for new community and physical infrastructure (so for example, new recreation and sports facilities and new transport infrastructure).

Housing Needs

- 5.3 The London Plan includes a housing target for Enfield Borough for the period 2019 to 2029, 12,460 dwellings (equivalent to an annual average of 1,246 dwellings per annum over the 10-year period).
- 5.4 However, it is important to differentiate between the housing target set within the London Plan (for London as whole, and for Enfield) and the assessed level of housing need. In examining the London Plan, the Inspector Panel identified an unmet housing need across London as a whole of 13,000 dwellings per annum in the period 2019-2029. In a similar vein, the Standard Method for calculating housing need suggests that some 64,789 new homes are required in Enfield in the period 2021-2041.
- 5.5 As well as the number of new homes needed, consideration must be given to the type of new homes needed.
- 5.6 The Enfield Local Housing Needs Assessment (LHNA)¹⁹ modelling indicates that the largest requirement is for three and four-bedroom properties, accounting for over 60% of the new homes need. However, an analysis of recent housing completions data shows that since the start of the London Plan period in 2019/20, to 2021/22, nearly 75% of the new homes delivered in Enfield have been one or two-bedroom properties.
- 5.7 In relation to affordable housing, the Local Housing Needs Assessment (LHNA) suggests a need for more than 700 social or affordable rented homes per annum in the Borough, as well as in addition, a need for nearly 700 intermediate and affordable owned homes. There is currently a substantial and widening gap between affordable housing delivery in the Borough and the estimated level of need. It is a Council priority to address this issue, whilst recognising that it will not be possible to meet the estimated need in full.

Employment Needs

- 5.8 The need for more office, industrial and warehouse space in Enfield is assessed in the Employment Land Review (ELR)²⁰. The ELR outlines the challenges in planning

¹⁷ <https://www.enfield.gov.uk/services/planning/evidence-base>

¹⁸ <https://www.enfield.gov.uk/services/planning/evidence-base>

¹⁹ https://www.enfield.gov.uk/_data/assets/pdf_file/0025/5569/enfield-local-housing-needs-assessment-full-report-2020-planning.pdf

²⁰ <https://www.enfield.gov.uk/services/planning/evidence-base>

for economic growth, including in terms of the likely scope for industrial intensification over the Plan period.

- 5.9 The ELR recommends that the ELP plans for some 306,000 sq m of additional industrial and warehousing floorspace over the Plan period to 2041, addressing the NPPF requirement for Council's to plan positively (but of course realistically) for growth (paragraph 7.74 of the ELR). In terms of office space, the ELR recommends planning for some 43,000 sq m of additional floorspace over the Plan period (paragraph 7.77 of the ELR).

Good Growth

- 5.10 In accordance with the London Plan and NPPF, the ELP must promote good growth, i.e. growth that is socially and economically inclusive and environmentally sustainable. This means that the identified needs for housing and employment development must be carefully assessed, to ensure that the growth can be accommodated in a way that will be socially and economically inclusive and avoid unacceptable environmental impacts.
- 5.11 This is a principal role of the Integrated Impact Assessment process, which explores the likely social, economic and environmental impacts of accommodating different levels and distributions of development within the Borough. The IIA also considers the scope for mitigating any identified potential adverse impacts.
- 5.12 The IIA process has helped to ensure that the Council is able to make an informed decision on the amount of new growth to be accommodated in the Borough, balancing the need for new homes and employment floorspace, with the need to protect and enhance green spaces, biodiversity and the varied character of the Borough.
- 5.13 The IIA process in Enfield has been iterative, with the Regulation 18 consultations allowing the Council time to properly explore the issues for the ELP, and the options for addressing these issues.

6. Development of the Spatial Strategy

6.1 This section of the Topic Paper explains how the spatial strategy for the ELP was developed. It sets out the 'reasonable alternatives' considered, explains the role of the IIA in the process of assessing and refining the options, and summarises the main factors that have influenced the spatial strategy.

Early Issues and Options

6.2 The first Issues and Options consultation was undertaken in 2015-16. The consultation on a New Local Plan for Enfield 2017-2032²¹ outlined some of the challenges and issues to be addressed and sought residents' views on the vision for the Borough. Even at this very early stage in the plan-making process, the Council identified that there was a divergence between housing delivery and local needs.

6.3 The consultation document presented five options for sustainable growth:

- Do nothing;
- Infill and intensify;
- Optimise growth corridors;
- Existing Green Belt settlements; and
- Industrial land release.

6.4 The advantages and disadvantages of each option were briefly summarised, and views sought on each option (and indeed any alternative options).

6.5 The consultation document highlighted concerns about what would happen if growth was not properly managed and accommodated, with impacts including a lack of truly affordable housing, a lack of high-quality supporting infrastructure to support population growth and increasing inequalities between different areas within the Borough.

6.6 In 2017, the Council undertook another consultation exercise, the 'Enfield Conversation'. The purpose of this initiative was to discuss and promote growth, and to test and challenge attitudes and assumptions about new housing and infrastructure.

6.7 Five pilot resident workshops were undertaken in September and November of 2017, with approximately 50 attendees at each. The workshops asked respondents to consider a number of defined options and trade-offs, which would then help to identify priorities. The key message was that difficult choices and trade-offs were necessary to deliver the number of homes, jobs and infrastructure the Borough needed.

6.8 Resident consensus was for delivering a higher number of homes if this resulted in the right kind of homes being built (including more affordable homes). Building homes in the Lee Valley Corridor was the most popular proposed area for new homes overall. Town centres, the A10 corridor and Council estates were the next most popular areas. Residents living in densely populated parts of the Borough

²¹ https://www.enfield.gov.uk/data/assets/pdf_file/0025/17881/Enfield-Local-Plan-Preliminary-consultation-2015-Planning.pdf

particularly supported the principle of development around town centres and areas within the Green Belt.

2018 Issues and Options (Regulation 18)

- 6.9 The Council prepared and consulted on a Regulation 18 Issues and Options document²² from December 2018 to February 2019. This document focussed on exploring broad issues and options but did not indicate a preferred approach in terms of the scale of growth to be planned for, or in terms of the spatial strategy.
- 6.10 Drawing on the feedback from the previous consultations, national planning policies, the emerging London Plan, and the Council priorities at that time, the 2018 Issues and Options document set out a proposed vision and supporting objectives and identified seven broad strategic growth options (for distributing housing and employment development across the Borough). It also presented a series of high-level policy options.
- 6.11 The seven broad strategic growth options were:
- Option 1: Main town centres and areas around all stations;
 - Option 2: Transport corridors;
 - Option 3: Existing estate renewal and regeneration programmes;
 - Option 4: Eastern corridor and low-density industrial areas;
 - Option 5: Future Crossrail 2 Growth Corridor²³;
 - Option 6: The New Southgate and Upper Lee Valley Opportunity Areas; and
 - Option 7: Strategic plan-led approach to Green Belt.
- 6.12 All of the strategic growth options and high-level policy options constituted reasonable alternatives and were subject to IIA. The results of this IIA appraisal work are presented in Appendix H of the 2023 IIA²⁴.
- 6.13 It is important to emphasise that the spatial distribution options were not mutually exclusive. The IIA and Issues and Options consultation document recognised that individually these options would not be able to deliver the overall growth required for the Borough, and therefore choices would need to be made about which elements of these options would be taken forward in the ELP.
- 6.14 The IIA work did start to draw out the importance of locating new development in areas with existing sustainable transport options, or in areas where there are opportunities to deliver new and enhanced sustainable transport options. The IIA also identified potential issues with delivering the range of housing types needed in the Borough, if the ELP were to rely on intensification within urban areas (where new housing delivery is predominately in the form of 1 and 2-bedroom dwellings).

²² https://www.enfield.gov.uk/_data/assets/pdf_file/0026/17882/Enfield-Local-Plan-Reguation-18-Issues-and-Options-consultation-2018-Planning.pdf

²³ This scheme has been indefinitely postponed.

²⁴ https://www.enfield.gov.uk/_data/assets/pdf_file/0027/49239/Enfield-Reg-19-IIA-Main-report-Reg-19-Planning.pdf and https://www.enfield.gov.uk/_data/assets/pdf_file/0026/49238/Enfield-Reg-19-IIA-appendices-A-to-I-Planning.pdf

policy approaches set out in the Main Issues and Preferred Approaches consultation document. The reasoning behind the proposed Spatial Strategy and other policy approaches is explained in the Growth Topic Paper²⁶ published in 2021. In summary, some of the key influences on the preferred approach to the spatial strategy (in terms of housing) include:

- In recent years, insufficient new homes have been delivered in Enfield to meet the currently adopted London Plan target. Delivery needs to increase to meet the London Plan housing target for the period 2019 to 2029, and further still if local need for affordable housing is to be better addressed.
- There is a significant need for more family housing (new properties with three or more bedrooms).
- There is also a need to retain existing employment floorspace and provide additional industrial/ logistics land and office floorspace to support economic growth.
- The viability of housing development varies across the Borough, with large greenfield developments likely to be the most viable (and able to bear a 50% affordable housing requirement and £50,000 per dwelling in developer contributions).
- Priority must be given to developing on urban brownfield land (in line with national and strategic planning policy). However, the Housing and Employment Land Availability Assessment (HEELA) shows that there is insufficient capacity to meet the Borough's housing, employment and other needs solely within the Borough's urban areas over the whole plan period.
- Through Duty to Cooperate discussions, it was clear that adjoining authorities were not in a position to help address any of Enfield's unmet employment and housing needs.
- Consideration was given to delivering non-employment uses on existing areas of employment land. Given the growing demand for employment space and the low vacancy levels in several key locations, it was concluded that no land should be released from employment use to non-employment uses.
- Having sought to make best use of suitable brownfield sites and underutilised land (and optimising the development density assumptions) and having been told by neighbouring authorities that they could not accommodate any of Enfield's unmet development needs, the Council looked at the potential to use Green Belt and Metropolitan Open Land (MOL) to help meet growth needs.

6.20 It must be emphasised that the decision to propose release of land from the Green Belt was not taken lightly.

6.21 The evidence and decision-making process followed the guidance set out in the NPPF, including that set out in paragraph 146 – i.e. before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the local planning authority must demonstrate that it has examined fully all other reasonable options for meeting its identified development needs.

²⁶ https://www.enfield.gov.uk/data/assets/pdf_file/0008/12140/Growth-topic-paper-LBE-2021-Planning.pdf

- 6.22 The decision-making process was iterative, informed by the IIA work. The IIA considered a range of strategic growth options looking at different levels of housing delivery and showed that by limiting development to the existing urban areas, the Council would fall a long way short of meeting local housing needs (in particular, the need for more family and affordable housing), unless such substantial levels of growth were accommodated here that there would be a significant negative impact on the prevailing character of the area that could not be justified. The approach of restricting development to the existing urban areas would also mean that employment land needs would not be met, with adverse impacts on local economic growth.
- 6.23 The Council therefore considered potential locations for development in the Green Belt, informed by the Green Belt Assessment²⁷ work undertaken by LUC. The Site Allocations Topic Paper²⁸ explains the site selection process, and how the findings of various pieces of evidence base, including the Green Belt Assessment work were considered, in determining which sites to propose for allocation.
- 6.24 The Growth Topic Paper 2021 outlined the strategic exceptional circumstances for the proposed release of Green Belt land to meet future development needs, which included:
- Acute housing need, demonstrated by the number of households living in temporary accommodation, house prices and rising rents, and the significant divergence between recent rates of new housing delivery and housing needs;
 - Affordability, which is worsening;
 - Housing supply, including in particular the need for more family housing;
 - The need to promote sustainable patterns of development;
 - Proposed compensatory measures, in line with the NPPF, with enhanced access to the remaining areas of Green Belt (countryside) for leisure and recreation purposes; and
 - Infrastructure provision, with the ability for the Green Belt sites to make good use of existing infrastructure, as well as delivering new infrastructure, for the benefit of existing and new residents.
- 6.25 An updated Exceptional Circumstances case is set out in the Council's Exceptional Circumstances Topic Paper²⁹, which also provides further detail on the site-specific exceptional circumstances.
- 6.26 Following the Main Issues and Preferred Approaches consultation (2021), the Council prepared a Consultation Statement³⁰. This summarised the feedback received by key themes:
- Support and concerns of the need for additional housing;
 - Support and concerns of the appropriateness of preferred housing target;

²⁷ https://www.enfield.gov.uk/_data/assets/pdf_file/0008/12113/Green-Belt-and-MOL-Assessment_Final-Report-LUC-2021-Planning.pdf

²⁸ <https://www.enfield.gov.uk/services/planning/evidence-base>

²⁹ <https://www.enfield.gov.uk/services/planning/evidence-base>

³⁰ https://www.enfield.gov.uk/_data/assets/pdf_file/0022/39703/ELP-Reg-18-Consultation-Statement-Apr-23-Planning.pdf

- Support for proposed affordable housing targets;
- Concerns around deliverability of affordable housing targets;
- Opposition and support for Green Belt release;
- Opposition to tall buildings – especially in Enfield Town;
- The need to ensure sufficient infrastructure to support the level of growth proposed;
- Support and opposition to Chase Park and Crews Hill policies and site allocations;
- The loss of large format food stores and associated car parking; and
- Opposition to some of the proposed allocations.

6.27 The consultation feedback was considered in preparing the publication draft ELP.

7. Publication draft Spatial Strategy and overall approach

- 7.1 The Spatial Strategy, related policies and site allocations included in the publication draft ELP are a refinement of the preferred approach set out in the last Regulation 18 consultation document.
- 7.2 The overall development strategy reflects national policy, and the policies of the London Plan, and takes into account local evidence in relation to development needs and constraints, and the feedback received from residents and other stakeholders. The Council has had to make some difficult decisions, but the following development strategy (as included in the publication draft ELP) is felt to present an appropriate strategy which is justified, striking an appropriate balance between meeting future development needs and protecting and enhancing the natural and built environment for the benefit of all.
- 7.3 As set out Policy SS1: Spatial Strategy, a major focus will be on regeneration of previously developed sites, regeneration areas in the east of the Borough and London Plan Opportunity Areas in the Lee Valley and at New Southgate (albeit with the uncertainty surrounding Crossrail 2, the opportunities at New Southgate are more limited, at least in the short to medium term). The town centres within the Borough will also be a major focus for high quality development, recognising their accessibility and excellent transport links.
- 7.4 As demonstrated in the Housing and Economic Land Availability Assessment³¹, Employment Land Review³², Retail Needs Assessment Update³³ and Infrastructure Delivery Plan³⁴, these locations offer a range of investment opportunities with substantial capacity to accommodate new homes, jobs and infrastructure. However, there is clearly insufficient previously developed land to meet the Borough's full development needs, without creating wholly unacceptable adverse impacts on the character of existing urban areas. The Council therefore considers that to help address housing needs (in particular, the need for more family and affordable housing), and to support economic growth, there are the necessary exceptional circumstances to justify the release of some Green Belt land for development.
- 7.5 The approach to each aspect of the overall strategy is summarised below.

Housing

- 7.6 NPPF paragraph 60 advises that the overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.
- 7.7 The approach set out in the ELP is to focus housing delivery on previously developed urban sites in the period to 2029, reflecting in part the lead-in time for delivery to commence at Crews Hill and Chase Park. The housing trajectory in the ELP demonstrates that the London Plan housing target for the period 2019-29 (12,460 homes) can be achieved.
- 7.8 Development at Crews Hill and Chase Park will make a significant contribution to housing needs in the period 2029-2041 and beyond. Importantly Crews Hill and Chase Park provide an opportunity to significantly boost the supply of family and

³¹<https://www.enfield.gov.uk/services/planning/evidence-base>

³² <https://www.enfield.gov.uk/services/planning/evidence-base>

³³ https://www.enfield.gov.uk/data/assets/pdf_file/0018/11916/Enfield-Retail-Need-Assessment-Update-2018-Planning.pdf

³⁴ <https://www.enfield.gov.uk/services/planning/evidence-base>

affordable housing in the Borough. For further detail see Crews Hill³⁵ and Chase Park³⁶ Topic Papers.

- 7.9 The ELP housing target of at least 34,000 new homes over the plan period will not meet the Borough's objectively assessed need in full (a figure of nearly 65,000 homes) but taking into account the IIA assessment of higher levels of housing growth, the constraints referenced in paragraph 4.2 above, and other evidence, the Council believes that the ELP strikes an appropriate balance between meeting housing needs and addressing environmental objectives.
- 7.10 NPPF paragraph 74 notes that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.
- 7.11 Development at Crews Hill (with capacity for circa 5,500 new homes) will make use of a significantly under-utilised existing railway station and help facilitate the redevelopment of areas of previously developed land. There is also an opportunity for Crews Hill to serve as a sustainable gateway for visitors to the wider countryside surrounding Crews Hill, and significant investment in new community infrastructure will ensure day to day facilities and services will be accessible to new residents via a range of sustainable travel options.
- 7.12 Chase Park adjoins the current western edge of Enfield and provides an opportunity to deliver a sustainable neighbourhood with around 3,765 new homes. The development will provide enhanced access to existing and improved services, facilities and related infrastructure.

Employment

- 7.13 The NPPF advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 7.14 Employment needs are to be met through the intensification of existing industrial areas in the east of the Borough, and new sites across urban and rural locations. In terms of industrial and logistics space, there is a need for circa 14,000 sq m per annum. The Council has given very careful consideration to the scope for intensification of existing industrial areas. A theoretical assessment of potential capacity for intensification has been made (as referenced in the ELR), but there are viability and deliverability challenges (and therefore uncertainty) in turning this theoretical capacity into additional floorspace on the ground, at the very least, in the short to medium term).
- 7.15 There is an existing pipeline of industrial and logistics space of circa 50,000 sq m, but that means in the first five years of the Plan period, there is already a shortfall between demand and supply. In the next five-year period (2024-29), the only source of additional supply available (without recourse to Green Belt land) is at Meridian Water (circa 50,000 sq m). This net additional floorspace at Meridian Water is considered deliverable, but there are complex displacement and relocation requirements, meaning it is unlikely to be deliverable within the period 2024-29).

³⁵ <https://www.enfield.gov.uk/services/planning/evidence-base>

³⁶ <https://www.enfield.gov.uk/services/planning/evidence-base>

- 7.16 The Council is therefore proposing to allocate three Green Belt sites for industrial and logistics space, in locations that are well suited to the main need, which is for logistics space.
- 7.17 The strategy for industrial and logistics space seeks to minimise the amount of Green Belt land release. The opportunities for intensification have been fully explored (see ELR and Employment Topic Paper) and the ELP provides a positive framework for intensification, as when opportunities arise, and the viability improves. On the land that is proposed for release from the Green Belt for industrial and logistics space, the ELP requires a minimum level of employment floorspace provision (with the requirement set to ensure most efficient use of the land).

Approach to the Green Belt

- 7.18 The NPPF is clear that Green Belt boundaries are only to be altered where exceptional circumstances are fully evidenced and justified (paragraph 145). It must be demonstrated that all other reasonable options for meeting identified development needs have been examined, before concluding that exceptional circumstances exist (NPPF paragraph 146).
- 7.19 As set out in section 6 above, and further explained in the Exceptional Circumstances Topic Paper, the Council considers that there are the necessary exceptional circumstances for altering its Green Belt boundaries.
- 7.20 All of the Borough's existing Green Belt has been assessed against the Green Belt purposes (as defined in NPPF paragraph 143). The findings of this work (as recorded in the Green Belt Assessment) were then fed into the site selection process. Priority was given to previously developed sites within the urban areas. However, as set out above, these sources of supply would not enable the Council to positively address the significant need for new family and affordable housing.
- 7.21 The site selection process (as described in the Site Allocation Topic Paper) therefore considered Green Belt land. The contribution that each parcel of Green Belt land made towards the purposes of the Green Belt was an important consideration in the site selection methodology, but other factors also needed to be taken into account, including the location of the Green Belt land, the extent to which development of the parcel would accord with the emerging spatial strategy, and the findings of the IIA.
- 7.22 The sites proposed for removal from the Green Belt to meet development needs are:

Housing:

- Chase Park (four land parcels, see Policy H1 and PL10);
- Crews Hill (six land parcels, see Policy H1 and PL11);
- Land Opposite Enfield Crematorium, Great Cambridge Road (see Policy H1); and
- Land between Camlet Way and Crescent West, Hadley Wood (see Policy H1).

Employment:

- Land West of Rammey Marsh (see Policy E1);
- Land East of Junction 24 (see Policy E1); and
- Land to the North West of Innova Park (see Policy E1).

Other elements of the Spatial Strategy

- 7.23 Policy SS1 sets out the protection to be afforded to Metropolitan Open Land, and the importance of delivering improvements to green and blue spaces within the Borough, as well as the access to these spaces.
- 7.24 In the rural parts of the Borough, land is to be largely managed for ambitious nature recovery and landscape restoration, and a range of sustainable countryside uses.
- 7.25 To compensate for the proposed loss of Green Belt land, alongside the aforementioned landscape restoration, a new country park is proposed to improve access to Enfield Chase. Improvements are also proposed to the Lee Valley Regional Park.
- 7.26 Finally, Policy SS1 emphasises the importance of ensuring that new and improved infrastructure is delivered alongside new development. The infrastructure needed to support the Spatial Strategy and associated site allocations is set out in the Infrastructure Development Plan (IDP)³⁷.

Delivery of the Spatial Strategy

- 7.27 The Spatial Strategy is supported by a range of policies to guide development on the allocated sites, and to steer development proposals on other land within the Borough (not allocated for development). The scope of these policies reflects the scope and requirements of the NPPF, whilst taking into consideration local priorities and issues.

Conclusion

- 7.28 There are significant development needs in Enfield Borough in the period 2019-2041. It is also the case that the land supply to meet these needs is constrained.
- 7.29 The Council is unable to meet all of its development needs, particularly in relation to meeting its objectively assessed housing need. The Council considers that meeting its full objectively assessed need would result in adverse impacts that significantly and demonstrably outweighed the benefits, when assessed against the policies in the framework (NPPF) taken as a whole (see NPPF paragraph 11).
- 7.30 Nonetheless, LBE is ambitious, and wishes to support local economic growth, and provide more family and affordable homes to meet local needs. Having considered and optimised the opportunities for development on previously developed land, the ELP proposes selective releases of Green Belt land to deliver a sustainable urban extension, sustainable new settlement, and new employment floorspace (as part of an overall strategy to deliver Good Growth).

³⁷ <https://www.enfield.gov.uk/services/planning/evidence-base>