

Steven Lee, BA(Hons) MA MRTPI
Inspector Enfield Local Plan Examination
C/o Annette Feeney, Programme Officer
Enfield Council

Please reply
to:

May Hope
localplan@enfield.gov.uk

My Ref:
Your Ref:

ELP EiP responses to IN7

Date: 31 March 2025

Dear Mr Lee,

Enfield Local Plan Examination: Submission of Updated Documents and Responses to IN7 (Stage 1 Hearings Initial Actions)

In accordance with your instructions outlined in document IN7 (dated 12 February 2025) and your subsequent letter IN8 (dated 17 March 2025), Enfield Council is pleased to submit the required updates and supplementary information for your consideration.

In response to your detailed queries and required actions, we confirm that the Council has undertaken the following:

1. Duty to Cooperate

The Council has collated comprehensive evidence demonstrating compliance with the Duty to Cooperate, as set out in Document E7.9. This includes a summary log of engagement and contemporaneous correspondence and meeting records on the Enfield Local Plan [E7.9.1 and Appendices 1-17] and Traveller Local Plan [E7.9.2], evidencing sustained engagement with neighbouring authorities and other relevant bodies. As part the plan making process for the Enfield Local Plan the Council sought assistance on its unmet housing, employment, and Gypsy and Traveller needs from a wide range of stakeholders in 2021 and again at the Regulation 19 stage in 2024, in line with its Statement of Community Involvement. While no authority was able to accommodate Enfield's unmet need, this informed the Council's spatial strategy. The evidence further demonstrates extensive and ongoing joint working with the Greater London Authority on key strategic matters including housing, employment land, transport, and infrastructure planning. Statements of Common Ground with all seven neighbouring authorities (dated July 2024) confirm these outcomes and verify that strategic cross-boundary matters have been appropriately addressed.

2. Engagement and Consultation Database

Significant improvements have been made to the Local Plan consultation database to ensure accuracy, transparency, and accessibility of all representations. This responds directly to concerns raised by the Inspector in IN7 and to feedback from the public and stakeholder groups. The entire representation database has now been migrated to the Objective Keyplan platform, providing a more robust and user-friendly experience for consultees, the public, and the Programme Officer. The updated consultation portal is now live and can be accessed here: <https://enfield-consult.objective.co.uk/kpse/event/EC2E02A7-481C-40BB-8D25-E5E420FC1F96>

A read-only version of the database is provided as part of this submission.

As part of this transition, the Council wrote again to a range of active local stakeholder groups including Enfield RoadWatch, Enfield Society, Better Homes Enfield, the Lakes Estate Conservation Study Group, and others in March 2025, inviting them to check the revised entries associated with their previous submissions. Each group was given early access to the new platform, along with guidance on how to view and validate their representations.

The Council received confirmations from several groups, including Enfield Society, Enfield RoadWatch and Better Homes Enfield, who either verified accuracy or declined the offer due to resource limitations but noted that their earlier feedback had been addressed. The Council has retained these responses for audit purposes.

As part of this response a spreadsheet export of the full database has also been made available to support transparency and ease of reference.

To ensure consistency and maintain a clear audit trail, the Council will:

- Resubmit the Regulation 22 Statement, updated to reflect corrections to representation data and the previously omitted schedule;
- Restore the original SUB12 document to the Examination library to provide a full chronology of updates.

The Council is currently updating the Regulation 22 Statement to reflect corrections and the inclusion of previously missing representations. The revised version is due to be finalised and submitted by Monday 14 April 2025.

3. Housing Requirement

The Council encloses a note on Housing Requirements [E7.10], which sets out revised housing figures in Table 2.2, consequential updates to Figure 2.5, and supporting text amendments. These updates respond to IN7 and reflect the latest monitoring data, a revised

base date of April 2024, and an updated trajectory based on realistic delivery rates. The revised figures remain in general conformity with the London Plan, addressing recent delivery challenges while maintaining a clear pathway to meeting Enfield's housing needs across the Plan period.

4. Local Housing Need Assessment (LHNA)

As requested, the Council has prepared a briefing note [E7.11] providing a comparative 'sense check' of the data underpinning the 2020 LHNA. The note considers key new datasets, including the 2018-based ONS projections, 2021 Census results, and updated local housing register data. The analysis confirms that these sources would not materially alter the key conclusions of the 2020 LHNA regarding housing size, mix, and affordable need. The document supports the continued use of the LHNA as an up-to-date evidence base for policy-making, with a strong justification for the Council's affordable housing policy approach. To aid clarity, the note links directly to the relevant passages of the LHNA.

5. Viability Evidence

A summary note is provided [E7.12] that draws together the current and emerging viability and infrastructure evidence for the strategic sites at Crews Hill and Chase Park. This note provides additional detail on infrastructure costs and the assumptions underpinning the Council's viability assessments, demonstrating that both sites remain viable against a range of infrastructure funding scenarios. The emerging findings from further detailed cost planning and master-developer appraisals continue to support the robustness of the original Whole Plan Viability Update. We believe this additional material will help focus and narrow the scope of discussion during the hearings on these sites.

6. Employment Land

The Council has prepared a briefing note [E7.13] updating the trend-based evidence on industry and warehousing floorspace requirements, as requested. The note incorporates the most recent completions data available (2021/22) and reviews whether this alters the conclusions of the Employment Land Review. It confirms that, while short-term delivery was affected by Covid-related disruption and market volatility, these impacts are not considered representative of long-term demand. Market signals and more recent recovery data (including from the VOA and CoStar) indicate a return to positive delivery. Therefore, the Council maintains its previously identified requirement for 304,000sqm of industrial and logistics space as sound and justified.

7. Site Selection Evidence

The Council has submitted detailed site assessment notes and supporting spreadsheets [E7.14] which clarify the site selection process for the Regulation 19 Local Plan. This includes the methodology applied to the inclusion and exclusion of sites, the rationale for

new allocations listed in Appendix 4 of the Site Allocations Topic Paper, and how omission sites promoted at Regulation 19 have been addressed. For clarity, these omission sites were reviewed proportionately at officer level and found to be either unavailable, unsuitable (due to policy or physical constraints), or duplicative of previously rejected options.

To support transparency, the Council has provided both a simplified and a composite version of the site selection spreadsheet to assist with interpretation. Minor referencing inconsistencies have also been corrected. The Council considers this evidence demonstrates a robust and transparent approach in line with paragraph 35 of the NPPF.

8. Other Agreed Actions and Supporting Documentation

In addition, the submission includes the following documents that support agreed actions and assist in narrowing the scope of remaining matters for the examination:

- **Erratum to the Integrated Impact Assessment – document E7.15**

This clarifies and corrects minor factual inconsistencies and formatting errors identified in the Regulation 19 version of the IIA to ensure the assessment aligns precisely with the final draft Plan.

- **Note on the calculation of open space requirements within the Recreation Mitigation Strategy – document E7.16**

This document responds to the Inspector's IN7 request and confirms that, rather than applying a quantitative ratio, Enfield's open space strategy uses a qualitative, site-specific approach developed in consultation with Natural England. It explains how projected visitor uplift to Epping Forest SAC has been calculated, sets out the rationale for relying on improvements to existing open space rather than new provision, and confirms that the RMS complies with Habitats Regulations, taking account of the latest 2024 visitor survey.

- **Statement of Common Ground and updated appendices between TfL and LBE – signed.** Document ref SUB 14j

The updated SoCG captures significant progress made on key matters including active travel, public transport integration, parking standards, and strategic infrastructure coordination at Crews Hill and Chase Park. It identifies remaining issues and sets out a clear pathway for future collaboration through policy modifications, masterplanning, and ongoing engagement during and after the Examination.

- **Statements of Common Ground**

For the public record, the Council is submitting:

- 1) An updated version of the Joint Statement of Common Ground (SUB14i), which reflects the belated receipt of Welwyn Hatfield Borough Council's signed copy, dated 15 August 2024 and received by the Council in January 2025. This completes the signing process for all seven neighbouring authorities and provides further evidence of positive and sustained engagement on cross-boundary strategic matters, in line with paragraph 35 of the NPPF and Planning Practice Guidance on the Duty to Cooperate.
- 2) Signed Statements of Common Ground with Natural England (dated 15 January 2025) and the Environment Agency (dated 25 February 2025). These confirm agreement on all strategic matters, including Epping Forest SAC (air quality and recreation impacts), flood risk, and water resource protection. There are no outstanding matters of disagreement, and both parties agree that the duty to cooperate has been satisfied.

Finally, as requested by the Inspector, the Council is submitting the latest version of the Proposed Main Modifications Schedule [Document E6.1], which consolidates the full suite of proposed changes to the submitted Enfield Local Plan as at 31 March 2025. In the interest of supporting clarity and accuracy during the modifications process, the Council has appointed Carmel Edwards to assist with professional proofreading. We will seek the Inspector's clarification on how best to engage on any subsequent modifications as part of Stage 2.

We trust this submission addresses comprehensively the issues raised in your correspondence. We remain at your disposal should further clarification or additional information be required and look forward to your feedback on these submissions.

Yours sincerely,



May Hope MRTPI

Head of Strategic Planning and Design, Enfield Council

Enfield Council has launched a series of 14 e-newsletters covering a range of topics that provide residents with more frequent Council news and service updates. More than 40,000 people have already signed up, make sure you're one of them. You can register at www.enfield.gov.uk/enewsletter