



Enfield Local Plan (Regulation 24) 2024

LBE's response to IN7

E7.9: Further Note in Response to the Inspector's Letter IN7 – Duty to Cooperate

31 March 2025

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ENFIELD LOCAL PLAN

Further Note in Response to the Inspectors Letter IN7 – Duty to Cooperate

1 INTRODUCTION

- 1.1 This note [E7.9] has been produced by the London Borough of Enfield (the “Council”) further to the Enfield Duty to Cooperate Statement for the Enfield Local Plan dated August 2024 [SUB14a] (“**DtC Statement**”). It is accompanied by the following subsidiary appendices of evidence:
 - 1.1.1 **E7.9.1:** Summary Log of DtC engagement for the ELP and Appendices 1 – 17
 - 1.1.2 **E7.9.2:** Summary log of DtC engagement for the TLP and Appendices 1 - 11
- 1.2 This note does not seek to repeat the information contained in the DtC Statement [[SUB14a](#)].
- 1.3 This information is in response to the Inspector’s Letter IN7 dated 12 February 2025 and the Inspector’s requests for specific additional information. For ease of reference, please note that:
 - 1.3.1 Copies of the letter send out to relevant authorities in 2021 requesting assistance in meeting the housing and employment needs and their responses are provided in the Appendix (under [E7.9.1]).
 - 1.3.2 Evidence of what was discussed at meetings at the same time as the 2021 letters and of ongoing engagement along with how this informed the Council’s plan preparation is summarised in this note and the Log and provided in the Appendix.
 - 1.3.3 Evidence of ongoing engagement concerned with the Gypsies and Travellers pitch need is summarised in this note, in the Log and evidence documents are provided in the log and the Appendix [E7.9.2].
- 1.4 Throughout the preparation of the Local Plan, the Council has maintained regular, constructive and proactive engagement with all relevant stakeholders, including the seven neighbouring local authorities to discuss strategic and cross boundary issues. These discussions have played a key role in identifying and addressing cross-boundary and strategic planning issues and in shaping the content of the local plan prior to its submission.
- 1.5 From an early stage, it became clear through Duty to Cooperate dialogue that neighbouring authorities were not in a position to accommodate Enfield’s unmet needs Including for general housing, including gypsies and travellers pitch needs, and employment land. This position reflects the wider strategic context of London and the South of England authorities, where authorities across the board face significant and persistent land supply constraints, making it difficult to accommodate needs beyond their respective areas.
- 1.6 In this context, there is a clear and shared recognition among Enfield’s neighbours that the general shortage of land supply in this region is a position that will not change with the Government emphasis on sustainable development. Demand for land for housing supply with housing targets increasing is a challenge for London and the South of England authorities. This had consequences for the Enfield Local Plan proposals.
- 1.7 Whilst the duty to cooperate is not a “duty to agree”, the Council has engaged constructively, actively and on an on-going basis with relevant stakeholders including neighbouring authorities and prescribed bodies with the intention that those discussions and on-going collaboration informed the substance of the Local Plan. Although no formal agreements to accommodate unmet needs were reached, this sustained collaboration has shaped and influenced the Local Plan and underpinned a clear understanding of the constraints and opportunities within the wider sub-regional context.

- 1.8 The Log has been prepared to explain in relation to each of the stakeholders the type of engagement and its purpose including the replies received. Accompanying this are copies of letters, meeting notes and other correspondence evidencing the engagement. The duty to cooperate is separate to the matter of soundness (which this note is not purporting to deal with in anyway).
- 1.9 The Council's policy proposals for meeting its housing and employment needs is, a matter to be considered during the Examination of the Local Plan. The purpose of this note and accompanying evidence is to explain and evidence the engagement with stakeholders demonstrating how the Council did take account of the responses it received and how it then continued to engage with and encourage dialogue on plan matters with these stakeholders.
- 1.10 With the neighbouring authorities and with other authorities, the Council continues to seek to engage others in cross boundary issues, as evidenced in the DtC Statement [SUB14a], the attached Log and accompanying documents. Matters raised by authorities e.g. GLA views on green belt release and site allocation will be discussed during the course of the examination in public and then reported upon.

2 LEGISLATIVE AND POLICY CONTEXT

- 2.1 Section 110 of the Localism Act 2011 amended Section 33A of the Planning and Compulsory Purchase Act 2004 (the "2004 Act") to introduce the Duty to Cooperate. Section 20(5)(c) of the 2004 Act provides that one of the purposes of a Local Plan's independent examination is to determine whether the local planning authority has complied with any duty imposed by section 33A in relation to the plan's preparation.
- 2.2 The duty is to co-operate with other local planning authorities, county councils and prescribed bodies in the preparation of development plan documents so far as relating to "strategic matters" so as to maximise the effectiveness of the preparation of the relevant documents. This includes a requirement to engage constructively, actively and on an ongoing basis in the process of preparing the plan.
- 2.3 Strategic matters are defined in section 33A(4) of the 2004 Act as "sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning area".
- 2.4 The prescribed bodies for the purpose of section 33A(1)(c) of the 2004 Act are set out at Regulation 4(1) of the Plan Making Regulations. Those specific to the Council are set out in the DtC Statement [SUB14a], at paragraph 2.3. The duty imposed requires the Council to engage constructively, actively and on an ongoing basis in the preparation of the Enfield Local Plan having regard to the activities of the parties/organisations referenced in this and the DtC Statement [SUB14a] , including with the Greater London Authority.
- 2.5 Under section 33A(7) of the 2004 Act, local planning authorities must "have regard" to guidance published by the Secretary of State about how the duty is to be complied with.
- 2.6 Paragraph 10 of the Planning Practice Guidance ("PPG") relates to statements of common ground and provides that:

"[a statement of common ground] documents where effective co-operation is and is not happening throughout the plan-making process, and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries. In the case of local planning authorities, it also forms part of the evidence required to demonstrate that they have complied with the duty to cooperate".
- 2.7 Paragraph 33 of the PPG relates to the application of the duty to cooperate in London. It provides as follows:

“The duty to cooperate applies in London, and other combined authority areas. Within these areas local planning authorities are required to cooperate with each other, county councils, other local planning authorities outside the combined authority area, and prescribed public bodies. The degree of cooperation needed between these parties will depend on the extent to which strategic matters have already been addressed in the spatial development strategy.” (emphasis added)

- 2.8 In accordance with the National Planning Policy Framework under which the Enfield's Local Plan is being examined, the Council have agreed a Statement of Common Ground dated July 2024 (July 2024 SOCG) (appended to the DtC Statement [SUB14a],) with all seven neighbouring local authorities which serves to verify the outcomes of the Council's effective and on-going joint working, document the cross-boundary matters being addressed by the Local Plan and the progress which was made in cooperating to address strategic matters up to the point of submission of the plan in August 2024.

3 TYPES OF FORMAL ENGAGEMENT AND CONSULTATION

- 3.1 The Local Plan has been subject to three main stages of consultation on the DTC:

- 3.1.1 Early engagement consultation on the 2018 Regulation 18 local plan
- 3.1.2 In January 2021, the Council formerly issued Duty to Cooperate letters sent to neighbouring and other relevant authorities, seeking their assistance with meeting Enfield's unmet housing and employment need. These letters were issued at a critical stage in the preparation of the Local Plan and provided detailed context around the Borough's spatial constraints, including the extent of designated Green Belt and Strategic Industrial Land (SIL), which limit development opportunities within the Borough.
- 3.1.3 The letters set out that even with maximum use of brownfield land and urban intensification, Enfield would fall short of meeting the housing target of 1,246 homes per year set out in the (then) emerging London Plan, with an estimated shortfall of up to 4,000 homes over the plan period. The correspondence also highlighted a significant unmet employment need of approximately 23ha of industrial/distribution land, even after taking account of urban intensification and new employment sites.
- 3.1.4 The Council therefore sought confirmation from neighbouring authorities and those within the Housing Market Area and Functional Economic Market Area as to whether they could accommodate any of this unmet need. This represented an important and proactive step in line with the Duty to Cooperate and helped to shape the spatial strategy of the Plan.
- 3.1.5 In August 2021, the Council issued Duty to Cooperate letters regarding its emerging Regulation 18 Local Plan, explicitly seeking to agree Strategic Matters across a wide range of themes. This included, but was not limited to, housing need, employment, transport, Green Belt and natural environment considerations, and gypsy and traveller accommodation needs. These matters were outlined in an enclosed table ("Log 1") which accompanied the letter and was sent to a wide range of prescribed bodies and neighbouring authorities, including those without direct administrative boundaries with Enfield but with whom there were strategic functional links. The correspondence invited recipients to confirm whether the identified strategic matters were accurate and complete, and whether the appropriate engagement mechanisms had been established. It also sought confirmation on the role each body could play in supporting Enfield to meet its development needs, including any unmet needs. This marked a formal and transparent step in the Council's ongoing collaborative approach to fulfilling its DtC obligations under the Planning and Compulsory Purchase Act 2004 and was aligned with the requirements of national planning policy and guidance.
- 3.1.6 In March 2024, the Council formally notified all Duty to Cooperate bodies of Regulation 19 version of the Enfield Local Plan, in accordance with the requirements set out in the

Council's adopted Statement of Community Involvement (2023) [SUB17]. This notification provided prescribed bodies with an opportunity to engage and make representations on the proposed submission version of the Plan

- 3.2 The Council has also engaged extensively with the Greater London Authority (GLA) throughout the preparation of the Local Plan, and this collaboration has supported joint working on a number of key strategic matters relevant to the Duty to Cooperate.
- 3.3 This includes:
 - 3.3.1 The London Strategic Housing Land Availability Assessment (SHLAA) 2017, in which Enfield worked with the GLA to assess borough-level housing capacity. Enfield's contributions and concerns around delivery were acknowledged and influenced outcomes at the London Plan EIP (para 4.9 of the DtC Statement).
 - 3.3.2 Bespoke borough-level population projections, produced in liaison with GLA officers, which informed Enfield's Infrastructure Delivery Plan and other evidence base documents (para 4.9).
 - 3.3.3 The Functional Economic Market Area (FEMA) Study (2020), prepared in coordination with GLA and neighbouring boroughs, which underpins the Council's employment land strategy. The GLA confirmed the initial conclusions were justified based on the presented analysis (para 6.30).
 - 3.3.4 The Gypsy and Traveller Accommodation Needs Assessment (GTANA): Enfield liaised with the GLA, which is leading on a London-wide GTANA update. Council officers have participated in a steering group convened by the GLA to oversee the methodology and process (para 6.28).
 - 3.3.5 Ongoing strategic transport discussions with the GLA group, including TfL, particularly in relation to site-specific transport feasibility, local implementation plans, and placemaking areas such as Meridian Water, Crews Hill and Chase Park (paras 4.8, 6.10, 6.47).
- 3.4 Multiple duty to cooperate and director-level meetings with the GLA (E7.9.1), including a specific DtC workshop in December 2019 involving other prescribed bodies and London boroughs.
- 3.5 These activities demonstrate that joint working with the GLA has not only taken place but has shaped the content and evidence base for the Enfield Local Plan, fulfilling both the previous legal test of the Duty to Cooperate and the current soundness test.

Gypsy and Traveller Consultation Stages to Date

- 3.6 In parallel with the wider Enfield Local Plan, the Council has undertaken a series of consultation stages specifically focused on preparing a separate Traveller Local Plan (TLP), aimed at meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople. These stages are summarised below:
 - 3.6.1 In 2020, the Council published its initial *Gypsy and Traveller Accommodation Needs Assessment* (GTANA), identifying the scale and nature of need within the Borough. This was made available as part of the Duty to Cooperate Statement (Appendix 2, [SUB14a]).
 - 3.6.2 A six-week public "Issues and Options" consultation took place from 29 September to 10 November 2023. This sought early views on the approach to site identification, pitch provision, and planning policy direction. On 23 September 2023, the Council issued letters to key stakeholders, inviting representations and launching a formal 'Call for Sites' process to help identify suitable land.
 - 3.6.3 On 24 October 2023, the Council wrote to neighbouring authorities requesting confirmation of their current Local Plan positions in relation to meeting the needs of

Gypsies, Travellers and Travelling Showpeople, and asking whether they could assist in addressing any potential unmet accommodation needs in Enfield.

3.6.4 On 24 September 2024, the Council published a draft Regulation 18 Traveller Local Plan alongside a suite of supporting evidence documents, including:

- *Traveller Local Plan Regulation 18 Consultation Statement* (2024);
- *Updated Gypsy and Traveller Accommodation Needs Assessment* (May 2024);
- *Integrated Impact Assessment (IIA)* (2024);
- *Equality Impact Assessment (EqIA)* (2024); and
- *Site Selection Paper* (2024), incorporating the finalised Site Selection Methodology

3.7 A six-week public consultation on the draft Regulation 18 Traveller Local Plan was held from 24 September to 4 November 2024. This invited formal representations on the draft policies and proposed site allocations and included a renewed 'Call for Sites' with a response deadline of 4 November 2024.

4 KEY DUTY TO COOPERATE PARTNERS

4.1 The Greater London Authority (GLA)

4.2 The Council's seven neighbouring authorities are:

4.2.1 London Borough of Barnet

4.2.2 Broxbourne Borough Council

4.2.3 Epping Forest District Council

4.2.4 London Borough of Haringey

4.2.5 Hertsmere Borough Council

4.2.6 London Borough of Waltham Forest

4.2.7 Welwyn Hatfield Borough Council

4.3 In terms of strategic housing geography, Enfield forms part of the wider London housing market area, which is characterised by complex and overlapping submarkets. As established in the GLA's Strategic Housing Market Assessment (SHMA) (2017), London is considered to function as a single housing market area. Enfield's Local Housing Needs Assessment (2020) [HNE2] provides additional analysis on localised housing dynamics and cross-boundary linkages, including with Broxbourne. While Enfield does not constitute a self-contained housing market, its housing needs are shaped by a range of factors operating across the London-wide housing market area. The Council has taken this into account in fulfilling its Duty to Cooperate on housing matters.

4.4 Those authorities, or authority areas, with housing market links to Enfield are:

4.4.1 London Borough of Haringey

4.4.2 London Borough of Barnet

4.4.3 "Rest of East London"

4.4.4 London Borough of Islington

4.4.5 Broxbourne Borough Council

4.4.6 Welwyn Hatfield Borough Council

- 4.5 Enfield Council did not engage directly with the London Borough of Islington as part of the Duty to Cooperate process due to the absence of any evident strategic cross-boundary issues. Enfield and Islington do not share a boundary and are separated by other authorities, including Haringey and Hackney. There are no known functional housing market or employment land relationships, infrastructure dependencies, or other strategic matters that would warrant active cooperation under the Duty to Cooperate.
- 4.6 This position aligns with national planning guidance, which focuses on engagement where cross-boundary strategic issues are present. Enfield has therefore prioritised working with neighbouring and functionally linked authorities, such as Haringey, Barnet, and Broxbourne.
- 4.7 Notably, Islington's own Duty to Cooperate statement does not reference Enfield, which further supports the conclusion that no mutual strategic matters exist. However, Enfield remains open to future engagement should any strategic issues involving Islington arise.
- 4.8 In 2023, as part of the plan-making process, Enfield Council updated its Employment Land Review (ELR), which led to a reassessment of the Functional Economic Market Area (FEMA). This update refined the FEMA boundaries to better reflect current economic linkages and commuting patterns. As a result, the revised FEMA now includes the following authorities concerned with employment land:
- 4.8.1 London Borough of Barnet
 - 4.8.2 Broxbourne Borough Council
 - 4.8.3 East Hertfordshire District Council
 - 4.8.4 Epping Forest District Council
 - 4.8.5 London Borough of Haringey
 - 4.8.6 Hertsmere Borough Council
 - 4.8.7 London Borough of Redbridge
 - 4.8.8 London Borough of Waltham Forest
 - 4.8.9 Welwyn Hatfield Borough Council
- 4.9 This revision resulted in the exclusion of the London Borough of Brent, Harlow District Council, Uttlesford District Council, and the London Borough of Newham from the FEMA boundary. The updated ELR provides a detailed analysis supporting these changes, ensuring that the FEMA accurately represents the current economic dynamics influencing Enfield and its neighbouring authorities.
- 4.10 London boroughs all face similar issues to the Council in not being capable of fully meeting their identified strategic needs with their land supply and not having land available to assist neighbouring boroughs all grappling with these same challenges.
- 4.11 Appendix C of the Council's Statement of Community Involvement contains information about who the Council would consult on emerging local plans. As well as the seven neighbouring authorities (see above) this appendix listed other nearby authorities: Brent Borough Council, Newham Borough Council, Redbridge Borough Council, Harlow District Council, Uttlesford District Council plus Essex County Council, Hertfordshire County Council, the Lee Valley Regional Park Authority and the primary care trust. In the beginning stages of consultation for the local plan in 2021, the Council did engage with this full list of "other" authorities including Local Authorities and London Boroughs wider than those adjoining. The Council then further focussed the consultation on housing, employment and Gypsy and Traveller pitch needs with those authorities that are statutory bodies for the Duty of Cooperate, neighbouring authorities and those within the housing market area links and current FEMA areas.

5 GLA AND LONDON WIDE CO-OPERATION

- 5.1 The Council is a Local Planning Authority operating beneath the Greater London Authority (GLA), which acts as the Strategic Regional Authority. The London Plan addresses London-wide strategic planning matters, setting borough housing targets, overall spatial distribution and approaches to meeting London's housing needs. Individual borough's local plans address cross-boundary matters where appropriate but primarily focus on borough specific policies. The DtC Statement [SUB14a] and accompanying Log detail the Council's extensive and comprehensive engagement with the GLA and its functional bodies, including Transport for London (TfL), on key strategic matters such as housing and employment land supply. Positive engagement by the Council and with the GLA throughout the process has resulted in frequent exchanges of information, which have shaped local plan policies. Ongoing dialogue and information-sharing have been constructive and iterative, continuing into the Examination in Public stage of the Enfield Local Plan. While the duty is not a duty to agree, it requires constructive and active engagement, which the Council has consistently maintained throughout plan preparation.
- 5.2 Joint working with the GLA has extended to a range of shared evidence base documents that underpin strategic matters in the Enfield Local Plan, including:
- 5.2.1 The London Strategic Housing Market Assessment (SHMA) (GLA, 2017), which establishes London as a single Housing Market Area and sets Enfield's strategic housing context.
 - 5.2.2 The Enfield Local Housing Needs Assessment (2020) [HNE2], which refines Enfield's position within London's wider housing market.
 - 5.2.3 Enfield's Functional Economic Market Area (FEMA) Study (2020) [EMP5], which identified the borough's strategic economic relationships, particularly with the GLA and east London boroughs. The GLA were consulted on this study and supported its conclusions, as noted in paragraph 6.30 of the DtC Statement [SUB14a].
 - 5.2.4 Enfield's Gypsy and Traveller Accommodation Needs Assessment (GTANA), for which the Council continues to liaise with the GLA in light of regional need distribution and data alignment.
- 5.3 This joint evidence informed strategic dialogue with the GLA, shaping local plan policy development, notably on housing, economic growth, site allocations and infrastructure.

GLA: Explanation of Compliance with the DTC

- 5.4 The strategic matters of the Council's housing targets, overall spatial distribution and approach to meeting London's housing needs are set out in the London Plan. Paragraph 33 of the PPG explains that "*the degree of cooperation needed between these parties will depend on the extent to which strategic matters have already been addressed in the spatial development strategy*".
- 5.5 As detailed in the DtC Statement [SUB14a], the Council has maintained regular engagement with the GLA through established forums including the LEAP group and the Association of London Borough Planning Officers (ALBPO). These forums facilitated proactive dialogue throughout all stages of the plan-making process, particularly around alignment with strategic policies set out in the London Plan.
- 5.6 Paragraphs 6.7- 6.10 of the DtC Statement [SUB14a] set out the nature and content of discussions held with the GLA on housing and employment matters.
- 5.7 During the Examination in Public (EiP) of the London Plan strategic housing targets were examined at a high level, with borough-specific hearings taking place between January and May 2019. The EiP provided boroughs with a platform to present their cases regarding housing targets and capacities; however, discussions at this strategic stage were principally concerned with individual boroughs' capacities to meet their own housing needs. As a result, detailed considerations about redistributing unmet housing needs between boroughs, including Enfield, were limited at that time. This was due to several factors:

- 5.7.1 Stage of Local Plan Preparation: Enfield was still at an early stage of its own Local Plan preparation. It had not yet fully established detailed evidence bases or site assessments, limiting its ability to explicitly discuss cross-boundary unmet housing needs.
- 5.7.2 Sequential Planning Process: The redistribution of unmet housing need generally follows a sequential approach. Strategic housing targets are initially established by the London Plan; individual boroughs subsequently assess their detailed capacities through their own local plan processes. Explicit discussions regarding unmet needs typically occur later, at borough-level examinations.
- 5.7.3 Strategic Nature of London Plan EIP Discussions: At the strategic London-wide level, explicit dialogue about transferring unmet housing needs between boroughs is rare, with more detailed discussions reserved for borough-level Duty to Cooperate processes and Statements of Common Ground.
- 5.7.4 Duty to Cooperate Mechanism: Formal discussions regarding borough-specific unmet housing needs and capacity reallocation predominantly take place within the Duty to Cooperate framework during individual borough Local Plan preparations and examinations.
- 5.8 Nevertheless, the Council actively engaged in forums such as ALBPO, LEAP meetings, and London-wide evidence preparation (including SHMA and FEMA), consistently communicating constraints and capacities to the GLA and neighbouring boroughs. These interactions ensured boroughs understood the constraints around Enfield's ability to meet wider strategic needs, laying the groundwork for more explicit subsequent engagement.
- 5.9 The Council further consulted with the GLA on Enfield's FEMA in May 2020 [EMP5]. The GLA responded positively, confirming that: *"the conclusion of the report seem justified on analysis"*(paragraph 6.30 of the DtC Statement [\[SUB14a\]](#)). This endorsement demonstrates a shared understanding of Enfield's economic geography and its implications for employment land provision.
- 5.10 It is important to highlight that the Enfield-Greater London Authority Statement of Common Ground (SoCG) from 2024 acts as a clear "bookend," concluding the strategic cooperation process initiated through earlier strategic discussions. The SoCG explicitly confirms the outcomes of previous discussions regarding housing need and confirms that no other borough has indicated the capacity or ability to accommodate any identified shortfall from Enfield.
- 5.11 Taken together, the Council has extensively and comprehensively engaged under the Duty to Cooperate before and throughout the Local Plan process with the Greater London Authority (GLA) group, which includes Transport for London (TfL) including on the key strategic matters of housing and employment land supply. This has resulted in frequent exchanges of information helping to shape the local plan policies. It is evident that the Council have had joint working with the GLA in its efforts to address strategic matters. This dialogue and engagement demonstrate ongoing constructive and active cooperation.

6 NEIGHBOURING LOCAL AUTHORITY LOCAL PLAN STATUS

- 6.1 At the time of submission of the Council's local plan in August 2024, the Council's seven neighbouring authorities were all at different stages of updating their own plans as outlined in the table below.

Local Authority	Local Plan Status
London Borough of Barnet	<ul style="list-style-type: none"> The Barnet Local Plan 2021 – 2036 was submitted for examination in November 2021 with hearings taking place in September and November 2022. The plan was adopted in early 2025 following the Inspector's report in November 2024.

Local Authority	Local Plan Status
Broxbourne Borough Council	<ul style="list-style-type: none"> The Broxbourne Local Plan 2018 – 2033 was submitted for examination in March 2018 with hearings taking place in September/November 2018 and June 2019. The plan was adopted 23 June 2020 following the Inspector's report in April 2020
Epping Forest District Council	<ul style="list-style-type: none"> The Epping Forest Local Plan 2011 – 2033 was submitted for examination in September 2019 with hearings taking place between February and June 2019. The plan was adopted in March 2023 following the Inspector's report in February.
London Borough of Haringey	<ul style="list-style-type: none"> The London Borough of Haringey's Local Plan containing strategic policies adopted in 2013 with alterations in 2017. The London Borough of Haringey is working on a new local plan.
Hertsmere Borough Council	<ul style="list-style-type: none"> Hertsmere Borough Council's current Local Plan runs from 2012 to 2027. In 2024, Hertsmere consulted on a new Draft Local Plan 2024. Their latest Local Development Scheme outlines a schedule for promoting the new Local Plan to adoption by 2027.
London Borough of Waltham Forest	<ul style="list-style-type: none"> The London Borough of Waltham Forest's Local Plan Part 1 was submitted for examination on 21 April 2021 with hearings taking place in March 2022 and March 2023. The plan was adopted on 29 February 2024 after the inspector's report published on 8 January 2024.
Welwyn Hatfield Borough Council	<ul style="list-style-type: none"> Welwyn Hatfield Borough Council's local plan was submitted for examination on 15 May 2017. Hearings took place between September 2017 and March 2021. The plan was adopted in October 2023 following an Inspector's report in September 2023.

- 6.2 In view of the plan-making activity being carried out by the above neighbouring authorities, the Council is confident that these authorities were fully aware of their own strategic land needs when they responded to Enfield Council's requests in 2021 seeking assistance with the Council's unmet need and about strategic matters. Their replies confirmed that, due to pressures on land availability and the need to meet their own objectively assessed needs, they were not in a position to accommodate Enfield's unmet housing or employment land needs. The majority of these responses were made during active periods of evidence gathering or consultation on their own emerging local plans, meaning their positions were informed by the most up-to-date strategic planning considerations at the time.
- 6.3 This reinforces the Council's conclusion that there are no realistic opportunities for neighbouring authorities to accommodate Enfield's unmet needs. Moreover, the information in the table demonstrates that Enfield has engaged in Duty to Cooperate discussions at appropriate and

meaningful stages in each authority's plan-making process, ensuring that strategic matters could be properly considered on both sides.

7 ENGAGEMENT ON MEETING HOUSING AND EMPLOYMENT NEEDS – NEIGHBOURING AUTHORITIES

- 7.1 The Log contains the full details of engagement with the Council's seven Neighbouring Authorities. The following paragraphs contain a summary of the Council's meaningful engagement with these bodies and an explanation as to how that engagement meets the duty to cooperate.
- 7.2 The London Borough of Barnet responded to the Council's letter of January 2021, which set out Enfield's land supply constraints and sought assistance with accommodating its unmet housing and employment needs. Barnet confirmed in January and again in September 2021 that it was unable to assist with Enfield's unmet needs due to its own significant housing challenges and capacity constraints. Engagement on strategic matters between both boroughs continued with both acknowledging where their respective plan making progress.
- 7.3 Local Plan underwent Regulation 19 consultation in 2021 and was submitted for examination in November 2021. Throughout 2022–2024, Barnet's planning resources were largely focused on progressing their own Local Plan through a demanding examination process. This period coincided with crucial phases in Enfield's own plan-making, including detailed technical evidence gathering and preparation for submission of its Regulation 19 Plan, thus limiting the scope and necessity for additional joint engagement during this time. However, strategic cooperation was captured clearly within a signed Statement of Common Ground (dated February 2022) which underpinned both boroughs' Local Plan submissions.
- 7.4 Both boroughs have maintained a longstanding and positive relationship on strategic planning matters, including regular Duty to Cooperate engagement prior to 2021. These strategic discussions focused particularly on shared boundary areas around New Southgate, Southgate, Cockfosters, and the London Plan-designated New Southgate Opportunity Area, acknowledging the potential for collaborative place-making, regeneration, east–west transport connectivity, and infrastructure planning.
- 7.5 Despite constraints faced by both councils—including Green Belt designations, limited industrial land supply, and significant infrastructure pressures—both authorities have explicitly committed to continued dialogue and coordination on cross-boundary strategic matters. Barnet continues to support Enfield's overarching spatial strategy, as confirmed most recently in the July 2024 Statement of Common Ground. Further joint engagement, particularly around New Southgate and infrastructure provision, will be prioritised post-submission, reflecting evolving evidence bases and updated planning contexts.
- 7.6 The London Borough of Haringey responded to the Council's letter of January 2021 which set out the Council's land supply issues and sought assistance with meeting the unmet needs. Haringey responded confirming it could not accommodate the Council's needs and that it faced its own housing delivery challenges for its area's plan making. Engagement on strategic cross border matters between both boroughs continued and in September 2021 Haringey confirmed it supported the Council's overarching spatial strategy. The SOCG with the seven neighbouring authorities signed in July 2024 confirms Haringey continues to support the Council's overarching spatial strategy prior to the date of submission.
- 7.7 The London Borough of Waltham Forest responded to the Council's letter of January 2021 which set out the Council's land supply issues and sought assistance with meeting the unmet needs. Waltham Forest responded confirming it was unlikely they would be able to accommodate the Council's needs given their own significant housing capacity issues identified in their Regulation 19 emerging local plan. Engagement on strategic cross border matters between both boroughs continued and in May 2024 Waltham Forest confirmed it supported the Council's Regulation 19 Local Plan. The July 2024 SOCG confirms Waltham Forest continues to support the Council's strategies and continued engagement.

- 7.8 Hertsmere Borough Council responded to the Council's letter of Jan 2021 which set out the Council's land supply issues and sought assistance with meeting the unmet needs. Their response confirmed they were unable to assist the Council as they lacked the capacity to meet their own identified housing and employment needs. Hertsmere are in the process, at Regulation 18, as of May 2024, with their emerging local plan. Engagement on strategic cross border matters between both boroughs continues and it is agreed in the July 2024 SOCG that each council will see to meet its own employment land needs.
- 7.9 Broxbourne Borough Council responded to the Council's letter of Jan 2021 which set out the Council land supply issues and sought assistance with meeting the unmet needs. Their response confirmed they were unable to accommodate the Council's needs and that their Local Plan (2018-2033) fully allocates land to meet its own requirements. Broxbourne confirmed they remained engaged with and that they would provide further comment at Regulation 19 stage. The July 2024 SOCG sets out Broxbourne's position and serves to verify the outcome of engagement between the Council and Broxbourne Borough Council.
- 7.10 Welwyn Hatfield Borough Council responded to the Council's letter of Jan 2021 which set out the Council's land supply issues and sought assistance with meeting the unmet needs. They responded indicating they do not have capacity to meet the Council's unmet housing and employment needs. They welcomed further engagement with the Council on its Local Plan and supports the master-planned approach for Crews Hill seeking assurances on its proximity to Cuffley, Green Belt impact, and infrastructure provision.
- 7.11 Epping Forest District Council have responded to the Council seeking assistance with meeting unmet needs by explaining due to significant land constraints, including 90% Green Belt designation and Epping Forest Special Area of Conservation protections, Epping Forest is unable to accommodate additional growth beyond its own Local Plan provision of 11,400 dwellings. The JULY 2024 SOCG confirms Epping Forest District Council has not objection to the spatial strategy set in the regulation 19 plan.

Neighbouring Authorities: Explanation of Compliance with the DTC

- 7.12 The Council formally invited all neighbouring authorities to engage on strategic matters in July 2021, seeking agreement in principle on how to address unmet housing and employment needs. As summarised above and evidenced in the DtC Log, the Council made proactive and early efforts to collaborate with all seven neighbouring authorities as part of the plan-making process. In parallel, the Council engaged through established Greater London Authority (GLA) processes, including the preparation of the London Plan and the London Strategic Housing Market Assessment (SHMA), which are intended to address the distribution of housing need across London boroughs at a strategic level.
- 7.13 The Examination in Public (EiP) for the London Plan took place between January and May 2019, providing a forum for boroughs to raise capacity challenges and any potential for unmet need. While the EiP did not focus on the redistribution of borough-specific shortfalls, it served as a key platform for strategic-level engagement. Enfield also contributed to the London SHMA (2017), which established London's housing context and identified it as a single housing market area. Further, the Council's own Local Housing Needs Assessment, published in November 2020, provided a more detailed understanding of Enfield's specific position within this wider market and informed subsequent engagement with the GLA and neighbouring boroughs.
- 7.14 Notwithstanding these efforts, three of Enfield's seven neighbouring authorities ultimately confirmed they were unable to assist in meeting the borough's identified unmet needs for housing (including Gypsy and Traveller accommodation) and employment land, citing their own land supply constraints and strategic planning priorities. These positions were communicated through formal responses to the Council's 2021 letters and are documented in subsequent consultations, correspondence, and Statements of Common Ground, where applicable.
- 7.15 The Duty to Cooperate (DtC) Log includes references to key pre-submission meetings in the lead-up to the Regulation 19 stage of the Enfield Local Plan (August 2024), including:

- 7.15.1 The London Borough of Barnet and the Council held six meetings between November 2019 and May 2024 to discuss strategic matters relating to each authority's emerging Local Plan proposals.
 - 7.15.2 The London Borough of Haringey and the Council met three times between June 2020 and March 2024, with discussions focused on strategic growth and infrastructure coordination in cross-boundary areas.
 - 7.15.3 The London Borough of Waltham Forest and the Council held seven meetings between 2018 and May 2024, covering key strategic planning matters, including housing need, industrial land, and growth coordination.
 - 7.15.4 Hertsmere Borough Council and the Council met three times between January 2020 and May 2024 to discuss respective plan progress, unmet needs, and strategic transport coordination.
 - 7.15.5 In February 2020, the Council held a briefing session with Broxbourne Borough Council on emerging plan proposals. Broxbourne has continued to be engaged by the Council under the Duty to Cooperate, with discussions primarily focused on strategic transport issues.
- 7.16 Had any of these neighbouring authorities changed their position regarding available land capacity during this period of engagement, such a change would reasonably have been communicated to the Council. Furthermore, the preparation of the July 2024 Statements of Common Ground (SoCGs) would have presented a clear opportunity for any such change to be raised. Their silence on this point, and formal confirmation within the SoCGs serve as conclusive evidence that, at the point of submission, no neighbouring authority was able to assist Enfield with its unmet housing (including Gypsy and Traveller pitches) or employment needs.
- 7.17 As noted above, each neighbouring authority was at a different stage in their own local plan-making process, but all had a clear understanding of their own land supply capacity by the time of Enfield's formal engagement in 2021. None of the neighbouring authorities have disputed the adequacy of the Council's Duty to Cooperate process. Moreover, each authority explicitly confirmed that they could not accommodate any of Enfield's unmet needs. These outcomes are formally recorded in the July 2024 SoCGs, which in accordance with paragraph 010 of the Planning Practice Guidance (PPG) "form part of the evidence required to demonstrate that [the Council] have complied with the duty to cooperate." Notably, the London Boroughs of Barnet, Haringey, Waltham Forest and Epping Forest District Council have raised no objections to the Enfield Local Plan and, in some cases, indicated support.
- 7.18 As set out throughout the DtC Log and appendices, the Council has fully considered the responses and positions of neighbouring authorities when preparing its Local Plan and proposed site allocations. At the time of Enfield's requests in 2021, each authority was in possession of up-to-date strategic evidence and clearly indicated that they could not assist with meeting Enfield's unmet needs. This consistency of message across several years of correspondence and dialogue is a key indicator of effective strategic engagement.
- 7.19 There is clear evidence of regular, active exchange of information between the Council and neighbouring authorities on cross-boundary strategic matters. This dialogue has continued throughout the plan-making process and remains ongoing, with further Statements of Common Ground currently in development on additional cross-boundary issues. While the Duty to Cooperate is a legal requirement that must be satisfied prior to submission, the Council's continued engagement underscores a genuine and sustained commitment to collaborative working throughout the preparation of the Local Plan.
- 7.20 By way of comparison, other Local Plan examinations have recognised the value of SoCGs in verifying effective engagement under the Duty. For example, paragraph 22 of the Inspector's report for the Lambeth Local Plan (2020) notes: "*The Council has acted in accordance with its responsibilities under DTC and has signed Statements of Common Ground (SoCGs) with each of its neighbouring Boroughs covering strategic cross-border matters,*" before concluding that the duty had been met. Enfield's approach is consistent with this precedent.

8 ENGAGEMENT ON MEETING HOUSING AND EMPLOYMENT NEEDS – OTHER AUTHORITIES

- 8.1 The DtC Log contains a detailed breakdown of the engagement which took place between the Council and the other local authorities (who do not neighbour the London Borough of Enfield) in relation to housing and employment needs prior to the submission of the local plan. This engagement is summarised below.
- 8.2 The Council engaged proportionately with the London Borough of Brent, reflecting the absence of a shared boundary and limited direct strategic cross-boundary impacts. Brent was previously identified as part of Enfield's wider FEMA. However, the 2024 Employment Land Review updated and refined the FEMA boundary, excluding Brent based on evidence of limited commuting flows, weaker employment land relationships, and its geographical distance from Enfield's core industrial areas. In January 2021 Enfield formally requested assistance from Brent regarding unmet housing and employment needs. Brent's response (11 January 2021) stated that although its emerging Local Plan aimed to modestly exceed its own housing target, it was unable to assist Enfield due to a lack of surplus industrial land and the need to protect such land for its own requirements. Brent reaffirmed this position in September 2021 during Enfield's Regulation 18 consultation, explicitly supporting Enfield's proposed safeguarding and intensification policies for industrial land (SP E1 B, SP E2, SP E3, SP E5, DM E6, and DM E7) as necessary for Enfield to meet its own needs. Given Brent's own plan-making commitments throughout 2023–2024, including adoption of its Local Plan, combined with the absence of active cross-boundary infrastructure or land use issues, no formal Statement of Common Ground was prepared. Nonetheless, both boroughs remain open to ongoing dialogue should future strategic matters arise.
- 8.3 East Herts District Council, whose administrative area lies beyond Broxbourne Borough Council, confirmed to Enfield in January 2021 that it could not assist in meeting Enfield's unmet housing and employment needs. Engagement has primarily taken place at officer level, including a Duty to Cooperate meeting on 22 July 2020, providing a high-level opportunity to share respective Local Plan progress and emerging evidence. Enfield's revised Functional Economic Market Area (FEMA), as identified in the 2024 Employment Land Review, continues to include East Herts. However, despite this functional economic link, East Herts clearly communicated that it was unable to accommodate additional employment land requirements from Enfield, citing significant local development pressures and Green Belt constraints. In its formal response dated 26 January 2021, East Herts also explicitly stated that its Housing Market Area does not extend to Enfield, further limiting the scope for cooperation on housing. This stance was consistent with findings from Enfield's earlier FEMA Study (2020), which identified no practical capacity in East Herts to assist with Enfield's unmet industrial land needs. Further engagement was undertaken through a letter dated 3 August 2021 in conjunction with Enfield's Regulation 18 consultation; East Herts replied on 23 August 2021, maintaining their earlier position. A Statement of Common Ground has not been prepared between the authorities, reflecting their separate housing market geographies, East Herts' adopted District Plan (2018), and their current strategic focus through the Hertfordshire Joint Strategic Plan. East Herts did not respond further to the Council's requests to discuss any cross boundary strategic matters. Given the absence of realistic opportunities for cross-boundary redistribution of housing or employment growth and the clarity of East Herts' responses, Enfield considers that it has undertaken all reasonable steps to discharge its Duty to Cooperate obligations with this authority.
- 8.4 The Council wrote to Essex County Council in both January and August 2021 to notify them of the emerging Local Plan and to seek engagement on strategic matters, including Enfield's unmet housing and employment needs. Essex County Council is a relevant Duty to Cooperate body as it shares a boundary with Enfield at the far eastern edge of the Borough and serves as the upper-tier authority for Epping Forest District, with whom the Council has engaged extensively. While Essex County Council did not respond directly to the Council's correspondence, engagement has taken place in parallel with Epping Forest District Council, including discussions on shared strategic issues such as air quality and transport impacts associated with Epping Forest Special Area of Conservation. The Council considers that reasonable efforts were made to involve Essex County Council in Duty to Cooperate discussions, and in the absence of a response, the Council

proceeded on the basis that Essex did not raise any strategic cross-boundary concerns in relation to Enfield's unmet needs.

- 8.5 The London Borough of Hackney, while not directly bordering Enfield was previously identified as part of Enfield's Housing Market Area. Enfield formally requested assistance from Hackney in January 2021 regarding unmet housing and employment needs. In their response (12 January 2021), Hackney acknowledged the request but explicitly indicated that they face significant housing delivery challenges themselves, and as such could not assist with accommodating Enfield's needs. Enfield followed up with a further letter in August 2021, reiterating key strategic cross-boundary issues and seeking further dialogue. However, no response was received from Hackney. Furthermore, the revised FEMA as set out in Enfield's 2024 Employment Land Review does not identify Hackney as forming part of Enfield's FEMA, thereby limiting economic interdependencies and reducing the imperative for formalised cooperation on employment land matters. While Enfield remains open to future cooperation, Hackney's own housing constraints, their exclusion from Enfield's current FEMA, and their non-adjacency mean the limited engagement and absence of a Statement of Common Ground are considered justified.
- 8.6 Harlow Council located approximately seventeen miles north-east of Enfield and previously included within Enfield's original Functional Economic Market Area (FEMA), confirmed in January 2021 that it could not assist in accommodating Enfield's unmet housing and employment needs. Initial engagement included a Duty to Cooperate meeting held in June 2020 and formal letters sent by Enfield in January and August 2021 explicitly requesting assistance. In their formal response dated 29 January 2021, Harlow clearly stated its inability to help, explaining that its own Local Development Plan, adopted in December 2020, had already required substantial Green Belt release to meet local housing and employment needs, leaving no additional capacity. Furthermore, Harlow highlighted significant sustainability concerns, noting that accepting displaced housing or employment needs from Enfield could place undue strain on local infrastructure and encourage unsustainable commuting patterns. Additionally, Harlow expressed concern about unplanned office-to-residential conversions leading to the displacement of Enfield residents into the district. Subsequently, Enfield's 2024 Employment Land Review revised the FEMA boundary and no longer includes Harlow, reflecting updated evidence on limited commercial market linkages and commuting relationships between the two areas. Given the definitive nature of Harlow's adopted Local Plan, its clear communication of inability to assist, and its removal from the FEMA, further cross-boundary strategic engagement on housing or employment matters has not been pursued. Nonetheless, Enfield remains open to cooperation with Harlow should future strategic issues or opportunities emerge.
- 8.7 The London Borough of Newham which does not border Enfield but was previously included within the original Functional Economic Market Area (FEMA) due to identified economic linkages and housing market connections within East London, confirmed in January 2021 that it could not accommodate Enfield's unmet housing and employment needs. Enfield formally wrote to Newham on 7 January 2021, explicitly requesting assistance; Newham responded on 27 January 2021, indicating its inability to assist due to significant land constraints, infrastructure pressures, and obligations to prioritise meeting its own substantial growth targets. This position was further reaffirmed in response to Enfield's follow-up correspondence in August 2021, where Newham clarified that any surplus capacity emerging would need to address wider unmet strategic needs across London, rather than specific borough-level shortfalls such as Enfield's.
- 8.8 Despite being unable to offer capacity, Newham provided supportive consultation responses during Enfield's Regulation 18 consultation (June–September 2021) and again at the Regulation 19 consultation stage (March–May 2024). These responses explicitly supported Enfield's Local Plan vision, particularly commending priorities around climate change, housing affordability, employment land protection, and industrial intensification. Nevertheless, Newham consistently emphasised its own delivery challenges, reinforcing that accommodating unmet housing, employment, or traveller site needs from Enfield was not feasible.
- 8.9 Enfield's 2024 Employment Land Review updated the FEMA and, due to refined analysis of employment relationships and commuting patterns, removed Newham from Enfield's revised FEMA. Given Newham's clear and consistent communication regarding its constraints, its subsequent removal from the FEMA, and supportive but definitive consultation responses, no formal Statement of Common Ground has been agreed. Both authorities recognise there are

currently no unresolved cross-boundary strategic issues necessitating formal agreement; however, Enfield remains committed to ongoing constructive cooperation with Newham, particularly around shared London-wide planning objectives and strategic infrastructure delivery.

- 8.10 The London Borough of Redbridge does not directly border the London Borough of Enfield but is considered relevant under the Duty to Cooperate due to shared housing and economic market dynamics identified within the East London Authority sub-region (as established in Enfield's FEMA study). In January 2021, Redbridge confirmed it could not assist Enfield in meeting its unmet housing and employment needs. Redbridge did not respond to the Council's subsequent letter seeking to strengthen strategic collaboration as part of its Local Plan (2020-2039). However, Redbridge did respond to Enfield's Regulation 19 consultation, expressing overall support for the soundness of the Plan, alongside providing specific comments on Policy E1 (industrial/logistics) and the Epping Forest SAC Zone. These comments will be addressed in the report following the EiP.
- 8.11 Enfield Council has actively sought constructive engagement with Uttlesford District Council in Essex, in line with its obligations under the Duty to Cooperate, particularly given the potential for strategic issues such as employment land provision and infrastructure to extend regionally beyond the London boundary. Although Uttlesford does not directly border Enfield and lacks strong functional connections in terms of housing markets or commuting flows, it was originally included within the Functional Economic Market Area (FEMA) analysis. Reflecting this, Enfield issued a formal request to Uttlesford on 1 February 2021, explicitly inviting dialogue on accommodating some of Enfield's unmet housing and employment needs.
- 8.12 In February 2021, Uttlesford responded, clearly indicating that due to the early stage of its own Local Plan preparation—without an up-to-date evidence base or a detailed understanding of its capacity, it was unlikely to accommodate Enfield's unmet needs. Additionally, Uttlesford questioned the functional and geographic relationship between the two authorities, raising valid sustainability concerns regarding the potential for accommodating Enfield's urban needs in a non-adjacent, predominantly rural district. A follow-up attempt by Enfield Council to re-engage on 3 August 2021 did not elicit a further response. Uttlesford subsequently did not submit any representations during Enfield's Regulation 18 (2021) or Regulation 19 (2024) consultations, and no Statement of Common Ground has been established between the two authorities.
- 8.13 Since 2023, Uttlesford is no longer part of Enfield's FEMA, reflecting updated evidence which further supports the lack of a clear functional link. Consequently, the limited ongoing engagement accurately reflects the absence of unresolved strategic matters between these authorities, particularly given the geographic distance, contrasting urban and rural contexts, and the absence of identified capacity or policy alignment for Uttlesford to assist in accommodating London's needs. Nonetheless, Enfield remains open to future cooperation should new evidence or strategic matters arise in subsequent plan-making cycles, necessitating renewed joint engagement with Uttlesford.
- 8.14 Southwest Hertfordshire authorities (Dacorum, Hertsmere, St Albans, Three Rivers, and Watford) are preparing a joint strategic plan for their area, although each council will continue to produce its own Local Plan. Among these authorities, only Hertsmere directly neighbours Enfield. The Council received no responses from any Southwest Hertfordshire councils regarding its emerging Local Plan, despite having formally requested assistance with unmet housing and employment needs and inviting further engagement on strategic matters. However, Enfield proactively engaged by responding to Southwest Hertfordshire's Joint Strategic Plan Regulation 18 consultation. Furthermore, Enfield's Local Housing Needs Assessment (2020) and Employment Land Review (2024) confirm that there are limited functional relationships regarding housing markets and economic interdependencies between Enfield and the Southwest Hertfordshire authorities. The evidence clearly identifies Enfield's strongest market linkages as being with North and East London, and immediate neighbouring boroughs such as Broxbourne and East Hertfordshire. Consequently, given the absence of significant commuting flows, housing market overlaps, or shared employment markets, there has been limited strategic justification or impetus for more extensive cross-boundary engagement between Enfield and Southwest Hertfordshire authority.

- 8.15 The Council approached their consultation and the duty to cooperate by seeking to actively engaged with a wide geographical area of authorities, not just those neighbouring. They did so in full cognisance of their position of having housing market links and the FEMA. Enfield cast a wide net, wider than some other authorities would do, in connection with their emerging new local plan.

Other Authorities: Explanation of Compliance with the DtC

- 8.16 The Council initially consulted widely with authorities, engaging on land supply and strategic issues about their plan proposals. In the beginning stages of consultation for the local plan in 2021, the Council did engage with this full list of “other” authorities referenced in section 5 of this note including Local Authorities and London Boroughs wider than those adjoining.
- 8.17 The Council then further focussed the consultation on housing, employment and Gypsy and Traveller pitch needs with those authorities that are statutory bodies for the Duty of Cooperate, neighbouring authorities and those within the housing market need links and current FEMA areas. As explained under section 5 of this note the Council is part of the wider London housing market area, which has complex submarkets, and the Council cannot be defined as a self-contained housing market. The Council under the duty to cooperate wrote to all the FEMA authorities about employment land and engaged with them as set out in the Log.
- 8.18 The above paragraphs briefly summarise the information contained in the Log and confirms that all these authorities were clear early in the process (in 2021) they could not assist the Council in meeting the Council's unmet needs for housing and employment. The Council took the information provided into account when proceeding to take forward their local plan proposals.
- 8.19 Moving forward with their emerging plan, the Council took a reasonable and proportionate view on the level of further engagement they would receive from these authorities, whose positions in relation to not be able to assist with the unmet need had been made very clear in their responses. Further engagement on the land supply/capacity in the regional and London context with these authorities who need to look at meeting their needs within their respective areas would not have achieved any different outcomes in shaping the Enfield Local Plan. This is due to the general shortage of land supply, a position that will not change with the government's emphasis on sustainable development and the housing targets increasing for authorities in this region and for London.
- 8.20 Importantly, none of these authorities have suggested the Council have not adequately discharged the duty to cooperate and each of these authorities indicated that they were unable to assist the Council by providing available land to meet the Council's unmet housing or employment needs. Brent, Newham and Redbridge all indicated support for the Enfield Local Plan. Whilst the absence of disagreement is not in itself evidence that the duty to cooperate has been discharged, it demonstrates that in this regional context the reasonable and proportionate approach which the Council took to strategic collaboration was in no way less meaningful. As further explained in section 11 of this note, the approach the Council has taken to DtC engagement has similarities with that of the London Borough of Barnet who were found to have complied with the duty to cooperate in their Inspector's report published on 06 November 2024.
- 8.21 The Council took all the responses received into account on the preparation of their local plan and the proposed site allocations. The Council's approach to the duty to cooperate on these strategic issues and their wide engagement with more than its adjoining neighbouring boroughs therefore demonstrates the efforts the Council made to find out if their unmet needs could be accommodated elsewhere. The level of engagement undertaken by the Council under the duty to cooperate is wider than other London Boroughs have undertaken where the duty to cooperate has been found to be satisfactorily carried out (for example the London Borough of Islington's 2023 local plan where the submitted Duty to Cooperate Statement comprised of 17 pages of commentary and evidence).
- 8.22 The position of neighbouring authorities and these other authorities of not being able to assist the Council with land supply for housing and employment were not unexpected responses. They did lead the Council to considering meeting needs for housing and employment through its proposed site allocations and green belt releases. There would have been opportunities for any

change in position to be communicated to the Council, including when finalising statements of common ground. As noted above, the soundness of these proposals is a separate matter to the Duty to Cooperate.

9 ENGAGEMENT ON MEETING HOUSING AND EMPLOYMENT NEEDS - OTHER CONSULTEES

- 9.1 The DtC Statement details the other bodies and consultees engaged by the Council and details the engagement and responses received from these bodies. The DtC statement appended statements of common ground with these bodies and detailed the engagement. In terms of these bodies' functions and responsibilities they are not in a position to assist the Council with its land supply for housing or employment (for example Lea Valley Regional Park Authority whose functions are recreation, sports and nature).

10 ENGAGEMENT ON MEETING THE STRATEGIC LEVEL OF GYPSY AND TRAVELLER NEED

- 10.1 Whilst the Enfield Local Plan and the Traveller Local Plan are separate development plan documents, they are interlinked and from a practical and operational perspective the same team within the Council is producing both development plan documents. For this reason, it would be artificial to suggest that cooperation and collaboration between the Council and other authorities on the Traveller Local Plan cannot be submitted as evidence of cooperation in relation to Gypsy and Traveller pitch requirements as part of the preparation of the Enfield Local Plan.
- 10.2 Further to the information contained in the Log, this section summarises how the Council cooperated with neighbouring and other authorities in relation to Gypsy and Traveller housing needs at various stages in preparing both the Enfield Local Plan and the Traveller Local Plan.
- 10.3 In August 2021 for the Enfield Local Plan the duty to cooperate letters expressly sought to discuss traveller pitch needs.
- 10.4 The September 2023 letters connected to the traveller local plan (before submission of the Enfield Local Plan for examination in August 2024) were sent to all seven neighbouring authorities and additionally to the following authorities, prescribed bodies and interest groups:
- 10.4.1 East Herts District Council
 - 10.4.2 Uttlesford District Council
 - 10.4.3 Harlow District Council
 - 10.4.4 London Borough of Redbridge
 - 10.4.5 London Borough of Newham
 - 10.4.6 London Borough of Brent
 - 10.4.7 London Borough of Hackney
 - 10.4.8 Hertfordshire County Council
 - 10.4.9 Essex County Council
 - 10.4.10 Greater London Authority
 - 10.4.11 National Highways
 - 10.4.12 Transport for London
 - 10.4.13 Historic England
 - 10.4.14 The Canal and River Trust
 - 10.4.15 The Metropolitan Police

- 10.4.16 The Environment Agency
- 10.5 Responses were received by the Council from the following authorities and bodies:
- 10.5.1 National Highways
 - 10.5.2 Transport for London
 - 10.5.3 Historic England
 - 10.5.4 Greater London Authority
 - 10.5.5 Canal and River Trust
 - 10.5.6 London Gypsies and Travellers
 - 10.5.7 Metropolitan Police
 - 10.5.8 Environment Agency
 - 10.5.9 Essex County Council
 - 10.5.10 London Borough of Haringey
 - 10.5.11 London Borough of Redbridge
 - 10.2.12 London Borough of Newham
- 10.6 As detailed under section 7 of this note, all seven neighbouring authorities responded in 2021, to confirm they could not assist with the Council's unmet need for housing.
- 10.7 Three authorities provided responses to the specific request for assistance with accommodation for gypsy and traveller needs. Essex County Council clarified that it is not responsible for housing and planning matters relating to gypsies and travellers and advised that engagement should be directed to individual Essex district and borough councils. The London Borough of Redbridge stated that it could not assist due to its own limited capacity and a projected shortfall in traveller accommodation. Similarly, the London Borough of Newham advised it was unable to offer support, citing challenges in meeting its own housing targets and gypsy and traveller pitch needs as set out in its Regulation 18 Local Plan. These responses highlight the ongoing pressures faced by neighbouring authorities in addressing their own traveller needs and reinforce the need for the Council to address its identified Traveller accommodation needs within its own administrative boundary and planning framework.
- 10.8 The Council's second consultation exercise that finished in November 2024 resulted in responses from the Canal & River Trust, Comer Homes (via Savills), Edmonton & Winchmore Hill Conservative Association, Enfield RoadWatch, Environment Agency, Essex County, Hertfordshire County Council, Historic England, the Greater London Authority, Natural England, the London Borough of Redbridge and Tottenham Hotspur Football Club. The detail of these responses is currently being considered by the Council as part of the Traveller plan process and in connection with the preparation of a Regulation 19 Travellers plan. Essex County Council restated that it is not the planning authority for traveller accommodation and Hertfordshire County Council stated that the Traveller Local Plan would have no impact on their services and therefore they had no comments at this stage. The London Borough of Redbridge confirmed they remain unable to accommodate any unmet Traveller need due to limited capacity but stated the proposals for this plan raises no Duty to Cooperate issues and they propose no modifications.
- 10.9 The Council is continuing its proactive ongoing Duty to Corporate engagement. On 14 February 2024, the Council issued a follow-up letter to the seven neighbouring and to the housing market link authorities, formally requesting confirmation of their current local plan position regarding their own identified needs for Gypsies, Travellers and Travelling Showpeople. This letter referenced the 2024 Gypsy and Traveller Accommodation Needs Assessment, which identifies a need in Enfield for 30 permanent pitches and a transit site to accommodate at least 15 caravans by

2041. In this correspondence, the Council reiterated the planning and environmental constraints it faces, including a high proportion of Green Belt and other protected land designations. It explained that, to meet its need, the Council is proposing to release sites from the Green Belt and stressed the importance of understanding neighbouring authorities' capacity to assist before proceeding further. The letter also reminded recipients of previous consultation engagement and outreach efforts it had made in October 2023 and September 2024, asking for responses by 7 March 2025.

Gypsy and Traveller Need: Explanation of Compliance with the DtC

- 10.10 As explained above, whilst the Enfield Local Plan and Traveller Local Plan are separate development plan documents – for the purposes of the duty to cooperate, their simultaneous preparation by the same Council team means a wide range of evidence should be considered.
- 10.11 For this reason, all of the engagement which took place on the Traveller Local Plan serves to demonstrate that the required level of collaboration under the duty to cooperate has been carried out in respect of the Enfield Local Plan.
- 10.12 As explained above, the subsequent discussions and engagement which has taken place after the submission of the Enfield Local plan in August 2024 serves to verify the original position and responses which the Council received, namely: that all the authorities (including the seven neighbouring authorities) were not able to assist in meeting the Council's need for traveller pitches.
- 10.9 The Council will continue to constructively and proactively discuss and engage on where and how to accommodate its need for traveller pitches building on the meaningful discussions that have already taken place. This will inform on the Traveller Local Plan proposals as they continue to be developed. It was evident early on that due to the constraints referenced in the preceding paragraph that some of this pitch need may need be accommodated on large strategic sites proposed for allocation in the Enfield Local Plan. However, meeting the required need for pitches is a matter which will be addressed within the Traveller Local Plan. The suitability for provision of pitches to meet some of the overall pitch need on the sites proposed within the Enfield Local Plan is being considered as part of the Traveller Local Plan analysis as well as through the of integrated place shaping proposals for these areas/sites and is ultimately a matter of soundness rather than compliance with section 20(5)(c) of the 2004 Act.

11 FURTHER GUIDANCE AND INFORMATION FROM OTHER LOCAL PLAN REPORTS ON THE DUTY TO COOPERATE

- 11.1 In other local plan examinations, Inspectors have been clear that exhaustive evidence is not required to satisfy the duty to cooperate. For example, the London Borough of Islington were found to have complied with the duty to cooperate when preparing their local plan in 2023 having submitted a Duty to Cooperate Statement comprised of 17 pages of commentary and evidence.
- 11.2 As the Inspector will know, the duty is more about whether meaningful collaboration has occurred between the relevant bodies, than the quantity of communications submitted in evidence. Where authorities gave clear indications of their position on not being able to assist the Council's unmet need, early in the process, this informed the Council about its plan preparation in a meaningful way. The Council were clear of the need to develop a local plan looking to accommodate their own housing and employment land supply within their borough boundary. The Council took all the responses received into account on the preparation of their local plan and the proposed site allocations. The Council's approach to the duty to cooperate on these strategic issues and their wide engagement with more than its adjoining neighbouring boroughs therefore demonstrates the efforts the Council made to find out if their unmet needs could be accommodated elsewhere.
- 11.3 In another Inspector's report for Lambeth's local plan examination in 2020, it is to be noted that the Inspector concluded in paragraph 22 that Lambeth had acted in accordance with its responsibilities under Duty to Cooperate by having signed Statements of Common Ground (SCGs) with each of its neighbouring Boroughs covering strategic cross-border matters. This Inspector's report does offer some guidance that SGCs can indicate compliance by the plan making authority with the duty to cooperate. The DtC Statement appends the JULY 2024 SOCG

with the Council's seven neighbouring authorities and other SCGs with the prescribed bodies as of the submission of the Enfield Local Plan in August 2024.

- 11.4 The London Borough of Barnet adopted their plan earlier this month (March 2025). Paragraph 18 of that report provided as follows:

“None of the bodies with which the Council is required to engage in pursuit of the duty to co-operate have suggested that it has not adequately discharged the duty. Whilst some, relatively minor, areas of disagreement about the content of the Plan remain between the Council and some of the prescribed bodies, there is evidence of constructive, active and on-going engagement about these issues. Any implications of the agreed approaches between DtC bodies and issues raised as part of the engagement process which relate to matters of soundness are necessarily addressed separately in this report”.

- 11.5 As with the London Borough of Barnet's Local Plan, none of the stakeholders consulted by the Council have suggested the duty to cooperate has not been discharged adequately by the Council and the implications of the agreed approach between duty to co-operate bodies and points for discussion between these bodies should necessarily be considered as part of the Inspector's analysis of the Enfield Local Plan's soundness. .
- 11.6 The London Borough of Merton in their Duty to Corporate Statement regarding the unmet housing need listed the bodies they had contacted explaining for the Inspector that none of these bodies would be able to assist Merton with the unmet need. The Inspectors report concluded *“The Duty to Co-operate Statement (i.e. that listed the bodies contacted by Merton) and other documents including correspondence with the Greater London Authority (GLA), comprehensively set out how the Council has worked with appropriate bodies on strategic matters affecting the Borough. Positive engagement through the DtC has resulted in regular exchanges of information. Amongst other things, this involved participation in strategic projects.....”*. Enfield have similarly set this out in their DtC Statement, and this note how the Council has worked with authorities and appropriate bodies. As explained above, the Council's DtC Statement also summarises those authorities who were contacted and the responses which were received. Whilst no assistance could be given to the Council on the unmet housing and employment need from these other authorities, this does not constitute evidence of a failure to meaningfully engage on these important strategic matters.