

## Enfield Council's response to Inspector's IN1 Document

This statement sets out the Council's response to the Inspector's Preliminary Questions [IN1] addressing PQ1c and forms an update to the position dated 1 November.

Responses to the remaining questions will be provided on or before 29 November. For the avoidance of doubt, these PQs response will address:

- PQ23
- PQ26
- PQ29 – PQ34
- PQ39 – PQ45
- PQ48 – PQ57
- PQ59, and
- PQ 60, PQ61b and PQ62

### Council's introduction

The Inspector's questions are shown below in ***bold italics*** with a border, following any preamble to the question in italics. The Council's responses are shown in normal typeface below the Inspector's questions.

Main modifications arising from the Inspector's questions (where proposed) are set out in grey tint boxes.

The Council further notes that the 'main modifications' suggested in response to the Inspectors' questions below are not the only ones that the Council has suggested to date. The schedule of suggested main modifications [DMOD1] is a live document.

### Responses to the Inspector's questions

#### Representations

***PQ1. Could the Council: a) Continue to identify and resolve the issues identified with the representation database; b) Once completed, provide a note to me outlining the issues that have been identified, what has been done to correct them (if necessary) and whether there are any outstanding issues that have not been resolved; c) Subject to the above, produce a revised version of SUB12 which corrects any errors in the schedules and addresses the points raised above, and d) Provide a timetable for the completion of work covered under a)-d).***

1. The representations were sent in full to the Inspector as part of the formal submission on 6<sup>th</sup> August.

2. Further to this the Council identified issues and were notified of issues that some representations were not logged correctly or had not been logged in the database. Key issues identified include:
  - Representations not logged correctly against the representation received;
  - Multiple individuals recorded against a single representation number;
  - Representations submitted but not received by the Council;
  - Representations submitted, logged but not available on the online searchable database; and
  - Representations partially or fully unredacted.
3. The Council has continued to identify and resolve these issues ensuring that the appointed Programme Officer is kept informed of progress. The Council notes the original intention to complete works by 25th October – an extension was appreciated to enable the Council to review and publish the reviewed database. A position paper is being prepared to set out how the Council dealt with the legal and conformity issues, in line with SCI.
4. A thorough review of the consultation database has been undertaken. This is now submitted alongside this response. The primary focus has been to review all representations received including those that considered to be 'missing' and undertake additional redactions where necessary.
5. The Council identified while undertaking a comprehensive review of all representations logged that some representations had been published without redactions. This was reported to the Council's Data Protection Officer and to the Information Commissioners Office (ICO).
6. The decision was taken on the guidance of the ICO, to remove to the Local Plan Consultation database from the Council's Regulation 19 Examination Page while officers undertook a comprehensive review of all published files in preparation to republish the representations.
7. The representations have now been uploaded to the Council's website and will be made publicly available following the Programme Officer's update to the Local Plan Examination page.
8. The updated excel database contains hyperlinks to all representation documents to ensure easy navigation and reference to the relevant materials. This will be made available as a part of the updates to the Local Plan Examination page.
9. It should be noted that Council has not had use of a dedicated Consultation platform and has created the database and managed the logging of representations internally, alongside the ambitious plan to release greenbelt sites

and local community groups engaged in the Local Plan process the Council has logged nearly 15,000 representations.

10. On 29 October the Enfield Society notified the Programme Officer and Council that 560 responses submitted via The Enfield Society have not been logged on the database submitted on the 6 August. Since then, the Enfield Society submitted 637 physical emails to the Council to review. The evidence submitted will be reviewed against our records and the database updated.
11. The Enfield Society have previously notified the Council to a significant number of representations that they had identified as either fully or partially missing, providing the Council with 2,900 email files to review of these 2,200 have been logged and now submitted to the inspector.
12. It was also brought to the attention of the Council that a number of representations submitted via the Hadley Wood Neighbourhood Forum were also not logged, those that have been sent to us have been investigated and logged forming a part of this updated submission of the Local Plan Consultation database.
13. We anticipate that additional anomalies will be identified and it is considered that these will be resolved continuously throughout the examination process. Enfield had a dedicated officer responsible addressing these anomalies. As such, we ask that any issues continue to be flagged to the Council and to the programme officer for resolution.
14. Please also note that unredacted responses will be presented in PDF form, as well as text form due to the way files have been saved. Whilst this should not impact the Inspector's ability to assess the plan, the Council wants to provide clarification on the formats that will be sent to the inspector.
15. A revised Regulation 22 Statement forms part of this submission [SUB12.1].
16. The Council understands that it has been notified of the most significant number of representations sent but not received during the Consultation period have now been addressed. However, we do accept there may be a discreet number of representations that have been sent but not received yet to be brought to our attention. As such, there will be no end date in logging those raised in the lead up to examination when accompanied by the evidence of submission during the consultation period.
17. The Council is committed to continue to investigate any claims of missing representations as the examination evolves.
18. The issues addressed relating to the Consultation database will not impact on the Inspector's ability to progress the examination, the Council has engaged continually with the Programme Officer who engages directly with the Inspector to ensure we have reviewed the database within an agreed timeframe and minimize the impact to the examination process.

19. The review of the database has been a substantial task, and the Council acknowledges the positive and proactive engagement local interest groups and of local residents to raise issues regarding representations submitted, to provide us with the information needed to support the database review and submission to the Inspector.