



# **Enfield Local Plan (Regulation 24) 2024**

## **Stage 1 Matters, Issues and Questions**

### **Matter 2: Housing Need and Supply**

Thursday 23 January

and

Tuesday 28 January 2025

**London Borough of Enfield**

## **Matter 2: Housing Need and Supply**

### **Issue 2.1: Whether the assessment of overall housing need and the housing requirement is justified, positively prepared, consistent with national policy and in general conformity with the London Plan**

#### **Q2.1. Is the housing requirement of at least 33,280 homes by 2041 justified and positively prepared. In particular:**

- a) What is the housing requirement up to 2029 and is this consistent with Policy H1 of the London Plan?
- b) What approach has been used to calculate the housing requirement for the post 2029 period?
- c) Is this approach consistent with the requirements of Policy H1 of the London Plan?
- d) Consequently, is the overall housing requirement positively prepared and in general conformity with the London Plan?

#### **Response**

##### **a) what is the housing requirement up to 2029 and is this consistent with Policy H1 of the London Plan?**

2.1.1 Yes, the Council considers the housing requirement up to 2029, which is part of the provision of at least 33,280 homes by 2041, to be justified, positively prepared, and consistent with Policy H1 of the London Plan.

#### **Housing Requirement and Consistency with Policy H1**

2.1.2 The Enfield Local Plan (ELP) Policy SS1 aligns with the requirements of Policy H1 of the London Plan. Table 2.2 of the ELP sets out annual housing targets, including completions between 2019 and 2022, 1,226 dwellings per annum between 2022/23 and 2026/27, and 2,091 dwellings per annum between 2027 and 2029. This establishes a total target of 12,460 net additional completions between 2019 and 2029, consistent with the targets set in Table 4.1 of the London Plan.

#### **Land Supply and Housing Delivery**

2.1.3 The Council is currently updating its land supply data to reflect completions between 1 April 2022 and 1 April 2024, alongside adjustments for lapsed planning permissions, new permissions, and revised site phasing. As set out in the Council's response to PQ24 [E3, paragraph 46], this update addresses a delivery backlog of 2,500 homes between 2019 and 2024. The Council intends to spread this backlog over the remaining plan period, beyond the first five

years, as confirmed in the Statement of Common Ground (SoCG) with the Greater London Authority [E3.1 PQ5 Appendix 1, paragraph 4.4].

- 2.1.4 While the backlog does not affect the housing requirement up to 2029, the Council continues to monitor the implications of lapsed permissions, such as the Colosseum Retail Park site (SA2.1). The Council remains committed to delivering the housing requirement through a flexible and evidence-based approach, ensuring alignment with Policy H1 of the London Plan.

### **Position on SA2.1 Colosseum Retail Park**

- 2.1.5 The Colosseum Retail Park site has significant residential potential, as demonstrated by its hybrid planning permission (20/00788/OUT), which provided for 1,587 homes and 7,224 sqm of floorspace. Although this permission lapsed on 31 July 2024 due to the site's changing viability, the Council supports comprehensive redevelopment and is working with the site promoter to develop a new mixed-use masterplan.
- 2.1.6 The revised masterplan will align with the broader objectives of the ELP and London Plan, balancing employment and housing uses to address local needs. It will consider compatibility with adjacent residential and mixed-use allocations, such as SA2.6, and explore opportunities for intensified formats in line with LSIS principles. While the Council acknowledges the site's adjacency to SIL, further work is needed to determine its suitability for SIL designation or strategic-scale industrial uses.
- 2.1.7 The housing numbers included in the ELP reflect the lapsed planning permission, providing a baseline for further refinement. However, the Council does not currently consider these homes deliverable and will update quantitative targets as masterplan work progresses. This ensures the plan remains positively prepared and adaptable to changing circumstances.

### **Housing Topic Paper**

- 2.1.8 The Housing Topic Paper [TOP3] provides detailed evidence of how the housing requirement up to 2029 aligns with the London Plan. Table 3 of the Topic Paper outlines the housing requirement versus supply for the London Plan period, while paragraphs 2.61–2.63 and Table 5 present a stepped trajectory for delivery. These demonstrate that the Council has taken a pragmatic and evidence-based approach to meeting housing targets while addressing delivery challenges, including the backlog.

### **Conclusion**

- 2.1.9 The Council considers the housing requirement of at least 33,280 homes by 2041, including the interim target of 12,460 homes by 2029, to be justified and positively prepared. This target reflects the borough's capacity and housing need, aligns with the London Plan, and incorporates flexibility to address challenges, such as lapsed permissions and changing site viability. The Council

remains committed to delivering sustainable, high-quality housing development in line with national and regional policy objectives.

**b) What approach has been used to calculate the housing requirement for the post 2029 period?**

2.1.10 The Local Plan [SUB2, paragraph 8.5] sets out, in the explanatory text to Policy H1, that Enfield has taken a capacity-based approach to set its housing target post-2029 based on Paragraph 4.1.11 of the London Plan, and further refers to the Housing Topic Paper [TOP3].

2.1.11 The Housing Topic Paper [TOP3, paragraphs, 2.33 to 2.54] sets out the Council's 4.1.11 calculation and summarises this in Table 4. The approach was initially explored in the Enfield Housing Numbers Paper (2021) [HNE1, paragraphs 2.1.3 to 2.1.9]. In brief, the ELP draws on both the 2017 London SHLAA findings as well as local evidence of identified capacity including Green Belt sites.

**c) Is this approach consistent with the requirements of Policy H1 of the London Plan?**

2.1.12 Yes, the Council considers the approach is consistent.

2.1.13 Policy H1 A and Table 4.1 of the London Plan sets a 10-year housing target for boroughs to plan for from 2019 to 2029, and to include as targets in their Development Plan Documents. The Local Plan adopts those targets to 2029, see answer to 2.1(a) above.

2.1.14 Policy H1 B then sets out steps that boroughs should take to ensure that these targets can be achieved:

- With regard to meeting the requirements of Policy H1 B 1), the Council considers that its plan is delivery focused and that its approach is in general conformity with the London Plan Policy. For example, the Council has allocated a substantial range and number of sites for residential and mixed-use development and intensification, as set out in the Site Allocation Topic Paper [TOP2].
- Furthermore, as set out in the Council's response to PQ38 [E3 Council Response to IN1, para 71] the plan allocates close to 20% of its overall land supply on sites smaller than 0.25 hectares, the London Plan definition of small sites, including a windfall allowance, and provides a supportive policy environment for such schemes to come forwards via Policy H4 Small sites and smaller housing development. The Council is also in the process of updating its windfall estimates on small sites and anticipates main modifications to align the ELP more closely with the GLA's targets in this respect, with this position set out in the Statement of Common Ground with the GLA [E3.1 PQ5 Appendix 1 GLA and LBE, paragraph 4.4].

- Finally, substantial housing capacity is also identified in Opportunity Areas as directed by the London Plan, including over 6,000 homes at Meridian Water [PL5], and over 2,500 homes across the Angel Edmonton [PL4] and Edmonton Green [PL3] Placemaking Areas. The spatial strategy and approach is further summarised in the council's response to PQ26 [E5 para 45].
- With regard to Policy H1 B 2), the Council's Site Allocation Topic Paper [TOP2], HELAA 2023 [HOU1] and Character of Growth Study [DES1 to DES43] also set out the evidence the borough has used to optimise the potential for housing delivery on brownfield sites in line with London Plan guidance on design, and more details are provided in the Exceptional Circumstances Topic Paper [TOP5, paras 4.10 to 4.22]. We note that the GLA did not raise concerns around the consistency of the Council's approach in regard to this matter in its representations.

2.1.15 The housing requirement for the post-2029 period is consistent with policy H1 and the London Plan. The Council's calculation methodology is set out in the Housing Topic Paper which does not contravene any part of policy H1. The calculation is, additionally, consistent with paragraph 4.1.11; the relevance of paragraph 4.1.11 in the context of issues of conformity is dealt with in the Conformity Paper [E3.2]. Some representations suggest that paragraph 4.1.11 should be used to generate a "minimum" housing requirement based solely on GLA SHLAA 2017. However, this ignores the role for 'any local evidence of identified capacity, in consultation with the GLA' set out in paragraph 4.1.11. Other representations have highlighted the need for consultation with the GLA. It is the Council's position that such consultation has taken place and that such a requirement is not a requirement to agree identified capacity with the Mayor.

**d) Consequently, is the overall housing requirement positively prepared and in general conformity with the London Plan?**

- 2.1.16 The Council consider that the Plan is positively prepared and in general conformity with the London Plan.
- 2.1.17 The objectively assessed needs of the borough to 2029 have been assessed at the London level and the Local Plan addresses those by meeting the targets set by London Plan Policy H1. In addition, and recognising the need to plan beyond 2029, the Council has taken a capacity based approach (consistent with the approach recommended by paragraph 4.1.11 of the London Plan) and also sought to positively explore new sources of supply including green belt sites, consistent with London Plan Policy G2.
- 2.1.18 The Local Plan has also taken account of available information in relation to the base housing need faced in the borough.
- 2.1.19 The Local Housing Needs Assessment [HNE2, Table 5.2] established Enfield's objectively assessed need as 3,856 dwellings per annum. However, the

calculation is dynamic according to its base date, and this figure was dated November 2020. Furthermore, the details of the calculation have been updated through changes to National Policy and Guidance, including most recently in December 2024. However, while important relevant context as a future direction of travel for housing provision for London and its boroughs, these latest updates are not considered here in detail given transitional arrangements.

- 2.1.20 Therefore, the Housing Topic Paper [TOP3, Table 2: Standard Method – with London Plan ‘cap’], sets out a more up to date calculation of 1,744 dwellings per annum from 2021 to 2041 – a calculation capped at the time based on Planning Practice Guidance at 40% above the 1,246 dwelling per annum London Plan target from the date of adoption of the London Plan in March 2021]. It is noted that twenty two years of housing need at this level would equate to 38,377 homes, which is similar to the overall capacity of sites allocated in the plan (38,159 homes). The plan is therefore aspirational in meeting the objectively assessed need figure (recognising that this does not directly apply in London due to the London Plan); yet is deliverable, recognising that some of this delivery will occur after the plan period due to site lead in times, phasing and delivery rates.
- 2.1.21 PPG Paragraph: 007 Reference ID: 2a-007-20190220 states that “The cap reduces the minimum number generated by the standard method but does not reduce housing need itself.” For this reason, the ELP also sets out the uncapped need figure calculated with a base date of 2023 as 3,505 dwellings per annum at Figure 2.3 Challenges in Enfield.
- 2.1.22 The Local Plan has been informed by agreements with other authorities. In particular, the Duty to Cooperate Statement [SUB14a, para 6.11 to 6.14] sets out that at the Regulation 18 stage it was established that other authorities were not able to accommodate Enfield’s unmet needs.
- 2.1.23 The Conformity Topic Paper [E3.2 PQ5 Appendix 2, paragraph 23] sets out the Council’s position on conformity, having regard to the (limited) areas of disagreement remaining with the GLA: see Statement of Common Ground [E3.1 PQ5 Appendix 1]. The Council’s position is that there are no issues of general conformity outstanding.
- 2.1.24 The Council also notes the future context in which the ELP is being prepared. Recent estimates by Lichfields<sup>1</sup> show that Enfield’s latest Local Housing Need calculation based on the updated NPPF and Practice Guidance and dated December 2024 is 2,762 homes per annum, or 60,764 homes over 22 years. This is far beyond the 34,710 homes proposed in the ELP.
- 2.1.25 While it will be for the next London Plan to set the overall requirement for London and to distribute the requirement amongst the boroughs, the evidence of pressing housing need both within London generally and in Enfield

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<sup>1</sup> See: <https://lichfields.uk/blog/2024/december/12/a-nother-new-standard-method-back-in-stock>

particularly as provided by the Standard Method and the LHNA highlights both the inevitable direction of travel and the necessity to significantly boost affordable and family housing in Enfield now. The next London Plan is likely to take a considerable period of time to produce and the Council considers that it must plan positively now to proactively address current and future needs.

**Q2.2. Where is the “GLA guidance” referred to in paragraph 26 of the Conformity Topic Paper (and also paragraph 3.4 of the SoCG with the GLA) documented?**

**Response**

2.2.1 The guidance referred to in paragraph 26 of the Conformity Paper [E3.2] and paragraph 3.4 of the Statement of Common Ground (SoCG) with the GLA (dated 1 November 2024) [E3.1] was circulated to Local Plan managers across London by the GLA via email on 5 September 2024. This email, issued by the Head of the London Plan and Growth Strategies officer, outlined the GLA’s current thinking on housing targets in light of proposed updates to the NPPF and the Standard Method for calculating housing need.

2.2.2 While the email was initially circulated in confidence, the GLA explicitly requested that its contents be referenced in the SoCG during discussions with Enfield Council. The Council proceeded on the understanding that the advice could be shared as part of the Local Plan examination process, given the importance of the guidance to the matters under consideration.

2.2.3 The guidance includes:

- a) A position on how London boroughs should plan for housing beyond 2028/29.
- b) A preference for boroughs to roll over their current London Plan housing targets rather than rely on calculations derived from paragraph 4.1.11 of the London Plan, as the GLA now considers the latter out of date.
- c) Advice on aligning future borough housing targets with a higher housing need figure of 80,693 homes per annum, pending further apportionment and consultation by the GLA.

2.2.4 The Borough has included reference to the GLA’s email in the SoCG as requested but notes the following points for consideration:

- a) The advice represents a departure from the advice contained in paragraph 4.1.11 and the GLA’s Regulation 18 and 19 representations on the Enfield Local Plan.
- b) These earlier representations emphasised adherence to paragraph 4.1.11, which the GLA has subsequently moved away from.

2.2.5 The Borough’s adopted approach aligns with the evidence presented in the submitted Plan and remains consistent with the London Plan as published.

- 2.2.6 The Borough would welcome further clarification from the GLA regarding its position, as the strategic plan-making body for London. Public clarity on this matter would provide a stronger basis for effective plan-making and would ensure consistency with national and regional policy frameworks.
- 2.2.7 The Council considers this guidance relevant to ongoing discussions but emphasises that the Plan, as submitted, is legally compliant and sound in its current form.

**Q2.3. How does this “guidance” affect the legal requirement for the Plan to be in general conformity with the London Plan?**

**Response**

- 2.3.1 The Borough does not consider that the GLA's recent advice has any bearing on the legal requirement for the Enfield Local Plan (ELP) to be in general conformity with the London Plan. The GLA's recent advice represents a departure from their previous approach to the setting of housing targets beyond 2028/29, but that is not capable of changing the London Plan itself or the assessment of general conformity.
- 2.3.2 As set out in the Conformity Paper [E3.2], paragraph 4.1.11 of the London Plan is not itself part of the spatial development strategy with which conformity must be demonstrated. Policy H1 does not set out any prescriptive approach for the delivery of housing beyond 2029/30 and the spatial development strategy includes other policies (such as GG4, D3 and G2) which support the approach taken to identifying capacity in the preparation of the ELP. In any event, paragraph 4.1.11 is not in fact prescriptive as to how a capacity assessment is to be undertaken and there is no conflict with its terms.
- 2.3.3 The Council therefore continues to rely on its position as set out in the Conformity Paper. However, the Council notes that the GLA's revised position is, overall, supportive of the need to take a more ambitious approach to the supply of housing. This is consistent with the approach taken in the ELP. It also now adopts an approach to paragraph 4.1.11 of the London Plan which is more aligned with the Council's position.

**Q2.4. If the “interim measure”, referred to in paragraph 26 of the Conformity Topic Paper were adopted, what would the housing requirement be for the overall Plan period? How would this compare to that set out in Policy SS1?**

**Response**

- 2.4.1 Under the London Plan's 'roll-on' approach, the housing requirement for Enfield would be 1,246 dwellings per annum (dpa), equating to 27,412 dwellings over the 22-year Plan period.



- 2.4.2 The Enfield Local Plan, as submitted, sets a target of 1,513 dpa, which equates to a total of 33,280 dwellings over the same period. This represents an additional 5,868 homes above the roll-on target, reflecting the Borough's commitment to meeting housing need and optimising delivery through a robust and locally responsive strategy, in line with the NPPF.
- 2.4.3 It is noted that the Statement of Common Ground (SoCG) with the GLA contains a factual error, where the housing target was incorrectly cited as 1,490 dpa rather than the correct figure of 1,513 dpa. This discrepancy amounts to 23 dpa and will be corrected in due course.
- 2.4.4 The ELP's approach goes beyond the minimum requirement of the roll-on methodology, aligning with the Borough's objective to deliver ambitious housing growth that supports sustainable development, economic growth, and community needs, as set out in the Council's responses under Matter 4.
- Q2.5. Does footnote 1 adequately meet the requirements of paragraph 67 of the NPPF? To be effective, should the footnote be included within the policy?**

## **Response**

- 2.5.1 The Council's response to PQ37 [E3 para. 65] explains Enfield's position in relation to how the requirements of Paragraph 67 have been met. It states the Council's view that Footnote 1 adequately meets the requirements of NPPF (2023) Footnote 67.
- 2.5.2 Given the statutory status of the Hadley Wood Neighbourhood Plan, the Council will propose a further modification to Policy SS1, inserting the following text after Paragraph 6. This will ensure that the Hadley Wood Neighbourhood Plan Area is recognised as a key component in delivering the Plan's Spatial Strategy.

### **"Adopted Neighbourhood Plan Areas**

The Hadley Wood Neighbourhood Plan was adopted in November 2023 following a successful referendum. All the Neighbourhood Plan's policies are in conformity with the strategic policies of the ELP and continue to apply. The minimum requirement for the Hadley Wood Neighbourhood Plan area, in line with NPPF Paragraph 67, is 160 homes. Whilst a proportion of the borough's overall windfall is also likely to be delivered in Hadley Wood, it has not been possible to quantify this."

- Q2.6. How does the 160 homes relate to the made Hadley Wood Neighbourhood Plan? Is this figure over and above any requirement set out in that Plan?**

## Response

### ***How does the 160 homes relate to the made Hadley Wood Neighbourhood Plan?***

- 2.6.1 The Hadley Wood Neighbourhood Plan was adopted (Made) in November 2023 following a successful referendum.
- 2.6.2 Paragraph 1.7 of the ELP how the ELP will sit alongside the newly adopted Hadley Wood Neighbourhood Plan (2023), which now forms part of the development plan for Enfield. Development proposals within the Hadley Wood area will be assessed using the new ELP, as well as the Neighbourhood Plan.
- 2.6.3 The Council engaged extensively with the Neighbourhood Planning Forum (HWNPF) throughout the process of the plan being prepared including to discharge its statutory duties in this respect. A draft Statement of Common Ground [SUB14i] has been prepared with the Neighbourhood Forum.
- 2.6.4 The HWNPF have made representations requesting a modification to paragraph 1.17 “All the Neighbourhood Plan’s policies are in conformity with the strategic policies of the ELP and continue to apply.” The Council is proposing a Main Modification to this effect.
- 2.6.5 The 160 homes relate in so much as this figure is set out and justified within the ELP, and should be provided within the geographic area covered by the Hadley Wood Neighbourhood Plan. The Made neighbourhood plan does not set nor steer the figure itself but sets policy and aspirations on how the homes should provide a wide range of housing sizes including smaller family homes and downsizing options.
- 2.6.6 It is noted that Policy HW-10 of the HWNP sets out criteria for housing within the built-up area only.

### ***Is this figure over and above any requirement set out in that Plan?***

- 2.6.7 The Council can confirm that the 160 homes set out in Footnote 1 is over and above what is set out in the Adopted Hadley Wood Neighbourhood Plan, which itself does not set out a housing requirement for the Hadley Wood Neighbourhood Area.
- 2.6.8 Planning Practice Guidance Paragraph: 006 Reference ID: 61-006-20190723 sets out that local plan policies do not supersede neighbourhood plans unless changed circumstances justify this. The Council considers that Exceptional Circumstances for the release of green belt, as set out in the Exceptional Circumstances Topic Paper [TOP5]. These amount to a change in circumstances which justify the setting of a housing requirement in Hadley Wood which is capacity based, in conformity with the London Plan, and reflects the release of site RUR.02 in the Green Belt for housing.

**Q2.7. Does the figure of 160 homes reflect the overall strategy for the pattern and scale of development and any relevant allocations, as required by paragraph 67?**

**Response**

- 2.7.1 In line with the capacity based approach for setting housing targets set out in the London Plan, the 160 home housing requirement for the neighbourhood area has been generated from the capacity allocated to site RUR.02. Therefore, the figure of 160 homes reflects the relevant allocation. The Site Allocation Topic Paper [TOP2, Page 60] sets out the justification for allocating site RUR.02.
- 2.7.2 The figure of 160 is also considered to reflect the overall strategy for the pattern and scale of development set out in Policy SS1 of the ELP [SUB1 to SUB6]. Although the site sits within the Green Belt, it is at the edge of the urban area, and has excellent access to public transport – being directly adjacent to Hadley Wood station. There are also a number of local amenities/facilities located around the station, meaning the site is sustainably located. The site also has good potential to deliver larger family sized homes through mansion blocks houses, housing, particularly affordable housing. Indeed, the delivery of the site allocation depends on the area being released from the Green Belt through the ELP and accompanying policies map. This is in line with the Exceptional Circumstances set out in TOP5, including the site specific case made at 4.41, as well as in greater detail in the Site Selection Topic Paper [TOP2, Appendix 2 p 60].
- 2.7.3 It is recognised that the reference to windfall schemes in Footnote 1 introduces a degree of uncertainty for the Neighbourhood Forum. However, this is considered to be justified as windfall schemes may come forward anywhere in Enfield including the Neighbourhood Area in accordance with policies in the ELP once adopted.
- 2.7.4 Hadley Wood is significantly constrained in its development potential due to conservation areas and its mostly built-up nature.
- 2.7.5 The council is willing to consider modifications to further investigate the potential windfall that might occur in Hadley Wood over the plan period and to reflect this in SS1 if this is considered necessary and to work with the Neighbourhood Planning Forum to ensure that this is reflected appropriately in the housing requirement figure for the area.

## **Issue 2.2: Whether the approach to meeting needs for Gypsy and Travellers is justified, positively prepared, consistent with national policy and in general conformity with the London Plan?**

**Q2.8. Is the identified need for Gypsy and Traveller pitches set out in Policy H10 justified and positively prepared? Is it based on a robust and up-to-date assessment of need which follows national guidance?**

### **Response**

2.8.1 This response should be read alongside PQs 10 – 19.

2.8.2 The identified need for Gypsy and Traveller pitches set out within Policy H10 is not based on up-to-date evidence in line with the NPPF. As such, it not considered to be justified or positively prepared.

2.8.3 Policy H10 as submitted with [SUB2] was based on an accommodation needs assessment [HNE4] dated 2020. The definition of travellers was updated via the NPPF (2023) and the subsequent update to the Planning Policy for Traveller Sites (PPTS) 2023. As such, the policy is not based on a robust and up-to-date assessment of need which follows National Guidance.

**Q2.9. If not, is the revised need set out in the updated GTAA, based on a robust and up-to-date assessment of need which follows national guidance?**

### **Response**

2.9.1 The Gypsy and Traveler accommodation need evidence for Enfield was updated in 2024 to reflect the change to the definition which derived from the NPPF (2023). As such, with modifications as proposed by [DMOD1] the revised policy wording does provide the necessary justification. This is evidenced by the updated Gypsy and Traveller Accommodation Needs Assessment (2024) [E7.3]. With those modifications it is considered that Policy H10 would be justified and positively prepared.

2.9.2 Enfield Borough Council prepared a Gypsy and Traveller Accommodation Needs Assessment (GTANA) in 2020 to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople across the Borough over the Plan period. Currently, there are no Gypsies and Travellers living on sites in Enfield. However, the Council has carried out a significant amount of community engagement work and this facilitated interviews with households who either live in bricks and mortar accommodation in Enfield or are on the road but have links with the Borough. This GTANA identified a need for 23 Gypsy and Traveller pitches across Enfield.

2.9.3 The 2020 GTANA also found no existing Travelling Showperson provision in Enfield. The 2009 Greater London GTANA had identified a need for 3 plots for Travelling Showperson over the period 2007-2017, but the council have

received no applications for plots since 2007. The Enfield GTANA (2020) did not evidence any need for additional Travelling Showperson plots in the Borough.

- 2.9.4 A Gypsy and Traveller Accommodation Assessment update (GTAA) was commissioned in 2024 to take into account new evidence and changes in policy relating to the definition of “Traveller”. The update included a review of 2021 Census data and following the Lisa Smith Court of Appeal judgement in 2023, reverted back to the 2012 definition of “Traveller” set out in the Planning Policy for Traveller Sites (PPTS). This removed the ‘nomadic habit of life’ definition introduced into the 2015 PPTS.
- 2.9.5 As the 2024 GTAA [E7.3] was an update to the existing evidence base, accommodation need has been assessed over the same five-year short-term period 2020/21 to 2024/25 and longer-term period has been extended from 2025/26 to 2040/41. Needs analysis considers the needs arising from existing households in the Borough and newly forming households.
- 2.9.6 The updated evidence identified a short-term need for 16 pitches over the period 2020/21 to 2024/25 and a longer-term need of 14 pitches over the period 2025/26 to 2040/41, resulting in a Plan period need for 30 pitches. In addition, a need for 1 transit site (to accommodate a minimum of 15 caravans) within the Borough was also identified.

**Q2.10. Is the suggested main modification to Policy H10 necessary to make the Plan sound?**

**Response**

- 2.10.1 Yes. The proposed modification to H10 (as set out [DMOD1] is considered to be necessary for soundness. The possible changes to Policy H10 would update the Policy to reflect the latest evidence of need as set out within the Gypsy and Traveller Accommodation Needs Assessment 2024 [E7.3]. Whilst the modifications address some drafting issues (i.e., criterion c and d being repeated within [SUB2], it would primarily ensure that both the ELP and the TLP are aligned, noting also that there is now an additional need for 1 transit site within the Borough.

**Q2.11. Is it justified, effective and consistent with national policy for the need identified in Policy H10 to be met through a separate development plan document? Does identifying allocations in a separate plan have any implications for the PSED?**

**Response**

- 2.11.1 The Council believes that its approach to meeting the needs of Gypsies and Travellers is justified, effective and consistent with national policy.
- 2.11.2 The approach is justified, because it is an appropriate strategy, taking into account the reasonable alternatives. In December 2018, the Council consulted

upon Issues and Options and proposed that Traveller needs would be met through the emerging ELP. At the same time, the Council conducted a call for sites exercise. No sites were submitted for Traveller use, and in order to avoid risking slowing down progress with the ELP, a decision was taken to prepare a separate Traveller Local Plan.

- 2.11.3 In the event, the ELP took longer to get to submission than anticipated. Whilst with the benefit of hindsight there may have been an opportunity to merge the emerging Traveller Local Plan with the emerging ELP, this would have been likely to have delayed progress with the ELP.
- 2.11.4 The approach is considered effective, on the basis that the ELP sets out a clear requirement to meet Traveller accommodation needs, and good progress has been made with the TLP. Following further unsuccessful calls for sites (at least in terms of sites being put forward for Traveller use) a detailed review of the Council's property portfolio identified a number of sites that were potentially suitable for accommodating Traveller needs. These sites were assessed by the Council, and three were taken forward and proposed as draft allocations in the draft TLP that was subject to consultation in September to November 2024.
- 2.11.5 The Council has an up to date Local Development Scheme and intends to publish a Regulation 19 draft TLP in Spring 2025 and submit the TLP for examination shortly thereafter.
- 2.11.6 The approach is considered consistent with national policy, taking into account the flexibility afforded to local planning authorities in fulfilling their plan-making function (NPPF paragraphs 17-19).
- 2.11.7 Overall, in the circumstances outlined, the Council believes it has taken a justified and effective approach to planning for Traveller needs, and that the approach is consistent with national policy.
- 2.11.8 In terms of whether the approach to allocating sites in the TLP has any implications for the PSED, the Council notes that the Equality Act 2010 protects people from discrimination in the workplace and in wider society. Romany Gypsies, Scottish Travellers and Irish Travellers have been declared by the courts to be protected as "races" under the Act. Nevertheless, Gypsies and Travellers continue to face high levels of racial discrimination, contributing to and exacerbating the inequalities they experience.
- 2.11.9 The ELP's IIA [SUB8 – point 7.7] concludes that there would be a significant positive effect in relation to deliver housing to meet agreed targets (including those for Travellers).
- 2.11.10 The TLP itself is accompanied by an [Integrated Impact Assessment \(IIA\)](#). In fulfilling this duty, many authorities still find it useful to produce a written record of equality issues having been specifically considered. Therefore, an EqIA was carried out as part of the IIA, setting out how the Traveller Local Plan is likely to

be compatible or incompatible with the requirements of the Equalities Act 2010. It concluded that the TLP could have a significant influence on addressing inequalities including those relating to health and will need to consider the appropriate siting of pitches. The TLP can ensure that pitches are located in areas which can improve accessibility for residents and ensure that future development does not exacerbate existing inequalities. The IIA process supports the identification and refinement of options that can contribute to reducing inequalities and support the development of policy options that cumulatively improve the wellbeing of local communities

2.11.11 In addition, the Council has produced a separate standalone [Equality Impact Assessment \(EqIA\)](#) to support the Draft TLP, which incorporates the findings of the IIA. This EqIA assessed the plan against the 9 defined protective characteristics:

- Age
- Disability
- Gender reassignment.
- Marriage and civil partnership.
- Pregnancy and maternity.
- Race
- Religion or belief.
- Sex
- Sexual orientation.
- Social-economic deprivation

2.11.12 The EqIA concluded that the TLP is not expected to differentially impact on any of the defined protected characteristics above with the exception of Race and Sex. The EqIA concluded that the TLP is expected to have a positive differential impact for those identifying as Gypsies or Travellers. It is considered that the TLP will have a positive differential impact on this protected group, in relation to the provision of culturally appropriate housing. A positive differential impact on women, in terms of perception of safety. Both males and females will benefit from good site design, in terms of actual and perceived safety.

2.11.13 As such, it is considered that identifying allocations in a separate plan will have implications for the Public Sector Equality Duty (PSED), however these would be positive implications only.

**Q2.12. Further to the above, does the Plan meet the requirements of the PPTS both in terms of identifying a supply of land to meet needs and/or setting out criteria for identifying allocations? Without specific allocations, how will a five-year supply of sites be identified?**

## Response

- 2.12.1 The Council has chosen the option of promoting a separate Traveller Local Plan. It is this plan which will meet the requirements of the PPTS in terms of identifying a sufficient supply of specific deliverable sites sufficient to provide 5 years' worth against local targets. Policy H10 seeks to set the target and also to provide criteria for identifying unallocated sites but does not itself meet the full requirements of PPTS. The Council's justification for this approach is set out above.
- 2.12.2 The new Planning Policy for Traveller Sites (PPTS) (December 2024) now applies to the emerging TLP. Paragraph 10 sets out the requirement for Local Plan to meet local set targets. The TLP will satisfy this requirement once adopted.
- Q2.13. Given that the requirement for Gypsy and Traveller sites is identified in this Plan and that policies PL10 and PL11 refer to the potential for such development within these areas, should the exceptional circumstances for altering Green Belt boundaries be established through this Plan?**

## Response

- 2.13.1 The Exceptional Circumstances for the release of Green Belt at both Crews Hill (PL11) and Chase Park (PL10) is set out within [TOP5]. That case does not include a need to make provision for Gypsy and Traveller pitches as the need and appropriateness of locating pitches within these placemaking areas has not yet been confirmed but will be examined through the TLP. The draft TLP currently suggests that the use of these sites to meet the longer-term need is considered a fall-back position, should the proposed allocations TLP\_01: Bulls Cross Nursery (8–10 pitches) and TLP\_03: Land Adjacent to Ridgeway (up to 22 pitches) not come to fruition.
- 2.13.2 At this stage, noting that the TLP is still emerging, and was only recently subject to a Regulation 18 consultation, it was not, and is still not considered appropriate to alter the Green Belt boundaries through the ELP to meet the identified needs of Gypsies and Travellers.
- 2.13.3 As set out within the Council's response to PQ 17, the masterplanning processes for Crews Hill and Chase Park are expected to be capable of identifying suitable land for permanent pitch provision only in the circumstance where alternative provision has not been secured elsewhere (either through the proposed allocations, or through windfall applications).
- Q2.14. If so, what does the Council consider the exceptional circumstances to be for altering Green Belt boundaries to meet the needs of Gypsies and Travellers?**



## Response

- 2.14.1 As per the Council's response to PQ15, the exceptional circumstances case for any amending the Green Belt boundary to meet Traveller accommodation needs will be set out in the pre submission Draft TLP (and related supporting material). It is anticipated that this draft will be consulted on (under Regulation 19) in Spring 2025 as set out within the adopted LDS [SUB16]. Additional testing for each of the proposed site allocations is required to confirm that the sites are feasible and deliverable. The outcomes of this additional testing will then need to be balanced against the need to meet the identified need. An example of this is highway implications for the A10 site within the TLP (ref TLP\_09).
- 2.14.2 The Draft TLP acknowledges the need for exceptional circumstances to be demonstrated for any site allocations in the Green Belt at paragraph 8.4. The Council will give further consideration to the necessary exceptional circumstances for amending the Green Belt boundary to meet the permanent pitch needs, but the key components of the exceptional circumstances case are likely to include:
- The need for sites to meet Traveller accommodation needs;
  - The lack of available alternative (non-Green Belt sites); and
  - The limited contribution the sites make to Green Belt purposes, and the limited impact on the overall function of the Green Belt in these areas.
- 2.14.3 Despite several calls for sites, no privately owned land has been promoted for Traveller provision. Consequently, the Council has proactively identified several sites within its own ownership that may be suitable for Traveller pitch provision. ELP Policies PL10 (point 7) and PL11 (point 7) also include requirements to investigate locations for Traveller provision until such conclusions within the TLP stipulate otherwise. The details of this are set out with paragraph 1.360 of the ELP. Further, the Council undertook another call for sites as part of the current TLP consultation in 2024, however no sites were put forward for consideration.

### **Issue 2.3: Whether the approach to meeting the needs of different groups in the community is justified, positively prepared, consistent with national policy and in general conformity with the London Plan.**

- Q2.15. Is the evidence on the need for different groups in the community, including the types of housing delivered, based on robust and proportionate evidence? Does the Local Housing Need Assessment (2020) represent an up-to-date assessment of need?**

## Response

- 2.15.1 Yes, the Local Housing Needs Assessment (LHNA) [HNE2] provides detailed, robust and proportionate evidence to help determine local housing priorities and to inform the Local Plan. It considers a range of factors that might place households in need of specialist housing such as age, health conditions, and other factors (paragraph 7.4). This is expanded in Technical Appendix F. The Council set out its position in relation to how the Local Housing Needs Assessment addresses the needs of different groups including students, houseboat dwellers, older people and families in its response to PQ21a, b and c, and to PQ36 [E3 paragraphs 30 to 43, and 62]. In summary, a proportionate approach was taken to the needs of students and houseboat dwellers given the small size of these groups in Enfield. The need for specialist accommodation for the elderly is included in the Local Housing Needs Assessment as set out in response to PQ21c.
- 2.15.2 The LHNA is considered by the Council to be robust and up to date. The Council notes that the Office for National Statistics (ONS) has yet to produce national household projections based on Census 2021 data due to uncertainties associated with the COVID pandemic and migration policy. As such, the data required to update the LHNA was not available at the time of submission and remains unavailable still. Therefore, the Council took a pragmatic decision to move forward with plan submission without an update to its LHNA, based on the view that producing its own household projections in advance of those being produced by the ONS would not be proportionate.
- Q2.16. Does the Plan make adequate provision for the needs of other groups in the community, including but not limited to older people?**

## Response

- 2.16.1 NPPF paragraph 60 highlights the need for plans to provide an appropriate mix of housing types for the local community, while Paragraph 63 sets out some of the groups which should be included such as students, families with children, and older people.
- 2.16.2 The Local Housing Needs Assessment [HNE2] recognises that a range of factors will influence demand for different size homes over the Plan period, including demographic changes, future growth in wages and a households' ability to save, and housing affordability.
- 2.16.3 Policy H3: Housing Mix and Type sets out the Council's approach to ensuring the needs of families with children are met. The policy places a significant focus targeting at least 30% family sized homes on all sites, and 40% on green belt sites, the basis that these will provide the most appropriate homes for local residents, including those wishing to start their own families. This matter is also addressed comprehensively in the Housing Topic Paper [TOP3, Section 6] and Exceptional Circumstances Topic Paper [TOP5, paragraphs 4.26 to 4.30].

- 2.16.4 The policy seeks to ensure sufficient homes are built of a size and type that meet the needs of local people. Monitoring data set out in the Housing Topic Paper [TOP3, paragraph 6.11] show that over the past decade, 70% of new homes delivered in Enfield have consisted of one and two bedroom homes. Policy H3 recognises the challenges of delivering this mix [explained at TOP3, paragraphs 6.8 to 6.15]. The ELP's policies have considered all future demographic scenarios set out in the LHNA, recognising their uncertainty, and a housing mix policy target has been established based on a range of factors, including demographic projections, viability, and deliverability. Regarding the needs of other groups, the PPG Paragraph: 006 Reference ID: 67-006-20190722 makes clear that concealed households can be considered under affordable housing need, but that care must be taken to avoid double counting. The starting point for assessing affordable need in Enfield is set out in the LHNA and is focused on the affordable housing waiting list which includes some concealed households [HNE2, page 142, paragraph B.8]. The Council considers that the needs of further concealed households have been adequately considered in its evidence base and housing mix policies, and that the needs of this group are best served by maximising the overall delivery of housing in Enfield of all types and sizes including maximising the delivery of affordable family housing through Green Belt releases.
- 2.16.5 Policy H5: Supported and specialist housing sets out the Council's approach to facilitating the provision of appropriate housing with care homes to meet the specialist and supported needs of vulnerable people including the elderly. The Council set out its position in relation to how the ELP makes adequate provision for the needs of older people identified in the LHNA in its response to PQ21 c. Policy H5 is considered to provide an adequate and effective framework to guide the provision of supported and specialist housing over the plan period.
- 2.16.6 The LHNA identified a need for up to 2,000 additional specialist homes for the elderly between 2018 and 2036, an average of 111 per annum, lower than the London Plan Annual Benchmark of 195 older persons homes from 2019 to 2029. It is noted that this has not been raised by the GLA. As such the Council is proposing a Main Modification to Paragraph 1 of Policy H5 as follows:
- "The Council will facilitate the provision of up to 111 specialist older persons homes per year including appropriate housing with care, care homes, and, where appropriate, retirement housing, to meet the specialist and supported needs of vulnerable people in Enfield, with a focus on creating specialist housing for elderly people. The Council will achieve this by:"*
- 2.16.7 Policy H6: Community led housing, sets out the Council's approach to meeting the needs of those wishing to build their own homes. Further information is contained within the Housing Topic Paper [TOP3, paragraphs 7.16 to 7.20]. The policy is considered to make adequate provisions and no representations have been raised on this matter.

- 2.16.8 Policy H9: Student accommodation sets out the Council's approach to meeting the needs of students further information was provided in the Council's response to PQ21a.
- 2.16.9 Policy H10 sets out the plan's approach to meeting the needs of Gypsies and Travellers, while noting that to proactively plan for and address these needs, a separate Traveller Local Plan is currently being prepared. The Council set out further its views specifically on Gypsy and Traveller Needs in its response to PQ10 to 20 [E3, pages 3 to 9]. This matter is addressed further under Issue 2.2 above, particularly to Q2.8-2.14.