



# The Enfield Society

*conserving our heritage and environment*

Enfield Local Plan Examination

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

This written statement refers to the following representations [01794-1-1 \(hyperlink\)](#) especially Policies SS1 paragraph 3 (page 7-8 of our representations) and H1 (pages 55-56).

**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?**

The approach to setting housing requirements post-2029 is explained in 4.1.11 and 0.0.21 of the London Plan.

Paragraph 0.0.21 ([link here](#)) states that *“The Plan provides an appropriate spatial strategy that plans for London’s growth in a sustainable way. The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore, boroughs do not need to revisit these figures as part of their Local Plan development unless they have additional evidence that suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this Plan.”*

Paragraph 4.1.11 ([link here](#)) states that *“If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA (Greater London Authority), and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.”*

The methodology is straightforward; it was accepted by the Inspector and Secretary of State at the Examination in Public (EiP) of the London Plan and has since been used by several boroughs in the development and adoption of their local plans.

The approach enables the Mayor to balance the strategic and sustainable planning of London, whilst providing opportunities for boroughs to increase their housing requirement,

within the proviso that additional capacity is aligned with the London Plan's strategic policies and decided in consultation with the GLA. This seems a perfectly reasonable way to balance regional and local objectives.

However, the Council does not appear to want to follow the approach set by the London Plan and used by other boroughs. Instead, the Council's approach seems to have been to identify the housing capacity of Green Belt sites the Council wanted to include as allocations, and then add the identified brownfield capacity to this number, in order to generate an overall housing requirement figure, regardless of the alignment with strategic aims of the London Plan and in abeyance of meaningful consultation with the Council, who have consistently and firmly objected to the inclusion of two strategic Green Belt sites (and notably none of the 80+ other sites for housing, including those involving the release of SIL and other Green Belt sites).

The Council's approach seems infected by its financial objective to generate profits of around £800 million by selling Green Belt land for development and has led to the Council prioritising regeneration of unsustainable Green Belt sites. For example, after it was demonstrated the Council's Regulation 18 Preferred Option target of 1,250 homes per year could be achieved via brownfield sites, the Council responded by simply increasing the housing requirement figure so the Green Belt sites could continue to be included.

This has led to an absurd and unreasonable logic being applied by the Council in its interpretation of 4.1.11, whereby they have set the housing requirement figure by including the Green Belt sites, despite the London Plan and the GLA's input, and then maintained the Green Belt sites are needed to meet this housing requirement figure, so therefore must be developed. This is obviously circular, and we are confident that this was not the approach envisaged when the London Plan was drafted and examined.

The Council's approach is clearly unreasonable, and they are going to considerable effort to try to reinvent parts of the London Plan to make them mean whatever they want them to mean, rather than what most reasonable people understand these policies to mean.

The housing requirement figure has not been reached in meaningful consultation with the GLA and some of the additional capacity that forms the housing requirement figure, i.e. Chase Park (PL10) and Crews Hill (PL11), does not align with the London Plan's strategic objectives and policies. Accordingly, the housing requirement is not in general conformity with the

London Plan because it has not reasonably followed the approach set out in 4.1.11 and 0.0.21 of the London Plan.

**TOTAL 840 WORDS**