



## Enfield Over 50s Forum

Matter 1 Legal, procedural and other general matters

8 January 2025

# Enfield Over 50s Forum Matter 1

Enfield Over 50s Forum (EOFF) submitted six representations as below (Dec 2024)

Representation Number	Type of representation	Organisation represented	Policy	Site allocation reference
<b>Representation Number</b>	<b>Organisation represented</b>	<b>Policy</b>	<b>Site allocation reference</b>	<b>Hyperlink</b>
01765-2-1	Enfield Over 50s Forum	DM H4: Small sites and small housing development		<a href="https://www.enfield.gov.uk/file/PDFs/email/01765-2-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/01765-2-1.pdf</a>
01765-3-1	Enfield Over 50s Forum	SP PL10: Chase Park		<a href="https://www.enfield.gov.uk/file/PDFs/email/01765-3-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/01765-3-1.pdf</a>
01765-4-1	Enfield Over 50s Forum	DM H5: Supported and specialist housing		<a href="https://www.enfield.gov.uk/file/PDFs/email-21.11.2024/01765-4-1.pdf">https://www.enfield.gov.uk/file/PDFs/email-21.11.2024/01765-4-1.pdf</a>
01765-5-1	Enfield Over 50s Forum	SP PL11: Crews Hill		<a href="https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf">https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf</a>
01765-5-2	Enfield Over 50s Forum	Appendix C: Site Proformas	RUR.03: Land west of Rammey Marsh	<a href="https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf">https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf</a>
01765-5-3	Enfield Over 50s Forum	DM DE6: Tall buildings		<a href="https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf">https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf</a>

## Issue 1.3:

### Public Engagement

#### **Q1.13: WERE ADEQUATE OPPORTUNITIES MADE AVAILABLE FOR PARTICIPANTS TO ACCESS AND MAKE COMMENTS ON THE PLAN AND OTHER RELEVANT DOCUMENTS?**

1. No. The number of documents published simultaneously for the Regulation 19 consultation in March 2024, and since, has challenged lay readers. Lengthy and, at times, opaque because of specialist terminology and unfamiliar regulatory concepts, the documentation is wordy and hard to cut through.
2. The ELP Document Library is 30 pages long and contains 300+ documents many of which are hundreds of pages long. The first two documents (SUB1 and 2) were published on 28 March 2024 about 7 weeks before the consultation finally closed on May 20th. This document differed from the **four** pre-publication documents of the Dec 2023 version (absent from the document library) on which we'd focussed between Dec and March. Please see pages [1 – 57](#), [58 – 144](#) [145 - 296](#), [297 - 346](#) . With changes in policy titles and numbers, page and paragraph numbers (as well as content) it is dubious whether this pre-publication version fulfilled the spirit of the commitment made by the Council on 12.10.2023 (para 18). It certainly required a mental gear shift to the detriment of our submissions.
3. We seek to show how exceedingly difficult this has been to navigate. Does this matter? Yes. Why? Because it takes time, is not lay reader friendly, erodes our confidence and has significantly diminished meaningful engagement with the issues. And, arguably, discriminatory for older people unused to scrutinising such documents.
4. We recognise the importance of the Local Plan for developers, statutory consultees and official organisations because of their need to interact directly with the plan and the consequences of it. The documentation makes more sense to them than to us, their submissions will be more detailed, thorough

## Enfield Over 50s Forum Matter 1

and informed than we can achieve within our limits. We feel that more effective opportunities for us to access, engage with and respond to Enfield's Local Plan would have improved it to everyone's benefit.

5. Taken together our submissions illustrate how a comprehensive, coherent policy framework for housing older people could unlock the potential for providing homes for those in need, without encroaching on the Green Belt, and better homes for ageing people with attendant benefits to their health and well being, and positive [consequences for health and social care in Enfield](#).(Enfield Annual Equalities Report 2024 p6-7).
6. Publication of the plan, evidence and statutory assessments were hard to anticipate and untimely. The council hasn't reached out to groups such as EOFF, which represents a significant and growing demographic (see para 22). EOFF is represented on Enfield's Health and Wellbeing Board, the Older People's Partnership Board and Enfield Borough Partnership Board but there is no record in the documentary evidence of their involvement in the development of the Local Plan.
7. We have kept our members informed about the Local Plan in our bimonthly newsletters, acquiring information by being members of other community organisations.
8. Sub 13, Reg 19 Representation Database (Aug 24) was potentially useful in providing an 'at a glance' summary of every submission. But the tedium of scrutinising Excel is real. The assumption that Microsoft is universally available, naïve. Ultimately the promise of the database remained unfulfilled and accessing the relevant information about other submissions proved tortuous, limiting our response. Latterly, the one click hyperlinks didn't work.
9. The changes to the database layout, style and content made it very difficult to navigate with confidence. We wonder why there's not a recognised approach to dealing with Local Plan submissions.

10. Screen grabs from the current website illustrate some of this complexity. The first image is half the New ELP landing page. The penultimate line reads “[Alongside SUB12.1.Reg 22](#) with nothing to indicate that this is the Nov. update of the important *Enfield Local Plan Regulation 22 Consultation Statement* we think

**Enfield Local Plan (Regulation 24) 2024**  
 Enfield Local Plan – Regulation 19 consultation  
 Local Plan preferred approaches consultation 2021  
 Local Plan issues and options consultation 2018  
 Privacy notice for the Enfield Local Plan

## Enfield Local Plan (Regulation 24) 2024 – Examination in Public

### Latest news

**29 November** - The council has submitted their final response to the Inspectors initial questions IN1.

- [E5 Council response \(PDF, 757.85 KB\)](#)
- [E5.1 Net zero carbon \(PDF, 314.01 KB\)](#)
- [E5.2 Exceeding energy efficiency \(PDF, 1224.86 KB\)](#)
- [E5.3 Retail and town centre update \(PDF, 183.26 KB\)](#)
- [E6 Proposed modifications \(PDF, 1642.42 KB\)](#)

**22 November** – The council would like to thank all stakeholders for their patience while we worked to address issues with the Local Plan representations database. We are pleased to confirm that the hyperlinks within the database have now been fully restored. This means that all redacted representations can now be accessed using the hyperlinks via the database.

**21 November** – The Inspector has published his initial “[Stage 1](#)” [Matters, Issues and Questions \(IN2\) \(PDF, 213.95 KB\)](#). This includes a covering letter and three appendices. Appendix 1 sets out the MIQs for the initial matters the Inspector wishes to discuss, Appendix 2 provides guidance on producing written statements, Appendix 3 provides a draft hearing programme (which may be subject to change – a final programme for stage 1 will be published once it is clear who wishes to attend and written statements have been received). The hearings are due to start of Wednesday 22 January 2025. Details of the venue and relevant deadlines are included in the letter. The Inspector has also published a separate [Guidance Note \(IN3\) \(PDF, 203.65 KB\)](#) setting out more detail about his role and how the examination will progress from this point. Representatives are asked to familiarise themselves with the guidance notes, and links to useful information set out within them.

- [IN2: Appendix 2 – Written Statement Guidance \(PDF, 114.6 KB\)](#)
- [IN2: Appendix 3 – Draft “Stage 1” Hearing Programme \(Version 1\) \(PDF, 157.49 KB\)](#)
- [IN2: “Stage 1” - Matters, Issues and Questions \(PDF, 158.51 KB\)](#)

**1 November** – The council has further responded to the Inspector’s preliminary matters and questions. Read the councils response – [E3 LBE response to IN1 \(PDF, 293.81 KB\)](#) and [E4 LBE response to IN1 PO1c \(PDF, 132.01 KB\)](#) and appendices:

- [E3.1 PO5 Appendix 1 GLA and LBE PDF, 221.16 KB](#)
- [E3.2 PO5 Appendix 2 Conformity Paper \(PDF, 741.07 KB\)](#)
- [E3.3 Schedule setting between ELP and LP2021 policies \(PDF, 168.75 KB\)](#)
- [E3.4 PO24 SYHLS \(PDF, 1486.09 KB\)](#)
- [E3.5 Annex Transport Topic Paper \(PDF, 1738.01 KB\)](#)

Alongside [SUB12.1 Reg 22 \(PDF, 8995.07 KB\)](#).

The council has also uploaded a corrected representation database.

requested by the inspector.

Unrecognisable to us, from this title, as successor to the SUB 12 which helped us to contextualise the submission and frame our expectations, but was unwieldy.

The hyperlink in the document library “[SUB 12 Regulation 22 Consultation Statement Part 1 \(enfield.gov.uk\) SUPERSEDED SEE SUB12.1](#)” doesn’t work. Overall, this discourages and frustrates engagement.

11. The early Parts 1 and 2 of the Reg 22 Consultation Statement comprised 2840 pages, and the revision at 491 pages. Obviously positive, we nevertheless wondered - What’s missing? Is it important?
12. Earlier documents are now unavailable (e.g. SUB 12) meaning the past history of commentary and documentation regarding Regs 18, 19 and 22 is missing. Legacy links generate error notices or direct the user to the current new ELP webpage. It requires unusual perspicacity on the part of a lay person to think to download, file and save the multitude of documents (sometimes with unhelpful file names) for future reference in ignorance (largely) of what the future holds at the time of making a representation. To respond adequately to Matter 1 it’s necessary to look back. E.g. in an email to a councillor in June 2021 seeking help in extending the R18 consultation period from six to twelve weeks (a lobby that worked), the link to the Council’s commitments no longer works and goes to a 404 error message.
13. The final line of New ELP page reads “The council has also uploaded a corrected representation database”. Our experience of missing submissions (Qn 1.14) makes this an extremely relevant post, easily overlooked amongst the rest of the text, and might usefully have been at the top for every update. We believe there were ten. We managed to download and save these eight, filtered on our submissions. They are telling about changing format, missing representations, misattributed submissions and confusing linked documents.

# Enfield Over 50s Forum Matter 1

19 Dec 2024, 23 Dec 2024, 30 Dec 2024 no change.

Repres	Organisation represente	Policy	Site allocation refer	Summary of Rep	Hyperli
01765-2-1	Enfield Over 50s Forum	DM H4: Small sites and small housing development		The Enfield Over 50s Forum's response to Policy H4	<a href="https://www.enfield.gov.uk/file/PDFs/email/01765-2-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/01765-2-1.pdf</a>
01765-3-1	Enfield Over 50s Forum	SP PL10: Chase Park		The Enfield Over 50s Forum raises concerns about P	<a href="https://www.enfield.gov.uk/file/PDFs/email/01765-3-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/01765-3-1.pdf</a>
01765-4-1	Enfield Over 50s Forum	DM H5: Supported and specialist housing		The Enfield Over 50s Forum highlights several concer	<a href="https://www.enfield.gov.uk/file/PDFs/email-21.11.2024/01765-4-1.pdf">https://www.enfield.gov.uk/file/PDFs/email-21.11.2024/01765-4-1.pdf</a>
01765-1-1	Enfield Over 50s Forum	General and whole plan		The Enfield Over 50s Forum submits their contact det	<a href="https://www.enfield.gov.uk/file/PDFs/email/01765-1-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/01765-1-1.pdf</a>
01765-5-1	Enfield Over 50s Forum	SP PL11: Crews Hill		The Enfield Over 50s Forum raises concerns about P	<a href="https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf">https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf</a>
01765-5-2	Enfield Over 50s Forum	Appendix C: Site Proformas	RUR.03: Land west of F	The Enfield Over 50s Forum raises concerns about Sit	<a href="https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf">https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf</a>
01765-5-3	Enfield Over 50s Forum	DM DE6: Tall buildings		The Enfield Over 50s Forum raises concerns about DI	<a href="https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf">https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf</a>

Represent	Organisation represer	Policy	Site allocation re	Summary of Rep	Hyperli
01765-2-1	Enfield Over 50s Forum	DM H4: Small sites and small housing development		Enfield Local Plan (ELP) argues that the policy is not	<a href="https://www.enfield.gov.uk/file/PDFs/email/01765-2-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/01765-2-1.pdf</a>
01765-3-1	Enfield Over 50s Forum	SP PL10: Chase Park		The Enfield Over 50s Forum raises concerns about Policy PL1	<a href="https://www.enfield.gov.uk/file/PDFs/email/01765-3-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/01765-3-1.pdf</a>
01765-4-1	Enfield Over 50s Forum	DM H5: Supported and specialist housing		The Enfield Over 50s Forum highlights several concerns with	<a href="https://www.enfield.gov.uk/file/PDFs/email-21.11.2024/01765-4-1.pdf">https://www.enfield.gov.uk/file/PDFs/email-21.11.2024/01765-4-1.pdf</a>
01765-1-1	Enfield Over 50s Forum	General and whole plan		The Enfield Over 50s Forum submits their contact details.	<a href="https://www.enfield.gov.uk/file/PDFs/email/01765-1-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/01765-1-1.pdf</a>
01765-5-1	Enfield Over 50s Forum	SP PL11: Crews Hill		The Enfield Over 50s Forum raises concerns about Policy PL1	<a href="https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf">https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf</a>
01765-5-2	Enfield Over 50s Forum	Appendix C: Site Proformas	RUR.03: Land west	The Enfield Over 50s Forum raises concerns about Site Alloc:	<a href="https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf">https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf</a>
01765-5-3	Enfield Over 50s Forum	DM DE6: Tall buildings		The Enfield Over 50s Forum raises concerns about DM DE6: 1	<a href="https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf">https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf</a>

Represent	Organisation	Policy	Site allocation	Summary of Rep	Hyperlink
ation	represented		reference		
Number					
01765-2-1	Enfield Over 50s Forum	DM H4: Small sites and small housing development		The Enfield Over 50s Forum's response	<a href="https://www.enfield.gov.uk/file/PDFs/email/01765-2-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/01765-2-1.pdf</a>
01765-3-1	Enfield Over 50s Forum	SP PL10: Chase Park		The Enfield Over 50s Forum raises concerns	<a href="https://www.enfield.gov.uk/file/PDFs/email/01765-3-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/01765-3-1.pdf</a>
01765-4-1	Enfield Over 50s Forum	DM H5: Supported and specialist housing		The Enfield Over 50s Forum highlights s	<a href="https://www.enfield.gov.uk/file/PDFs/email-21.11.2024/01765-4-1.pdf">https://www.enfield.gov.uk/file/PDFs/email-21.11.2024/01765-4-1.pdf</a>
01765-1-1	Enfield Over 50s Forum	General and whole plan		The Enfield Over 50s Forum submits th	<a href="https://www.enfield.gov.uk/file/PDFs/email/01765-1-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/01765-1-1.pdf</a>
01765-5-1	Enfield Over 50s Forum	SP PL11: Crews Hill		The Enfield Over 50s Forum raises conc	<a href="https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf">https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf</a>
01765-5-2	Enfield Over 50s Forum	Appendix C: Site Proformas	RUR.03: Land w	The Enfield Over 50s Forum raises conc	<a href="https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf">https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf</a>
01765-5-3	Enfield Over 50s Forum	DM DE6: Tall buildings		The Enfield Over 50s Forum raises conc	<a href="https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf">https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf</a>

13 Dec 2024

Representati	Organisation represen	Policy	site allocation reference	Summary of Rep	
on Number					
01765-4-1	Enfield Over 50s Forum	DM H5: Supported and specialist housing		The Enfield Over 50s Forum high	<a href="https://www.enfield.gov.uk/file/PDFs/email-21.11.2024/01765-4-1.pdf">https://www.enfield.gov.uk/file/PDFs/email-21.11.2024/01765-4-1.pdf</a>
01765-2-1	Enfield Over 50s Forum	DM H4: Small sites and small housing devel		response to Policy H4 of the	<a href="https://www.enfield.gov.uk/file/PDFs/email/01765-2-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/01765-2-1.pdf</a>
01765-3-1	Enfield Over 50s Forum	SP PL10: Chase Park		The Enfield Over 50s Forum raise	<a href="https://www.enfield.gov.uk/file/PDFs/email/01765-3-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/01765-3-1.pdf</a>
01765-1-1	Enfield Over 50s Forum	Appendix C: Site Proformas	URB.22: Oakwood Station C	The Enfield Over 50s Forum's exp	<a href="https://www.enfield.gov.uk/file/PDFs/email/01765-1-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/01765-1-1.pdf</a>

As published 28 November 2024

# Enfield Over 50s Forum Matter 1

Representation	Organisation	Non-policy	Policy	site allocation reference	Summary of Rep	
01765-4-1	Enfield Over 50s Forum		DM H5: Supported and specialist housing		The Enfield Over 50s Forum highlights several	<a href="https://www.enfield.gov.uk/file/PDFs/email-21.11.2024/01765-4-1.pdf">https://www.enfield.gov.uk/file/PDFs/email-21.11.2024/01765-4-1.pdf</a>
01765-2-1	Enfield Over 50s Forum		DM H4: Small sites and small housing development		Policy H4 of the Enfield Local Plan (ELP)	<a href="https://www.enfield.gov.uk/file/PDFs/email/01765-2-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/01765-2-1.pdf</a>
01765-3-1	Enfield Over 50s Forum		SP PL10: Chase Park		The Enfield Over 50s Forum raises concerns al	<a href="https://www.enfield.gov.uk/file/PDFs/email/01765-3-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/01765-3-1.pdf</a>
01765-1-1	Enfield Over 50s Forum		Appendix C: Site Proformas	URB.22: Oakwood Station Car P	The Enfield Over 50s Forum's expresses conce	<a href="https://www.enfield.gov.uk/file/PDFs/email/01765-1-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/01765-1-1.pdf</a>

As published .... First revision

Represent	Organisation represented	Policy	site allocation	Summary of Rep	Clickable link
01765-4-1	Enfield Over 50s Forum	DM H5: Supported and		The Enfield Over 50s Forum highlights several concerns with Policy H5 on	<a href="https://www.enfield.gov.uk?a=24101:local-plan-response/email/01765-4-1.pdf">https://www.enfield.gov.uk?a=24101:local-plan-response/email/01765-4-1.pdf</a>
01765-2-1	Enfield Over 50s Forum	DM H4: Small sites and		The Enfield Over 50s Forum's response to Policy H4 of the Enfield Local Plan	<a href="https://www.enfield.gov.uk?a=24101:local-plan-response/email/01765-2-1.pdf">https://www.enfield.gov.uk?a=24101:local-plan-response/email/01765-2-1.pdf</a>
01765-3-1	Enfield Over 50s Forum	SP PL10: Chase Park		The Enfield Over 50s Forum raises concerns about Policy PL10 in the Local Plan,	<a href="https://www.enfield.gov.uk?a=24101:local-plan-response/email/01765-3-1.pdf">https://www.enfield.gov.uk?a=24101:local-plan-response/email/01765-3-1.pdf</a>
01765-1-1	Enfield Over 50s Forum	Appendix C: Site Proformas	URB.22: Oakwood	The Enfield Over 50s Forum's expresses concerns about the Enfield Local Plan	<a href="https://www.enfield.gov.uk?a=24101:local-plan-response/email/01765-1-1.pdf">https://www.enfield.gov.uk?a=24101:local-plan-response/email/01765-1-1.pdf</a>

As published, together, Aug 2024. It was initially necessary to scrutinise the REP ID by name in order to find the relevant rep number and then search the second spreadsheet for the representations.

REP ID	Representation Number	Policy Number	Paragraph number in policy	site allocation reference	Legally Compliant	Sound	Summary of Rep	If your representation is seeking a modification to the plan.	8. If you wish to participate in the hearing session(s), please outline	Hyperlink to response PDF on LBE website
01765	01765-1-1	Appendix C: Site Proformas		URB.22: Oakwood			The Enfield Over 50s Forum's expresses concerns about the			
01765	01765-2-1	DM H4: Small sites and small					The Enfield Over 50s Forum's response to Policy H4 of the Enfield			
01765	01765-3-1	SP PL10: Chase Park					The Enfield Over 50s Forum raises concerns about Policy PL10 in			
01765	01765-4-1	DM H5: Supported and					The Enfield Over 50s Forum highlights several concerns with			

## Enfield Over 50s Forum Matter 1

REP ID	Representation N	Type of representation	First Name	Last Name
01765	01765-1-1	<a href="#">Local interest groups</a>	Victoria	Pite
01765	01765-2-1	<a href="#">Local interest groups</a>	Victoria	Pite
01765	01765-3-1	<a href="#">Local interest groups</a>	Victoria	Pite
01765	01765-4-1	<a href="#">Local interest groups</a>	Victoria	Pite

14. Our submissions received an autoreply which said “You can get further information and updates on the Local Plan by visiting the following link: <https://www.enfield.gov.uk/services/planning/new-enfield-local-plan>”. An automated email with alerts to regular updates would have helped and avoided random website searches, especially when the websites changed.

15. The two terms “Evidence base” (R19 link from the ELP landing page ) and “Document library” at the bottom of the ELP landing page are confusing (we worked out the difference). The council’s response to our PL10 submission referred us to the *Chase Park Topic Paper*. Searching the council website located the Evidence Base page (part of R19). It took us a while to work out that Chase Park Topic Paper is a Place

### Evidence base

Evidence and information we use to create and inform the Local Plan is known as the supporting Local Plan evidence base. You can read and download all of the proposed submission documents that form part of our supporting evidence base using the links below. This supporting evidence has been developed in line with the National Planning Policy Framework and National Planning Practice Guidance, and directly informed the content of the plan.

#### Topic papers

- Place-making
- Blue and Green Enfield
- Design and character
- Homes for all
- Economy
- Town centres and high streets
- Movement and connectivity
- Environmental protection
- Infrastructure planning
- Viability
- Consultation and duty to cooperate
- GIS Layers of the Local Plan
- Policies Map

#### Topic papers

Topic papers are key documents which summarise the evidence used to prepare major policy areas and provide a justification of the approach. They do not provide new evidence but rather summarise and cross reference other evidence base documents.

- [Spatial Strategy and Overall Approach Topic Paper \(2024\) \(PDF, 608.04 KB\)](#)
- [Site Allocation Topic Paper \(2024\) \(PDF, 2485.01 KB\)](#)
- [Enfield Housing Topic Paper \(2024\) \(PDF, 1090.73 KB\)](#)
- [Enfield Employment Topic Paper \(2024\) \(PDF, 1256.29 KB\)](#)
- [Green Belt exceptional circumstances Topic Paper \(2024\) \(PDF, 695.84 KB\)](#)
- [Growth Topic Paper \(LGF\) \(2024\) \(PDF, 2474.84 KB\)](#)

Making Topic Paper. This isn’t obvious (to us). Google helped [Enfield Local Plan - Chase Park Topic Paper - March 2024](#).

Ultimately referring to the lengthy document library it became clearer.

16. In the same response the council reassured us that “*The council is committed to engaging with community stakeholders to refine these plans and ensure they meet*

*the diverse needs of Enfield’s ageing population. Further details and updates will be included in the masterplanning work to ensure compliance and address your concerns comprehensively*”. “Master-planning work” is opaque to us.

17. This is the R19 page and at the end of the first paragraph is a link to a [summary leaflet](#) which is notable for

### Enfield Regulation 19 Local Plan documents

The emerging Enfield Local Plan was approved for publication for a minimum 6-week period of public consultation by Full Council on 19 March 2024. To review the details of the Full Council meeting and access the minutes, see the agenda for the Full Council meeting. The council has also prepared a [summary leaflet of the local plan \(PDF, 7109.38 KB\)](#).

#### Local plan and appendices, and policy map:

- [ELP REG19 Consult Chapters 1-2 \(PDF, 14839.61 KB\)](#)
- [ELP REG19 Consult Chapters 3-15 \(PDF, 18754.5 KB\)](#)
- [ELP REG19 Appendices A Evidence Base and B KPIs \(PDF, 249.24 KB\)](#)
- [ELP REG19 Appendix C Site Allocations \(PDF, 12566.69 KB\)](#)
- [ELP REG19 Appendix D Tall Buildings Maps \(PDF, 12648.34 KB\)](#)
- [ELP REG19 Appendix E Developer Contributions \(PDF, 156.47 KB\)](#)
- [ELP Policies-Map A0 Rev-A \(PDF, 18702.97 KB\)](#)

#### Statutory assessments

- [ELP REG19 IIA and appendices \(PDF, 11902.53 KB\)](#)
- [ELP REG19 IIA Non-Technical Summary \(PDF, 525.85 KB\)](#)
- [ELP REG19 HRA Reg 19 \(PDF, 7263.5 KB\)](#)
- [ELP Reg19 EQIA \(PDF, 258.2 KB\)](#)

#### Supporting evidence base documents

You can view all of the supporting documents which form part of the [evidence base](#) used in the preparation of the ELP.

what it doesn’t say about the draft proposals, and in retrospect feels evasive. Although distributed to households it doesn’t indicate to residents what they can expect in the plan e.g. about Crews Hill, a popular, even famous, commercial horticultural area. [Crews Hill - Wikipedia](#) or Vicarage Farm (location of the much enjoyed [Merryhills Way](#)).



18. Issues at Regulation 18, prompted community groups to form a temporary association called 'Action for Enfield's Future' (AfEF), to campaign for more time to be given to read, digest and respond to plan making documents. Their petition was signed by over 4000 residents. The Council voted unanimously in support of the campaign's asks at a Full Council meeting on [12 October 2022 Item 6](#).
19. Many Evidence Base documents were published late in March 2024, slightly ahead of the formal consultation process. Partly at the behest of AfEF, the all-important council meeting (and hence consultation time) was increased. AfEF had written to the leaders of both political parties (cc all councillors) on Feb 4<sup>th</sup> and published widely. The letter included this

***Missing evidence.***

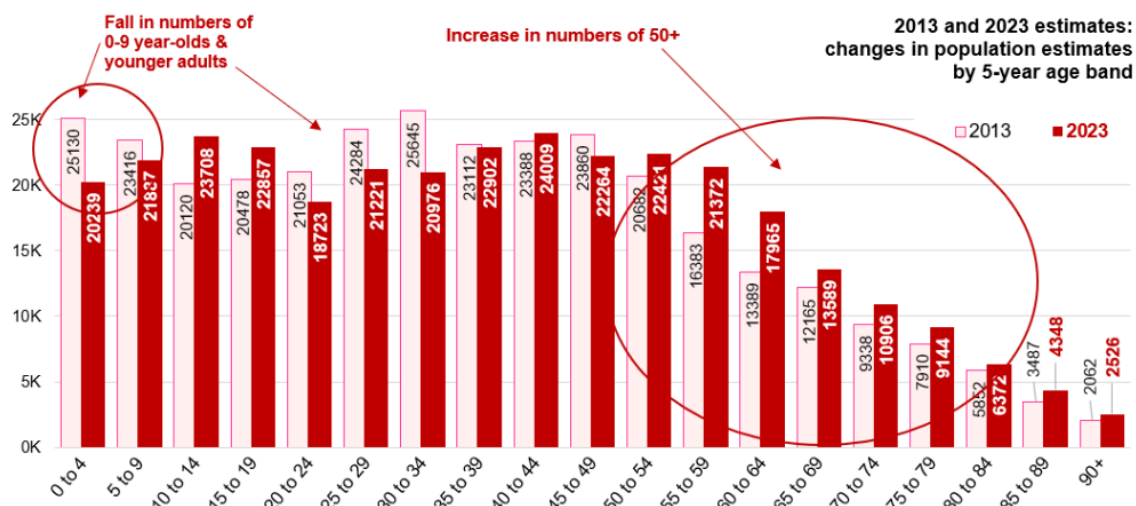
*We ask that Enfield Council publish the evidence that complements the proposed Local Plan, for instance about housing targets or the exceptional case made for releasing Green Belt land. The six weeks formal R19 consultation from March 6 includes Easter, effectively limiting the time available for many families and, in planning terms, it's considered good practice to keep communities informed and involved. **It is not possible for councillors and the public to fully understand the plan without this information.***

20. In Enfield Dispatch on 5 March, the Leader of the Council was quoted as saying *"I want to make sure that this process is as comprehensive and open as possible, ensuring councillors make the most informed decision with access to all the technical assessments that support the Local Plan. "Therefore, I have asked officers to publish the supporting documents as soon as they are ready so they can be read alongside the draft Local Plan already published. "I have also asked for the council debate to be moved to 19th March to give councillors and residents more time to consider the documents before full council."*
21. Regrettably a quote used in AfEF's letter to demonstrate the Council 's promises on its R19 webpage (at that time) now links to the current Reg 24 webpage. Again, an early commitment is missing and the significance of AfEF's requests for active engagement harder to substantiate (though the commitment is repeated in SUB12.1 2.5).
22. Nevertheless, a number of significant documents were only published in March 2024, and we question why the Council, having originally committed unanimously to AfEF's campaign, could not have published them far sooner. The dates in the Local Plan Document Library illustrate this.

**Q1.14: HAVE REPRESENTATIONS BEEN ADEQUATELY TAKEN INTO ACCOUNT?**

23. No. Enfield's over fifty population is a significant and increasing demographic (Enfield Borough Profile 2024, p11).

## Changes in age group numbers from 2013 to 2023



24. The Council responses to our Regulation 19 representations show that they have not been adequately considered. They have been missed, mistaken and overlooked.

25. Below the timeline and content of publically available information about our submissions.

Subject of representation	Date of incorporation in the Representation database	SUB 12 Aug 2024		SUB 12.1 Nov 2024		Representation database 13 Dec 2024	Representation database 30 Dec 2024
		Summary Statement	Council response	Summary Statement	Council response		
DM H4: Small sites and small housing development	Aug 2024	No	No	Yes	Yes	Yes	Yes
SP PL10: Chase Park	Aug 2024	Yes	Yes	Yes (consistent)	Yes (consistent)	Yes	Yes (consistent)
DM H5: Supported and specialist housing	Aug 2024	Yes	Yes	Yes (consistent)	Yes (consistent)	Yes	Yes (consistent)
<b>SP PL11: Crews Hill</b>	<b>19 Dec 2024</b>	<b>Yes</b>	<b>Yes</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>Yes</b>
<b>RUR.03: Land west of Rammey Marsh</b>	<b>19 Dec 2024</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>Yes</b>
<b>DM DE6: Tall buildings</b>	<b>19 Dec 2024</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>Yes</b>

26. Those in red font (PL11, RUR.03 and DM DE) were submitted on The Enfield Society (TES) platform and finally appeared on the representation spreadsheet on 19 Dec after two written approaches by EOFF and a lengthy correspondence between TES and the planning authority.

27. Two out of six have consistent representation throughout (PL10 and H5 Supported and specialist housing)

28. DMH4 Small sites appeared in SUB 12.1 but not SUB 12. Responses to DMH5 and DMH4 seem muddled.

29. PL11 was summarised **and received comment** in SUB 12 (p 273) in August, but not in SUB 12.1.
30. Neither RUR.03 nor DM DE6 have received comment which makes a hearing statement more difficult than it should be.
31. URB.22 was misattributed in the database to EOFF until 19 Dec, and in both SUB 12 and SUB 12.1 which ironically contained summaries of, and responses to, a submission we'd not made.
32. The links to PL11, RUR.03 and DM DE6, though given different ref numbers, all linked to the same document. We provided this document via email to the programme officer on 15 Nov to be helpful when we first reported the omissions.
33. At best we feel this is careless, inconsiderate even. We do not feel "taken account of" and other evidence suggests it may be systemic (see Qn 1.15 and 1.22). Insofar as the content of our submissions are concerned, please refer to Matters 2 and 4.
34. No reference was made to our Reg 18 response ([2953](#)) in [REG 2](#) . Whilst limited reference is made in SUB12.1 (as above), age is a protected characteristic (see Qn1.22) and we wonder why other local organisations are mentioned in the Summary of Process and Main Issues, but EOFF is not. Neither are any other groups dedicated to advocacy of older people.

**Q1.15: IS THERE ANY CLEAR EVIDENCE THAT THE PUBLIC CONSULTATION CARRIED OUT DURING THE PLAN-MAKING PROCESS FAILED TO COMPLY WITH THE COUNCIL'S SCI OR ANY OTHER LEGAL REQUIREMENTS?**

35. Yes. The Council's SCI makes these commitments (amongst others) under **Consultation Principles**
- "In line with the principles of the Council Plan to put *people at the heart of everything we do* .....but to *help residents understand the full spectrum of issues involved in successful planning*" (SUB 17 1.12)
  - "We want to involve people in a **meaningful way** using timely, proportionate and appropriate consultation techniques. (SUB 17 1.14)
    - Clear and non-technical information
    - Meaningful: an on-going process
    - Outreach and accessibility: when preparing for consultations, we will consider how to engage with the most affected people and promote consultations as widely as possible with 'seldom heard' groups that are traditionally under-represented in planning. This may include those with no access to the internet, those who do not speak English as a mother-tongue, lower socio-economic groups, younger people and those with disabilities. When organising consultation events, we will aim to make them accessible to those with disabilities and to hold events in local areas. We will promote equality through ensuring vulnerable people or disadvantaged groups are involved in the planning process. Where possible and if requested, translations and large print versions will be made available.
    - Openness: be open, transparent and responsive, allowing the opportunity *for all to take part* and *showing how comments and views have been considered*".
36. It also states
- "We recognise that not all residents **will have access to the internet**. Therefore, documents will also be made available in a variety of formats to enable widest possible audience to provide

feedback on planning consultations. **Particular efforts** will be focused towards reaching ‘hard to reach groups’ such as young people, **elderly people** and those from ethnic minorities”.(SUB17 2.64)

37. The emphases are ours. Our responses to Qn1.13 and Qn1.14 we hope illustrate the impossibility of making meaningful submissions, and of preparing hearing statements, for people that SCI acknowledges are hard to reach digitally.
38. ‘Outreach and Accessibility’ fails to resonate with older people who all too often may be “seldom heard”, “no access to the internet”, “under-represented in planning” but who are literally not mentioned. As an aside, few Cabinet members, Scrutiny Chairs and Vice Chairs and Chairs of quasi judicial committees are over 50. Then there’s “not speaking English as a mother tongue”, “being in lower socio-economic groups” and, of course, “having disabilities”.
39. Had the EOFF been approached we’d have welcomed the opportunity to provide workshops, or provide for officers the opportunity to write in our regular printed newsletters which goes to all members.
40. “Particular efforts” have not been made. Figure 2.4 SCI covers three pages of types of communication methods used.

Figure 2.4: Types of communication methods

Method	Explanation
<b>Digital communications and social media</b>	
<b>Digital</b>	The use of digital tools to assist consultation and presentation of policies is the primary method of interaction. We already engage with the community at different stages of plan making using a multi-media approach as this can help wider communities to become empowered and involved in the planning process and decision making.  New initiatives for resident engagement will be further explored.  We will publish all planning policy documents on our website and consider the use of a dedicated micro site for community engagement and consultation.
<b>Social media</b>	With an increasing number of residents and businesses using various forms of social media, consultation notifications will be posted on the Council’s social media pages. We use Twitter feeds.
<b>Method</b>	<b>Explanation</b>
	Facebook and LinkedIn to publicise and provide links to planning consultations and deadlines.  We will consider using a dedicated micro site and/or software for engagement on expressing opinions in a simple multiple-choice format on key consultations issues.  For planning consultations, using maps and photos can be included alongside contextual information to make it more appealing and user-friendly. We will also use links to our webpages which will inform people of upcoming consultation events, where they can view particular documents, how they can submit comments and where any exhibitions and workshops will be held.  You can follow us on Twitter at: @enfieldcouncil or Facebook at Enfield Council UK. Any comments made to our posts on social media will not be taken as comments made to any formal planning policy consultations.
<b>Hard copies</b>	
<b>Documents being made available for inspection at the Council offices and the hub libraries</b>	Making documents available for inspection at specified points within the borough is a minimum requirement set by planning regulations. These locations are accessible to people with disabilities. Copies of documents are also sent to the Hub Libraries and held within the reference section.  The availability of documents and opening times of the libraries will be advertised in a number of ways, including a letter/email, via the Council’s website at <a href="https://new.enfield.gov.uk/services/libraries/contact-information-and-opening-hours/">https://new.enfield.gov.uk/services/libraries/contact-information-and-opening-hours/</a> and through statutory notices within the local press.  Charges will apply for printed copies and background paper requests. The Regulations allow for a reasonable charge to be made for copies of documents requested by individuals or organisations. When providing printed copies, we must seek to cover our own costs. Costs will be calculated on a case by case basis.
<b>Summary documents and questionnaires (where appropriate)</b>	Summary documents and response forms/questionnaires, where appropriate will be made available on the Council’s website at: <a href="http://www.enfield.gov.uk/localplan">www.enfield.gov.uk/localplan</a>

Method	Explanation
<b>Mail shots (letters and emails)</b>	Mail shots are used to notify relevant bodies of planning policy consultation events (depending on the issues raised) and are mainly used for statutory notification or to communicate with a specific group of bodies.  We maintain a database with those individuals and groups who wish to be informed of various stages of the Local Plan process. Before the start of the consultation, we will always notify statutory consultees, and those registered on our database for planning policy matters, of the commencement dates and period for comment, along with clear guidance regarding how to comment. Currently, comments can be submitted via email to: <a href="mailto:localplan@enfield.gov.uk">localplan@enfield.gov.uk</a> or posted to: Strategic Planning and Design, Enfield Council, EN1 3XA.  Email is an increasingly preferred means of communication on planning policy consultations. It is a quick, resource saving and accurate way of communication with the public and various stakeholders.  Where possible, the Council will use emails as opposed to posting hard copy documents and letters in order to support its move towards being a paperless authority.
<b>Newspapers</b>	We are no longer required to advertise consultation on planning policy documents in the local press. However, we may decide to place a press advert in the statutory pages of The Enfield Independent. These are known as public notices, which will include details about where information can be found and consultation deadlines for further details visit <a href="https://www.enfieldindependent.co.uk/">https://www.enfieldindependent.co.uk/</a> . Furthermore, we may also decide to put other public notices in Avrupa, Parikiaki, Edmonton Green Magazine and Housing News., where appropriate.
<b>Newsletters</b>	A new Local Plan newsletter will provide regular updates those who hold a valid email address on our consultation database.
<b>Face-to-face/online</b>	
<b>Meetings with selected stakeholders and key interest groups</b>	This provides a useful way of identifying key issues, getting key bodies involved and achieving consensus with other strategies and initiatives. In certain circumstances, public or identified stakeholder meetings may be held. Discussion groups can also provide an opportunity to receive feedback on specified topic areas.

Method	Explanation
<b>Focus groups/workshops</b>	Workshops and focus groups enable a range of stakeholders, including local residents to influence and shape proposals in a way that helps meet their aspirations and concerns. These events are usually more helpful when held early on in the plan making process. This could include targeted work with community and voluntary organisations.
<b>Exhibitions</b>	Depending on the plan we are consulting on, exhibitions provide a useful way of conveying key pieces of information and providing a mechanism for stakeholders to understand the role and content of the consultation and discuss issues with officers. Public exhibitions can be either staffed (e.g. market stalls and unstaffed static exhibitions).

41. Despite having made submissions by email it appears we’re not on a mailing list for Local Plan newsletters.
42. Targeted work with community and voluntary organisations seems not to have included EOFF.
43. Summary documents have been unhelpful (see para 17).
44. “Meetings with selected stakeholders”. Noticing (when searching any documents, including SC1) that “older” is part of “stakeholder”, makes 10000+ word documents difficult to scan, but illustrates convincingly the almost total exclusion of older people and their representatives as stakeholders.

45. The Civic Centre foyer is no longer the informal library it once was for local information of any sort. Few residents, especially older people, would approach the reception now to request documents available for inspection.
46. It is hard to believe that SCI is taken seriously when REG 2 (2.25 – 2.29) has so signally failed to include older people. SUB12.1 does not make such ambitious claims.

## Issue 1.6: Other Matters

### Equalities

#### **Q1.22: IN WHAT WAYS DOES THE PLAN SEEK TO ENSURE THAT DUE REGARD HAS BEEN HAD TO THE THREE AIMS EXPRESSED IN S149 OF THE EQUALITY ACT 2010 IN RELATION TO THOSE WHO HAVE A PROTECTED CHARACTERISTIC?**

47. Enfield states its legal requirement with a [statement of its Public Sector Equality Duties](#)
48. It has the required objectives. One relates to older people *“Provide access to support services and networks to reduce social isolation”*.
49. It publishes an [Annual Equalities Report](#), which has little to say about older people.
50. In conclusion and with regard to EOFF’s comments on Matter 1, we find little evidence that either the policy framework generally, or the Local Plan specifically, ensure due regard to the aims expressed in S149 of the Equality Act 2010.

2999 words