

ENFIELD LOCAL PLAN (2019-2039)
MAIN ISSUES AND PREFERRED APPROACHES CONSULTATION

COUNTRYSIDE PROPERTIES (UK) LTD
SEPTEMBER 2021



TERENCE
O'ROURKE

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	Authorised by
	Signature
	Date August 2021
	Please return by

LONDON
23 Heddon Street
London
W1B 4BQ

BIRMINGHAM
Enterprise House
115 Edmund Street
Birmingham
B3 2HJ

BOURNEMOUTH
Everdene House
Deansleigh Road
Bournemouth
BH7 7DU

TELEPHONE
020 3664 6755

www.torltd.co.uk

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Terence O'Rourke Ltd Reg.
No.1935454 Registered office
Everdene House Deansleigh
Road Bournemouth Dorset
BH7 7DU Registered in England
and Wales VAT No.905095727

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1. Introduction and Site Overview

- 1.1 This representation has been prepared by Terence O'Rourke (TOR) on behalf of Countryside Properties (UK) Ltd.
- 1.2 Countryside is working successfully in partnership with the Council to deliver long-term regeneration at the Alma Estate, Ponders End and look forward to assisting the Council to prepare a robust and comprehensive Plan that will enable the borough to deliver the growth needed in future, including to meet its challenging housing need and address the requirement for affordable housing.
- 1.3 Outline planning permission was granted for the redevelopment of the Alma Estate in 2017 to provide 993 homes, alongside community and retail uses. Phases 1A (full planning permission), 2A, 2Ai and 2Aii (Reserved Matters) have been progressed through detailed consents, and construction has commenced on site, with first occupations occurring in March 2019. Further to the recent resolution to grant, construction will commence later this year on Phase 4.
- 1.4 To accord with the thrust of the national and regional planning framework, Local Plans should contain policies to optimise the use of land and meet as much of the identified need for housing as possible. Countryside therefore responds to relevant sections of the emerging draft Local Plan for Enfield in the context of the future phases of the Alma Estate. Indicative density studies have been undertaken which outline the potential to achieve further optimisation on the estate to provide c. 1,300 homes across the site, equating to 300 above the currently consented quantum. This would enhance the contribution that this strategically important estate regeneration has in meeting the borough's growth needs, reflecting its highly accessible and sustainable location.
- 1.5 The representation builds on Countryside's comments to the previous Local Plan consultation (February 2019). It reflects the chapters of the Local Plan, and provides responses to the questions raised in the consultation document where required.

2. Response to Enfield Local Plan (2019-2039) consultation

Chapter 2.4 (Enfield's spatial strategy):

Q1. Do you consider the Council has selected the right spatial strategy option as its preferred option?

- 2.1 Countryside supports the preferred spatial option identified by the Council (Option 2). Notwithstanding, there are several suggested amendments to the application of this spatial option.
- 2.2 The principal weakness associated with this spatial option is its reliance on Green Belt release and thus the requirement to demonstrate exceptional circumstances. As outlined in paragraph 114 of the NPPF, *'the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.'* Through the examination of strategic policies therefore, the Council needs to demonstrate that it has taken account of the following:
- *'Makes as much use as possible of suitable brownfield sites and underutilised land';*
 - *'Optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport.'*
- 2.3 Appendix D of Enfield's Strategic Housing Land Availability Assessment (SHLAA) (2020), which forms part of the draft Local Plan evidence base, acknowledges the contribution of the Alma Estate to the borough's future housing delivery (Ref: POP39) based on the outline consent. However, there appears to be no acknowledgement or consideration of the potential for further optimisation of this highly sustainable, brownfield opportunity. The NPPF is clear in paragraph 114 that before there is green belt release, there is a need to optimise the density of development and maximise the potential of suitable brownfield sites and underutilised land. In the context of the Alma Estate, there is no consideration to further optimisation which indicates a conservative approach to the assessment of brownfield delivery and the potential for increased optimisation and intensification in highly sustainable locations such as Ponders End.
- 2.4 Accordingly, the adoption of Option 2 (Medium Growth 1) as the preferred option is supported on the basis that this will be largely delivered in urban areas. However, the reliance on any Green Belt release should be prioritised last, with the greatest focus on intensification in sustainable urban locations and close to transport nodes and key centres.
- 2.5 A further area of concern relates to the identified housing need of *'approximately 25,000.'* As noted in the Council's Housing Topic Paper (May 2021) which forms part of the Local Plan evidence base, the standard method without the London Plan 'cap' is 43,733 for the period 2021-2031. Whilst it is acknowledged that the Mayor of London has the responsibility for setting the housing targets for London's local authorities, as outlined in the Housing Topic Paper, *'the London*

Plan does not provide a clear answer to the critical issue of how many homes Enfield needs to identify beyond 2029. Consequently, in light of the uncapped housing need, and the lack of a London Plan target beyond 2029, the approximate housing need figure of 25,000 should be the very minimum. Opportunities to optimise sustainable brownfield development in the borough to both meet and more importantly exceed this target should therefore be maximised.

2.6 This position has also been further exacerbated due to the Covid-19 pandemic. Even where local planning authorities are able to demonstrate a 5-year housing land supply (5YHLS), the likely impact on the anticipated pipeline of delivery indicates the need for greater flexibility. This position was reflected in appeal decision APP/X0360/W/19/3238048 where the Inspector noted that *'the Covid-19 pandemic is likely to have implications for the housebuilding industry as with other sectors of the economy.'* It is likely to be the case that there are a number of substantive risks linked to the future housing supply resulting from the Covid-19 pandemic.

2.7 This includes ongoing challenges for the capacity of the construction industry on sites that had been assumed to be deliverable. As well as potential supply chain issues for housebuilders, a key risk comprises housebuilders or developers running out of funds to maintain the delivery previously anticipated. These issues are also likely to have a direct impact on the viability of some existing permissions and allocations, causing stalling of delivery and also potentially requiring existing s106 commitments to be reviewed. The NPPF requires sites in a 5YHLS to be *'deliverable'* and for those in category b) (where a site has been allocated in a development plan), the realistic prospect of housing completions within five years should be demonstrated with *'clear evidence.'* Covid-19 is a planning *force majeure* which means that previous deliverability assumptions in recent Annual Monitoring Reports may need to be reviewed. In this context, it is essential that potential for housing development in strategic and sustainable locations is maximised and policies ensure there is sufficient flexibility, should assumed delivery rates be constrained.

Q2. Are there any changes you would suggest to the proposed key diagram?

2.8 Countryside supports the proposed key diagram as shown in the draft Local Plan, and in particular its recognition of Ponders End as an area of intensification around transport nodes and town centres. No changes are therefore considered necessary.

Q3. Are there any changes you would suggest to the proposed Spatial Strategy policy wording?

2.9 Whilst the draft policy wording of SS1 acknowledges that the 25,000 new homes target is a minimum, in light of the uncapped housing need, and the lack of a London Plan target post 2029, all opportunities to exceed this target should be maximised. Therefore, amended wording is suggested as follows:

'2. Provision will be made for at least 25,000 homes up to 2039, with an expectation that this should be exceeded to ensure that the housing need is adequately met during the plan period.

- 2.10 In addition, whilst Countryside accepts that the main foci of growth include centres such as Enfield Town and Meridian Water, the policy wording is considered overly restrictive in identifying the source of future development needs in the borough. In particular, part 2) of draft Policy SS1 states that *'with a large proportion of the Borough's future development needs provided by the four main placemaking areas of Meridian Water, Southbury, Crews Hill and Chase Park.'* Furthermore, draft Policy SS1 states in part 4) that *'Enfield Town, Meridian Water, Edmonton Green, Southbury, Southgate, New Southgate and Angel Edmonton will be major urban foci of high quality growth.'* There is no apparent recognition of other key centres and transport hubs in the borough, such as Ponders End, and their significant growth potential. In line with the new London Plan, areas around key transport nodes are considered suitable locations for sustainable growth and intensification. Suggested amended wording therefore is as follows:

'2...with a large proportion of the Borough's future development needs provided by the four main placemaking areas of Meridian Water, Southbury, Crews Hill and Chase Park, and other key centres, estate regenerations, and transport hubs in the Borough.'

'4. Enfield Town, Meridian Water, Edmonton Green, Southbury, Southgate, New Southgate and Angel Edmonton and other key centres, estate regenerations, and transport hubs will be major urban foci of high quality growth.'

- 2.11 The policy wording in its current form does not sufficiently acknowledge the importance of other key centres and transport hubs, such as Ponders End, in meeting the borough's development needs.

Q4. Has the Council missed any other spatial strategy options?

- 2.12 Countryside supports the principle of the spatial strategy options identified, however as noted elsewhere in this representation, consider the assumptions contained in preferred option 2 require amendment.

Chapter 3 (Places)

Q1. Have we included all appropriate placemaking areas in the urban area to accommodate growth?

- 2.13 The estate renewal at the Alma Estate, Ponders End is ongoing, and the estate continues to offer a source of housing supply which will contribute to meeting needs for housing in Enfield with significant enhancement to residential quality and promotion of mixed and balanced communities within a sustainable location.
- 2.14 The contribution that sustainable development at the Alma Estate can make to delivering homes and other benefits for the borough should be optimised as proposals for further phases of development are brought forward. This would enable the efficient and effective use of the sustainable location in accordance with chapter 11 of the NPPF and the principles for the Local Plan, and London Plan. As such, the Alma Estate and its ongoing potential to deliver growth through estate renewal making effective use of the site should be acknowledged as part of the Plan.

Q2. Are there any proposed placemaking areas we have proposed that you believe should not be included?

- 2.15 The inclusion of Crews Hill under draft strategic Policy SP PL9 as a standalone placemaking area, without the inclusion of other key centres in the Borough, such as Ponders End, is considered questionable. As noted in the draft plan, *'the parts of the placemaking area that are expected to come forward in the next plan are proposed to be removed from the Green Belt designation as part of this Local Plan.'* Reliance on green belt release which requires adequate demonstration of exceptional circumstances ahead of sustainable brownfield development opportunities in other centres such as Ponders End is considered contrary to NPPF paragraph 114. Consequently, as well as expanding the proposed placemaking areas, those that are in the most sustainable locations (e.g. adjacent to existing transport nodes), and brownfield opportunities should be prioritised over those dependent on green belt release. This reflects the key tenet of sustainable development outlined in NPPF paragraph 8 to *'help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity.'*

Chapter 7 (Design and Character)

Do you have any other issues/comments?

- 2.16 Countryside supports the principles established in draft Policy DE2 in promoting high quality design. Notwithstanding, there are considered to be several aspects of the policy which are overly restrictive or lacking clarity.
- 2.17 Under part 2a) i), the policy states that *'engagement in a planning performance agreement (PPA) that sets a target committee date, expectations and programme of meetings.'* Countryside has successfully worked with Enfield Council through a PPA agreement in delivery of the Alma Estate regeneration. In addition to the criteria cited, it is considered the cost of the PPA should be made clear in advance to ensure that developers have greater cost certainty, and this should be acknowledged in the policy wording.
- 2.18 Similarly, Countryside has worked successfully with the Borough's Design Review Panel, however consider that the wording of part 2a)ii) requires amendment. Not all major schemes will necessarily require three design review panels ahead of submission, particularly where this is for outline consent only. In addition, where reference is made to smaller major schemes being referable *'after first pre-application meeting and may be reviewed by the Design Review Panel at a 'minor majors' workshop session'* this needs to be clearer. In what circumstances will a review by the Design Review Panel be necessary, and at what stage will this be communicated to the applicant? Late referrals to the Design Review Panel have the potential to cause avoidable delays in a project programme and delivery, and creates uncertainty.
- 2.19 Part 2b) states that *'when appropriate, applications should be presented to a planning panel.'* The reference to a planning panel needs to be clearer, in terms of at what stage would this take place, and under what circumstances should an application be presented, and who that panel would consist of.

- 2.20 Countryside similarly has concerns regarding the wording of Part 3, and consider that the requirements are overly prescriptive and do not provide sufficient flexibility to the adoption of a design-led approach, as referenced in Policy D3 of the London Plan.
- 2.21 Draft Policy DE2 outlines that *'ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments that negatively impact quality.'*
- 2.22 Equally, part 3a) ii) states the requirement to ensure *'the wording of the planning permission, associated conditions and legal agreements provide clarity regarding quality of design'* and part 3a) iii) outlines the need to avoid *'deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or reserved matter.'*
- 2.23 Finally, concerns are raised regarding part 3a) iv), which states that *'requiring that, for important schemes such as those affecting heritage assets, the architect appointed as design lead for the project up to and including planning approval must be retained for the duration of the design and construction of the project. Shall the architect not be retained then a payment under the section 106 agreement is due to directly employ the architect or another to provide 'design guardian' services.'* This stipulation is considered unreasonable, excessively onerous and inconsistent with parts ii) and iii) which seeks to ensure a high degree of design detail upfront via the planning application itself, or via planning condition or legal agreement. Paragraph 81 of the NPPF is clear that planning policies should *'be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid respond to changes in economic circumstances.'*
- 2.24 Overall Countryside is supportive of the requirement for development to positively contribute to the setting and integrity of important local views and shorter distance local views. It is noted however, that this requirement should be balanced against the potential for optimisation in the Borough's most accessible and sustainable locations. As highlighted in paragraph 7.6.2, *'there are significant opportunities to optimise the provision of new homes and businesses while providing a form of development at a human scale.'* Equally, paragraph 7.6.3 outlines that *'carefully sited tall buildings can help optimise the development potential of sites and can make a positive contribution to the skyline.'* In this context, the wording of draft Policy DE5 is considered overly vague and potentially onerous where it states that *'where developments are likely to be visible within designated important views, the council will require the production of accurate visual representations of the development from the surrounding area and from different points within the viewing corridor. Dynamic models, such as VuCity, will often be sufficient.'* Reference to development being visible in an important view does not distinguish the level and type of visibility. A development which is comparable in height and form to a neighbouring site for example might be visible, but would also be proportionate and in scale with its surroundings. Equally, whilst reference to VuCity is made as an example, this is considered most appropriate for those developments which represent a significant departure from the surrounding built form. It is important that this policy is applied in a proportionate and flexible manner.

2.25 Countryside supports the aspiration to securing high quality residential development, as outlined in draft Policy DE13 (Housing standards and design). Notwithstanding, elements of this policy are considered to be overly prescriptive, and have the potential to restrict the design-led approach outlined in the London Plan. In particular, notable elements which have the potential to constrain an innovative design approach include the following specified in the draft policy wording:

- *‘Habitable rooms should have at least one window where the distance to unobscured windows and/or unscreened external amenity space of neighbouring residential occupiers is at least 18m, unless it can be demonstrated that this would not result in housing with inadequate daylight/sunlight or privacy for the proposed or existing development’.*
- *‘Even where it meets BRE guidance on daylight or sunlight, no part of a proposed development should have elements above ground floor that are within 11 metres (horizontally) of an existing residential window serving a habitable room (drawing a 45 degree line from the edges of the existing window).’*
- *‘New residential development above ground floor must be set back from the edge of existing amenity space by a minimum of 1.5 metres for every total storey of new development proposed, irrespective of daylight and sunlight implications. i.e. beginning with 3 metres for 2-storey development.’*
- *‘Side and rear facing windows overlooking adjacent sites will not be permitted above ground floor.’*

2.26 These design requirements should be balanced with the policy aim of Policy D3 of the London Plan which outlines the requirement for a design-led approach, and that *‘all development must make the best use of land by following a design-led approach that optimises the capacity of sites.’* Furthermore, *‘the design-led approach requires consideration of design options.’* In addition, Policy D3 highlights that *‘higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.’* The stipulations contained in draft Policy DE13 to be applied uniformly across the Borough may restrict and constrain a design-led approach for developments in the Borough’s most accessible and sustainable locations therefore.

Chapter 8 (Homes for all)

Do you consider that, if supported by viability evidence, the target for proving affordable housing on housing sites should be increased? If so, what percentage of affordable housing should the council be seeking?

2.27 Countryside supports Enfield’s aspiration to maximise the provision of affordable housing. However, this needs to be balanced with other site specific circumstances, and other financial contributions being provided. For estate regeneration schemes in particular, affordable housing is one of several community benefits being provided, which can include public realm improvements, provision of youth facilities and enhancements to public transport

connections. Often these elements of estate regeneration are as important as the provision of affordable housing, in the role of placemaking. Therefore, Countryside considers that the affordable housing target, as well as being subject to viability, should also take into account site specific circumstances. Accordingly, there is not a need to increase the affordable housing target, as this could deter investment in other community benefits. In addition, Paragraph 64 of the NPPF states that *'to support the re-use of brownfield land, where vacant buildings are being reused or redevelopment, any affordable housing contribution due should be reduced by a proportionate amount.'* The affordable housing target therefore should be flexible, subject to viability, and support the reuse of brownfield land in line with the NPPF.

Do you agree with the draft policy approach set out in H3, H4, H5, H6, H7, H8 and H9?

- 2.28 Countryside is supportive of the preferred spatial strategy, as noted in paragraph 8.1.3, to pursue *'the more intensive use of urban land, particularly in the place making areas'* whilst acknowledging the important role of other sustainable brownfield locations in the borough. The intensification of development around key underground and overground rail stations, and optimising the Council's land portfolio for new development including estate renewal and regeneration programmes both offer sustainable options to deliver some of the growth that is required in Enfield. Making sure that these opportunities are fully and effectively embraced as part of the Plan and new development in the borough will be vital if the Council is to meet the borough's identified needs in a sustainable way.
- 2.29 Draft Policy H1 (Housing development sites) outlines that *'the Enfield Local Plan will provide for at least 24,920 new dwellings in the plan period up to 2039, equating to 1,246 homes per year.'* Countryside agrees that this is a minimum number of dwellings, and would emphasise that this should be seen as a starting point to meeting Enfield's housing need over the plan period. It is highlighted that for the last nine monitoring years, Enfield has failed to meet its housing target, as noted in the Annual Monitoring Report 2019/20. In 2019/20, an average of 30% (139) of all completed conventional housing was affordable. This falls short of the 40% requirement for affordable home delivery. Equally, as outlined in the latest Annual Monitoring Report, the net number of dwellings approved in the monitoring year was 641, which was a fall from 753 in 2018/19. This poor track record, combined with Enfield's uncapped housing need being substantially higher than the borough's housing target reaffirm the need to maximise sustainable brownfield opportunities that come forward. Furthermore, as noted in paragraph 2.6 of this representation, previous delivery assumptions may need to be reviewed in light of the long-term implications associated with the Covid-19 pandemic.

Chapter 13 (Movement and connectivity)

Do you agree with the draft policy approaches set out in T1 and T2? If not, what changes would you suggest?

- 2.30 Countryside agrees with the wording of draft Policy T1, and in particular the shift to car-free development and the provision of initiatives such as car clubs and well-designed. Through the delivery of the Alma Estate regeneration, these elements have formed an integral part of the design approach. It should be highlighted however, that whilst the encouragement of investment in public transport

infrastructure is welcomed, it is noted that some locations in the borough are more suited to public transport access and investment than others. Sustainable brownfield sites near or close to existing transport nodes for example, are considered more suitable for investment and growth, than less accessible Green Belt and edge of Green Belt locations.

- 2.31 Countryside is supportive of the healthy streets approach outlined in draft Policy T2, and the requirement for proposals to encourage the shift to active transport modes. Notwithstanding the important role proposed development can have in improving access to active transport modes, there needs to be greater recognition within draft Policy T2 that some locations are more suitable. It is critical that new development occurs in locations which are, or which can be, made sustainable including through enabling access for occupiers to a range of services by modes other than the private car, and through facilitating use of public transport, walking and cycling as modes of travel.
- 2.32 Making effective use of land through higher densities of development, and directing increased densities of development to sustainable locations including for example town centres and areas around stations, must be a key component in seeking to meet future needs for growth in the borough. This will help to ensure delivery of development in line with the objective of promoting sustainable travel options in the borough, both by reducing the need to travel and by offering greater support for new and enhanced public transport connections.

Draft Proposals Map

- 2.33 It is highlighted that the draft proposals map appears to show a designated local open space within Phase 1A of the Alma Estate. This phase has already been built out, and whilst the Alma Estate regeneration includes numerous outdoor amenity spaces, it is not clear on what basis this area has been specifically designated. Accordingly, it is requested that this designation is removed subject to any further clarification from the Council.

3. Conclusion

- 3.1 This representation has been prepared on behalf of Countryside, who is working successfully in partnership with the Council to deliver the long-term regeneration of the Alma Estate, Ponders End. Further to the grant of outline consent in 2017, Countryside has successfully delivered the first phases, with occupations from 2019. The potential for further optimisation of the estate has been explored, and outlines the possibility of a total of c.1,300 homes being provided on the estate, equating to an additional c.300 homes for the Enfield. As well as making an invaluable contribution to the borough's growth needs therefore, this demonstrates the continued role the Alma Estate, and Ponders End itself, has in contributing to the borough's requirements in this highly sustainable and accessible location.
- 3.2 As recognised within the draft Plan and in national and London strategic planning policy, there is a pressing need for delivery of new homes. Making effective use of land within town centres and around stations and through estate renewal and regeneration areas will be vital in helping the borough to meet challenging needs for growth. It is therefore important that the Plan recognises and encourages growth in appropriate locations to meet needs, but also provides for sufficient flexibility to ensure that the Plan is effective and positively prepared to enable it to meet the needs of Enfield's local communities in future.
- 3.3 A detailed review has been undertaken of the draft Local Plan and the consultation questions posed in this representation. Whilst this reaffirms that the draft Local Plan is considered sound, there are several areas where further refinement of the policy wording is encouraged. To ensure conformity with paragraph 114 of the NPPF, all opportunities for brownfield and underutilised sites needs to be explored ahead of greenbelt release. Any requirement for green belt release as proposed by Option 2 of the spatial strategy should be a last resort, and sustainable brownfield opportunities in the borough should be prioritised. Equally, the application of the approximate housing need of 25,000, as identified in the preferred spatial growth option is very much a minimum, and the Local Plan should encourage this to be exceeded during the plan period. This reflects the borough's significantly higher uncapped housing need, its poor track record of delivery over the last nine years and the London Plan housing requirement not covering the whole plan period. Furthermore, whilst the principal urban foci for growth identified in draft Policy SS1 is noted, this needs to be expanded to take into account other smaller centres around transport nodes, such as Ponders End, which also have an invaluable role to play. As the appended design document illustrates, the Alma Estate has the potential to make a significant contribution to the borough's growth needs in this highly sustainable location, around an existing transport node.
- 3.4 The Local Plan's approach to design is welcomed, and Countryside supports the creation of high quality and well-designed environments, as has been the case through the delivery of the Alma Estate regeneration to date. Notwithstanding, there needs to be a balance with overly prescriptive and restrictive policy wording which has the potential to stifle and constrain innovative design-led development as outlined in the London Plan. Design-led development is key in securing high quality design which optimise the potential of the borough's principal areas of growth. Equally, NPPF paragraph 81 emphasises the need for policies to be

flexible and responsive to changing circumstances. Draft Policy DE2 is considered to be contrary to this aspiration.

- 3.5 In summary, this representation builds on Countryside's comments to the previous Local Plan consultation (February 2019). Countryside looks forward to working with the Council to prepare a robust and comprehensive Plan that will enable the borough to deliver the growth needed in future, and meeting its challenging housing need.