

Dear Enfield Planning Policy Team,

Enfield Local Plan 2019 - 2039 – Regulation 18 Consultation

We believe the Plan is positive and ambitious, and will support and expand the Council's good work to date around housebuilding, sustainability, and placemaking. We support the priorities of the plan, including the six 'golden threads'.

Our response is set out in more detail below and we have no strong concerns about the proposals in the plan.

Strategic Issues

Our primary strategic consideration regarding the Enfield Local Plan is that of Epping Forest SAC. Additional considerations include the approach to employment land and Green Belt.

Infrastructure

We support the provision of the infrastructure identified in the draft Infrastructure Delivery Plan.

We note the current uncertainties about Crossrail 2. The plan makes appropriate reference to it and it is clear the borough would benefit; however, the plan correctly avoids placing undue emphasis on this proposal.

Employment

Policy E1 sets a target to provide minimum of 251,500 sqm net additional industrial / logistics floorspace (or approximately 56 ha of land), and 37,000 sqm net additional office floorspace. This is supported, notwithstanding the difficulty of resisting losses through prior approval applications. Redbridge, as previously stated, does not have the capacity to meet Enfield's unmet employment land need.

Enfield has a significant reservoir of industrial land, with sites suitable for more intensive uses or those with significant floorspace requirements, along with smaller

and older units suitable for SMEs.

Previously, the “Intend to Publish” London Plan indicated that Enfield was a “provide capacity” borough with regard to industrial capacity; however ministerial directions meant that in the final published version, boroughs were given more flexibility to release industrial land. Nonetheless, Enfield’s own evidence demonstrates the importance of new industrial and logistics floorspace; with demand for B8 class floorspace for storage, logistics, and e-commerce.

Given the strategic importance of the long-standing industrial cluster along the Lea Valley, and its advantages including transport links, we support the continued growth of this sector.

Housing

We wholly support Enfield’s aspirations to significantly increase housing supply and in particular affordable housing supply. Our acute housing needs and reliance on temporary accommodation is comparable in scale to that of Enfield; and we have also seen significant increases in rents, house prices, and housing unaffordability.

We support the strategic target within Policy H1 (which reflects the London Plan policy) and believe that the proposed allocations, and approach to windfall and small sites, will allow this to be met. The “Character of Growth” study provides a useful evidence base for developers to understand an appropriate intensity of development in established neighbourhoods. Redbridge, as previously stated, does not have the capacity to meet any of Enfield’s unmet housing need.

Epping Forest SAC

Epping Forest SAC is a key strategic issue affecting both ourselves and Enfield. Epping Forest is a popular recreational destination, the popularity of which has only increased recently.

The HRA Screening identifies air pollution and recreational disturbance as potential likely significant effects on Epping Forest SAC; with the eastern part of Enfield being within the 6.2km buffer zone for recreational pressure.

We support the SANG requirements; however, it is likely that with the possible exception of the sites to be released from Green Belt land, that these sites will be incapable of providing SANG on-site; in common with the other London Boroughs within the Epping Forest SAC catchment. Table 6.1 lists those locations which can provide new or upgraded spaces to serve as SANG, supported by the Enfield Blue & Green Strategy; this is supported provided such sites offer suitable recreational capacity and overall attractiveness to visitors as semi-natural spaces.

Green Belt

The Enfield Local Plan proposes a combination of the de-designation of some Green Belt land to accommodate its housing and industrial floorspace requirements; along with enhancement of the remaining land to remain as Green Belt. Enfield's employment floorspace requirements preclude a permissive approach to the release of employment land for housing, even with an optimistic view of industrial intensification; which in many cases has significant viability constraints. The Enfield FEMA study concludes that there is limited potential to provide for employment requirements in nearby London or wider south-east authorities.

Likewise, the intensification and redevelopment of existing housing is an important supply of additional housing; however, there are limits to the ability of individual localities to accommodate this sustainably; with the majority of areas having potential for medium change that will need to be carefully managed.

We consider that Enfield has met the requirements of NPPF paragraph 137 regarding reasonable alternatives to Green Belt release, and therefore it can justify that exceptional circumstances exist, noting the judgement in *[2019] EWHC 3242 (Admin)* regarding the Guildford Local Plan, and that the widespread nature of the housing crisis does not mean that housing cannot be an exceptional circumstance for a particular local authority.

The provision within policy H2 regarding 50% affordable housing on Green Belt land is supported; however, the wording of the policy should be clarified to ensure that it includes land that *was released from the Green Belt*, due to how the Green Belt boundaries change immediately upon adoption, thus it could be interpreted that the de-designated land is exempt from this intended policy requirement.

There is an additional benefit in the ability of the proposed allocations to provide serviced plots for self-build housing. Most London boroughs struggle to discharge their requirements regarding the Self-build and Custom Housebuilding Act 2015. However, strategic sites offer the opportunity to provide serviced plots alongside a mainstream development. Such new self-build housing could benefit from a "plot passport" approach and would not be constrained by the character of an existing area and significant architectural freedom afforded.

Transport

We support the proposed measures regarding transport improvements, and active travel.

It should be noted that major transport projects are amongst the types of developments which have the potential to adversely affect Epping Forest SAC.

Monitoring and Review

We support the inclusion of clear criteria for the review of the Local Plan, and the listing of remedial actions to be taken in the event of underdeliver. However, this policy should be considered a strategic policy.

Duty to Cooperate

We consider that Enfield is fulfilling the Duty to Cooperate; regarding communicating with neighbouring authorities regarding accommodating its housing and employment floorspace requirements. We have commented separately on the Duty to Cooperate letter identifying strategic matters.

Summary

The London Borough of Redbridge supports the Enfield Regulation 18 Local Plan, subject to the acknowledgement that we do not have the capacity to meet the unmet housing and employment needs of Enfield (or any other borough) and we look forward to future opportunities for input.