



Planning and Economic Development

Mr Vincent Lacovara
Head of Planning
Enfield Council
Silver St
London
EN1 3XA

Your Reference:
Our Reference:
Contact: Grace Middleton
Extension: 5050
Date: 14 September 2021

Dear Mr Lacovara

Enfield Draft Local Plan (Regulation 18)

Thank you for notifying and consulting Hertsmere Borough Council on the LB Enfield Regulation 18 Preferred Policy Options document. This response comes from the Planning Strategy team at Hertsmere Borough Council, and is an officer response only.

The emerging document appears generally sound and consistent with national policy recognising that your plan also needs to be in general conformity with the London Plan. Further collaborative work on strategic cross boundary infrastructure remains a high priority for our Council and we look forward to continued joint work under the Duty to Co-operate.

Vision and Objectives

HBC officers support Enfield's aspirational Vision and Strategic Objectives for the borough. We particularly support the zero carbon agenda for major development but would welcome this being even more ambitious by seeking to apply these aims to all development, or at least across a spectrum of smaller developments.

Employment need

The preferred option, expressed in Table 9.2 of the Draft Plan, of seeking to meet the Enfield's full (or close to full) employment need across both the urban area and selected green belt sites is supported.

The Enfield FEMA Study (June 2020) includes Hertsmere within its Functional Economic Market Area (FEMA). The RAG rating assessment (Table 2 within the report), which identifies opportunities for the substitution of industrial land with each Local Authority in Enfield's FEMA, assesses there to be no potential for Hertsmere to accommodate any of Enfield's employment need. We are seeking to meet our own employment land need in full.

We also support the proposal not to release currently-designated employment land in Enfield to meet housing need. We note that the levels of need for certain types of employment space may need to be updated to account for changes to working patterns and the potential of there being reduced demand for some forms of employment space due to increased home-working due to Covid-19.

Housing need

Three options have been considered, each predicated on accommodating different levels of housing growth; 17,000, 25,000 and 55,000 new homes. The preferred option presented in the Regulation 18 Plan is the medium growth 1 scenario (25,000) which would meet much of the housing requirement, including through the release of green belt land, and would meet or come close to enable the plan meeting the needs of other land uses in full. Recognising the issues raised by the London Plan target neither reflecting the standard national methodology nor providing a target past 2029, we consider that 25,000 is likely to be an appropriate option for housing growth for now, by simply rolling forward the London Plan requirement. As and when the London Plan is reviewed, however, it may be necessary for individual Local Plans in London to be revisited.

The release of some green belt land is supported, this being necessary to meet as much of a reasonably assessed housing need as possible within the borough itself, in the absence of updated London Plan targets. The draft plan (at Table 2.2. on p.26) states that this approach risks the plan being found unsound as it would not be meeting the full amount of housing generated by the Standard Method but we recognise that the London Plan, being adopted prior to the introduction of the Standard Method, presents a particular challenge for London boroughs.

The potential need for a local SHMA, raised in the Enfield Growth Topic Paper, 2021, is supported, given that Enfield's most recent housing needs evidence base dates from 2015 (SHMA update).

Proposed site allocations

Housing site SA45: Land Between Camlet Way and Crescent Way, Hadley Wood

This site, put forward in the Enfield Plan for 160 homes, directly adjoins the Hertsmere borough boundary. Locating some new housing at Hadley Wood is logical given the proximity to a mainline railway station. Care should be taken in the layout and design of development on the site to ensure it does not compromise the purposes of the green belt between Hadley Wood and the M25/Potters Bar, and between Hadley Wood and the hamlet of Bentley Heath within Hertsmere. Our emerging draft Local Plan does not recommend any further consideration of green belt land for development south of the M25 as this part of the green belt is assessed as performing strongly in preventing the outward sprawl of Greater London and the avoiding risk of coalescence between London and Potters Bar.

Employment Site SA54: Land East of Junction 24 of the M25

This is one of two sites highlighted in the Draft Enfield Plan as having a high potential to deliver an uplift in employment floorspace (para.9.1.3). It is put forward as a draft allocation for the provision of a minimum of 30,550 sq m employment floorspace (light and general industrial, storage and distribution, and related sui generis uses). This site adjoins Junction 24 of the M25 and also the borough boundary with Hertsmere. Junction 24 serves Potters Bar, one of Hertsmere's primary towns, so any highway impacts of the proposed uses of the site are likely to have an effect on this junction and on access to Potters Bar, as well as environmental impacts beyond the boundary of Enfield borough. The site is isolated within the green belt, away from any populated areas of Enfield. The strategic vision for Hertsmere does not include extending the town of Potters Bar to the south of the M25 as this could erode the green belt gap between London and Potters Bar. We would not support a proposal that sees development to the south of the strong and permanent green belt boundary provided by the motorway, resulting in encroachment into the countryside and a narrowing of the gap between Hadley Wood and Potters Bar.

Policy H10 Gypsy and Traveller Provision

It is noted that a separate Gypsy and Traveller Local Plan is being developed, to be informed by the Enfield Gypsy and Traveller's Accommodation Assessment (GTAA) 2020. In the meantime the

draft plan includes Policy H10 which sets out the intention to prepare a separate local plan, and sets local criteria for the consideration of applications.

Hertsmere supports the decision to plan to meet the full identified need for 21 pitches over the plan period (as identified in the GTAA), in addition to any new transit site, but is unclear how or why this should require the preparation of a separate development plan document. An opportunity exists now, through the Regulation 18 stage, to identify sites and bring them forward in the Regulation 19 Plan.

We are not aware of any scope to pursue a joint scheme/site as there is already a large (private) site in Potters Bar together with a transit site nearby at South Mimms. The Council is looking to distribute further Gypsy and Traveller provision across the borough as a whole rather than focusing more new pitches and sites in Potters Bar or across the local authority boundary into Enfield. This is reflected in the provision we propose to make in our draft Local Plan which is due to be published for a 6 week period in early October.

Generally speaking and unless LB Enfield is able to own and/or manage new pitches itself, we would suggest that any new private sites are small in scale, typically not exceeding 5-6 pitches. This allows for the better management of sites and successful coexistence with nearby settled community. It will also ensure that new supply can be made available to a wider number of Gypsy and Traveller households given the possibility that small private sites will be limited to a particular family or extended family.

If there are any queries regarding this letter, please do not hesitate to get in contact.

Yours sincerely