

## Response to the Enfield Local Plan Main Issues and preferred approaches June 2021

### Response to Policy TC6

#### 1. Introduction

1.1 We have considered the above policy and its supporting text with regard to the principles set out within the Framework. Local Plans should “plan” positively for development; be justified; effective; and consistent with the Framework.

1.2 We consider that limiting the concentration of hot food takeaways would be unsound.

#### 2. Such an approach is not positive, justified, effective or consistent with the Framework.

2.1 Restricting the concentration of new hot food takeaway proposals within the borough is not a positive approach to planning. The Framework “foreword” sustainable development is about positive growth, making economic; environmental; and social progress, for this and future generations.

2.2 The suggested restrictions, take an ambiguous view of takeaway uses. It would apply an over-generic approach to restrict development with little sound planning reasoning or planning justification. This is contrary to the Framework which advises authorities to positively seek opportunities to meet development needs of their area.

2.3 Thus it is inconsistent with Para 81 of the Framework. Para 81 states:

*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.*

2.4 The Policy seeks to restrict town centre uses, including within designated centres. The Policy contradicts the framework and the sequential approach.

2.5 The Framework cannot be interpreted to provide generic restrictions on a particular use class. Moreover, the evidence does not support such restrictions. The need for evidence is emphasised in para 31 of the Framework which states that ‘*the preparation and review of all policies should be underpinned by relevant and up-to-date evidence*’. Compliance with the soundness test is still required.

2.6 The proposal does not accord with the “golden thread” running through the Framework which seeks to build a strong competitive economy. Such a policy could potentially stifle economic development and is not consistent with the Framework.

2.7 Neither the policy wording nor the supporting text defines ‘*overconcentration*’. No evidence is provided which shows the existing concentration levels throughout the borough. The impact of the policy cannot therefore be assessed.

#### 3. Soundness - summary

3.1 We consider that restricting the concentration of hot food takeaways would be unsound and fails to meet the four tests of the Framework. It is not a positive approach to planning; justified; effective; or consistent with national planning policy. Such a policy should therefore not be taken forward to the next stage of the plan making process.

#### **4. Conclusion**

- 4.1 It has been highlighted above that there is no appropriate reason to restrict hot food takeaways uses by their concentration.
- 4.2 The proposed policy takes no account of the sequential approach and therefore contradicts the Framework.
- 4.3 No evidence is provided to show existing takeaway locations and saturation levels within centres and key frontages.