



BetterHomesEnfield

Regulation 18

Draft Local Plan Response

September 2021



Better Homes Enfield

9th September 2021

By email

Dear Local Plan Team,

RE: Formal Response to draft Local Plan Reg 18 Consultation

Please find below our formal response to Enfield's draft Local Plan 2039 "Consultation" under Section 18 regulations which we will follow up, if and when the Section 19 regulation proceeds, as formal consultees.

Whilst we agree with many of the overall aims and aspirations of the draft Local Plan (DLP), we doubt that the DLP in its current form will live up to these aspirations and deliver the housing Enfield needs.

We have set out our reasoning in full throughout our detailed response.

As a general observation, we think that large sections of the draft Local Plan (DLP) have more in common with a marketing or a sales pitch, than a serious planning or policy document.

Furthermore, we think that a large number of the proposed "policies" are very vague. In our opinion, the guidance these principles or policies would provide, would be open to very wide interpretation. As such, if the DLP were adopted in anything like its current form, a large number of the policies would be left open to broad interpretation by planning officers, who could interpret them at their discretion on a case-by-case judgement. This would create a highly unpredictable and undesirable local planning system. It would mainly be large developers who would have the time, expertise and investment needed to "win" or negotiate a planning permission. On the other hand, smaller developers, and local residents, will be left frustrated at the lack of clarity and certainty, and will not have the time, knowledge or money needed to engage with such a vague and unpredictable local planning system. This is not what Enfield needs.

Yours faithfully,

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BETTER HOMES ENFIELD RESPONSE TO DRAFT LOCAL PLAN CONSULTATION SEPTEMBER 2021

DRAFT LOCAL PLAN POLICY	RESPONSE TO DRAFT LOCAL PLAN POLICY
Chapter 2: Good growth in Enfield (Page 5)	
SP SS1: Spatial strategy (Pages 22-30)	<p>In our opinion and based on our extensive analysis of the DLP and Evidence Base, the council's overarching spatial strategy will not deliver the sustainable growth that Enfield needs; the proposed spatial strategy does not make the best use of the land available, nor does it prioritise delivering the housing the type of housing that Enfield needs, and we object to the Spatial Strategy for the following reasons.</p> <ul style="list-style-type: none"> • The potential and role of Small Sites for housing have not been properly considered and conflicts with the London Plan 2021 and with policies from within the Draft Local Plan (DLP) itself e.g. DM H4. (see Appendix A for additional information) • The potential for housing on brownfield sites has been significantly underestimated in the DLP. (see Appendix B for additional information) • The strategy proposed in the DLP will not deliver the type of affordable housing needed by Enfield's current residents i.e. Social Rent, London Affordable Rent and London Living Rent tenures. (see also Appendix C for additional information) • The spatial strategy proposed will lead to a large increase in vehicle usage (e.g. as a result of the proposed housing estate at Vicarage Farm and Merryhills Way). • The plan does not properly consider and cost for the infrastructure necessary to deliver the proposed spatial strategy and visions of aims of the DLP (e.g. for all greenfield sites). • Brownfield sites that could provide additional SIL have been overlooked (e.g. at Southbury) and the intensification potential of some existing SIL has been ignored (e.g. at Harbet Road).

- Opportunities for a large-scale mixed-use development (e.g. in Brimsdown) have been too easily dismissed.
- The housing densities proposed for redeveloped in green belt areas are far too low and would represent a poor use of the land available and increase urban sprawl.
- The amount of green belt land proposed for release is excessive, not required and does not represent an efficient use of land.
- Opportunities for farming and agriculture and a rural/green economy have not been properly considered.
- The strategy fails to properly value existing assets e.g. the Crews Hill areas contribution to the local economy and employment.
- Opportunities to create a substantial new park in the southeast of the borough have been overlooked (e.g. CPRE vision for a new park in Upper Edmonton “Banbury Reservoir Park”).
- The Edmonton Incinerator, and the impact this could have on local air quality and the health of local residents, has been completely ignored.
- Options are missing from spatial strategy options e.g. releasing greenbelt for SIL but not for housing or releasing some green belt for housing but not all etc.
- Medium Growth 2 (ie. option 3) in Table 2.2 says that “Most housing units will be small and many in tall buildings”. We completely disagree with this line of thinking and conclusion. Firstly tall buildings are often (almost always) unnecessary – they should not be seen as the only answer to achieving the densities needed as there are other viable options. We have set out our response to DM DE6: Tall buildings later in this document which set outs some of are thoughts in more detail. We also note that the DLP accepts that there are viable alternatives to tall buildings (see DLP 7.6.4, page 160). The council needs to look much harder at the alternatives to tower blocks and look more closely at adopt mid-rise development to meet housing needs. For example the Levitt Bernstein report on Superdensity says recommends adopting “mid-rise development to meet London’s housing needs: apartment blocks of between five and eight storeys, including family apartments and duplexes, create successful homes and neighbourhoods at surprisingly high densities, are cost-effective and perpetuate the character and street life of London. Creative combinations of mid-rise mansion blocks with taller elements can make room for family houses within high density neighbourhoods”. We have included a few examples in Appendix F and would happily feed into a topic paper on this subject.

In terms of housing and employment, a spatial strategy is required that, as a starting point, first prioritises the urgent housing and employment needs of existing local residents. For example, the evidence shows that this means:

- Delivering 10,500 new (NET additional) affordable homes as quickly as possible.
 - Around 7,000 will need to be at Social Rent levels for families in acute housing need, who struggle to afford even the lowest cost rents in Enfield.
 - 3,500 will need to be 'intermediate' affordable housing for key workers and first-time buyers (e.g. London Living Rent), who can often afford low-cost rents but increasingly need help getting on the housing ladder.
 - The emphasis for intermediate affordable housing should be on London Living Rent and not Shared Ownership, which is unaffordable to the large majority of local first-time buyers.
- Around 3,500 - 4,500 of the affordable homes will need to have 3+ bedrooms. The remainder should focus on a mix of 2-bed homes. Studios and 1-bed flats should be kept to a minimum as the least needed and use space inefficiently.
- At least 10% of these new dwellings should be built to M4(3) wheelchair accessible dwelling standard in accordance with Building Regulations.
- These homes will need to be built in sustainable locations, within reasonable distance of existing amenities, services, employment areas and existing public transport infrastructure.
- These homes will need to be built to minimise ongoing costs i.e. energy usage and costs associated with service charges.
- Applications that propose a NET loss of social rent housing (e.g. as part of an estate regeneration), should be refused.
- Applications which fail to properly account for affordable housing policies in their land value assessments and which do not as a result deliver at least the minimum affordable housing required by policy, should be refused.
- Local employment spaces should be protected and encouraged. Any loss of employment space should be proactively managed by the council e.g. employers should be helped to find suitable replacement spaces within the borough and any employment space lost (e.g. through conversion or development) will need to be replaced.

	<ul style="list-style-type: none"> • Protections should be put in place to protect key employment areas, such as town centres and local high streets (e.g. by using Article 4 directions)
Chapter 3: Places (Page 34)	
SP PL1: Enfield Town (Page 40-42)	<p>We object to SP PL1 for the following reasons:</p> <ul style="list-style-type: none"> • The policy and vision for Enfield Town is uninspiring and seems to be full of subjective words and ambiguous phrases. • Tower Blocks: We think it is surprising that the council continues to think that it is appropriate to encourage tall tower blocks in Enfield, and particularly in Enfield Town, given its heritage, when there are better alternative solutions available. We object to the DLPs encouragement for tower blocks in Enfield Town. • Putting aside the aesthetics and visual & heritage impacts, the evidence that tower blocks are unnecessary (research shows that other high density housing options can deliver just as much floor space), generally undesirable (research shows most people would rather not live in them, - or even near them - especially over the long-term, given the choice), harmful to health (research shows the impact living in these blocks can have on mental health) and harmful to the environment and wildlife (again research shows that alternative high density housing solutions have a far lower negative impact on the environment) is overwhelming. (see our response to DM DE6 for more information). • Retail Destination: The plan does not recognise the importance of Enfield Town as Enfield's main shopping destination (especially when out of town retail areas are redeveloped for housing). The plan does not address practical elements of retail and a major destination shopping area e.g. car parking provision and servicing. There is almost no mention of how the Town area will

	become greener e.g. encourage innovative growing projects such as on car park roofs, aiming for a greener high street (a true National Park City approach!), incentives for green business and ventures that promote sustainability.
SP PL2: Southbury (Page 45-46)	<p>We do agree that areas of Southbury should be redeveloped for mixed use housing, commercial, community and employment space. However we object to this policy for the following reasons:</p> <ul style="list-style-type: none"> • A master plan for the area would properly inform residents of what is proposed, and prospective developers could reasonably be expected to play their part in formulating this in exchange for their potential profits. Eg Uplands Business Park, Blackhorse Rd, Waltham Forest. This needs to be provided, • The map is confusing as there are areas and zones highlighted as Site Allocations, but no further information has been given about these (e.g. are these for SIL or housing?). There are 7 sites allocated on the map, but just 5 in the Explanation. This makes responding properly to this policy very hard. • Other maps show other areas will be designated as SIL, yet this is not articulated in the vision or on the map provided here e.g De Mandiville Retail Park and Enfield Retail Park. These inconsistencies are also confusing. • The map shows a Green Link running the length of Southbury Road. However “Green Link” is not defined in the Glossary, and it is unclear how a “Green Link” along Southbury Road would be implemented in practice. This needs further clarification. • We wholeheartedly object to major housing being proposed without proper access to greenspace. The main greenspace proposed is on the east side of the A10, meaning residents, including children of all ages, will regularly need to cross a very busy major road to access a proper park and playing fields. A more specific vision is needed regarding how crossing the A10 can be improved for pedestrians and cyclists e.g. new bridges, underpass etc. Furthermore, a few tokenistic pocket parks are a wholly inadequate response to the level of residential building envisaged for the area, not to mention other needs e.g. growing spaces, allotments etc. • The “Enhanced access to blue/green infrastructure” appears to be not much more than an exercise in sticking green stars on existing park entrances.

	<ul style="list-style-type: none"> • Cycle routes are proposed for almost every pedestrian pathway across Bush Hill Park and Enfield Playing Fields. Whilst encouragement of cycling is welcome, this should be balanced with the needs of other park users e.g. those on foot. Why are pedestrian footpaths being allocated as cycle paths? • New cycle lanes are envisaged in both directions on the A10, despite there already being cycle lanes in both directions - why can't existing cycle infrastructure be improved? • Same issues with tall towers as outline in Enfield Town response.
SP PL3: Edmonton Green (Page 47-51)	<p>We do not support this policy for the following reasons:</p> <ul style="list-style-type: none"> • No mention is made of the impact of the proposed Edmonton Incinerator on the environment, pollution, health. • Same issues with tall towers as outline in Enfield Town response. • Nothing is included about adaptation to climate provision e.g. trees for shade • As with Southbury, the Green Links appear to be nothing more than dots on a map - there seems to be no clarity about how this vision could be implemented in practice • There appears to be a large number of "intensification opportunities" highlighted on the map, but it is unclear what these actually are. What is an "intensification opportunity" exactly – there is no definition in the glossary
SP PL5: Meridian Water (Page 56-60)	<p>We object to SP PL5 for the following reasons:</p> <ul style="list-style-type: none"> • The vision says that "It will be a place where Enfield residents and Londoners can afford to live" - this is untrue. The nature of the homes proposed means the majority will not be affordable to Enfield residents. The scheme needs to deliver more social rent family housing and more London Living Rent family housing. There is currently far too much emphasis on private properties, built to rent and shared ownership (none of which address local housing needs) • It is notable that a part of the vision is that "there will be a burgeoning economy for makers and creators", which is precisely what the council is proposing removing at Crews Hill. • The vision says: "Meridian Water will be a model for sustainable neighbourhoods with exceptional environmental credentials," however, this is not true. The scheme fails to deliver a suitable level of usable greenspace and the impact of air pollution from the

- incinerator and major roads (A406, Meridian Way) have been almost completely ignored. We are aware that the council has stopped the publication of a scrutiny committee report that examined the environmental credentials off the scheme.
- Furthermore, the residential properties in Phase 1 and Phase 2 will be severed from greenspace as a result of the council's vision not to develop the east bank areas for housing.
 - The suggestion that greenspace should be measured as a % of the entire area is highly problematic. Greenspace should be based on the ratio of people to greenspace (as the council itself admits elsewhere in the Local Plan), to change the rules for Meridian Water is unacceptable and will lead to a poor provision of greenspace for future residents, in an area that already has a significant deficit of greenspace.
 - Very little, if anything, is said about how the scheme will connect existing communities in Edmonton with the Lee Valley Regional Park and new greenspaces. Previous iterations of the Median water scheme looked to remedy this by incorporating new bridges into the scheme, which would reduce severance caused by the railway, roads, and river. These benefits now seem to have been removed in this latest vision.
 - Not including the Harbet Road (east bank) into the site allocations and vision is a huge mistake. This needs to be dealt with now. If this area is not going to be de-designated than the scheme must change to reflect this now. Calling this "safeguarding" is highly misleading and shows a complete lack of understanding about the consequences of this approach.
 - The vision talks about net gains in biodiversity yet does not address the impact of the scheme on the existing greenspaces, such as Tottenham Marshes.
 - Furthermore, many tall buildings are envisaged for Meridian Water, despite evidence to show the negative impact of tall tower blocks on affordability, the environment, mental health and the ability to deliver the type of child friendly housing needed (also see comments for Enfield Town re tall buildings).
 - It is infuriating that so much underused greenspace surrounding Meridian Water is completely ignored in this vision - Why isn't the CPRE vision for Banbury Reservoir Park being considered?
 - Shockingly, the vision makes no mention of the existing employers and employees on the site. Many jobs with the existing employers on the site will be lost as a result of the development and part of the vision must be ensuring that these jobs are

	protected, or that alternative suitable sites and solutions are offered. This is especially important as many of the job losses will impacted groups with protected characteristics.
SP PL6: Southgate (Pages 64-65)	See Enfield Town comments, especially regarding tower blocks for objections
SP PL7: New Southgate (Pages 68-69)	See Enfield Town comments regarding tower blocks for objections
SP PL8: Rural Enfield 'London National Park City' (Pages 70-74)	<p>We object to SP PL8 for the following reasons:</p> <ul style="list-style-type: none"> • This whole section of the plan is ill conceived and poorly thought out. • To a large extent, the aims policies and visions set out amount to little more than a rebranding exercise of existing blue and green infrastructure. Rebranding and marketing can be useful, but should not form part of a local plan, especially if it misleads rather than inspires or informs. • For example, the aims and objectives of the National Park City have been completely misunderstood and are misrepresented. It is troubling that the council did not contact the London National Park City Foundation before putting this plan out for consultation and it is unacceptable for the council to misuse the ideas and aims of a charitable organisation in this way. (see Appendix D – “Letter of complaint”). • In our opinion, the references to “rewilding” are also incorrect and misleading. The council appears to have confused the principles and aims of rewilding with tree planting and publicly accessible park land. Likewise, phrases such as “Green Loop” and “Green Link” are not defined. These phrases sound “nice” and “green”, but what do they actually mean? • The map provided feels more like a colouring and sticky paper exercise, rather than something rooted in reality. For example, it manages to designate parts of the A406 and main roads and roundabouts as the “London National Park City”, as well as land, which is fenced off and not in public ownership, yet there is no mention within the DLP of how this land will be made publicly accessible and safe for public access. It is in our opinion highly misleading.

	<ul style="list-style-type: none"> The plan aims to “convert significant tracks of farmland” yet, does not appear to consider the impact this will have on the livelihoods of the farmers, the landscape heritage, or the need for locally produced food.
SP PL9: Crews Hill (Pages 75-80)	We object to SP PL9 because Crews Hill is alive with commerce and entrepreneurial spirit, delivering numerous employment opportunities. There are independent businesses of all shapes and sizes carving out a living and creating employment here. The area has a unique character and is visited by people from across the area. Many of the businesses are horticultural or green businesses. Most boroughs would be looking to protect and support such an asset. The place making strategy needs to be reconsidered to better reflect the areas strengths and identity and to ensure jobs are protected.
SP PL10: Chase Park (Pages 81-87)	<p>We object to SP PL10 for the following reasons:</p> <ul style="list-style-type: none"> The proposals for Vicarage Farm and Merry Hills Way appear to be ill-conceived and seem to us to be more of sales pitch than a plan. This section appears to contain a number of inaccuracies and misinformation. SP PL10 does not recognise that this area is extensively used by local residents. Two neighbouring wards already have a significant deficit of greenspace (Town and Highlands) and local residents rely on this area for exercise, relaxation and for physical and mental health. Removing such a well-used, well-loved and valuable open space on the edge of the urban environment will have detrimental impact on the health and wellbeing of local residents and worsen the deficit they already experience. The area is clearly not sustainable. The houses currently nearest to the development (which are nearer to public transport than the homes within “Chase Park” would be) are reliant on cars, a clear indicator of what is to come if this area is developed for housing. The housing development at Trent Park also provides a very good real-world example of just how heavily car reliant these developments will be. The claims made in some of the documentation about distances to public transport are inaccurate and are also contradicted by the other reports and assessments within the Evidence Base.

	<ul style="list-style-type: none"> • The DLP describes this area as “a location which is accessible with good public transport connections” – this claim is not supported by the assessments in the Evidence Base and is inaccurate. It is abundantly clear from the accurate evidence that the area will not be “a place where walking, cycling and use of public transport is the natural choice”. • The references to London National Park City are highly misleading and the London National Park City Foundation has written to the council to express its concern about the misuse of the Foundations aims and objectives. • Notably, the place making strategy outlined here mentions the delivery of an extensive amount of new infrastructure. However, almost none of this new infrastructure appears to have been accounted for in the plan viability assessment, which therefore completely undermines the claims made about the level of affordable housing that could be delivered at this site later in the Plan. • We find the number of serious inconsistencies troubling. • Renaming this area “Chase Park” is also, in our opinion, an exercise in branding and marketing, not an exercise in plan making.
Chapter 6: Blue and Green Enfield (Pages 112 – 140)	
SP BG1: Enfield’s blue and green infrastructure network	<p>It is not possible for us to respond properly to this section as the DLP is missing key information (i.e. 4 maps have not been included in the DLP which are referred to 7 times). these maps were eventually uploaded to the Evidence Base in August (after repeated requests to the Local Plan Team). The maps uploaded to the evidence base in August are of extremely poor quality and are largely unreadable. These have been included in Appendix E to show the quality of what was put out for consultation.</p>
SP BG2: Protecting nature conservation sites	
SP BG3: Biodiversity net gain, rewilding and offsetting	<p>Notwithstanding the above, the aims or this section are largely fine and supported. However, we have the following concerns and objections:</p>
SP BG4: Green Belt and Metropolitan Open Land	<ul style="list-style-type: none"> • The policies themselves are open to wide interpretation. There are very few quantifiable/measurable metrics that could be used to assess a planning application. A lot of the polices are just general aims and are non-committal. They will be open to “negotiation”. We were left feeling that, however nice these aims may sound, that in practice the policies themselves are largely meaningless.
SP BG5: Green Belt and edges of the countryside/urban areas	

DM BG6: Protecting open space	<ul style="list-style-type: none"> As with other part of the DLP, there are issues with meaningless phrases and buzzwords (e.g. what actually is a “green grid link”?) and the London National Park City is misrepresented (again). We also understand that the use of Banbury Reservoir as a sports location is not supported by the owners of the reservoir (Thames Water).
DM BG7: Watercourses	
DM BG8: Urban greening and biophilic principles	
DM BG9: Allotments and community food production	
DM BG10: Burial and crematorium spaces	
DM BG11: Blue and green infrastructure plans	
Chapter 7 Design and Character	
DM DE6: Tall buildings (Pages 156-160)	<p>We object to the DLP policies on tall buildings.</p> <ul style="list-style-type: none"> There appears to be no distinction made between tall buildings for residential use and tall buildings for commercial and mixed use The policy seems to suggest that there will be different definitions of tall buildings in different parts of the borough. If so, this would mean that buildings in some areas could be more than 20 storeys, and still not be considered tall by this policy. It is appropriate and helpful to set maximum heights for an area, but a changeable definition of what constitutes “tall” is problematic. A borough wide standard definition is required (e.g. 10 storeys) The DLP’s largely unqualified encouragement and support for tall tower blocks is troubling. The evidence shows that tall buildings are often expensive to build and as a result often deliver lower levels of affordable housing than other high-density typologies. There are already plenty of examples of this within Enfield (e.g. see recent viability assessment report for the Former Gas Holder Site, Station Road, New Southgate, N11 1QJ). Tall tower blocks are also more expensive to run and maintain, which results in higher ongoing costs and service charges. This further exacerbates affordability and means this type of housing will be not meet Enfield’s affordable housing needs.

- There is clear and compelling evidence that tall tower blocks are:
 - often **unnecessary** (research shows that other high density housing options can deliver just as much floor space),
 - often **undesirable** (research shows most people would rather not live in them, or even near them, especially over the long-term, given the choice),
 - **harmful to health** (research shows the impact living in tall tower blocks can have on mental and physical health)
 - **harmful to the environment** and wildlife (again research shows that alternative high density housing solutions have a far lower negative impact on the environment)
 - **often unsuitable for families with children**
 - **often have undesirable local impacts** (e.g. high winds, overshadowing, increased heat island effect etc.)
- The Local Housing Needs Assessment shows that Enfield needs to build far more family housing, and therefore developers should be discouraged for building tall tower blocks wherever possible.
- Given the issues with tower blocks, we agree with the following suggestion and believe such a policy should be included in the DLP “if a [residential] tower is proposed or a tower is thought about, to address density issues, then it should be required that alternative methods of achieving the same goals and densities should be demonstrated, shown and considered, as a prior condition; so that it [residential tower] is not immediately seen as the answer, but that alternatives should be presented, which is normal policy in so much as good governance, design and implementation of property moves.” (Sunand Prasad; Penoyre & Prasad). These alternatives also need to be considered not just against the quantum of floor space, but also how they compare in terms of affordable family housing delivered, servicing charges and environmental impacts (e.g. energy use, embodied carbon, impact of wildlife etc)
- The DLP appears to associate tall towers with high density and therefore efficient land use. However, other configurations, delivering larger quantities of family housing units, often deliver a better land use and high densities where density is defined as “bed spaces per hectare” rather than “dwellings per hectare”. This is because tall tower blocks often contain a majority of mainly studios and one- beds, and some two-bed flats, which often results in a poor use of space compared to larger family dwellings, due to the duplication of kitchen, bathroom and circulation space.

	<ul style="list-style-type: none"> • We also note and agree with the London Assembly Planning & Regeneration Committee Consultation Response, Good Quality Homes for All Londoners London Plan, which said that “Evidence has shown that tall buildings tend to result in large monocultures of a single tenure or particular demographic, and that the creation of mixed sustainable communities is more challenging. In this respect, the typology does not perform well in relation to the standards on housing mix standard”
Chapter 8 Homes for all	
SP H1: Housing development sites (Pages 183-192)	<p>We object to SP H1 for because the council's preferred option set out in the DLP does not make the best and most efficient use of previously developed land and brownfield sites can deliver far more homes than is claimed</p> <p>There are two main reasons for this (explored in more detail below):</p> <ol style="list-style-type: none"> 1. Anomalies in the council's calculations. 2. The council has excluded brownfield sites. <p>Anomalies in the council's calculations.</p> <ul style="list-style-type: none"> • The DLP does not include enough small sites to meet the London Plan target. To meet the Mayor's London Plan target, a minimum of 7,060 homes should be built on small brownfield sites in Enfield over the next 20-years i.e. sites smaller than 0.25 hectares. Although the council states a clear intention to meet this target (see Policy DM H4 p203), only around 4,100 homes on small sites have been allowed for in the draft Local Plan. Therefore undercounting about 3,000 homes that could be built on small sites. More detail on small sites can be found in Appendix A • The DLP actually identifies enough housing on large brownfield sites to deliver the housing needed. Around 17,940 homes will need to be built on large brownfield sites (>0.25 hectares) in Enfield over the next 20-years. A detailed reading of the draft Local Plan Evidence Base shows that the council has identified large brownfield sites to deliver 19,596 homes, which is 1,656 more than needed.

- The DLP has undercounted the number of homes some brownfield sites with existing planning approval will deliver. Some brownfield sites already have planning approval. The DLP includes housing estimates for these sites that are lower than the number already approved, therefore undercounting the homes these sites will deliver.
- The DLP's estimates for the number of homes brownfield sites can deliver are lower than estimates in other council documents. Some estimates made about the number of homes a brownfield site could deliver are substantially lower than other assessments made by the council. This is another way homes have been undercounted.
- The estimated delivery timelines has resulted in further undercounting: The DLP estimates when the housing on some large sites will be completed, and predicts that a number of sites will not deliver housing until after 2039 (i.e. beyond the 20-year Plan period). However, other council documents show that these sites will deliver housing sooner than is predicted in the draft Local Plan. This inconsistency is another source of significant undercounting of homes that could be built on brownfield sites within the Plan period
- After accounting for these anomalies, we estimate that there are already brownfield sites identified in the draft Local Plan capable of delivering 29,660 homes over the next 20-years

More detail on these calculations can be found in Appendix A and B

The council has excluded brownfield sites.

- A number of brownfield sites have been excluded from the draft Local Plan, which if included, could deliver a far more homes. For example, there are sites at Meridian Water and in Brimsdown that have not been included in the DLP and which could deliver around 9,000 additional homes, as well as new and additional employment space.
- For example, the site located at Brimsdown. Through the intensification of Strategic Industrial Land at Brimsdown, this will release up to 7,500 new homes with an increase in the overall size of industrial floorspace resulting in an increase of up to 1,600 new jobs. Located close to Brimsdown train station, the site at Brimsdown represents an opportunity to create new links to the reservoir for local residents to enjoy and bring much needed new homes to an area that has long waiting lists for families.

	<p>Furthermore, there would be no loss in industrial floorspace. A masterplan has already been developed for this site which will deliver a 31% (30,000 sq m) increase on the existing employment floorspace and there will be no net loss of employment floorspace at any point during the development.</p> <ul style="list-style-type: none"> • There are also a large number of smaller brownfield sites, which were submitted to the council by housing campaign groups in January 2019. These sites are generally in sustainable locations and could make a significant contribution towards delivering the housing Enfield needs. The council decided not to include many of these sites in the draft Local Plan due to a lack of information. However, the campaign groups have not been asked to provide the missing information. • Our analysis of the DLP (and the Local Plan Evidence Base) demonstrates that far more homes could be built on brownfield sites than the council claims and that there are sufficient brownfield sites to deliver the 25,000 homes target. <p>More detail on these sites can be found in Appendix B</p>
SP H2: Affordable housing (Pages 194 – 198)	<p>We object to SPH2 for the following reasons:</p> <p>Strategic Policy SP H2 – Affordable Housing</p> <p>H2.1 refers to 'genuinely' affordable housing and the word 'genuinely' is used as a qualifier at least 12 times in the DLP. How does 'genuinely affordable' housing differ from 'affordable' housing? It would be helpful to be provided with a definition of 'genuinely affordable' in the Explanation section of the policy. The term 'genuinely affordable' should also be defined in the 'Acronym buster and glossary'.</p> <p>Policy H2.1, 2.2, 2.3 & 2.4</p> <p>It is understood that the 50% affordable housing target is designed to be aspirational, however, the policies set out in the DLP itself mean the target will not be met and therefore the target seems meaningless / arbitrary. The target will not be taken seriously unless changes are made throughout the Plan that support this level of affordable housing delivery.</p>

At H2.1 it states: “1. The Council will seek to maximise the delivery of affordable housing in the Borough and aim to secure 50% of all new homes across the plan period as genuinely affordable.”. However, the other affordable housing policies set out in H2 show this will not be achieved because:

- the 50% is the highest policy target set which will only apply to some types of development. The Whole Plan viability report states that these sites could possibly deliver up to 50% but recognises that this will depend on individual site assessments and excludes a number of significant costs e.g. infrastructure costs, which will be substantial for some strategic sites. Furthermore, the evidence shows that 50% is unrealistic e.g. past performance shows that the average additional affordable homes completed over the last 10 years in Enfield was 26%, which has reduced to 10% over the last 3 years.
- Furthermore, many sites included towards the targets in the DLP already have planning approval to deliver less than the targets set in the Plan. This means there is already a significant shortfall of affordable housing against the targets set. It is extremely unlikely that these shortfalls will be compensated for over the lifetime of the plan (i.e. forthcoming developments would need to deliver far more than 50% affordable housing to make up for the existing shortfall).
- Over the last 10 years around 35% of all additional homes in Enfield have come from schemes delivering less than 10 units, however, there are no affordable housing requirements for developments delivering less than 10 units in the draft Local Plan. This means major developments will need to deliver substantially more than 50% over the plan period to make up for the lack of affordable housing delivered by smaller schemes to reach the overall strategic target. There is no evidence to show that major schemes will be able to deliver more than 50% affordable housing.
- The DLP sets targets of 35% affordable homes for the majority of the homes that are predicted to be built, which means an overall target of 50% is highly unlikely to be delivered.
- Estate Regeneration schemes are not required to deliver a substantial uplift in affordable housing from existing levels, which will limit the ability to achieve the 50% target.

- Policy H2.7 is confusing but appears to say the London Plan Threshold approach can be applied. If so, it is extremely unlikely that developments, will deliver more than the policy requirements. This means the overall 50% strategic target on ALL new housing will not be achieved.

The affordable housing targets for green belt areas are particularly questionable and are very unlikely to be achieved (see Appendix C for more detail on this).

H2.3

Affordable housing targets for Build to Rent schemes should be added (or be more obvious) as it is unclear what the affordable housing requirements will apply to these developments e.g what is the Social Rent policy for BTR? The Policy wording of H7 (Build to Rent) suggests that Discount Market Rent will be supported for BTR schemes but does not mention Social Rent. The explanation at H7 says “8.7.2 Build to rent should provide a proportion of low-cost and London Living Rent homes”, but no quota or target is set for these. Policy guidance for London Living Rent homes is needed to help ensure BTR developments reflect local housing needs.

H2.4

The affordable housing splits do not align with the new London Plan policy (Policy H6 Affordable housing tenure).

H2.4 says that “Affordable housing should be provided in line with the guideline mix of 50% social-affordable rented housing and 50% intermediate housing. Flexibility in the tenure mix will be allowed subject to viability where developments propose more than 50% affordable housing”. This is too prescriptive and- an approach more aligned with the London Plan allows a greater element of flexibility and discretion.

The Social Rent target “50% of affordable housing” is too low and the evidence supports a higher ratio of Social Rent housing.

	<p>Enfield's Local Housing Needs Assessment 2021 shows that Social Rent housing is in the highest demand (70/30 compared to intermediate housing needs). The evidence shows that Social Rent housing is urgently required in Enfield (e.g. the numbers of households in temporary accommodation in Enfield is amongst the highest in the country)</p> <p>The DLP policy would actually reduce the target for Social Rent housing in Enfield from the 28% set in the current Core Strategy (Adopted 2010) to between 17.5% to 25%, despite the increasing need for Social Rent housing in Enfield.</p> <p>The policy needs to set targets for types of intermediate affordable tenures to meet the needs of key workers. London Living Rent is far more affordable to local residents than Shared Ownership and Discount Market Rent. The expected split of Intermediate tenures needs to be set out in order to ensure that there are suitable housing alternatives for lower paid Key Workers, who do not qualify for Social Rent but who are also unable to afford Shared Ownership. Without this specification developers are likely to focus on Shared Ownership housing to meet the policy requirements and a wide variety of intermediate housing tenures will not be delivered, which will harm lower paid key workers. Shared Ownership also tends to deliver smaller units (1-2 bed flats). This means key workers who need intermediate housing with 3+ bedrooms will not have their needs met by the draft Local Plan.</p> <p>H2.5</p> <p>The draft Local Plan policy allows Estate Regeneration schemes to simply replace the existing number of affordable housing units. A far more aspirational policy is needed for these schemes. The policy should define specific targets for a percentage uplift of different types of affordable housing on these schemes, including uplifts in Social Rent.</p> <p>H2.7</p> <p>The wording is hard to understand and open to wide interpretation. It would be helpful if a couple of worked examples could be provided in the Explanation section to show exactly what is meant by this policy.</p>
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H2.8

This policy is unclear. Does this apply to all developments - even those that meet affordable housing targets or can follow the threshold approach?

8.2.1 and 8.2.5

Given the needs of private renters set out in 8.2.1, it is concerning that an officer from Enfield Council said that the council are not supporting London Living Rent housing due to a lack of funding/ROI (see Appendix to Whole Plan Viability Assessment). The statement made by officers in the Viability Consultations is consistent with recent planning applications and approvals in Enfield but contradicts 8.2.5 of the draft Local Plan. Clarification is needed to confirm exactly what the Local Planning Authority's and the Housing Team's intentions actually are regarding London Living Rent in Enfield.

8.2.7

At 8.2.7 it states that “The Borough’s target is to deliver at least 711 new affordable homes per year in the Borough up to 2039, based on a threshold approach (at least 35% on gross residential homes, rising to at least 50% on public sector land, industrial land) to meet identified needs”. This would suggest that the strategic affordable housing target should be 57%, not 50% (i.e. 711 is 57% of the 1250 annualised target).

Furthermore, the 711 figure quoted in the Local Plan and underpinning numerous policies is also incorrect. The LHNA says that 711 is the minimum additional housing needed for acute housing (i.e. Social Rent) and a further 696 additional intermediate homes are also required as a minimum (e.g. see 6.38 and 6.40 in the latest Local Housing Needs Assessments). This means the DLP appears to significantly under estimate annual affordable housing needs and also confuses NET affordable housing requirements, with GROSS targets.

In addition to this, in the LHNA it says that the estimate of housing need is based on the Government's standard method, which as the report authors explained, is considered to be a significant underestimate of the actual affordable housing need in Enfield. The report authors estimated that the need was more likely to be between 2,111 to 3,493 additional homes per year.

Also, the LHNA affordable housing calculations were based on a housing register figure of 3,386 - despite the housing register in Enfield being much larger than this at the time, so the estimates were based on incorrect data.

8.2.8

8.2.8 says that "Applicants will be strongly encouraged to meet or exceed affordable housing targets (as set out in part 3 of the policy) in line with the London Plan". Talking about exceeding targets seems meaningless given that applicants are allowed to take the Threshold Approach – why would they exceed targets? Notwithstanding the fact that this rarely, if ever, happens in reality.

8.2.9 - Affordable housing provision in the rural areas

The affordable housing targets for housing provision in rural areas is misleading because the evidence shows that it will not be met. More comprehensive viability testing, and market assessments are required to establish a more realistic scenarios for affordable housing in rural Green Belt areas. (see Appendix C for more information). In particular, the costs associated with delivering the vision for these areas set out in the DLP have not been included (e.g. see SP PL 10 in the DLP). Once these are factored in the affordable housing delivery on green belt sites will be substantially reduced.

8.2.9 is misleading as it fails to recognise that the Whole Plan Viability report said up to 50% affordable housing (see 10.20) could be achieved on Greenfield sites and also noted that this did not account for infrastructure costs, which could be significant. The Whole Plan Viability Assessment states at 10.17 that "*At the time of this report (April 2021) the Council does not have site specific estimates of the strategic infrastructure and mitigation costs for any particular sites*" and that "*More detail regarding contributions from potential Strategic Sites will emerge from the Council's wider IDP in due course, the Council will then specifically engage with the promoters of*

the potential Strategic Sites to establish if they can bear the required infrastructure costs before they are included within the Plan". Furthermore at 2.24 it says that "The Strategic Sites are not tested at this stage as they have not been identified". At 12.80 it says "The infrastructure cost for the potential Strategic Sites is not yet known. As an when the this is established it will be necessary to reconsider deliverability to ensure the sites can bear their full strategic infrastructure and mitigation costs. In any event, it is recommended that that the Council engages with the owners, from an early stage, in line with the advice set out in the Harman Guidance (page 23) and the PPG".

The affordability figures also appear to have been calculated after excluding certain items, such as EV car charging points (10.48), essential to achieving climate change ambitions and sprinklers. The calculations also do not account for the numerous infrastructure wish list requirements set out in SP PL8, PL9 and PL10.

The affordable housing target also ignores that other available evidence that shows that Green Belt developments achieve far lower levels of affordable housing in reality (i.e. 10% as reported in the latest CPRE analysis of Green Belt housing developments). A relatively recent Green Belt development at Trent Park in Enfield only achieved 20% affordable housing - all of which was Shared Ownership. The claims made in the Local Plan simply do not reflect a reasonable reading of the available evidence or of reality. See Appendix C for more information.

The affordable housing policies for small sites and schemes delivering less than 10 units are unclear, so it is not possible to consider them properly or comment on them in detail.

8.2.14 states that "*In the case of small sites, we will accept payment in lieu of affordable housing*", clarification is needed as to what constitutes a small site and how payments in lieu will be calculated for these sites. Policy H4 defines small sites as less than 0.25 hectares – is that what is envisaged here? This should also be defined in the "Acronym buster and glossary". Does this apply even where these schemes deliver 10 or more units? Does it apply where they deliver less than 10 units?

	<p>DM H3: Housing mix and type (Pages 199 – 202)</p> <p>We object to DM H3 for the following reasons:</p> <p>H3.1</p> <p>Enfield has an urgent need for affordable dwellings with 3+ bedrooms and a significant need for market housing with 3+ bedrooms, so this policy needs to be rewritten to focus on ways to reflect this need to help ensure that it is met. As it stands, the policy wording appears largely to be a list of loopholes applicants can use to <u>not</u> deliver the mix of housing Enfield needs.</p> <p>For example, policy wording or Explanation notes <i>might</i> be reworded to state:</p> <ul style="list-style-type: none"> “Developers will be expected to take a design led approach to maximising the provision of family units (3 bed +), and Design and Access Statements must demonstrate that proposals have assessed how family units can be designed into the scheme to meet policy requirements and local need, including looking at higher density solutions such as stacked maisonettes, courtyard designs, and mansion blocks” “Viability Assessments must demonstrate the maximum number of homes with 3+ bed units the scheme could viably deliver, as well as the applicants preferred options, if different” “the council recognises that larger homes are more flexible than smaller format options and can serve the needs of a wide variety of household typologies, including families, extended families, home workers and sharers and live in carers and as such larger formats will be prioritised across tenures” “the council recognises that a wide cross-section of households want to live in sustainable locations, near transport hubs and town centres and applications for sites located near transport hubs and town centres will be expected to reflect the needs of a range of modern households and family typologies” “Larger homes can help improve site efficiency as population densities on a particular site can increase significantly where a larger proportion of 3+ bedroom homes is delivered”
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- “in particular, larger development sites will be expected to deliver the mix of homes set out in the LHNA or updated equivalent because of the flexibility these sites have”

H3.1(e)

The policy wording of H3.1(e) diminishes the importance of the local need for larger market units and the roles these units can play in creating stable mixed communities.

H3.1e encourages flexibility around market housing unit mix in order to deliver more affordable housing solution (“*the extent to which flexibility around the mix of market units could secure the delivery of additional affordable housing*”). This approach risks continuing the significant shortfall of new larger housing that we have seen in Enfield over the last 10 years. It also implies that the development will be undesirable to those who can afford a larger format home without assistance. Most troubling of all it means that the new community will not be truly mixed, in fact there is a very real risk that having a family, or a larger home will mark people as those in need of assistance for family housing.

Table 8.4

It is unhelpful to set out the targets as they have been in Table 8.4 as it just means people need to go and look up what they mean in the latest LHNA given the policy requirements of H3.1a.

Furthermore, the Intermediate Housing mix requirements would benefit from considering Shared Ownership and intermediate rental options separately, otherwise there is a very real danger that the needs of key workers on lower incomes with families will not be reflected in this policy. They will be left in a gap as they will not be eligible to be on the council waiting list but will be unable to afford a Shared Ownership property of the size required. This means these families will be left in the Private Rented Sector, possibly in housing they cannot afford or in housing unsuitable to their needs.

	<p>8.3.3</p> <p>The Explanation note is troubling because it refers to area-based needs that are open to interpretation.</p> <p>The Explanation note states: “In certain cases, an area-based approach to housing tenure may be warranted. Some parts of the Borough have specific tenure deficits or surpluses (refer to the evidence in the LHNA21). However, deviation from the policy will only be justified where the evidence clearly demonstrates that the priorities in the catchment area of the proposed development differ from the list set out above.”</p> <p>This is troubling as in Enfield we have seen the following contradictory arguments being made by applicants/planning officers in favour of delivering high numbers of small flats: (a) This area has a lot of family housing, therefore more smaller units are required to balance the areas housing mix (b) This area has a lot of flats, which demonstrates that it is unsuitable for larger family housing.</p> <p>How are catchment areas defined in terms of this policy? How do you find out the priorities of the catchment area?</p>
<p>DM H4: Small sites and small housing development (Pages 203 – 205)</p>	<p>Whist we support the aims of DM H4 we object to the policy as written for the following reasons:</p> <p>H4.1.</p> <p>The DLP as it stands will not meet the London Plan target of 353 homes per year. This policy states that “The Council will support well-designed new homes on appropriate small sites (including on vacant infill and backland plots, upward extensions of flats and redevelopment of non-residential buildings) <u>and seek to achieve the London Plan target of 353 new homes per year on sites of less than 0.25 hectares.</u>” However, the Plan doesn’t positively plan to achieve this.</p> <p>We recognise that small sites play a very important role in new housing across London and have a number of benefits. For example, small sites can be delivered relatively quickly by small and medium-sized developers, who are more likely to be based locally and</p>

employ local people. Small sites also help to deliver a diverse range of housing types, including family homes, in a range of sustainable locations which benefit from existing infrastructure and help support town centres and high streets.

The Mayor's London Plan (2021) places a great deal of importance on small sites and says that boroughs should pro-actively support well-designed new homes on small sites and sets a minimum target for each borough. The minimum small sites target for Enfield is 353 homes per annum. Enfield's draft Local Plan supports this target and says the council will "seek to achieve the London Plan target of 353 new homes per year on sites of less than 0.25 hectares".

Building 353 homes per year would provide 7,060 homes over the 20-year timeframe covered by the draft Local Plan.

It appears that the council's DLP does not, in reality, properly account for the London Plan target for small site housing. We reviewed and assessed all of the small site housing in the DLP and the numbers just don't add up. The DLP only accounts for (at most) 5,087 homes coming from small sites over the next 20-years, although we think the number is actually closer to 4,100 once various errors in the council's figures have been accounted for. This means that the DLP is around 3,000 homes short of the minimum London Plan target for small sites.

The analysis to uncover these anomalies is quite complex, so we have provided a more detailed explanation in Appendix A

We think the council has significantly undercounted the number of homes that will be built on small sites, and this has serious implications. The DLP sets a proposed strategy for the borough for the next 20-years. An important part of the Plan is identifying where and how 25,000 homes will be built in Enfield over the 20-year period. The council says there are not enough brownfield sites to build 25,000 homes, and that 6,500 homes need to be built in Green Belt areas. However, if the homes built on small sites had been properly accounted for, then at least one of the Green Belt areas earmarked for development in the draft Local Plan would almost certainly not need to be developed.

DM H6: Community led housing (Pages 209 – 210)	<p>We object to DM H6 for the following reasons:</p> <p>H6</p> <p>This policy is uninspiringly drafted which gives the impression the council is not really that supportive of this form of housing.</p> <p>8.6.4</p> <p>This Explanation notes states that “The Council has a statutory duty to maintain a register for self-build and custom-build housing and have regard to this register in its planning, housing and related functions. The register forms part of the evidence base informing Local Plan preparation.” We looked for this register and could not locate it in any of 60+ evidence documents that accompanied the consultation. We did not ask for this information, because we have already asked for other missing information several weeks ago which has not been provided – we could not see the point in making another request for missing information. We believe the lack of attention to detail about providing the information needed to assess this policy properly is illustrative of the council’s lack of support for community led housing.</p> <p>The LHNA considered demand for this type of provision and said that the council should encourage provision of self and custom build plots through policy and major allocations identified in the Local Plan. This does not appear to have happened, we could not find such allocations.</p>
DM H7: Build To Rent (Pages 211 – 212)	<p>We object to DM H7 for the following reasons:</p> <p>H7.1</p> <p>As mentioned above, it is not clear what the targets are for affordable housing on BTR schemes. What is the overall affordable housing target and what proportion should be Social Rent/London Affordable Rent, London Living Rent and Discount Market Rent?</p> <p>8.7.2</p>

	<p>Without setting clear affordable housing targets for BTR it is not possible to establish how BtR will address housing need in Enfield as set out in the LHNA 2021. The Explanation note for 8.7.2 states that “<i>Build to rent should provide a proportion of low-cost and London Living Rent homes</i>” but no proportion is specified as there is no reference to the overall affordable housing policy at H2.</p> <p>The policy says BTR will be encouraged, so it is important that affordable housing targets are clearly set out.</p>
Chapter 9 Economy (Page 224)	
SP E1: Employment and growth (Page 227)	<p>Whilst we broadly agree with SPE1 we do have the following concerns and observations:</p> <ul style="list-style-type: none"> Two large areas in Southbury are shown as SIL extensions (new SIL) in maps (orange with white cross hatch markings) and areas of potential SIL intensification, but these have not been included in Table 9.1. If these areas are not to be used as SIL then they should be considered for mixed use development. Opportunities for SIL intensification have been missed in Harbet Road area of Meridian Water. Ideally this area would be developed for mixed use housing and employment over the plan period. However, if this is not proposed in the plan period then this area should be intensified for industrial use. The industrial land use reports and intensification studies confirm that there is a huge opportunity for SIL intensification in this area (in fact it has been identified as the best site for SIL intensification in the borough) The Brimsdown area has been largely overlooked for SIL intensification, with only small sections identified in the DLP for intensification. This is disappointing given the masterplan that has been put forward for the area by Areli Real Estate and Farrells which would, through the intensification of Strategic Industrial Land at Brimsdown, create 7,500 new homes with an increase in the overall size of industrial floorspace resulting in an increase of up to 1,600 new jobs. The masterplan says that there would be no loss in industrial floorspace and there would be a 31% (30,000 sq m) increase on the existing employment floorspace, with no net loss of employment floorspace at any point during the development. This should be factored into the SP E1 and the strategic approach to land use more widely.

SP E3: Protecting employment locations and managing change (Page 233 – 234)	Strategic Industrial Locations <p>Whilst we recognise and support the need to protect SIL, we also believe that SIL needs to be proactively managed. Reports in the evidence base show that it will be financially challenging to intensify some SIL areas without residential housing forming some part of the mix. Therefore we do not support the policy (point b) that residential uses are not permitted in SIL, but instead think that there should be specific and strict policies managing housing in SIL areas, and that such schemes should be permitted where there is no loss of industrial floorspace and an increase in employment. We note that there is already housing in SIL areas in Enfield due to permitted development conversions.</p>
SP E5: Transforming Strategic Industrial Locations and Locally Significant Industrial Sites (Page 236-237)	<p>The evidence shows that delivering this policy will be restricted unless the potential for some housing in some situations in SIL is at least considered as a possibility. Intensification of industrial sites is expensive and will be constrained by financial viability unless a broader approach is taken - the result will be missed opportunities for employment space, jobs and housing. This policy should be reconsidered.</p>
Chapter 15 Delivering and monitoring	
DM D4: Monitoring and review (Page 307)	<p>We support monitoring and review but have the following concerns and objections:</p> <p>D4.1 - The DLP say that “the policies and proposals set out in the Local Plan will be subject to review, in whole or in part, at least once every five years after its adoption”. We support this, however, it is unclear how and when the public might be involved in this review and further information on this would be welcome</p> <p>D4.2 – We agree with this policy in that we think accurate and useful annual monitoring is an essential part of ensuring the plan is delivered. However, we make the following observations (a) The Key Indicators in appendix D, do not match the Policies e.g. see affordable housing monitoring wording vs policy and (b) the metrics measured need to be far broader and much tighter. For example monitoring reports must distinguish between gross and net annual housing delivery both at an overall level and for all types of</p>

housing e.g fully broken out in detail by both tenure and mix. This has not been happening over the last decade and partly as a result of this the council has not successfully delivered its current plan objectives (Core Plan 2010) e.g. it has massively underdelivered housing with 3+ bedrooms but overdelivered 1-2 bed units. It is important that the monitoring measures Net Additional Housing for all affordable housing types to ensure Additional Affordable Housing of all types is being added to Enfield's housing stock. The current monitoring of Gross figures creates confusion due to losses of affordable housing at estate Regeneration sites.

D4.3 – We have some concerns about this policy.

D4.3 (b) implies that shortfalls in housing will be responded to by “securing additional funding from various sources (e.g. GLA, TfL and government bodies) to facilitate the timely delivery of sites and associated infrastructure and achieve greater densities than projected in the housing trajectory set out in Authority Monitoring Report”. However, no guidance is provided about how to interpret “density”. In our view, densities should be understood in terms of bedrooms per hectare or population densities, but the council to date has focussed on dwellings per hectare. A focus on dwelling per hectare as the density metric leads to over delivery of small flats, despite small flats representing the most inefficient land use in terms of housing people. Far greater clarity is needed regarding how density will be measured and interpreted.

D4.3c. implies that shortfalls in housing will be responded to by “maintaining a register of suitable and deliverable sites (including small sites and self-build projects) to ensure a rolling five-year supply of housing on an annual basis;” . In our opinion these registers (and the brownfield register) should be updated at least annually regardless of housing delivery performance. We also note that recently the council has been very poor at maintaining these registers and the brownfield register has not been updated for several years despite poor performance in terms of housing delivery.

APPENDIX A



APPENDIX A

Homes built on small sites: Serious discrepancies between the London Plan and Enfield Council's draft Local Plan

In its draft Local Plan, Enfield Council has stated that it plans to meet the Mayor's London Plan target for the number of homes built on small sites. However our analysis shows otherwise.

Housing built on small sites is important.

“Small sites” are those with the potential for residential development, which have an area of less than 0.25 hectares. Over the last 14 years, new housing built on small sites has accounted for more than a third of all additional homes built in Enfield (37%), an average of around 250 dwellings per annum. ^[1]

Small sites play a very important role in new housing across London and have a number of benefits. For example, small sites can be delivered relatively quickly by small and medium-sized developers, who are more likely to be based locally and employ local people. Small sites also help to deliver a diverse range of housing types, including family homes, in a range of sustainable locations which benefit from existing infrastructure and help support town centres and high streets.

Enfield Council claims to support the London Mayor's target for small site housing.

The Mayor's London Plan (2021) places a great deal of importance on small sites and says that boroughs should pro-actively support well-designed new homes on small sites and sets a minimum target for each borough.

The minimum small sites target for Enfield is 353 homes per annum. ^[2]

Enfield's draft Local Plan supports this target and says the council will “*seek to achieve the London Plan target of 353 new homes per year on sites of less than 0.25 hectares*”. ^[3]

Building 353 homes per year would provide 7,060 homes over the 20-year timeframe covered by the draft Local Plan.

A detailed review of the council's draft Local Plan shows that the London Plan target for small site housing has not been properly accounted for.

It appears that the council's draft Local Plan does not, in reality, properly account for the London Plan target for small site housing.

We reviewed and assessed all of the small site housing in the council's draft Local Plan and the numbers just don't add up.



APPENDIX A

The draft Local Plan only accounts for (at most) 5,087 homes coming from small sites over the next 20-years, although we think the number is actually closer to 4,100 once various errors in the council's figures have been accounted for.

This means that the draft Local Plan is around 3,000 homes short of the minimum London Plan target for small sites.

The analysis to uncover these anomalies is quite complex, so we have provided a more detailed explanation in the appendix.

Enfield's draft Local Plan would be very different if the London Plan target had been properly accounted for.

The council has significantly undercounted the number of homes that will be built on small sites, and this has serious implications.

Enfield Council's draft Local Plan sets a proposed strategy for the borough for the next 20-years. An important part of the Plan is identifying where and how 25,000 homes will be built in Enfield over the 20-year period. The council says there are not enough brownfield sites to build 25,000 homes, and that 6,500 homes need to be built in Green Belt areas.

However, if the homes built on small sites had been properly accounted for, then at least one of the Green Belt areas earmarked for development in the draft Local Plan would almost certainly not need to be developed.

The undercounting of small sites is just one of a number of issues.

The undercounting of homes delivered on small sites is a serious issue, with far reaching consequences. However, it is just one of a number of issues that we have identified with the draft Local Plan's housing calculations. We hope to report on the other issues we have uncovered in the coming weeks. Suffice to say, the draft Local Plan should be markedly different once these numerical issues and inaccuracies have been properly addressed.

Better Homes Enfield

FOOTNOTES

1. Enfield Small Sites Research 2019
2. Policy H2 and Table 4.2 of the London Plan 2021
3. Policy 8.4 of Enfield's draft Local Plan 2021



APPENDIX A

APPENDIX 1 – ANALYSIS EXPLANATORY NOTES

The London Plan minimum target for housing built on small sites

The London Plan policy H2 stipulates that a minimum of 353 homes per annum should be on small sites in Enfield. The evidence shows that this minimum target is not unrealistic:

- Historically 37% of new housing built in Enfield has come from small sites. If this rate continued, then an average of 462 homes per year would be built on small sites.
- The findings of the council's "Enfield Small Sites Research 2019" showed that Enfield could deliver 300 homes per annum on small sites.

Draft Local Plan – Accounting for the London Plan small site housing target

Enfield Council's draft Local Plan says it will seek to achieve the London Plan target of 353 homes per annum. This means the draft Local Plan should account for and include 7,060 homes from small sites (28% of the 25,000 overall housing target).

There are two ways housing from small sites could have been included in the draft Local Plan.

1. They can be classified as "Allocations (as defined in Strategic Policy SP H1: Housing development sites)", "other deliverable sites" or "other developable sites".
Small sites for housing that the council has been made aware of, are assessed as part of the Housing and Economic Land Availability Assessment (HELAA) and are either excluded or classified as allocation sites, deliverable site, or developable sites in the draft Local Plan.
2. They can be classified as "unaccounted small windfall sites".
This is an allowance for small sites that the council has not yet been made aware of or assessed as part of the HELAA but that are likely or needed to come forward in the future.

Unfortunately, the HELAA contains a number of errors, which makes it difficult to calculate precisely how many small sites homes have been included. Notwithstanding this, we are able to present the following two options:

- A. Ignoring errors, the maximum number of small sites homes identified in the HELAA and classified as allocation, deliverable or developable sites is 3,547 over 20-years
- B. After accounting for errors we have found thus far, * the number of small site homes identified in the HELAA and classified as allocation, deliverable or developable sites is 2,556 over 20-years



APPENDIX A

Clearly, neither option meets the 20-year minimum target of 7,060 homes; Option A has a shortfall of 3,513 homes and Option B a shortfall of 4,504.

The shortfall could have been accounted for in the draft Local Plan as “unidentified small windfall schemes”. However, the Plan only allocates 1,540 homes as “unidentified small windfall schemes” over 20 years (see draft Local Plan Table 8.2).

This means that there is at least 1,973 - 2,964 small site homes missing from the draft Local Plan.

Table 1: Summary of housing from small sites in draft Local Plan.

	Option A (HELAA errors included)	Option B (HELAA errors removed*)
HELAA small site analysis	3,547	2,556
Unidentified small windfall schemes	1,540	1,540
TOTAL SMALL SITE HOMES ACCOUNTED FOR IN DRAFT LOCAL PLAN	5,087	4,096
SHORTFALL AGAINST LONDON PLAN <u>MINIMUM</u> TARGET OF 7,060 HOMES	1,973 homes short of <u>minimum</u> required	2,964 homes short of <u>minimum</u> required

* Errors include sites that are misclassified as small sites (e.g. are substantially larger than 0.25 ha, such as Cockfosters Tube Station), or where the housing estimates are inaccurate (e.g. do not reflect the typology assumption or approved plans for a site), or where the same site has been included more than once.

APPENDIX B



Enfield Council's draft Local Plan undercounts the number of homes that could be built on brownfield sites

Enfield Council's draft Local Plan says that 25,000 homes need to be built in Enfield over the next 20-years. The council claims there are not enough brownfield sites to accommodate these homes, so 6,500 need to be built in greenbelt areas. In this paper we explain why this claim is incorrect.

There are many benefits associated with building on brownfield sites.

A brownfield site is previously developed land, which has the potential to be redeveloped. By comparison, a greenfield site is land that has not previously been developed, such as woodland, agricultural land and greenbelt land.

The redevelopment of brownfield sites plays an important part in the renewal of our towns, suburbs and industrial areas. Building housing on these sites can bring multiple benefits, especially as the sites are often in sustainable locations and near existing infrastructure.

The redevelopment of brownfield sites can help to create new jobs and bring investment into urban areas to benefit existing residents. For example, the investment can be used to decontaminate land, create parks, develop better climate change protections, visually improve an area, enhance public services and essential amenities, and improve access to safe active travel routes.

Enfield council claims there are not enough brownfield sites.

Enfield Council's draft Local Plan says that 25,000 homes need to be built in Enfield over the next 20-years and claims that 6,500 of these will need to be built in greenbelt areas because there are not enough brownfield sites.

Brownfield sites can deliver far more homes than the council claims.

We have reviewed the council's draft Local Plan in detail, and it appears that far more homes could be built on brownfield sites than the council claims. There are two main reasons for this:

1. Anomalies in the council's calculations.
2. The council has excluded brownfield sites.

Taking each of these in turn:

(1) Anomalies in the council's calculations.

- The draft Local Plan does not include enough small sites to meet the London Plan target. To meet the Mayor's London Plan target, a minimum of 7,060 homes should be built on small brownfield sites in Enfield over the next 20-years i.e. sites smaller than 0.25 hectares. Although the council states a clear intention to meet this target (see Policy DM H4 p203), only around 4,100 homes on small sites have been allowed for in the draft Local Plan.



Therefore undercounting about 3,000 homes that could be built on small sites. We have previously reported on this issue in more detail [here](#). ^[1]

- **The draft Local Plan actually identifies enough housing on large brownfield sites to deliver the housing needed.** Around 17,940 homes will need to be built on large brownfield sites (>0.25 hectares) in Enfield over the next 20-years. A detailed reading of the draft Local Plan shows that the council has identified large brownfield sites to deliver 19,596 homes, which is 1,656 more than needed. ^[2]
- **The draft Local Plan has undercounted the number of homes some brownfield sites with existing planning approval will deliver.** Some brownfield sites already have planning approval. The draft Local Plan includes housing estimates for these sites that are lower than the number already approved, therefore undercounting the homes these sites will deliver. ^[3]
- **The draft Local Plan's estimates for the number of homes brownfield sites can deliver are lower than estimates in other council documents.** Some estimates made about the number of homes a brownfield site could deliver are substantially lower than other assessments made by the council. This is another way homes have been undercounted. ^[4]

- **The estimated delivery timelines has resulted in further undercounting:** The draft Local Plan estimates when the housing on some large sites will be completed, and predicts that a number of sites will not deliver housing until after 2039 (i.e. beyond the 20-year Plan period). However, other council documents show that these sites will deliver housing sooner than is predicted in the draft Local Plan. This inconsistency is another source of significant undercounting of homes that could be built on brownfield sites within the Plan period. ^[5]

After accounting for these anomalies, we estimate that there are already brownfield sites identified in the draft Local Plan capable of delivering 29,660 homes over the next 20-years. ^[6]

(2) The council has excluded brownfield sites.

A number of brownfield sites have been excluded from the draft Local Plan, which if included, could deliver a far more homes. For example, there are sites at Meridian Water and in Brimsdown that have not been included in the draft Local Plan and which could deliver around 9,000 additional homes, as well as new and additional employment space. [See Appendix A]

There are also a large number of smaller brownfield sites, which were submitted to the council by housing campaign groups in January 2019. These sites are generally in sustainable



locations and could make a significant contribution towards delivering the housing Enfield needs. The council decided not to include many of these sites in the draft Local Plan due to a lack of information.^[7] However, the campaign groups have not been asked to provide the missing information.

Our analysis of the draft Local Plan (and the Local Plan Evidence Base) demonstrates that far more homes could be built on brownfield sites than the council claims and that there are sufficient brownfield sites to deliver the 25,000 homes target.

Better Homes Enfield

APPENDIX A

Brownfield sites in Brimsdown and Meridian Water that could deliver around 9,000 homes have been excluded from the draft Local Plan because they are on Strategic Industrial Land (SIL). Current use on the sites has already developed beyond industrial uses and both sites would benefit from modernisation.

The developers' visions for these sites support the creation of new employment space, and housing. Any loss of SIL could be offset by two new SIL sites in Southbury that have been identified in the draft Local Plan, but which have not been included in the Plan's Industrial Land site allocations. Alternatively, these sites in Southbury could be developed for housing.

There are advantages associated with the redevelopment of both sites. For example, redevelopment would improve connectivity between existing communities and greenspace at Lee Valley Regional Park, which is currently severed by industrial sites. Investments in these sites would also improve the blue/green infrastructure needed for climate change mitigation. The development of these sites would deliver a large number of homes in sustainable locations (e.g. near railway stations), as well as additional employment.

There has already been enormous investment in the regeneration of Meridian Water including a new train station, which should help to increase the investment appeal in the surrounding areas and help unlock growth gains on other brownfield sites. Unfortunately, the council has decided not to complete the scheme until 2055.

Despite the enormous benefits associated with developing these brownfield sites, neither of them has been included in the housing allocations in the draft Local Plan, but neither have they been included as targets for SIL intensification, despite the potential for intensification of these sites. The draft Local Plan appears to be proposing that these two brownfield sites should be largely ignored for the next 20 years. This means there are two very large brownfield sites that would not be used to anywhere near their full potential either for housing, or for employment or for intensified industrial use for at least 20-years. This is an unsatisfactory approach to efficient land use.



APPENDIX B

Footnotes and Additional Information

1. See <https://betterhomes-enfield.org/> BHE – draft local plan small sites paper
2. 25,000 minus the 7,060 minimum homes needed from small sites equals a maximum of 17,940 from large sites (0.25 ha+).

Table 8.2 in the draft Local Plan identifies sites to deliver 30,192 homes. After subtracting housing in Green Belt areas (6,500) and Small Sites, including unidentified small windfall schemes (4,096), it leaves 19,596 homes, which will be delivered on large brownfield sites. This is 1,656 more than is needed

3. Examples of undercounting against actual NET gains in granted planning approvals (these examples = 297 undercounted):

HELAA REF	SITE	HELAA / DLP	PLANNING APPROVAL
COP10	Blackhorse Tower	200	219
COP71	New Avenue	213	237
SA9	Colosseum Retail Park	1,587	1,800
PP-08682627	292 - 308 Southbury Road	63	80
TBC	Royal British Legion	10	16
BOP13	Ridgeon Court	-14	4

4. Examples of undercounting against other known information (these examples = 2,046 undercounted):

HELAA REF	SITE	HELAA / DLP	OTHER INFO *
SA2	Palace Gardens	350	900 **
SA31	Cockfosters Car Park	316	351*
SA35	Wessex Hall Building	110	129*
SA3	100 Church Street	56	78*
SA16	Pub, Fore Street	68	112*
UPP32	Meridian P1	725	950**
COP71	New Avenue	213	334*
19/01941/FUL	Office Village	125	200 ***
20/01049/FUL	Arnos Grove Car Park	120	162 ***
SA15	Joyce & Snells	1,217 (within 20 years)	2,130 **

e.g. *current application, ** council/cabinet approved business case / contract / *** Appeal in progress

5. Examples of potential timeline issues (these examples = 661 undercounted):

HELAA REF	SITE	NET housing delivery outside Plan Period
SA15	Joyce Avenue and Snells	608*
EDC2	Edmonton Green Sh. Centre	631 **
TBC	867-879 High Road	30

* The council's 2019 feasibility work said the project would be delivered in 15 years (note not counted here as already counted above); ** Application says scheme will be delivered sooner



APPENDIX B

6. Total brownfield housing once anomalies are accounted for
(these examples = 661 undercounted):

TYPE	NUMBER
Minimum Small Sites Homes Required by Plan	7,060
Homes on Large Brownfield sites already identified in Plan	19,596
Homes undercounted vs. actual planning approvals	297
Homes undercounted vs. other council information	2,046
Homes undercounted due to timing inconsistencies	661
TOTAL BROWNFIELD SITES	29,660

7. CPRE, Enfield RoadWatch, The Enfield Society: Space to Build, Enfield January 2019
<https://new.enfield.gov.uk/services/planning/local-plan-individual-responses-v-z-planning.pdf>

APPENDIX C



APPENDIX C

Homes built in Green Belt areas: Building in Green Belt areas will not deliver the affordable housing Enfield Council claims

There is an urgent need for more affordable housing.

Enfield needs around 10,500 affordable homes, including 3,500 Social Rent homes with 3+ bedrooms. These family homes are needed to provide permanent and safe housing for the thousands of families with children currently living in temporary accommodation and in other unsuitable conditions across Enfield e.g. in housing that is overcrowded, unhealthy or unsafe.

Thousands of affordable homes are also needed for first-time buyers who are struggling to get on the housing ladder and who are unable to afford a home in Enfield, near where they grew up or within a reasonable commuting distance from their work.

[See Appendix 1 for more information about housing needs in Enfield]

Enfield Council claims building on Green Belt areas will deliver the affordable homes needed.

Enfield Council has put forward proposals in its draft Local Plan that will allow around 6,500 homes to be built on Green Belt areas over the next 20-years. The council says that building on these areas will deliver thousands of new affordable family homes and claims that: *“Development in the Green Belt areas is a more viable form of development and allows the borough to deliver **at least 50%** of housing on Green Belt sites as affordable housing products”*. ^[1]

The council’s claim is incorrect.

The council’s claim that development in the Green Belt areas will deliver **at least** 50% affordable housing is based on the findings of a ‘viability assessment’. ^[2]

However, this viability assessment did not report that **“at least 50%”** affordable housing could be delivered in Green Belt areas, it reported that **“up to 50%”** could be delivered on greenfield sites. ^[3] **“Up to 50%”** on greenfield sites is completely different from **“at least 50%”** in Green Belt areas.

The viability assessment also stated that it had been unable to fully account for the full costs associated with building on specific sites. For example, it was unable to account properly for road building and infrastructure costs. These costs directly impact the amount of affordable housing that can be delivered in Green Belt areas and need to be accounted for.



APPENDIX C

Unsurprisingly, the assessment's authors cautioned against drawing firm conclusions.^[4] However, the council appears to have ignored this note of caution and has made a claim about affordable housing on Green Belt areas which is both incorrect and misleading.

The council's claim is contradicted by 'real-world' evidence.

Research that examines the types of homes that actually get built in Green Belt areas shows that only a small proportion of these are "affordable". The average, based on a sample of over 17,000 homes, is about 10%.^[5]

Furthermore, many of the new homes classified as "affordable" in Green Belt areas are likely to be 1-2-bedroom Shared Ownership flats, which are unaffordable to most first-time buyers currently living in Enfield, and do not help families in need of affordable to rent housing.

For example, purchasing a 2-bed Shared Ownership flat on a current Green Belt development in Enfield requires an income of at least £67,000 per year, almost twice the average household income in Enfield.^[6, 7]

Of the 6,500 homes proposed for the Green Belt areas in Enfield it is highly plausible - based on the evidence - that these sites will not deliver any Social Rent family housing at all and will do very little to help Enfield's first-time buyers.

There are better alternatives.

Enfield needs to build more affordable homes, but there are better options than building unaffordable homes in Green Belt areas. The evidence shows that regenerated brownfield sites deliver far more Social Rent family housing and affordable housing for Enfield's first-time buyers than housing built in Green Belt areas.^[8]

Building new housing on regenerated brownfield sites also brings other benefits. These sites are often in sustainable locations and near existing infrastructure. Brownfield regeneration can help to create new jobs and bring investment into urban areas, which benefits existing residents. Investment in brownfield sites can be used to decontaminate land, create new local parks, develop better climate change protections, enhance public services, and improve access to safe active travel routes.

For example, the Meridian Water site in Upper Edmonton already has planning approval for 3,050 homes of which at least 256 will be Social Rent homes (i.e. affordable) with 3+ bedrooms.^[9] Once the scheme is complete it should have delivered at least 840 of these homes.^[10] In total around 4,000 of the homes eventually built at Meridian Water will be "affordable" homes, which is four times higher than what would be achieved in Green Belt areas.^[11]



APPENDIX C

There has already been enormous investment made in the regeneration of Meridian Water including significant infrastructure and a new train station, which should help to increase the investment appeal in the surrounding areas and help unlock growth gains on other brownfield sites. Unfortunately, despite this enormous investment and the benefits the redevelopment of Meridian Water could bring in terms of affordable housing, employment and urban regeneration, the council has decided not to complete the scheme until 2055. ^[12]

However, even without Meridian Water, there are still sufficient brownfield sites across Enfield to deliver the housing needed over the next 20-years. More information can be found on this [here](#). ^[13]

If the council genuinely wants to build the type of homes needed by Enfield's first-time buyers and the thousands of families and children currently living in unsuitable conditions in Enfield, and which will truly help the local community, then it should follow the real-world evidence and focus its efforts and limited resources on regenerating brownfield sites. It should not allow itself to be distracted from this task by those eager to benefit from building unaffordable housing on Enfield's Green Belt.

Better Homes Enfield



APPENDIX C

REFERENCES AND ADDITIONAL INFORMATION

- 1 Enfield Local Plan Growth Topic Paper, Evidence to support the Enfield Local Plan, May 2021, p65
- 2 The council's claim about affordable housing on the Green Belt is based on a misrepresentation of a theoretical assessment. In April 2021, the council received the findings of its 'Whole Plan and CIL Viability Update', which included an assessment of the level of affordable housing Green Belt sites could potentially deliver [in theory].

This assessment did state that "*large greenfield sites are likely to be able to bear 50% affordable housing*" (12.106b). However, the assessment also noted that it had not tested specific strategic sites (2.24) this did not include "*specific estimates of the strategic infrastructure and mitigation costs for any particular sites*" (10.17) and cautioned against drawing firm conclusions (12.106g).

This means there are significant infrastructure costs unaccounted for in the council's affordability claims. These costs are likely to be high for Green Belt sites such as Vicarage Farm, which will require an enormous amount of new infrastructure, including new roads. The number and type of affordable homes delivered on these sites will substantially decrease once these costs are properly investigated and accounted for.

- 3 The Whole Plan and CIL Viability Update reported that greenfield sites could support affordable housing of "up to 50%", however the council reported this as "at least 50%" on Green Belt in its Growth Topic Paper.
- 4 Analysis of more than 17,000 homes built on the Green Belt between 2015/16 and 2019/20, found that only 10% of the homes would be defined as affordable by the government definition*. (CPRE, State of the Green Belt 2021). *The government definition includes Shared Ownership, which requires incomes 2-3 times higher than the average household income in Enfield and rarely delivers homes with 3+ bedrooms.

In 2017 permission was given to build 262 homes within the Green Belt at Trent Park in Enfield (a site adjacent to Vicarage Farm, which is one of the Green Belt sites targeted for development). Not a single one of the 262 homes will be at Social Rent levels. This means this development will not directly help any of the thousands of families and children currently stuck in temporary accommodation.

According to the council's theoretical assessment, at least 33 of the homes at Trent Park should have been Social Rent. Nor will the Trent Park development deliver any intermediate low-cost rental homes, so none of the homes built will be affordable to lower income families or most key workers.

The development will deliver a small number of Shared Ownership units (20%), only 2 of which will be 3-bedroom flats. According to the August 2021 price list for these properties the anticipated income for someone purchasing a 25% share in a 2-bedroom flat is £67,000 - £75,000 per year (<https://landgah.com/scheme/trent-park/>). The median average household income in Enfield is reported to be £35,300. (Enfield Council Borough Profile 2021, p21)

Prices for the properties at Trent Park range from £565,000 for a 1-bed flat to £1.96m for a 5-bed house.



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August 2021 <https://www.berkeleygroup.co.uk/developments/london/enfield/trent-park>

A similar pattern is repeated in other recent applications for housing developments on land adjacent to Enfield's Green Belt. These developments deliver no Social Rent housing whatsoever and the large majority of the homes will be unaffordable to local people in need of help with housing costs.

- 5** Looking broadly at major developments on brownfield and urban area sites in Enfield over the last 10 years, 35% of the additional homes delivered were affordable and 10% were Social Rent, which is lower than what is needed but is still far higher than what is achieved on Green Belt sites (10% affordable housing overall).

Examples of recent brownfield applications and developments in Enfield:

- Exeter Road: 100% of the homes will be affordable (67% at Social Rent levels).
- Deimel Fabric Co.: 100% will be affordable to rent housing
- Meridian Water: 40% of the homes will be affordable (28% at Social Rent levels).
- Green Street: 50% will be affordable (35% at Social Rent levels).
- Royal British Legion: 37% will be affordable (25% at Social Rent levels).
- Meta Switch: 16.5% at Social Rent levels

6 See note 4

7 See note 4

8 See note 5

9 Granted planning applications for Meridian Water Phase 1 and Phase 2

10 Granted planning applications for Meridian Water Phase 1 and Phase 2

11 Enfield Council <https://twitter.com/MeridianWater/status/1430078171425165322?s=20>

12 See draft Local Plan - PL5: Meridian Water – Site Allocations, p338

13 Better Homes Enfield undercounted brownfield sites report



Appendix 1: Affordable housing in Enfield

- Rents have rapidly increased in the Private Rented Sector and as a result there are thousands of families struggling with housing costs. Many are living in overcrowded or unsafe conditions or are at risk of eviction. [a, b]
- Enfield is reported to have the highest eviction rate from rental property in London. [c]
- Enfield has one of the highest rates of temporary accommodation use in England. [d]
- There are currently 5,000 children in temporary accommodation in Enfield. Many are living in accommodation that unsuitable for their needs. [e]
- Only 33% of affordable housing in Enfield has 3 or more bedrooms. [f]
- Families in need of a home with 3+ bedrooms spend an average of 6 years in temporary accommodation, waiting for a suitable home that they can afford. [g]
- Affordable Family housing (i.e. homes with 3+ bedrooms) needs to account for around 50% of all affordable housing built in Enfield [h]
- Since 2018, Enfield has demolished more Social Rent housing than it has built. [i]
- Home ownership is becoming an increasingly remote prospect for Enfield's key workers and younger first-time buyers. Twenty years ago, a low-priced home in Enfield cost five times a nurse's average annual salary - buying the same home now costs twelve times a nurse's salary. [j]
- At least 10,500 additional affordable homes need to be built in Enfield over the next 5-years. Around 7,000 of these will need to be at Social Rent levels for families in acute housing need, who struggle to afford even the lowest cost rents in Enfield, and 3,500 will need to be 'intermediate' affordable housing for key workers (who can often afford low-cost rents but need help getting on the housing ladder). [k]

a, b: Local Housing Need Assessment (LHA) 2020, point 24, 41; c,d: Enfield Review of Homelessness 2019; e: Cabinet Report October 2019; f: LHA 2020, Figure 4.3; g: FOI request March 2021; h: LHA 2020, 6.42; i: GLA, Planning London datahub, Aug 2021; j LHA 2020, Table 3:1 Lower quartile house price; k: LHA 2020, Figure 4.3

APPENDIX D

Better Homes Enfield

26th July 2021

By email

Dear [REDACTED],

We are writing to you to express our concerns about the Local Plan Consultation.

Our main concerns are as follows:

- The consultation has been running for five weeks, yet key information is still missing. This makes it impossible to give a fully considered response to important elements of the Plan. For example, figures 6.1, 6.2, 6.3, 6.4 and 9.1 are all missing.
- Despite several requests, the missing information has still not been provided. It is frustrating that you are aware of this issue and know that we require these maps, but you and your team have still not provided any of the missing information.
- Key information is presented in a way that appears designed to prejudice the consultation responses. For example, the 'pros' and 'cons' of the alternative spatial options have been set out in the Plan (e.g. at Tables 2.2 and 8.3), but these have not been presented in an objective and even-handed manner. There are 'cons' missing from the council's preferred option, whilst 'pros' are missing from the alternative options.

Presenting key information in this way appears to be an attempt to influence and lead public opinion towards supporting the council's preferred option, which undermines the validity of the consultation process.

- There are significant inconsistencies in the documents. For example, claims made in the Integrated Impact Assessment regarding the sustainability of the Vicarage Farm site are contradicted by the Transport Assessment in the Evidence Base. There are lots of other examples. These inconsistencies regarding fundamental aspects of the Plan are troubling and call into question the Plan's legitimacy and undermines the public consultation process.
- Key elements of the Plan are inaccurate. For example, the Growth Topic Paper says that Development of the Green Belt allows the borough to deliver at least 50% of housing on Green Belt sites as affordable housing products. This is incorrect. The Whole Plan Viability Assessment says up to 50% could be achieved and caveats this estimate (e.g., it does not include site specific infrastructure costs, which could be significant). "Up to" 50% with caveats is very different to "at least" 50%.



APPENDIX D

- The Plan includes a lot of jargon and acronyms, which reduces the potential for public engagement and understanding. Here is one example: the IIA says “*As explained later in this chapter, the SA, SEA, HIA, EqIA and CSIA have been undertaken together as part of the IIA. Therefore, for simplicity within this report we mostly refer just to the IIA, which should be taken as incorporating SA, SEA, HIA, EqIA and CSIA.*” There are lots of other examples.
- The questions within the consultation itself are poorly drafted, full of planning speak and are hard to understand. They appear to be designed to put the general public off responding, rather than to encourage positive engagement.
- The sheer volume of information is overwhelming and off-putting and reduces the potential for meaningful public engagement. There are now more than 65 documents to review, many of which are several hundred pages in length.
- Important documents have been added to the evidence base, weeks after the consultation started. This is happening without notification or correspondence with people signed up to receive updates about the Local Plan.
- Maps provided within the main consultation document are of such poor quality that key information cannot be read. For example, the indicative maximum heights on Figure 7.4, (which is referred to eight times in the Local Plan), is illegible. This makes it impossible to understand what is being proposed.
- Information on some maps is incorrect. For example, in Figure 3.1 Enfield Town is labelled as Southbury, and New Southgate is labelled as Enfield Town. There are numerous other examples of this type of inaccuracy. These errors create confusion, make the Plan difficult to understand and undermine confidence in the Plan.
- Comments in the Plan and supporting documents give the impression that the authors do not know Enfield. For example, the Growth Topic Paper says the University of Middlesex campus is located in Trent Park, which it vacated in 2012. Inaccuracies about basic local information undermines confidence in the Plan and the Plan’s authors. It also highlights the importance of meaningful early engagement with local people who have valuable local knowledge
- Information shown on some maps is inconsistent with other documents in the Evidence Base. For example, the Local Plan Policies Map shows SIL intensification areas within Southbury that are not shown in the Map of Southbury within the Local Plan itself (Figure 3.3). This makes it impossible to understand what is actually being proposed.
- The Plan includes misinformation. As you are aware, the London National Park City Foundation has written to Enfield Council to say that references made to them in the Plan about the Foundation’s aims and objectives are “incorrect” and “misleading”.

It is troubling that the council has so frequently referred to the London National Park City Foundation in the Plan, without first seeking the charity’s approval. ‘National Park City’ is mentioned at least 38 times in the Plan and many more times in the Evidence Base documents (e.g. a further five times in the Growth Topic Paper and six times in the Chase Park Placemaking Study).

We believe that the extent and nature of this misinformation goes far beyond what might be considered reasonable ‘human error’ and calls into question the validity of both the Plan and the consultation.



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The issues identified by the London National Park City Foundation have not been rectified. This needs to happen so that the public are not provided with misinformation.

These are just a few examples of some of the issues we have encountered so far whilst attempting to write a considered response to the Local Plan consultation. We have identified many more issues than those given above.

We were also very concerned to read the council's recent response to the letter from the London National Park City Foundation, which was reported by Enfield Dispatch last week.

The council says in its response that "***We reject any suggestion we have linked the National Park City concept with the draft Enfield Local Plan preferred option ...***". This response is nothing short of extraordinary and seems to us to be highly misleading.

The council has clearly linked the National Park City concept with its preferred option in the draft Plan. For example, in Table 2.2 of the Plan the National Park City is listed as a "key detail" of the council's preferred option, but not of any of the alternatives. It is also referred to repeatedly in the "Placemaking Vision" and within Strategic Policy PL8 (Strategic Policy SP PL8: Rural Enfield – a leading destination in London's National Park City). The National Park City concept is also directly linked with the council's preferred option in the Growth Topic Paper (see Table 5.1,) but not with any of the other 12 spatial options shown.

Furthermore, the council's claim that unless the Green Belt is built on, people will be packed "*into small units in dense towers with a lack of access to open space and supporting infrastructure*" is inaccurate and misleading. The use of emotive language appears to be an attempt to scaremonger. It is notable that even the Plan itself contradicts this claim, for example at 7.6.4 of the Plan it states that tall buildings are not the only solution to delivering high quantities of housing and refers to the benefits of viable alternatives.

In short, the council's public response to the letter from the London National Park City Foundation appears to be an attempt to distort reality, mislead the public and prejudice the consultation process.

The nature and extent of the issues we have encountered are serious, and it is our firm opinion that the Local Plan consultation documents in their current form are not fit for purpose.

It is also our opinion that the consultation is not being conducted positively and in good faith. It appears to us that the Reg 18 consultation process is being managed in order to achieve the council's desired outcome.

We will be providing a full response to the Local Plan policies in due course.

Yours sincerely,

Better Homes Enfield



APPENDIX D

CC.

Sadiq Khan, Mayor of London

Tom Copley, Deputy Mayor for Housing and Residential Development

Ian Davis, LBE Chief Executive

LBE, Local Plan email



APPENDIX E

Enfield Local Plan

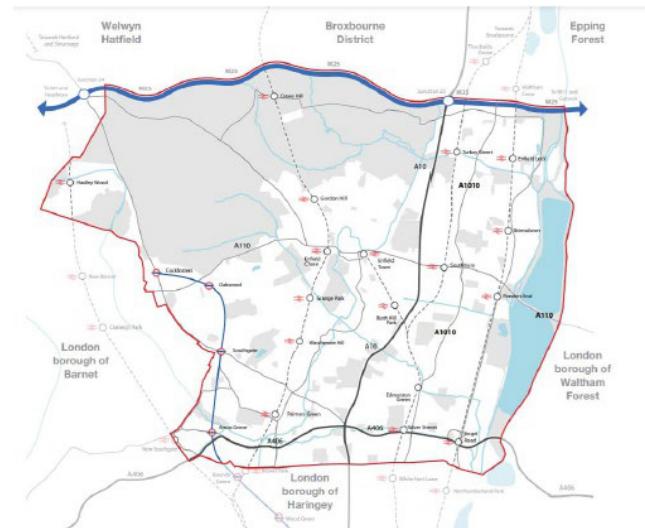
Errata to the Enfield Local Plan: Main Issues and Preferred approaches consultation (June 2021)

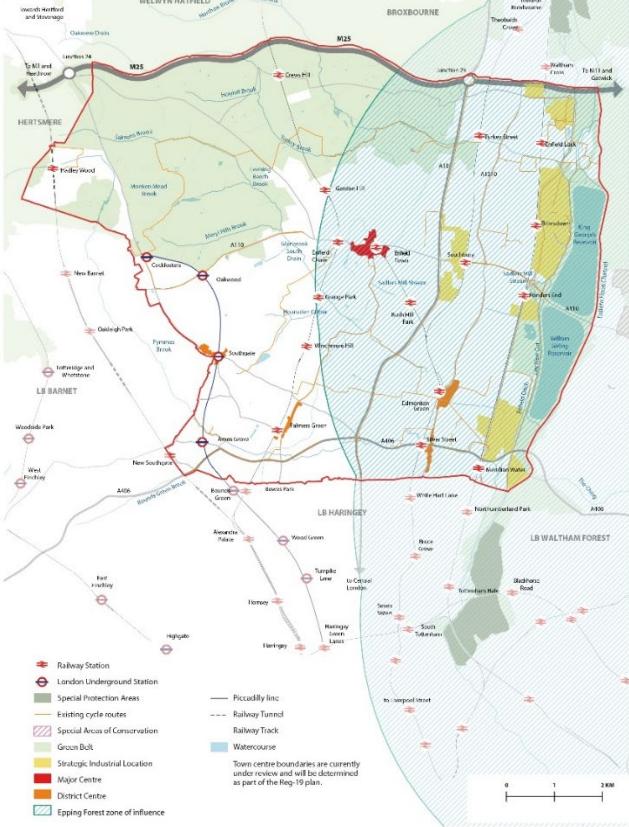
August 2021

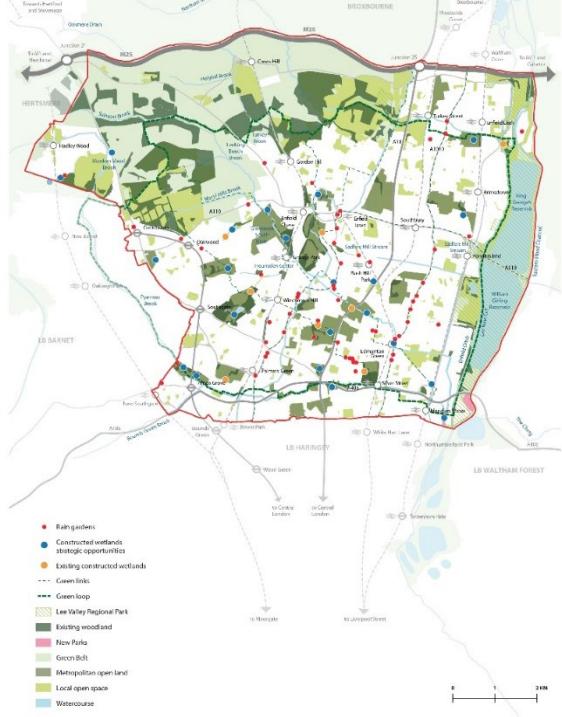
Errata to the Enfield Local Plan Main Issues and Preferred Approaches consultation – June 2021

The minor modifications below are expressed either in the form of ~~strikethrough~~ for deletions and underlined for additions of text specifying the modification in words or by the use of diagrams.

The minor modifications are set out below are sorted with the order of the Local Plan's chapters and policy sections.

Chapter or policy	Paragraph number or section or figure number	Minor modification	Reason for modification
Chapter 2	Page 12 Figure 2.1: London borough of Enfield	 <p>Figure 2.1: The London Borough of Enfield</p> <p>Replace with</p>	Wrong map used updated with correct map with up to date base layers.

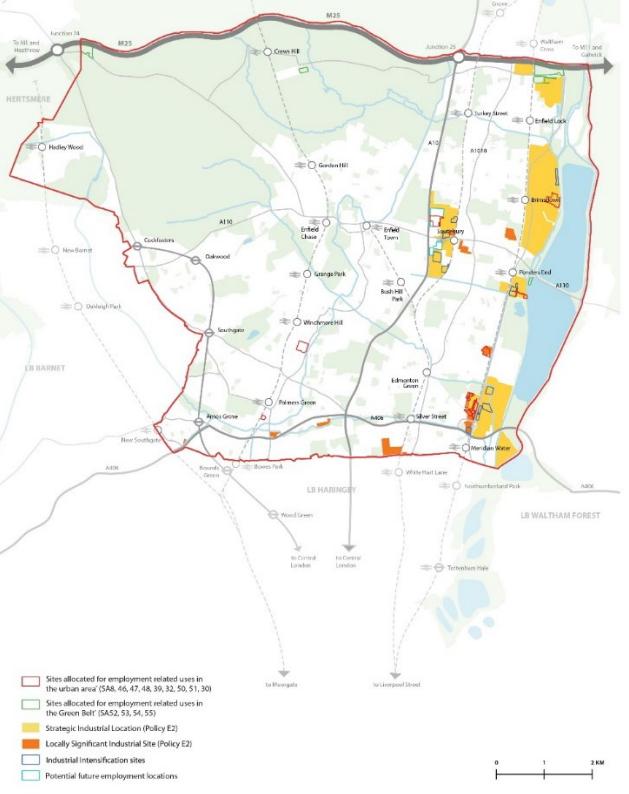
Chapter or policy	Paragraph number or section or figure number	Minor modification	Reason for modification
		 <p>The map illustrates the Epping Forest zone of influence, which covers a significant portion of the London Borough of Enfield. Key features include the M25 and M1 motorways, the River Lea, and various green spaces such as Waltham Forest, Enfield Chase, and Chipping Barnet. The map also shows railway lines, underground stations, and major roads. A legend provides details on the symbols used for railway and underground stations, special protection areas, existing cycle routes, special areas of conservation, green belts, strategic industrial locations, major and district centers, and the Epping Forest zone of influence.</p>	
Chapter 6 SP BG1: Blue and green infrastructure network	Page 114 Figure 6.1: Enfield's blue and green network	<p>Placeholder for diagram</p> <p>Replace with</p>	Map omitted in error this is now included.

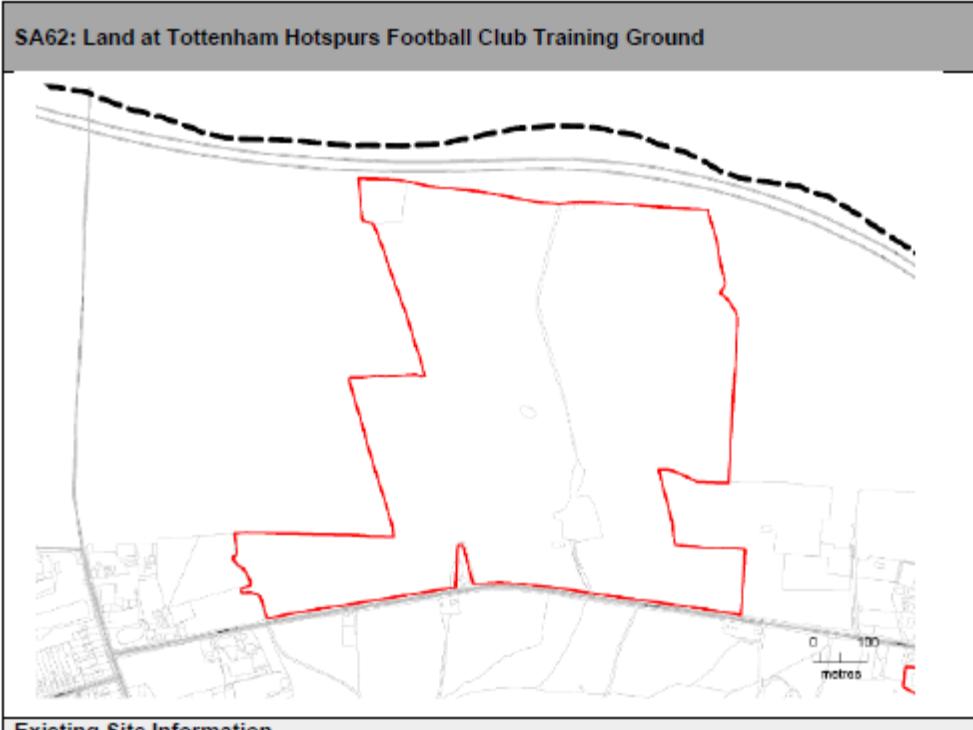
Chapter or policy	Paragraph number or section or figure number	Minor modification	Reason for modification
			
Chapter 6 SP BG2: Protecting nature conservation sites	Page 117 Figure 6.2: Areas of deficiency	<p>Placeholder Map showing areas of deficiency</p> <p>Replace with</p>	Map omitted in error. This is now included.

Chapter or policy	Paragraph number or section or figure number	Minor modification	Reason for modification
		 <p>Legend:</p> <ul style="list-style-type: none"> Deficiency in Access to Nature (Orange) Open Space (Green) 400m access buffer (representing 5 minute pedestrian walking time) (Dashed Green) 	
Chapter 6 SP BG3: Biodiversity net gain,	Page 119 Part 3c of the policy Page 120	<p>Part 3 of policy BG3: Biodiversity net gain, rewilding and offsetting</p> <p>Where the 10% minimum requirement cannot be met on site, or would be better served elsewhere, adequate off-site compensation provision must be provided to an equivalent of better standard to offset the loss of habitats arising from the proposed development. Provision will be directed towards projects that contribute to Enfield's nature</p>	Typographical error which has been corrected.

Chapter or policy	Paragraph number or section or figure number	Minor modification	Reason for modification
rewilding and offsetting	Figure 6.3: Bug Life B Line	<p>recovery network and other biodiversity and landscape-scale conservation priorities, particularly within the following locations:</p> <ul style="list-style-type: none"> a. Areas of nature deficiency (e.g. Enfield Chase and Chingford Reservoirs); and b. Riparian corridors; and c. Bug life B-line (as shown on Figure 6.3). <p>Figure 6.3: Bug Life B-Line</p> <p>Placeholder—Diagram</p>	
Chapter 6 SP BG4: Green Belt and Metropolitan Open Land	Page 125 Paragraph 6.4.3	<p><i>This policy seeks to protect and safeguard the extent of the Green Belt and Metropolitan Open Land (as shown on the Policies Map and figure xx 6.3) and enhance the beneficial use of this land through positive management.</i></p>	<p>Typographical error which has been corrected.</p> <p>Map omitted in error. This is now included.</p>

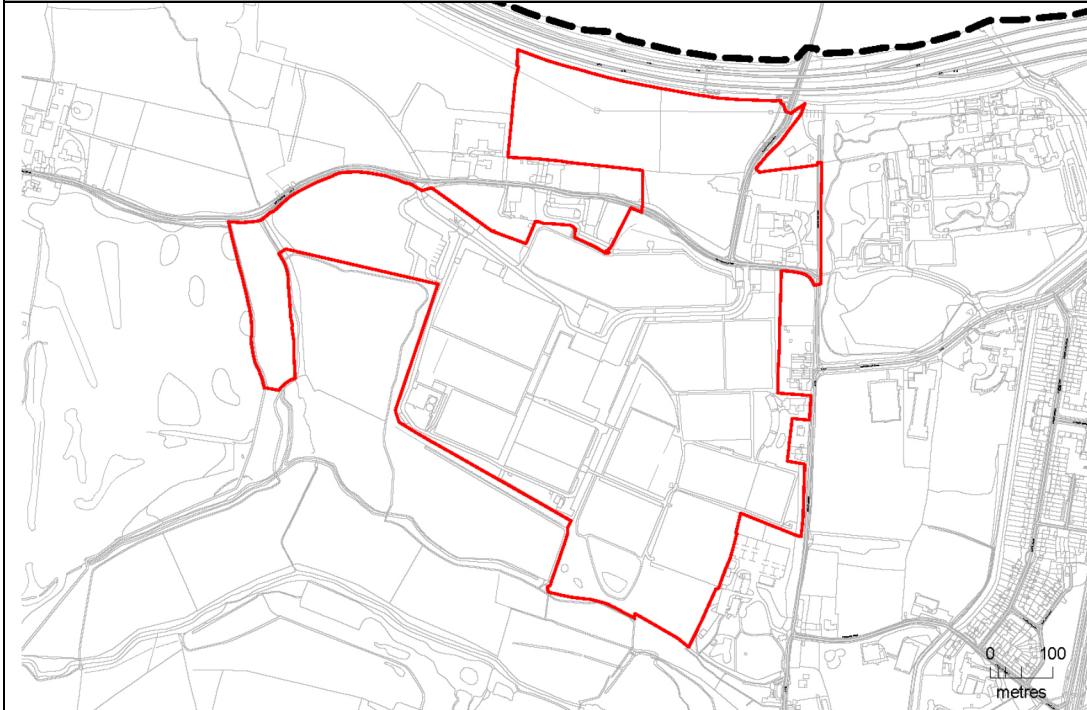
Chapter or policy	Paragraph number or section or figure number	Minor modification	Reason for modification
			
Chapter 6 SP BG4: Green Belt and Metropolitan Open Land	Page 126	<p>6.7.1 This policy seeks to protect, maintain and enhance the quality, quantity, accessibility and usage of the Borough's existing network of watercourses (as shown on Figure 6.4). In the context of this policy, watercourses relate to any area of water (permanently or intermittently) that exists in the borough, as described in Table 6.2.</p> <p>Figure 6.4: Network of watercourses in the Borough Placeholder</p>	Typographical error which has been corrected.

Chapter or policy	Paragraph number or section or figure number	Minor modification	Reason for modification
Chapter 9 Economy	Page 237 Figure 9.1: Areas for SIL intensification-Placeholder for diagram	<p>Figure 9.1: Areas for SIL intensification-Placeholder for diagram</p>  <p> Sites allocated for employment related uses in the urban area (SA8, 46, 47, 48, 39, 32, 50, 51, 30) Sites allocated for employment related uses in the Green Belt (SA52, 53, 54, 55) Strategic Industrial Location (Policy E2) Locally Significant Industrial Site (Policy E2) Industrial intensification sites Potential future employment locations </p>	Map omitted in error. This is now included.
Appendix C Site Allocations	SA62: Land at Tottenham Hotspurs Training Ground	Incorrect map	Incorrect map had been used (a repeat of SA60). This is now corrected with SA62.

Chapter or policy	Paragraph number or section or figure number	Minor modification	Reason for modification
		<p>Other Site Allocations</p> <p>SA62: Land at Tottenham Hotspurs Football Club Training Ground</p>  <p>Existing Site Information</p> <p>Replace with:</p>	<p>A correction to the site area has been made.</p>

Other Site Allocations

SA62: Land at Tottenham Hotspurs Football Club Training Ground



Existing Site Information

Address Land at and within the vicinity of Tottenham Hotspur Football Club Training Ground, Hotspur Way, Whitewebbs Lane.

Site Area 42.5ha
44ha

Existing Use(s) Existing football club training centre and surrounding land, including golf course.

Site Considerations

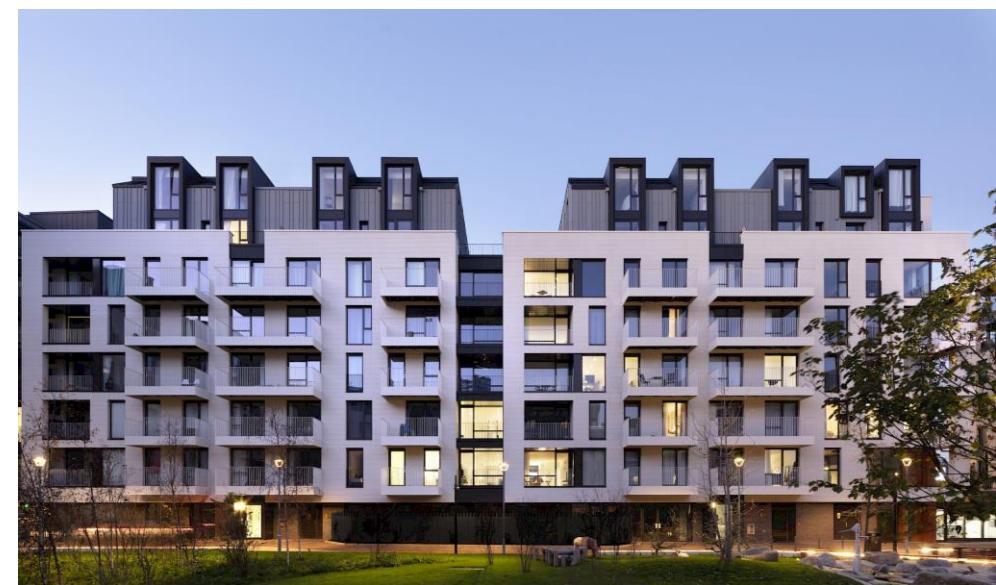
Flood Zone 1-2

Chapter or policy	Paragraph number or section or figure number	Minor modification			Reason for modification																																					
		<table border="1" data-bbox="608 336 1769 1175"> <tr> <td data-bbox="608 336 871 382">PTAL</td><td data-bbox="871 336 1769 382">1a-1b</td></tr> <tr> <td data-bbox="608 382 871 520">Heritage Considerations</td><td data-bbox="871 382 1769 520">In close proximity to many designated heritage assets. Amber - Heritage constraints; potential to develop; usual methodology for assigning indicative density will not apply; heritage impact assessment required; mitigation required</td></tr> <tr> <td data-bbox="608 520 871 659">Impacts an Archaeological Priority Area</td><td data-bbox="871 520 1769 659">Within APA 3: Whitewebbs Hill, Bulls Cross and Forty Hill Heritage constraints; potential to develop; usual methodology for assigning indicative density will not apply; heritage impact assessment required; mitigation required</td></tr> <tr> <td colspan="2" data-bbox="608 659 1769 705">Proposal</td></tr> <tr> <td data-bbox="608 705 871 811">Land Use Requirements</td><td data-bbox="871 705 1769 811"> <ul style="list-style-type: none"> The site should provide professional sport, recreation and community sports/leisure uses, including ancillary related facilities. </td></tr> <tr> <td colspan="2" data-bbox="608 811 1769 857">Implementation</td></tr> <tr> <td data-bbox="608 857 871 922" rowspan="2">Timeframe for Delivery</td><td data-bbox="871 857 1320 922">0-5 years</td><td data-bbox="1320 857 1635 922">5-10 years</td><td data-bbox="1635 857 1769 922">10+ years</td><td data-bbox="1769 857 2048 922"></td></tr> <tr> <td data-bbox="871 922 1320 922">-</td><td data-bbox="1320 922 1635 922">X</td><td data-bbox="1635 922 1769 922">-</td><td data-bbox="1769 922 2048 922"></td></tr> <tr> <td colspan="5" data-bbox="608 922 1769 968">Estimated capacity by proposed Land Use</td><td data-bbox="1769 922 2048 968"></td></tr> <tr> <td colspan="2" data-bbox="608 968 1170 1081">Growth Scenario / Spatial Strategy</td><td data-bbox="1170 968 1507 1081">Baseline / Urban Area only</td><td data-bbox="1507 968 1769 1081">Medium / Urban area + Green Belt</td><td data-bbox="1769 968 2048 1081"></td><td data-bbox="1769 968 2048 1081"></td></tr> <tr> <td colspan="2" data-bbox="608 1081 1170 1175">Capacity Estimate</td><td data-bbox="1170 1081 1507 1175">X</td><td data-bbox="1507 1081 1769 1175">X</td><td data-bbox="1769 1081 2048 1175"></td><td data-bbox="1769 1081 2048 1175"></td></tr> </table>	PTAL	1a-1b	Heritage Considerations	In close proximity to many designated heritage assets. Amber - Heritage constraints; potential to develop; usual methodology for assigning indicative density will not apply; heritage impact assessment required; mitigation required	Impacts an Archaeological Priority Area	Within APA 3: Whitewebbs Hill, Bulls Cross and Forty Hill Heritage constraints; potential to develop; usual methodology for assigning indicative density will not apply; heritage impact assessment required; mitigation required	Proposal		Land Use Requirements	<ul style="list-style-type: none"> The site should provide professional sport, recreation and community sports/leisure uses, including ancillary related facilities. 	Implementation		Timeframe for Delivery	0-5 years	5-10 years	10+ years		-	X	-		Estimated capacity by proposed Land Use						Growth Scenario / Spatial Strategy		Baseline / Urban Area only	Medium / Urban area + Green Belt			Capacity Estimate		X	X			
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Capacity Estimate		X	X																																							

APPENDIX F



CHOBHAM MANOR; LONDON E20, 859 HOMES 75% DESIGNED FOR FAMILIES



NEW GARDEN QUARTER; LONDON E15, 471 HOMES, 40% 3+-BED HOMES



ISLAND POINT; LONDON E14, 173 HOMES, 35% 3+-BED HOMES



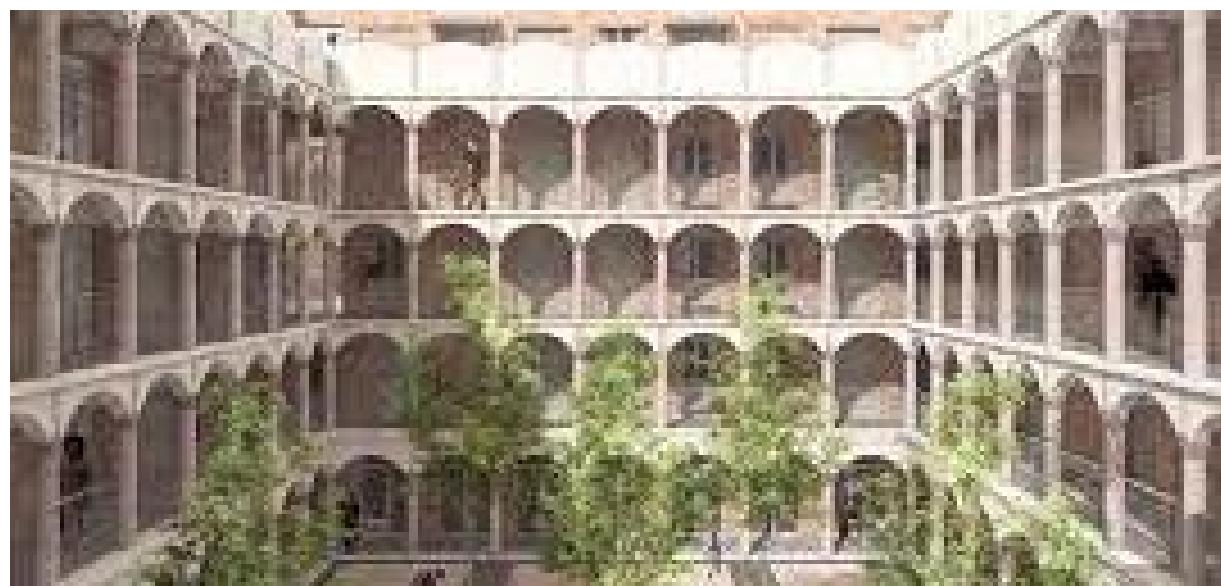
EAST WICK & SWEETWATER; LONDON E20, 1,844 HOMES, 50% FAMILY HOMES



KIDBROOKE PARK ROAD; LONDON SE3, 117 HOMES, 27% 3+ BEDS



HACKNEY GARDENS; LONDON E8, 58 HOMES, 29% 3+ BEDS



PLASHET ROAD; LONDON E8, 58 HOMES, 29% 3+ BEDS



BEAM PARK; LONDON RM13, 3,000 HOMES, 30% 3+ BEDS AND 500 HOUSES



ZENITH HOUSE; LONDON BARNET, 309 HOMES, 26% 3+ BEDS (281 DPH)



View looking west along Exeter Road with Block D in foreground



View looking East along Exeter Road with Block F in foreground



View looking East along Exeter Road with Block D in foreground



View looking West along Exeter Road with Block F in foreground

EXETER ROAD; ENFIELD, EN3 129 HOMES, 3+ BED HOMES = 45%



ORDNANCE ROAD ENFIELD



GARDINER CLOSE ENFIELD



HAMMOND COURT, WALTHAM FOREST



MARMALADE LANE



BATTERSEA LONDON, HIGH DENSITY MANSION BLOCKS WITH 3+ BED APARTMENTS



WEST HAMPSTEAD LONDON, HIGH DENSITY MANSION BLOCKS WITH 3+ BED APARTMENTS



SOUTH WEST LONDON, HIGH DENSITY MANSION BLOCKS WITH 3+ BED APARTMENTS