

Enfield Local Plan

Consultation Statement addressing the Issues and Options consultation undertaken between December 2018 and February 2019



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Enfield's New Local Plan

Consultation Statement addressing the Issues and Options consultation undertaken between December 2018 and February 2019

1. Introduction

- 1.1 The purpose of this short Consultation Statement is to summarise the feedback received in response to the "Issues and Options" Local Plan consultation document (published in December 2018). Consultation on this "Issues and Options" document was the first formal consultation on the emerging Enfield Local Plan (a stage known as the "Regulation 18" stage¹).
- 1.2 The "Issues and Options" consultation document sets out the key challenges and opportunities in Enfield Borough, including in terms of meeting future housing needs, supporting local economic growth and maintaining and enhancing community facilities and areas of open space. Some options for accommodating future growth were also outlined, alongside some draft policy wording.
- 1.3 The consultation ran for a 12 week period between 6th December 2018 and 28th February 2019.
- 1.4 It was intended that following this consultation, the Council would prepare and consult upon a "Submission Draft" version of the Local Plan (a stage known as the "Regulation 19" stage²). However, for a range of reasons, the Council has decided to prepare a second "Regulation 18" Local Plan consultation document, which will set out the Council's preferred strategy and detailed draft policy wording, taking into account the feedback received on the previous "Regulation 18" consultation document.
- 1.5 Further information about the process and timetable for preparing the Enfield Local Plan can be found in the Council's Local Development Scheme, linked [here](#).

2. Purpose and Scope

- 2.1 Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, requires that any Local Plan submitted to the Secretary of State for independent examination, must be accompanied by a statement setting out:
 - which bodies and persons the local planning authority invited to make representations under Regulation 18;
 - how those bodies and persons were invited to make representations under Regulation 18;
 - a summary of the main issues raised by the representations made pursuant to Regulation 18;
 - How any representations made pursuant to Regulation 18 have been taken into account.
- 2.2 The Council will ensure full compliance with Regulation 22, prior to submitting the Enfield Local Plan for examination, and having undertaken consultation on the second "Regulation 18" Local Plan document.
- 2.3 The purpose of this Consultation Statement is to record the main themes and issues raised in the consultation responses on the first "Regulation 18" Local Plan document. It must be emphasised that Officers reviewed the consultation responses in detail, and in drafting the second "Regulation 18" Local Plan document, have taken into account both the general thrust of the comments received, as well as the detailed comments on the draft policy wording.

¹ Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

² Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

3. Summary of the Consultation Process

- 3.1 To ensure that all interested parties were given the opportunity to understand and respond to the consultation in late 2018/ early 2019, the Council undertook a comprehensive programme of engagement and consultation relating to the December 2018 “Issues and Options” document. This consultation followed, and in many cases exceeded, the Council’s own standards for public engagement as set out in the adopted Statement of Community Involvement 2015.
- 3.2 An executive summary document was produced to provide a non-technical summary of the “Issues and Options” consultation document, and to outline how interested parties could have their say.
- 3.3 Respondents were able to view all consultation material on the Council’s online consultation portal, and were able to submit representations via the online consultation portal, by e-mail, or by post.
- 3.4 Reference copies of the consultation material were also placed in several public locations, where residents were able to inspect documents and find paper copies of the representation forms. Upon reasonable request, the Council did also provide individual copies of documents to those who could not reasonably access the consultation material through standard means.
- 3.5 1,600 subscribers to the Council’s planning mailing list were notified of the consultation opportunity by email, and these subscribers also received ‘reminder’ emails during the course of the consultation period. The Council’s planning mailing list consists of various local residents, businesses, developers and agents who have expressed an interest in receiving planning-related updates from the Council.

Promotional posters were also produced to promote the consultation opportunity, and these were displayed on noticeboards across the Borough. Posters were also distributed for display at local leisure centres, doctors’ surgeries and private gyms. Smaller flyers were also produced; these were distributed at local events including business networking events and public drop-in sessions.

- 3.6 A prominent banner was placed on the front page of the Council’s website directing visitors to webpages explaining the consultation process and outlining opportunities for readers to have their say. These webpages were also promoted through hyperlinked logos in Council email signatures, direct email bulletins to subscribers to the Council’s planning mailing list, and other direct communications with members of the public. Furthermore, digital ‘banners’ were displayed on television screens located in Council reception areas, alerting visitors to the consultation opportunity and how they could get more information.
- 3.7 The Council used its official social media accounts on LinkedIn, Twitter and Facebook to promote the consultation opportunity.
- 3.8 The consultation was covered by local media throughout the three month consultation period, including press releases from the Council to advertise forthcoming drop-in events.
- 3.9 The Council sought to directly engage with identified hard-to-reach communities who are typically underrepresented in the consultation process. This included direct engagement with the Turkish community through letters and face-to-face communication, as well as placing promotional material in school newsletters at the College of North East London and Barnet and Southgate College.
- 3.10 A further important strand of the consultation and engagement process was a series of public drop-in sessions, held across the Borough in community halls, schools, libraries and churches. The location and timing of each event, along with the number of people who attended, is set out as **Appendix A** to this Consultation Statement.

4. Summary of Consultation Feedback

4.1 In total, **1,712** unique responses were received to the “Issues and Options” consultation in late 2018/ early 2019. A breakdown of the number of responses received by type of respondent is provided below:

- 54 from landowners, developers or planning agents;
- 2 from neighbouring local authorities;
- 20 from government agencies and other public bodies;
- 15 from interest groups and trusts;
- 996 from community associations and local action groups (where they are responding as an organisation on behalf of their members);
- 618 from the consultation portal; and
- 7 via post

4.2 A list of those individuals and organisations that comprise each sub-category (except those that are considered members of the general public) is provided at Appendix B.

4.3 The main feedback received³ is summarised below, by theme.

Spatial Strategy (Green Belt versus Brownfield Development)

- Some respondents indicated that the need to deliver more affordable housing justified development in the Green Belt.
- Many respondents were against release of Green Belt land to meet development needs.
- Many respondents expressed a preference for use of brownfield sites to meet the development needs of the Borough, with support for higher development densities. Other expressed a preference for lower density developments within urban areas.
- Many of the objections to particular potential development sites in the Green Belt were from those that lived in the immediate vicinity.
- Other respondents recognised the need to strike a balance between protecting the Green Belt and meeting future housing needs (in particular the need for more affordable housing).

Housing

- Lack of clarity around the housing target for the Borough – with some respondents suggesting the assessment of housing need was flawed, and a lower housing target should be set, and others arguing for an increased housing requirement for the Borough.
- Concern around the affordability of housing, with most respondents agreeing that the Council should seek to deliver as much affordable housing as possible.
- Need for more family housing, and more housing for “downsizers”.
- New housing should be for existing residents of the Borough (and not be provided to accommodate overspill from the rest of London/ elsewhere).
- More use should be made of empty homes.
- Gypsy and traveller accommodation is not required.

Design and Heritage

- Development should avoid harm to heritage assets.
- Enfield should retain its character.
- Whilst many respondents supported the increased densification of the urban area in order to safeguard the Green Belt, there were equal concerns regarding the impact of more infill development at higher densities on the character of existing communities and in particular the loss of open spaces within settlements.

³ In preparing the second “Regulation 18” Local Plan consultation document, Officers have referred to the original representation forms, and haven’t relied on the summary information included within this Consultation Statement

- Concerns around high development densities and tall buildings, in relation to the impact on heritage assets.

Economy

- Investment should be focused on the knowledge based economy.
- Provision of high speed broadband will support jobs and businesses.
- Need for more accommodation for smaller businesses.
- Need for more industrial space.
- Lots of empty offices in the Borough (suggesting there is no demand for more office stock).
- Some stakeholders suggested that a more flexible approach should be taken to land use zoning, allowing residential uses in industrial areas, and vice versa.
- Need to take into account the planning issues arising from more home-working.

Town Centres and High Streets

- Need to recognise changes in shopping patterns, in particular the increase in internet shopping.
- Need for more diversity in the range and quality of shops in the Borough.

Community and Social Infrastructure

- Current infrastructure is inadequate, especially public transport, hospitals and schools.
- Insufficient infrastructure capacity to support proposed development.
- Link between affordable housing provision and the key workers needed to provide local social services.
- Importance of ensuring new and improved social infrastructure is delivered by (and alongside) new development.
- Local Plan should provide greater certainty about the location and delivery of new schools.

Transport and Movement

- Need for improved public transport.
- The needs of pedestrians and cyclists should be prioritised.
- Significant existing infrastructure capacity issues need addressing before new development is delivered.
- Concerns around new development impacting on parking availability for existing residents.

Green and Blue Infrastructure

- The canals and waterways represent a significant, under-exploited, opportunity.
- Objection to development that would impact on the Green Belt, Metropolitan Open Land and open space.
- Provision needs to be made for burial space (providing for the different needs of different parts of the local community).
- Concerns around air quality in the Borough, both in terms of its impact on human health and in terms of its impact on habitats and protected species.
- The Local Plan should deliver net gains for the natural environment.

4.4 Alongside the comments received from local residents, detailed comments were received on the emerging spatial strategy options and draft policy wording from organisations including the Greater London Authority, Transport for London, Natural England, the Environment Agency, Historic England, Enfield Sport and the London Wildlife Trust.

4.5 The comments from these organisations, and others, have been particularly helpful to the Council in seeking to develop and refine the wording of the draft Local Plan policies for the second "Regulation 18" consultation document.

Appendix A

Public Drop-in Sessions and Invited Sessions

Table 1: Public drop in sessions

	Public drop-in sessions	When & Time	Number of attendees
Area ward forums	Enfield West: Southgate and Cockfosters joint area ward forum at Garfield Primary School	27 November 2018 at 7:30-9:30pm	50
	Enfield East: Edmonton Green, Upper Edmonton, Lower Edmonton and Haselbury at Community House	28 November 2018 at 8-9:30pm	50
	Jubilee area ward forum at Forest Road Health Centre	5 December 2018 at 7-9pm	8
	Enfield West joint area forum: Bowes, Palmers Green, Winchmore Hill and Grange at Friends Meeting House	16 January 2019 7:30-9:30pm at	50
	Enfield Town and Highlands at Enfield Civic Centre	17 January 2019 at 7:30-9:30pm	25
	Enfield North joint area ward forum: Chase, Turkey Street, Enfield Lock, Highway, Southbury, Town and Highlands at Ordnance Unity Centre	6 February 2019 at 7:30-9pm	20
	Ponders End area ward forum at The Qube	19 February 2019 at 7-8:30pm	35
Drop in sessions	Ponders End Library, 645 Hertford Road	29 January 2019 at 11-2:30pm	20
	Vincent House, 2E Naggs Head Road	29 January 2019 at 3-6pm	10
	Dugdale Centre, Enfield Town	5 February 2019 at 12-2pm	20
	Enfield Civic Centre	7 February 2019	100
	Edmonton Green Library	12 February 2019 at 3-6:30pm	20
Palmers Green Library	19 February 2019 at 11:30-2:30pm	50	

Table 2: Invited sessions

	Invited sessions	Where	When & Time	Number of attendees
Special meetings	Enfield Town Residents Association	Enfield Baptist Church, Cecil Road	29 November 2018 at 7-9pm	30
	Enfield's health and wellbeing board	Enfield Civic Centre	6 December 2018 at 4-6:30pm	20
	Voluntary Sector Strategy Group	Community House, Fore Street	10 December 2018 at 2-4pm	20
	Crews Hill Residents Association	Plough Pub		20
	Enfield Racial Equality Council	Enfield Civic Centre	9 January 2019 at 7:30-9:30pm	30
	Conservation Advisory Group	Enfield Civic Centre	15 January 2019	30
	Green Belt Forum	Enfield Civic Centre	29 January 2019	60
Targeted outreach	Health and wellbeing board	Edmonton Green Shopping Centre	14 February 2019	100
	Crews Hill Residents Association	Plough Pub	9 January 2019 at 7:30-9:30pm	20
	Turkish community	The Alevi Centre	12 January 2019 at 12-2pm	65
	Enfield Road Watch, CPRE and The Enfield Society	Civic Centre	30 January 2019	10
	Christian community		30 January 2019	25
	Residents of Angel, Edmonton Community Trust	Dyson Road	6 February 2019 at 7-8pm	25
	Hadley Wood Neighbourhood Forum	Civic Centre	11 February 2019 at 10:30-12:30pm	6
Youth engagement	Edmonton Green Residents Association	Green Towers	16 February 2019 at 12-2pm	100
	Enfield Youth Parliament – initial presentation and thoughts	Civic Centre	17 October 2018	25
	Enfield Youth Parliament – workshop	Civic Centre	14 December 2018	20
	College of Haringey, Enfield and North East London – workshop	College of Haringey, Enfield and North East London	23 January 2019	20
	Barnet and Southgate College – workshop	Barnet and Southgate College	28 February 2019	20

Appendix B

Local Plan Consultation Respondents (other than Members of the Public)

