

Examination of London Plan 2017 as proposed to be modified

Statement of the London Borough of Enfield on Matter 1

1 Background

1.1 In the course of preparing its Regulation 18 Consultation Document for its Local Plan it became apparent to the London Borough of Enfield (“Enfield”) that there are some real challenges arising from the spatial approach proposed in the London Plan 2017 (“the Plan”)¹ which would impact on the prospects of Enfield significantly increasing delivery of Good Growth throughout the Borough.

1.2 Therefore Enfield’s overall approach to the Examination of the Plan is to propose amendments to the Plan which improve the ability of the Borough Council to deliver Good Growth. These amendments are set out in other Matter Statements and are supported by research undertaken or commissioned by Enfield over the past few months.

1.3 Accordingly it has been a natural step to examine the Integrated Infrastructure Assessment (“IIA”)² to see whether the amendments proposed by Enfield would be possible without further assessments being required. Enfield’s position on this is set out in this paper. Enfield’s examination of the IIA for that purpose revealed shortcomings in the IIA, which are also addressed in this paper. A particular shortcoming is that the IIA does not give adequate consideration to the potential need for selective Green Belt release.

2 The underlying need for flexibility in the Plan.

2.1 There are a number of reasons why there is a need for greater flexibility in the Plan. The main concerns of Enfield are as follows.

2.2 The Secretary of State has allowed the London Plan (and some other plans) to move forwards to Examination despite not being prepared on the basis required by NPPF 2018. However, unless NPPF 2018 is further modified any London Borough which is at an earlier stage in Local Plan preparation will need to show that it can deliver sufficient housing to meet Objectively Assessed Need based on the NPPF 2018 methodology.

¹ Like the Panel we refer to the Plan as comprising London Plan 2017 incorporating the Mayor’s Minor Suggested Changes (August 2018)

² Again the IIA is the November 2017 document as updated by the July 2018 addendum.

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Enfield's initial assessment is that this could be an increase by a factor of 50% over that projected in the Plan.

- 2.3 Early public consultation in respect of the Enfield Local Plan identified overwhelming support for Good Growth to take place in the Enfield Eastern Corridor ("EEC"). However, protective Strategic Industrial Land ("SIL") policies in the Plan plus a requirement to find further SIL will significantly hinder delivery of ambitious plans for EEC.
- 2.4 The housing strategy within the Plan has at its heart the Small Sites Policy (H2), which is being proposed without any supporting evidential base that it can be delivered³. Enfield's researched evidence⁴ is that the target for Small Sites in Enfield is undeliverable. Indeed if the problems identified in delivering H2 in Enfield were to be replicated elsewhere the result could be wider under-delivery throughout London.
- 2.5 The Plan proposes that Green Belt release is not required to meet London's growth target. Given that this is one of the largest land assets within Enfield, it is not sensible to rule the use of this option out, expecting instead significant additional housing plus new SIL to be accommodated wholly within the urban area:-
- i) in a short time frame
 - ii) simply on the basis of Sustainable Intensification
 - iii) without there being very significant injection of public resources to make this happen using compulsory purchase powers and infrastructure subsidy; and
 - iv) without any plausible examination of the potential for selective Green Belt release.
- 2.6 Our other Matter Statements will identify the textual changes to the Plan that Enfield is seeking. However the critical issue for Matter 1 is whether the impact of the changes that Enfield is looking for has been sufficiently assessed within the IIA: in particular, whether Sustainable Intensification has been sufficiently assessed and whether adequate consideration has been given to reasonable alternatives.

³ As admitted by the GLA at the SHLLA Technical Session.

⁴ See Enfield's Statement on Matter 20 (to follow).

3 **Review of the IIA.**

- 3.1 The analysis of spatial options only overtly takes place at one point in the IIA namely through the assessment of the alternatives to Good Growth Policy 2. Here we find that the IIA works through five different alternatives (expanded from the 3 which were set out in the IIA scoping report of February 2017) as amplified in Table 4 of the IIA⁵.
- 3.2 Option 2, Sustainable Intensification, is the option proposed in the plan which Enfield, for reasons amplified in our other Statements, does not consider to be sound. It is not that Enfield is opposed in principle to Sustainable Intensification. Indeed Enfield's long term aim is to intensify the EEC significantly in connection with major infrastructure delivery. However as the strategic policy basis for the Enfield Local Plan will be the London Plan 2017, if that is unsound then Enfield will not be able to deliver in accordance with both Enfield's and London's actual needs. Sustainable Intensification should be part of the delivery package but the Plan should not rely so wholly on a single policy approach where the step change required looks to be unachievable. In this context the absolute ruling out of any Green Belt release without proper evaluation is particularly unsatisfactory.
- 3.3 Enfield considers that Option 4 (current London Plan plus selective Green Belt review) is the closest match to the flexible policy environment that Enfield is seeking through its proposed changes to the Plan. For reasons set out elsewhere Enfield believes that building flexibility into the Plan, which will allow this to happen alongside Sustainable Intensification, is a much sounder policy basis.
- 3.4 All 5 spatial options have been assessed individually as set out in Section 8 of the IIA⁶ and the subsequent text and tables from Table 22 to 26. Table 23 addresses Sustainable Intensification and Table 25 Current London Plan plus selective Green Belt release. The latter table has now been superseded by Table 2 produced in the Addendum.
- 3.5 It is significant that Table 15 indicated that Objective 5, the Housing Supply objective⁷ is of relevance to SEA. However, when it comes to the individual assessments this has

⁵ At page 7 (27 of the pdf).

⁶ From page 43 to 52 (63 to 72 of the pdf).

⁷ To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand

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been excluded from SEA consideration. It appears that a Key Guide Question⁸ could not be formulated despite in the case of spatial strategies (and indeed all the other assessment of policy in the IIA) the objective of delivering sufficient housing to meet London's needs being one of the most important issues.

3.6 When it comes to the actual performance of the 5 different spatial options, an explanation of each appraisal is set out in covering text and the performance of each is then logged in each table. Apart from the absence of any testing against Objective 5 (as referred to above) the number of objectives appraised varies between options. In order to illustrate this we have prepared a summary chart comparing the assessment for each option which we enclose as an Appendix 1 to this matter.

3.7 The key points arising from this, which can be seen from the summary chart are:-

- i) There seems to be considerable uncertainty about whether impacts are temporary or permanent with the extensive use of the TP symbol.
- ii) Equally there are only two reference points in relation to the local/global spectrum. Some impacts are local, others are local to global. Those impacts may be, for instance, of a regional nature, does not appear to have been considered.
- iii) There is no explanation of why the London Plan is performing worse and moving towards an unknown performance in terms of best use of land when all other options perform well.
- iv) It is by no means certain that Sustainable Intensification will, in the long run create more attractive neighbourhoods.
- v) Why Sustainable Intensification will in the long run lead to the best performance in terms of a Global City over the other options requires further explanation.
- vi) Equally given that Sustainable Intensification will lead to increased competition for already developed urban land, achieving the appropriate balance between infrastructure delivery and demographic growth may well be much more challenging than the assessment indicates.
- vii) It is uncertain why the Polycentric option is the least assessed and yet is the only option assessed against safeguarding culture.

⁸ Table 16 at page 30 (50 of the pdf).

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- viii) Why there is certainty that the London Plan and Polycentric options will reduce emissions whilst the others will not (or alternatively there is no evidence) is unexplained.
- ix) Why Sustainable Intensification is the only option to be assessed against tackling climate change, which is one of the most important issues for the Plan, is not explained.
- x) Why flood risk is seen as a local to global issue for the Sustainable Intensification option whilst only a local issue for the London Plan plus Green Belt option is again unexplained when in both cases the impacts are said to be unknown.
- xi) There would appear to be similar inconsistencies in relation to the main environmental objectives (Objectives 20 -22).
- xii) Why waste is an issue for the City Region option but not for other options is again unexplained.

3.8 Notwithstanding the above, the overall impression given between the different options is that 2, 3 and 4 are quite close in performance with Sustainable Intensification ahead but on the basis of significant positive ratings which do not appear to be particularly well justified in comparison to other options.

3.9 The issue then is why has Green Belt release been ruled out through the IIA process.

- i) Selected Green Belt release is put forward as an option that is considered.
- ii) It is rejected in preference to a strategy that emphasizes the extensive use of small sites to assist with the delivery of housing targets
- iii) Consultation responses flagged the failure of the GLA to assess London's Green Belt.
- iv) The answer given to that criticism is that the Plan cannot change Green belt boundaries. That seems to miss the point that the strategic policies in the Plan will affect whether green belt boundaries can be changed especially since the

preferred strategy is to reject the need for Green Belt land to be used to meet London's strategic needs within the plan period⁹.

- v) In this context it is no answer to say that boroughs can assess the performance of green belt boundaries. They will be doing so in the context of a strategic plan which rejects the need for Green Belt land to deliver its objectives. It is hard to see how they can undertake meaningful Green Belt review if the strategic plan has set its stall against green belt release.

3.10 Accordingly the IIA process shows that options concerning the selective release of Green Belt have not been adequately assessed.

4 Conclusions

4.1 The IIA in terms of the assessment of the Good Growth options has a number of flaws arising out of an inconsistent approach to reviewing the different options.

4.2 Enfield considers that the cumulative impact of these flaws is that the IIA has not sufficiently evaluated reasonable alternatives particularly in the case of selective Green Belt release.

⁹ It is noted that Document NLP/PP/001, The Outer London Commission in its Seventh Report: Accommodating London's Growth at Recommendation 26 did not seek a London wide Green Belt review, but rather for there to be a strong strategic dimension provided by the London Plan including a consistent methodology/principles which would enable reviews to take account of strategic considerations including Growth and Coordination Corridors, proposed transport investment and pan London environmental objectives to ensure that development outputs are optimised.

Appendix 1 IIA/SEA Component GG2 Summary Table

Objective	6 Best Use of land			7 Attractive neighbourhoods			9 Connectivity Enhancement			10. Global City Maintenance			11 Infrastructure Balanced with demographic need			13 Safeguarding Culture			14 Reducing Emissions			15 Adding Resilience			16 Tackling Climate Change			19 Managing flood risk			20 Protection of natural capital			21 Heritage conservation			22 Geodiversity Conservation			23 Best Waste Practice		
Option																																										
1. London Plan	+	0/?	?/-	+	?/-	?	+	+	+	+	?	0/-	+	+	?				+	+	+								+	+	+	?/-	?/-	?/-	?/+	?/+	?/+					
	D	TP	L	ID	TP	LG	ID	TP	LG	ID	TP	L	D	P	LG				I	TP	L								D	TP	L	D	TP	LG	ID	TP	LG					
2. Sustainable Intensification	+	+	++	+	+	+	+	+	++	+	+	++	+	+	++				?	?	?				?	?	?	?/-	?/-	?/-	+	+	++	?/-	?/-	?/-	?/+	?/+	?/+			
	D	TP	L	D	TP	L	ID	TP	L	D	TP	L	ID	TP	LG				I	TP	L				I	TP	L	D	TP	LG	ID	TP	L	D	TP	LG	I	TP	L			
3. Polycentric	+/?	+/?	+/?				+/?	+/?	+/?	?/-	?/-	?/-	+/?	+/?	+/?	+	+	+	+	+	+								+	+	+											
	ID	TP	LG				ID	TP	L	ID	TP	LG	ID	TP	LG	ID	TP	L	I	TP	L								ID	TP	LG											
4. London Plan plus Green Belt release	+	+/?	+/?	+	+/?	?	+	+	+	+	+	+	+	+	?				?	?	?							?	?	?	?	?	?	?/-	?/-	?/-	+/?	+/?	+/?			
	D	TP	L	ID	TP	L	ID	TP	LG	ID	TP	L	D	P	L				D	TP	L							D	TP	L	D	TP	LG	ID	TP	LG	ID	TP	LG			
5. London Plan plus City Region	+	+	+	+	+/?	?	+	+	+	+/?	+/?	+/?	+	+	+				-	-	-	-	-	-				+	+	+	+	+	+	+/?	+/?	+/?	-	-	-			
	D	TP	L	D	TP	GL	D	P	LG	ID	TP	L	D	P	LG				I	TP	L	I	TP	L				D	TP	L	ID	TP	LG	ID	TP	LG	ID	TP	LG	ID	TP	L

Key

Top Row	Short Term	Medium Term	Long Term	Significant Positive ++	Minor Positive +	Neutral 0	Minor Negative -	Unknown?	?/- Unknown negative ?/+ Unknown Positive
Bottom Row	Indirect to Direct Effects I D				Temporary to Permanent Effects T P				Local to Global Effects L G