

Appendix 07: Pre 2024 Chronology with London Borough of Enfield



25_02_2019 – Email from Officer M Silverman to Enfield Local Plan Issues and Options Consultation

I am writing in response to your current Issues and Options consultation. We do not appear to have received a notification of the consultation in December but following receipt of the Duty to Co-operate Panel invitation, are aware that the consultation closes this week, so provide some brief comments as follows.

The step change in housing delivery which is required across London is acknowledged in the Issues and Options document and we welcome the recognition that all options will need to be considered, including a commitment in Policy GI2 to undertake a Green Belt boundary review and an assessment of whether exceptional circumstances might exist to justify changing Green Belt boundaries. At this stage, it is unclear if or how, the full objectively assessed housing need of 1876 homes per year will be met and would suggest that following the completion of additional technical work, including the call for sites, Policy H1 is worded less ambiguously. The current reference to “*secure the conditions to bring forward a sufficient supply of homes to meet the identified needs of existing and future households by seeking to deliver at least 1,876 homes per year in the plan period*” is open to interpretation and has implications for neighbouring authorities who must all look to accommodate their OAN.

Although LB Enfield’s boundary with Hertsmere is relatively short and characterised by open countryside between Hadley Wood and Potters Bar, this boundary is not picked up in the Issues and Options and it is unclear why Potters Bar and Hertsmere are not identifiable on the key diagram. We would ask this is addressed in your draft plan. It is not clear whether any growth is being considered in Hadley Wood although it is noted that Crews Hill, which also has a mainline station, is identified as a potential local for additional development. Finally, we would ask that reference is made to the emerging South West Hertfordshire Joint Strategic Plan as this will consider long term growth requirements across five local authorities in our part of Hertfordshire and help guide our obligations under the duty to co-operate.

We look forward to meeting with you to consider the cross-boundary implications of our respective emerging Local Plans.

22_09_2020 Email from Officer I Salim Mulla regarding invitation to Enfield's IIA and HRA Scoping Workshop.

We cordially invite you, or an alternative member of your organisation, to attend a meeting on **2nd December 2019** aimed at informing preparation of the Enfield Local Plan Integrated Impact Assessment (IIA) and Habitats Regulations Assessment (HRA) Scoping Report.

The attached briefing note introduces the IIA process, but in short it is a process that aims to integrate Sustainability Appraisal (SA) with several other more focused assessment processes.

With regards to HRA, this is being undertaken as a stand-alone process, but the opportunity will be taken to discuss the HRA scope within the IIA Scoping Report, including matters in respect of Epping Forest SAC.

The workshop will take the form of a roundtable discussion, with under ten participants. There will be a focus on the environmental aspects of the IIA process only.

Outcomes of the workshop will inform preparation of the IIA Scoping Report, which will then be published for consultation in early 2020.

I look forward to receiving confirmation of your attendance.

05_12_2019 - Email from External Consultant AECOM regarding LBE IIA and HRA Scoping Workshop

Dear All

Thank you to those who were able to attend Monday's workshop; it provided some very useful insight into the region's issues that need to be considered in the IIA scoping process. Please find attached the workshop notes. Please do let me know if you have any comments or you feel any key issues/points have been missed.

For those who were not able to attend, we would be grateful if you could also:

- Identify any issues that you are aware of that have not been covered in the meeting notes
- Or any further sources of evidence which may provide insight to the points raised

Could you please provide your comments by Friday 13th December.

Key Issues

Epping Forest SAC recreational impacts

- Recreational pressure is a key local issue as such Epping Forest District Council (EPDC), alongside LB Redbridge and LB Waltham Forest are setting up a governance arrangement for the forest. Given the potential growth in the east of LBE, the borough may need to be a part of this set up.
- EFDC have developed a mitigation strategy which Natural England are reviewing. One option is SAMM (Strategic Access Management and Monitoring) contributions within a 3km sphere of influence.
 - Currently there are two mitigation zones (3 and 6.2 km) but this may change following the September 2019 visitor survey. It was noted the 6.2 km zone would impact LB Enfield (LBE) from approximately Winchmore Hill eastward.
 - Mitigation through SANG (Suitable Alternative Natural Greenspace) in the Enfield Green Belt will also be an option to explore (potentially having a bearing on the spatial strategy towards housing). Although this can also be explored through the potential to mitigate through non-SANG strategic green infrastructure (GI) enhancements.

Epping Forest SAC air quality impacts

- The key issue is movements east along the A406 (North Circular) impacting southern outlier parts of the SAC in Waltham Forest.
- Given Meridian Water's proximity (within 3km); the LBE Local Plan may need to consider the air quality impacts; transport modelling will provide a greater understanding of the Local Plan's impacts on the forest.
- EPDC have undertaken detailed traffic modelling including an adjusted fleet mix which includes assumptions on electric vehicle and new emission standard vehicles increases. EPDC are awaiting confirmation from Defra that this mix is OK to use.

- LB Waltham Forest and EFDC have growing concerns about HGV back log into Epping Forest and the air quality issues this brings.

Lee Valley SPA

- There are limited risks of Local Plan impacts, given the nearest site is Walthamstow Reservoirs. However, LBE should be aware of the impacts of recreational issues given the aspirations to reduce severance between to Lee Valley Regional Park.

Green Infrastructure (GI)

- LBE are commissioning a green, blue and grey infrastructure study.
- If LBE are to meet housing targets this will require a consideration of all available land; it was suggested that Green Belt review may be needed. EFDC are releasing 10ha of Green Belt in their Local Plan.
- Natural England have developed a climate change adaption tool, to assist local authorities in making landscape scale decisions for issues such as green infrastructure designations.
- Increasing access to the Enfield Lee Valley is a major opportunity; studies are being undertaken to explore the increasing recreational use of the Lee Valley reservoirs.

Air Quality

- The Broxbourne A10 CAZ (see <https://www.bbc.com/news/uk-england-beds-bucks-herts-49675893>), is likely to have an impact on the future baseline situation due to traffic using diversion routes, as road users look to avoid charges, this may also impact Epping Forest.

Transport

- Bus Rapid Transit Study is underway (with TFL) in response to proposal 92 in the Mayor's Transport Strategy. Arup are leading on this business case which should be ready by March 2020
 - The A406 is a key route, given Meridian Water, New Southgate and elsewhere in Barnet and Waltham Forest (also access to Epping Forest is a good thing). LB Barnet and LB Waltham Forest showed support for potential routes that unlock access between boroughs.
 - Also explore an A110 route via Enfield Town, areas of industrial land with potential for intensification and Cockfosters.
 - LBE have been delivering 300 houses per annum on small sites, this will need to increase to 600 per annum. Strategic small site selection could play an important role in the case for rapid transit.
- Enfield Town has received £9m of Liveable Neighbourhood funds, this could be integrated into a Bus Rapid Transit business case.
- Crossrail 2 (CR2) is the other critical transport issue. Although it cannot be assumed for the Local Plan, LBE will need to bear this in mind and provide sensitivity testing.
- New Southgate Opportunity Area is a key location which could be an opportunity for a joint masterplan between LBE, LB Haringey and LB Barnet. Highway modelling and GLA capacity testing has taken place around the Western Gateway and Barnet retail sites offer potential CR2 station sites.
 - Meeting between LBE and LB Barnet re the Opportunity Area is scheduled for February.

- Long term aspiration is to reduce commuting by developing a local higher wage economy, e.g. through being seen part of a strategic innovation corridor.
- Meridian Water - has HIF funding for four tracking, which will result in four trains per hour at the new Meridian Water station.

Other

- EFDC are seeking to protect 'glass house industry, LBE has seen a decline in this area. It is viewed as an appropriate use of Green Belt land. Seen as a duty to cooperate issue given concerns over food security/food miles.
- LB Barnet has a potential 1000 dwellings per annum shortfall in housing (using the Government's standard method) and has written to neighbouring authorities requesting assistance with meeting this.
- LBE is undertaken an economic study to look at the potential of transferring SIL targets to outer authorities.
- EFDC WAL.E8 (employment area allocation) may lead to employment implications in Enfield.
- Haringey - Pinkham Way allocated for waste; industrial land in use; nothing major will happen adjacent to Enfield ahead of CR2.
- The IIA Scoping Report should include an initial list of cross boundary infrastructure opportunities.

Sources of Evidence

- LB Barnet are willing to share their Local Plan IIA and SA work.
- Rodger Flowerday would be a useful contact at Hertfordshire County Council to discuss the A10 CAZ.
- EFDC are willing to share the transport modelling data that was used for their Local Plan.
- EFDC are publishing their GI Strategy in March 2020.

05_12_2019 Briefing note from External consultant AECOM regarding London Borough of Enfield

Briefing note

Project	Purpose of this briefing note
Enfield Local Plan Integrated Impact Assessment (IIA)	Introduce the Local Plan IIA process and the inputs required from specialists ahead of preparing a Scoping Report for consultation in early 2020.

Scoping the Enfield Local Plan IIA

AECOM is commissioned to lead on Integrated Impact Assessment (IIA) in support of the emerging Enfield Local Plan. IIA involves undertaking the legally required Sustainability Appraisal (SA) process alongside: Equality Impact Assessment (EqIA), which is undertaken in order to discharge the Public Sector Equality Duty; Community Safety Impact Assessment (CSIA), in line with the Council's duty to do all that reasonably can be done to prevent crime and disorder; and Health Impact Assessment (HIA) to promote the reduction of health inequality and have regard to the health effects of planning policies. AECOM is also leading on a further legally required assessment process, namely Habitats Regulations Assessment (HRA); however, HRA involves distinct procedural steps, and hence is undertaken as a stand-alone process.

The IIA process involves a series of procedural steps, as understood from the legislation underpinning the required SA process (specifically, the Environmental Assessment of Plans and Programmes (or Strategic Environmental Assessment, SEA) Regulations). In short, the process involves:

IIA stage	Description
1) Scoping	Establish the key issues / objectives that will (and will not, with a view to ensuring a stream-lined process) be a focus of the assessment stages.
2) Establish and assess reasonable alternatives	Explore alternative ways of achieving certain key plan objectives (to be determined) in time to inform preparation of the Draft Plan.
3) Assess the emerging Draft Plan	Scrutinise the performance of the emerging plan in respect of the framework of issues/objectives established at the scoping stage and make recommendations to which the plan-maker should formally respond.
4) Publish the IIA Report	Publish a report alongside the Draft Plan that presents a range of required information, but fundamentally an assessment of

	“the plan and reasonable alternatives” in order to inform the consultation and plan finalisation.
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We are currently at Stage 1 in the process, in that we are commencing work to ‘scope’ the IIA. In practice this stage will involve: A) a review of available evidence; B) identification of key issues and objectives; and C) a targeted consultation (a further legal requirement of the SEA/SA process).

As such, we are seeking views on the key sources of evidence that we should review, and the broad scope of issues / objectives that we should aim to explore. Views will be taken onboard and reflected in a Scoping Report, which will then be published for consultation early in 2020.

It is important to note that IIA scoping starts from a blank sheet and aims to respond to the local context and the scope of the emerging plan. The local context will be familiar to the current audience. With regards to the scope of the emerging plan, the following bullet points introduce key issues and pose initial questions:¹

A key decision to be taken through the Local Plan will be in respect of **housing and employment growth strategy**. The Local Plan must identify deliverable sites to meet the minimum requirements set by the London Plan, and there will be a need to explore higher growth options that reflect a more ambitious approach to meeting needs. Do you have views on broad strategy options?

- Growth will be distributed with a view to avoiding constraints and realising opportunities. Certain aspects of **distribution** strategy can be taken as a ‘given’, e.g. the need to focus on locations with highest transport connectivity, focus on the two designated Opportunity Areas and avoid Green Belt as far as possible; however, there will be many decisions to be made / options to explore, e.g.
 - Town centres and district centres – should new homes be distributed broadly in-line with the hierarchy of centres, or are there certain centres that are suited to a lower or higher growth strategy? Whilst a balance must always be struck between a desire to concentrate growth in the most accessible locations and a desire to restrict the impact of tall buildings on local character and amenity, are there certain areas where the option of taking an ambitious approach to tall buildings (or high-density development more generally) should be explored?
 - Suburbs – is it broadly appropriate to continue recent trends in respect of limited redevelopment and infilling within the suburbs, or should higher growth options be explored, either for the suburbs as a whole (taking account of character) or for specific areas?
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- Eastern corridor – what are the strategic issues and opportunities associated with the proposal to transform this area, with delivery of a large number of new homes alongside efforts to maintain or increase the amount of Strategic Industrial Land (SIL) floorspace?
- Green Belt – whilst Green Belt release must always be a last resort, should it transpire that it is a challenge to meet housing and employment targets solely within the urban area without unacceptable impacts, what parts of the Green Belt should come into consideration, and what might be the benefits of one or more strategic scale schemes in the Green Belt?
- Securing new and upgraded **infrastructure**, including community infrastructure and green infrastructure, will be a key priority when exploring spatial strategy options and when preparing development management (DM) policy (both Borough-wide and for specific areas / sites). It goes without saying that viability will need to be factored-in, and to this end detailed viability work will be undertaken; however, at this early stage in the plan-making process, what are the key priorities from your perspective?
- **DM policy** will be developed not only to secure infrastructure delivery, but to ensure that wider opportunities are realised (e.g. in respect of connectivity, place-making, climate change), and ensure that the potential negative impacts of development are avoided. From your perspective, what are the priorities (N.B. see draft proposals for DM policies within the 2018 Issues and Options document)?

It is important to recall that the Local Plan will be of a strategic nature, applying to the Borough as a whole and identifying spatial priorities in the knowledge that there will be further detailed work down-the line (e.g. sites will be allocated in the knowledge that there will be detailed work through the planning application process).

With this in mind, we wish to explore the following (related) **key questions**:

- What sources of evidence should we review in order to build an understanding of issues and opportunities at the Borough-wide scale and spatial variation across the Borough?
- What are the key issues/objectives that should be a focus of the Local Plan IIA process in order to ensure due scrutiny of the Local Plan, with a view to avoiding pitfalls and realising 'good growth' opportunities?
 - In other words, what key questions should we systematically pose of all plan proposals / options?
- What more detailed issues/objectives/questions should we bear in mind as part of the assessment?

06_12_2019 Email sent from Hertsmere Borough Council to London Borough of Enfield regarding IDP

Good morning,

Hertsmere Borough Council has appointed consultants ARUP to prepare an Infrastructure Delivery Plan (IDP) to establish the level of infrastructure provision (and associated cost) required to support growth in the Borough to 2036.

The IDP will also provide a basis for developing our new Infrastructure Funding Statement (IFS), which will set out the Council's spending priorities for infrastructure projects to be funded through money we have collected from developer contributions (both via our Community Infrastructure Levy and through S106 agreements).

In order to make our Infrastructure Delivery Plan as comprehensive as possible we are contacting duty to cooperate bodies to ask for any input that they have. If there are any cross-boundary infrastructure issues or other relevant information you think we should be made aware of please let us know.

The council would be happy to receive any comments that you have by email but if you would like to speak to our consultants about the IDP and any concerns that you can also book a time slot to speak with them. Please refer to the tables below and let us know your availability.

If you could please send any comments by **Friday 20 December 2019** or if you would like a call instead, your availability as soon as possible.

Organisation	
Contact Name	
Job Title	
Contact Email	
Contact Phone	

Time	Mon 09 Dec	Tue 10 Dec	Wed 11 Dec	Thu 12 Dec	Fri 13 Dec
09:00 – 11:00					
11:00 – 13:00					
13:00 – 15:00					

15:00 – 17:00					
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Time	Mon 16 Dec	Tue 17 Dec	Wed 18 Dec	Thu 19 Dec	Fri 20 Dec
09:00 – 11:00					
11:00 – 13:00					
13:00 – 15:00					
15:00 – 17:00					

Thank you for your time and cooperation.

31_01_2020 Letter sent from Hertsmere to Enfield Borough Council regarding any outstanding housing numbers

Hertsmere Local Plan

Hertsmere Borough Council is currently progressing work on its own Local Plan which will cover the period from 2018 to 2036.

As part of the duty to cooperate process, we have been actively engaging with all of our neighbours and stakeholders to consider how Hertsmere will meet its own identified housing and employment needs. The standard national methodology for assessing housing need has resulted in an annual requirement of 750 homes per annum (incorporating a 5% buffer, as required by the NPPF) or 13,500 homes over the plan period. By comparison, our current Local Plan which was adopted 2013, has an annual housing requirement of 266 homes. That Plan is now more than five years old and therefore deemed to be 'out of date' in determining our future strategic growth requirements.

We recognise that there is an agreement in principle to progress a joint plan for the South West Herts Housing Market Area, which would involve a comprehensive and comparative assessment of Green Belt land. Clearly this will not be in place in time to inform our new Local Plan and there remains a need for Hertsmere to bring forward this new plan without delay.

Following a Call for Sites, we have consulted on a Potential Sites for Housing and Employment document which identified and summarised the site proposals initially put forward by landowners and developers. Hertsmere's current housing and employment land capacity is considered to be solely that which can be developed on previously developed land and includes all sources on land not covered by Green Belt designation. We also recognise that there is greater emphasis in the NPPF on making effective use of land (chapter 11) and maximising densities (chapter 13) as a preliminary requirement prior to assessing where Green Belt land might be taken and whether exceptional circumstances exist for doing so. Given these requirements and to ensure that previously developed land is maximised, we have set out to:

- 1) Review the housing densities and capacities of all potential sites located within major settlement boundaries, and applying a significant uplift in the average density of residential development in accordance with paragraph 123 of the NPPF.
- 2) Assess the utilisation of local vacant housing stock as a source of untapped brownfield housing supply.
- 3) Review the achievability and deliverability of Hertsmere's own land assets.
- 4) Contact owners/occupiers of major brownfields sites who have not yet submitted any of their land holdings.

Our Housing and Economic Land Availability Assessment (HELAA), published in 2019, points to a capacity of less than 2,500 homes on previously developed

land. This includes an allowance for windfall development and existing commitments. We are hopeful that around two-thirds of our employment requirement of over 25ha of employment can be accommodated within land which has previously been safeguarded for such purposes in our current Local Plan.

There is therefore a very significant shortfall between the potential housing capacity of Hertsmere's previously developed land and the level of identified need, as well as a clear deficit of land required to meet employment needs over the plan period. As an authority with almost 80% of its area designated as Green Belt, we are therefore asking you whether your authority is able to accommodate some of the growth shortfall identified within Hertsmere. A similar request has also been sent to all neighbouring authorities and other authorities within our HMA.

We are intending to arrange a Duty to Co-operate workshop in due course to discuss our emerging plan and potential cross boundary issues arising, and will be in contact again with more details about this event. In the meantime, I would be grateful for a response to this letter at the earliest opportunity.

If you have any queries relating to the above request, please do not hesitate to get in contact.

10_02_2026 Email from Hertsmere Borough Council to London Borough of Enfield regarding email sent on 06_12_2019

Dear Sir / Madam,

I was wondering whether you, or one of your Local Plan team would be able to reply to the email below, sent by my team on behalf of consultants ARUP, who are carrying out an update to Hertsmere's Infrastructure Delivery Plan (IDP)?

In particular they are keen to know your thoughts on the following questions:

1. To what extent do you consider there to be cross-boundary infrastructure linkages with Hertsmere, e.g. transport corridors, education flows, shared reliance on utilities?
2. Are there any notable infrastructure improvements in the pipeline in your local authority area that might be of relevance to Hertsmere?
3. Is there any infrastructure within Hertsmere which you will potentially be reliant upon to accommodate future growth within your local authority area?

A brief reply by email would be most welcome. However if you would like a more detailed chat, please contact Rob Webster at ARUP direct (cc'd into this message) to arrange a mutually convenient time.

26_02_2020 Email from London Borough of Enfield to Hertsmere Borough Council confirming receipt of Housing Numbers Letter

Confirming receipt. Apologies for slow response but I have been on paternity leave.

10_03_2020 Email response from Enfield Borough Council to Hertsmere Borough Council regarding Outstanding Housing Need

Further to your letter dated 31 January in relation to the Duty to Cooperate and request to meet Hertsmere's unmet housing need, please find enclosed a letter from Enfield.

I would be grateful if you could acknowledge receipt and officers will be in touch with your office to schedule a meeting between our respective authorities where strategic matters can be explored further.

10_03_2020 Response from London Borough of Enfield to Hertsmere Borough Council regarding Outstanding Housing Need.

ENFIELD'S RESPONSE TO HERTSMERE LOCAL PLAN 2018 TO 2036: DUTY TO COOPERATE UNMET HOUSING NEEDS

I acknowledge receipt of your letter dated 31 January 2020 that includes a formal request from Hertsmere Council to Enfield Council to consider whether Enfield could accommodate some of the housing growth shortfall identified within Hertsmere over the emerging Local Plan period up to 2036.

It is noted that this request has been made by Hertsmere Council as part of the preparation of the Hertsmere Local Plan and under the requirements of the Duty to Cooperate. Enfield Council has carefully considered the Hertsmere request and this letter should be regarded as Enfield Council's formal response on this matter.

Hertsmere's Local Plan 2036

It is noted that Hertsmere Council has accepted an identified Objectively Assessed Need (OAN) of 13,500 dwellings over the plan period, equating to 750 per year including a 5% buffer as required by the National Planning policy Framework (NPPF).

Your letter highlights that Hertsmere Council is undertaking a series of measures that have been proposed to increase the delivery of homes across the borough. Enfield Council supports this approach but also suggests that further review of the site capacity and assumptions regarding delivery are undertaken to assess the potential of bringing forward further housing supply.

Enfield's new Local Plan 2036

The current development plan for Enfield includes the Core Strategy (2010) and Development Management Document (2014) and Area Action Plans.

The Council has also commenced work on a new Enfield Local Plan 2036. To support the next stage of plan preparation at Regulation 19 stage a range of technical studies are underway that will identify development capacity and constraints to housing supply in the borough.

As an Outer London authority Enfield is equally alive to the growth challenges. Enfield is a celebrated green borough, with close to 40% of our borough designated Green Belt or Metropolitan Open Land, and a further 400 hectares provides the critical industrial land that serves the capital and wider south east growth corridors. Our emerging housing needs evidence is estimating an uncapped requirement of 3,750 dwellings a year to 2036. This represents a sizeable uplift in the scale of housing need compared to both existing London Plan 798 target and emerging Intend to Publish London Plan 1,246 figure.

At this stage, it is not possible to provide a definitive view on the capacity of the urban area but the implications of accommodating such a high within the borough will need to be informed through outputs of key supporting technical evidence base

before Enfield Council can confirm it has the capacity to meet the residual needs of any of the surrounding Housing Market Area (HMA) authorities.

The Council is willing to continue to constructively engage on this matter as part of the Duty to Cooperate arrangements for both the Hertsmere and Enfield Local Plan respectively.

Enfield Council also requests confirmation from Hertsmere Council as to whether there are any other identified unmet needs that would require a formal request under the requirements of Duty to Cooperate.

I will be in touch with officers to schedule a meeting between our respective authorities where strategic matters can be explored further.

03_06-2020 – Invitation for Duty to Co-operate meeting between Hertsmere Borough Council and London Borough of Enfield.

Agenda:

1. Local Plan Programme update LBE
2. Local Plan Programme update Hertsmere
3. Technical Evidence Base Focus:

LBE

1. Functional Economic Market Area Study and Strategic Industrial Land (SIL)
2. Housing Needs Assessment
3. Strategic Integrated Transport Study
4. Ways of Working
5. AOB

12_06_2020 Email from Hertsmere Borough Council's in response to London Borough of Enfield Duty to Co-operate request

I wanted to respond on behalf of Hertsmere to Enfield's letter in March which itself was a response to our DtC request. Our response requests confirmation as to "whether there are any other identified unmet needs that would require a formal request under the requirements of Duty to Cooperate."

I can confirm that presently there are no other unidentified needs that would require a formal request from Hertsmere to LB Enfield under the DtC. Should that situation change, we will of course let you know. I am meeting with Enfield before the end of month so if there are any specific DtC issues you would like to cover, the meeting would provide a useful opportunity to discuss them further.

14_08_2020 – Follow up from AECOM to Hertsmere’s Duty to Co-operate Meeting

Dear colleagues

I trust that you’re all doing well.

Thank you for your input to the recent LBE DTC meeting, where we sought to discuss the progress of respective emerging draft new Local Plans, technical evidence base, potential cross-borough strategic matters.

As part of our future ways of working, please see the attached draft meeting note and key forward actions for your review. Also attached for information is the presentations.

I would be grateful if a response can be sent by the **28 of August 2020.**

Meeting note

Meeting context

The DTC meeting led by the London Borough of Enfield sought to discuss the progress of respective emerging draft new Local Plans; associated technical evidence base; emerging cross-borough strategic matters; and future ways of working.

A series of meetings and workshops will be held to establish a greater understanding of the cross-borough impact on growth and regeneration potential and share key pieces of technical evidence base work in terms of their approach and emerging findings.

The aim of these sessions is to provide opportunities for joint working and to build consensus into our emerging respective Local Plans as part of discharging of the DTC.

Key highlights on Enfield’s new Local Plan: (see accompanying slide presentation)

- A series of technical evidence base studies are being progressed to inform the next stage of Enfield’s new Local Plan, with the aim consult early 2021;
- Enfield’s new Local Plan will be divided into four parts:
 - **Part A** – sets out a strong bold, long term vision that aims to make the borough a better place in which to live and work. It also sets out our approach to the future planning and growth of the borough: the pattern, scale and broad locations of different types of development and the overall principles that will guide and influence the way it is delivered;
 - **Part B** – sets out place based and site-specific policies. This identifies the places where physical change and development will take place in the borough and the key opportunity sites which are critical to the delivery of the plan;

- **Part C** – sets out the policies that will be used to positively manage development and assess planning applications; and
- **Part D** – sets out how the policies set out in the Local Plan will be delivered and implemented; it will also set out new s106 formulas and new Community Infrastructure Levy (CIL).
- A key challenge in Enfield is the delivery of a significant number of new homes per annum;
- Work has commenced on a Local Housing Needs Assessment, using Governments standard methodology, which has established an annual need of 3,750 dwellings each year;
- The figure of 3,750 dwellings each year is uncapped need based on demographic projections and an affordability uplift;
- Population is projected to increase by over the plan period from 339,200 in 2018 to 382,700 by 2036 with about 54% increase in people aged 65 or over;
- The final standard method minimum need is lower as caps to existing targets are applied:
 - 1,117 based on current London Plan targets;
 - 2,626 based on the proposed draft London Plan 2019 target; and
 - a lower figure if the Intend to Publish London Plan target were used.
- Other pieces of technical evidence base studies were mentioned:
 - a housing capacity study;
 - Functional Economic Market Assessment (FEMA) and Industrial Intensification study;
 - an up to date retail and town centres study;
 - an assessment of the need for burial space; and
 - a review of the Green Belt and Metropolitan Open Land.

Key highlights from Enfield's emerging technical evidence base studies:

1) Functional Economic Market Assessment (FEMA) and Intensification Study (see accompanying slide presentation)

- The vast majority of Enfield's Industrial capacity is designated as Strategic Industrial Location (SIL) covering 332 hectares, mostly occupied by medium to large size firms as well as manufacturing businesses;
- Generally low vacancy rates, with less than 1 per cent of space currently actively marketed;

- A large number of Enfield's industrial land is concentrated within the Lee Valley Opportunity Area, which would benefit from improvements on the West Anglia Main Line and as well as the potential arrival of Crossrail 2;
- Considering the ambitious plans for housing growth, there is also a need to plan for an uplift in employment space;
- The Greater London Authority (GLA) Industrial Land Demand Study identifies the need of 52 hectares over the London Plan period up to 2041. This broadly aligns with Enfield's Employment Land Review (2018), which identified the need of approximately 48 hectares of employment land over the Local Plan period.

In addition to accommodating the borough wide need, Enfield is also exploring the opportunity to facilitate the release of approximately 18 hectares of SIL land at Harbet Road Industrial Estate, in principle to enable the future phases of Meridian Water to come forward; Overall the FEMA seeks to update the market area boundaries and assesses the opportunity for industrial intensification; the findings have suggested there are opportunities for substitution potential in: Uttlesford with 32 hectares; and limited potential at Newham with approximately 16 hectares.

2) Housing needs assessments and capacity study (see accompanying slide presentation)

- A draft Local Housing Needs assessment has been carried out by AECOM and Arc4. The study highlights the following points:
 - Overall median house prices (£385k) lower than London but higher than England;
 - Differences in price, quality and tenure in east v west (ward level medians from £268k to £722k);
 - 125,000 dwellings and 138,141 households;
 - Half of dwelling stock = 3-bed houses;
 - The rest are flats (mostly 1 and 2-beds).
- The Capacity Study involves a series of site searches and mapping exercise undertaken in line with the planning practice guidance.

3) Strategic Integrated Transport Study (SITS) (see accompanying slide presentation)

- SITS is key piece of supporting technical evidence for the Local Plan and is underpinned by a range of technical evidence including transport models.
- The objectives of the SITS:
 - to analyse current and committed provision of transport to determine its capacity to support future demand for movement and connectivity from

the projected new homes and jobs in the borough across the plan period;
and

- to identify necessary mitigation measures required to support the borough's growth, which can be delivered as part of the planning process or strategic transport interventions.
- SITS will involve data gathering, analysis, transport modelling, stakeholder engagement, strategy and policy development.
- Overview of the current work by AECOM consist of:
 - **Stage 1: Review of Existing Evidence**
 - Report summarising previous work and recommendations for developing evidence base
 - **Stage 2: Review of TfL Modelling Suite**
 - Model review note

Further stages of SITS will involve:

- Updated data and modelling risk register;
- Some of the Update of Transport for London (TfL) modelling suite;
- Baseline Assessment;
- DtC Engagement;
- Develop scenarios (transport/spatial land use);
- Scenario testing; and
- Transport Strategy.

Key highlights on Hertsmere's Local Plan:

- Hertsmere is working towards publishing a draft Regulation 19 consultation document by February 2021;
- A series of technical studies have been completed but have not yet been published. Although, there are several other pieces of published technical studies jointly undertaken by boroughs of the southwest which include Dacorum Borough Council, St Albans City and District Council, Three Rivers District Council and Watford Borough Council.
- Hertsmere also noted that they share a small housing market with Welwyn Hatfield in the Potters Bar area;
- In relation to Green Belt release, a number of sites across the borough are promoted in the Local Plan, the largest one is a site towards the north west of

Potters Bar with a proposal for about six thousand homes. A Green Belt stage 1 & 2 assessment have been carried out, but further rural settlements work is in progress;

- A landscape and visual impact assessment is currently in progress undertaken by Land Use Consultants (LUC);
- A Joint Strategic Plan for South West Hertfordshire up to 2050 is currently in the early stages of preparation and a regulation 18 consultation on an Issues and Options document is anticipated by 2021.
- Other pieces of work mentioned include, a document published in late 2018 about potential sites for housing and employment. In terms of infrastructure, the initial baseline work for the Infrastructure Delivery Plan (IDP) has been undertaken by ARUP. Some of the challenges highlighted around the IDP is that many organisations feed into that work, as the organisational structure contains two and three tier local authority areas with parish Councils in some areas.
- **Key actions:**

Enfield to coordinate the actions below with LB Enfield and Hertsmere:

- 1) For Enfield and Hertsmere colleagues to liaison evidence studies that are mutually beneficial, particularly on housing, employment land aligned with the greater transportation impact.
- 2) To develop an initial Memorandum of Understanding outlining key strategic matters including:
 - a. SIL intensification and substitution;
 - b. Green Belt release; and
 - c. Strategic Transport Infrastructure related to Logistics and Supply Chains.
- 3) Meetings to be arranged as required.

07_01_2021 Email from London Borough of Enfield to Hertsmere Borough Council regarding Enfield's Unmet Housing need

Please find enclosed a letter from Vincent Lacovara in relation to the Duty to Co-operate and a request to consider unmet housing and employment need in our borough.

Letter from Enfield Council to Hertsmere Borough Council regarding Unmet Housing Need

The London Borough of Enfield is currently progressing work on its new Local Plan which will cover the period up to 2039. We have been actively engaging with all of our neighbours and stakeholders through the Duty to Co-operate for several years and now wish to deepen this process as we consider how Enfield will meet its own identified housing and employment needs.

Our evidence base production has progressed significantly in the last few months and we have identified that we will not be in a position to meet all of our housing and employment needs in the borough. As you will be aware, Enfield is a constrained borough with around 40% of its area covered by Green Belt and a further 300 hectares (5%) designated as Strategic Industrial Location (SIL). Other significant constraints such as SSSI, MOL, Registered Parks and Gardens and Ancient Woodland affect large areas of the borough. These constraints affect our land supply and our ability to meet the borough's growth requirements. The council is continuing to use its best efforts to meet its needs within the urban and brownfield areas of the borough but unfortunately the supply evidence is indicating that it will not be able to do this, despite maximising the urban site pipeline and increasing supply through intensification and creative design solutions.

The purpose of this letter therefore is to formally ask if your council would be in a position to assist Enfield in meeting some or all of its unmet employment and housing requirements. To assist you in coming to view on Enfield's request I have set out below a summary of the evidence and scale of shortfall relating to the housing and employment requirements

Housing

Enfield's housing requirements are set by the London Plan. The adopted 2016 London Plan will shortly be out-of-date and is due to be replaced by the new London Plan. The latest version (Published London Plan (Dec 20)) has a housing requirement for Enfield of 1,246 dwellings per annum which equates to a total of 18,690 over a 15 year plan period. Our current urban and brownfield site pipeline is not sufficient to meet this requirement and we currently estimate we could be up to 4,000 dwellings short of the target over the plan period.

The council does have a supply of sites in Green Belt/MOL areas that might potentially be used to meet housing needs based on the 1,246 target, although there is further work to be done on this. However, we recognise the very strong policy constraints relating to use of Green Belt/MOL land to meet unmet housing need and are adopting a 'no stone unturned' approach before turning to this supply. This approach includes establishing whether Duty to Co-operate partners would be able to assist us in meeting our unmet housing need.

It is important at this point to note that the Published London Plan target is not adopted and is still subject to considerable uncertainty as a result of discussions between the Mayor and Secretary of State. Furthermore, the targets in that plan are only applicable for 5 years from the date of adoption and any new London Plan that is developed will be expected to be based on the new Standard Methodology (December 2020) for calculating housing need. Applying the methodology to Enfield alone would leave us with a housing need of up to 65,955 new homes over a 15 year plan period. It is clear that we would be unable to provide for this level of need even if we were to use our entire site supply (including Green Belt/MOL and other policy constrained sites).

Employment

The council's employment evidence indicates that we have a need in the borough for 53ha of additional industrial/distribution land. Utilising intensification and new employment sites in urban areas we estimate we can provide for 30ha of this. This leave us with a significant unmet industrial/distribution need of around 23ha.

The council does have a very small supply of sites in the Green Belt/MOL that could potentially be used for industrial/distribution uses but this is not expected to make significant in-roads to the 23ha unmet need. We are seeking your assistance with meeting this need. We are expecting to publish the next stage of our local plan in summer 2021 and thus there is some degree of urgency for us in understanding whether or not your council would be in a position to take some of Enfield's unmet housing and employment needs. **Accordingly, I would be grateful for a response to this letter by the end of January 2021.**

In the meantime, if you feel you need more information, including detailed evidence of our supply pipeline and constraints, or would like to discuss the matter with us before formally responding please let me know as soon as possible so that we can arrange a meeting in early January.

For your information, a similar request has also been sent to all neighbouring authorities and other authorities within our Housing Market Area and Functional Economic Market Area.

20_01_2021 Follow up from email from Enfield on 07/01/2021

Enfield's new Local Plan 2039 – unmet needs

Further to my email on 7 January 2021, we are keen to hear from you with our request to consider unmet housing and employment need in our borough.

We are expecting to publish the next stage of our local plan in summer 2021 and there is some degree of urgency for us in understanding whether or not your council would be in a position to take some of Enfield's unmet housing and employment needs. Accordingly, I would be grateful for a response to this letter by the end of January 2021.

04_02_2021 Response from Hertsmere Borough Council to London Borough of Enfield regarding Unmet Housing Need

Thank you for your letter of 7 January 2021 requesting consideration of the unmet development needs in Enfield.

Please note that this letter represents an informal response based on Officer opinion only, and should therefore be considered as such. The purpose of the letter is to help inform Enfield Council of the process being conducted in Hertsmere to meet its own development needs, and whether we have the capacity and capability to meet some of your identified unmet development needs.

Hertsmere is currently progressing work on its own Local Plan which will cover the period from 2018 to 2036. As part of the duty to cooperate process, we have been actively engaging with all of our neighbours and stakeholders to consider how Hertsmere will meet its own identified housing and employment needs. Documents summarising the responses to our previous consultations from the both the general public and, site promoters, statutory bodies, and local interest groups can be found online:

<https://www.hertsmere.gov.uk/Planning--Building-Control/Planning-Policy/Local-Plan/New-Local-Plan/New-Local-Plan-Planning-for-Growth.aspx>

Housing

The Borough's adopted Local Plan is made up of the Core Strategy (adopted in January 2013), the Elstree Way Corridor Area Action Plan (adopted in 2015) and most recently, the Site Allocation and Development Management Plan (adopted in 2016). The Local Plan sets out the requirement for housing provision for the Borough between 2012 and 2027, which equates to 266 dwellings per annum. The Council's strategic policies were five years old as of January 2018, towards the end of the 2017/18 monitoring year.

The government recently advised that the 2014 sub-national population projections are to be used as the basis for calculating housing need equating to 716 homes per year or 14,250 homes over an 19 year plan period (including a 5% buffer). Hertsmere's housing capacity is considered to be solely that which can be developed on urban land and includes all sources on land not covered by Green Belt designation. There is greater emphasis in the NPPF on making effective use of land (chapter 11) and maximising densities (chapter 13). This new advice applies in any event to ensure the most effective use of land and applies as a preliminary requirement prior to assessing where the Green Belt land needs to be taken and whether exceptional circumstances exist for doing so.

Given this consideration, and the requirements within the NPPF Feb 2019, the updated HELAA (2019) reassessed the council's brownfield land allocation, to ascertain Hertsmere's housing capacity and ensure that urban land was maximised. This included:

- 1) Reviewing the densities and capacities of all potential sites located within major settlement boundaries, and applying a significant uplift in the average density of residential development in accordance with paragraph 123 of the NPPF.
- 2) Assessing the utilisation of local vacant housing stock as a source of untapped brownfield housing supply.
- 3) Reviewing the achievability and deliverability of Hertsmere's owned assets.
- 4) Contacting owners/occupiers of major brownfields sites who have not yet submitted any of their land holdings.

This process concluded that there is still a significant shortfall between the potential capacity of Hertsmere's urban land and the level of identified need. Hertsmere is therefore unable to consider Enfield's unmet housing needs as this capacity is not sufficient to meet our own needs.

It is only once we identified this shortfall against housing need that the Council has considered looking at Hertsmere's Green Belt to see whether "exceptional circumstances" exist to justify release. There remains the possibility of asking neighbouring authorities to take some of the growth shortfalls identified within Hertsmere but it is recognised that most authorities within the SW Herts Housing Market Area (HMA) are already having to consider Green Belt release to meet demand. We have previously written to Enfield Council, as well as the London Boroughs of Harrow and Barnet to enquire whether there is any additional capacity in north London to meet Hertsmere's identified need. To date, the responses have shown that no such capacity exists.

In the absence of a joint plan for the South West Herts Authorities which would involve a comprehensive and comparative assessment of Green Belt land, the Council considers that exceptional circumstances do not exist for Hertsmere to release some of its Green Belt to meet the housing requirement of neighbouring authorities.

Employment

Your letter identifies that Enfield has a shortfall of around 23ha of industrial/distribution land, notwithstanding a small supply of sites in the Green Belt/MOL. Given that our HELAA also identified a shortfall of urban sites to meet future jobs growth within Hertsmere, based on the findings of the SW Herts Economic Study Update (2019), we will need to demonstrate that exceptional circumstances exist to justify green belt release for economic development. The scope, scale and location of employment-led development is still being considered but deliverable land has been promoted on the edge of Hertsmere's designated employment areas for the potential allocation of any additional employment land for B class and other employment generating land uses. Please also note that the Council has just opened a new Employment Call for Sites as we have been made aware of a number of new sites being promoted for economic development which have not previously been submitted to us for assessment.

This informal letter provides a direction and basis for discussions going forward and we look forward to further engagement with Enfield in relation to the production of both authorities' Local Plans.

08_02_2021 – Email from the London Borough of Enfield in a follow up to Duty to Co-operate meeting

Hi All

Good to catch-up just now. Key outcomes agreed:

1. A further meeting towards the end of March 21 following respective outcomes from the call for sites exercises and LP options development;
2. Potential collaboration on a future sub-regional employment land/ economic study;
3. Sharing of case studies on Neighbourhood Planning;
4. Data sharing on exceptional circumstances case for GB release;

08_02_2021 Email from Hertsmere Borough Council in response to London Borough of Enfield

I'm not sure if it's an outcome, as there is no immediate action arising, but I'd suggest adding 'HBC would support further investigation of scope for GB releases around outlying LBE built up areas served by rail, given similar pressures in Hertsmere'.

14_09_2021 Hertsmere Borough Council response to London Borough of Enfield Regulation 18

Enfield Draft Local Plan (Regulation 18)

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

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

Vision and Objectives

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

Employment need

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

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

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

Housing need

Three options have been considered, each predicated on accommodating different levels of housing growth; 17,000, 25,000 and 55,000 new homes. The preferred option presented in the Regulation 18 Plan is the medium growth 1 scenario (25,000) which would meet much of the housing requirement, including through the release of green belt land, and would meet or come close to enable the plan meeting the needs of other land uses in full.

Recognising the issues raised by the London Plan target neither reflecting the standard national methodology nor providing a target past 2029, we consider that 25,000 is likely to be an appropriate option for housing growth for now, by simply

rolling forward the London Plan requirement. As and when the London Plan is reviewed, however, it may be necessary for individual Local Plans in London to be revisited.

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

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

Proposed site allocations

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

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

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

This is one of two sites highlighted in the Draft Enfield Plan as having a high potential to deliver an uplift in employment floorspace (para.9.1.3). It is put forward as a draft allocation for the provision of a minimum of 30,550 sq m employment floorspace (light and general industrial, storage and distribution, and related sui generis uses). This site adjoins Junction 24 of the M25 and also the borough boundary with Hertsmere. Junction 24 serves Potters Bar, one of Hertsmere's primary towns, so any highway impacts of the proposed uses of the site are likely to have an effect on this junction and on access to Potters Bar, as well as environmental impacts beyond the boundary of Enfield borough.

The site is isolated within the green belt, away from any populated areas of Enfield. The strategic vision for Hertsmere does not include extending the town of Potters Bar to the south of the M25 as this could erode the green belt gap between London and Potters Bar. We would not support a proposal that sees development to the south of the strong and permanent green belt boundary provided by the motorway, resulting in encroachment into the countryside and a narrowing of the gap between Hadley Wood and Potters Bar.

Policy H10 Gypsy and Traveller Provision

It is noted that a separate Gypsy and Traveller Local Plan is being developed, to be informed by the Enfield Gypsy and Traveller's Accommodation Assessment (GTAA) 2020. In the meantime the the draft plan includes Policy H10 which sets out the intention to prepare a separate local plan, and sets local criteria for the consideration of applications.

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

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

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

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

20_05_2024 – Hertsmere Borough Council Response to London Borough of Enfield's Local Plan

Enfield Local Plan (Regulation 19 Consultation)

Thank you for notifying and consulting Hertsmere Borough Council on the LB Enfield Regulation 19 Local Plan. This response comes from the Planning Strategy team at Hertsmere Borough Council.

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

Vision and Objectives

Hertsmere's officers support Enfield's aspirational Vision and Strategic Objectives for the borough. We particularly support the Borough's objectives to tackle the climate emergency by achieving net-zero for major development, but, as stated in our previous response, would welcome this being even more ambitious by seeking to apply these aims to all development, or at least across a spectrum of smaller developments.

Employment need

The borough's strategy of seeking to meet the Enfield's full employment need across both the urban area and selected Green Belt sites is supported. Local Planning Authorities in Hertfordshire are having to identify whether exceptional circumstances exist for allocating Green Belt land to contribute towards housing and employment needs and it is appropriate for outer London boroughs to do so as well.

As stated in Hertsmere's response to the Regulation 18 consultation, the Enfield FEMA Study (June 2020) includes Hertsmere within its Functional Economic Market Area (FEMA). The RAG rating assessment (Table 2 within the report), which identifies opportunities for the substitution of industrial land with each Local Authority in Enfield's FEMA, assesses there to be no potential for Hertsmere to accommodate any of Enfield's employment need.

Hertsmere are still awaiting the conclusions of the draft South West Herts Employment Study to understand our employment need. However, it is unlikely that our authority will be in any position to accommodate unmet need from Enfield given the pressure to meet employment need our area and the lack of available previously developed sites.

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

employment space due to increased home-working and an increased demand in other sectors, notably distribution and warehousing.

Housing need

We acknowledge the borough's difficulty in determining a housing target given the position of the London Plan, and welcome the supporting topic paper in setting out how the overall target was determined based on deliverable, developable and potential developable supply. The release of some Green Belt land is acknowledged, this being necessary to meet as much of a reasonably assessed housing need as possible within the borough itself, in the absence of updated London Plan targets.

Enfield's approach to affordable housing, with the overall aim of providing 50% as genuinely affordable, mostly on former Green Belt and Public owned sites, with 35% on other major developments, is commended and supported.

Proposed site allocations

Housing site SA RUR.R.02: Land Between Camlet Way and Crescent Way, Hadley Wood

This site, put forward in the Enfield Plan for 160 homes, directly adjoins the Hertsmere borough boundary. As previously stated in Hertsmere's response to the Regulation 18 plan, locating some new housing at Hadley Wood is logical given the proximity to a mainline railway station.

Within Hertsmere's Greenbelt Assessment, the parcel (16) scores strongly in respect of its performance when assessed against the Green Belt Purposes in the NPPF. Its findings are summarised below;

"The parcel scores moderately against purposes 1 and 2 and strongly against purpose 3. The parcel does not meet purpose 4. The character varies between the north and south of the parcel. The southern area, within LB Barnet, has a more semi-urban character around Monken Hadley Common. This area is separated from the wider countryside visually and physically. The northern area within Hertsmere has a very rural, open character and plays an important role in preventing encroachment into the countryside.

There are no readily identifiable sub-areas for further consideration and the parcel should not be considered further.

Exceptional circumstances will need to be demonstrated to justify bringing forward new housing in the Green Belt here. Care should be taken in the layout and design of development on the site to ensure it does not compromise the wider strategic purposes of the Green Belt between Hadley Wood and the M25/Potters Bar, and between Hadley Wood and the hamlet of Bentley Heath within Hertsmere.

Our draft Local Plan, currently out for Regulation 18 consultation, does not recommend any further consideration of Green Belt land for development south of the M25 as this part of the Green Belt is assessed as performing strongly in preventing the outward sprawl of Greater London and the avoiding risk of coalescence between London and Potters Bar.

Employment Site SA RUR.04: Land East of Junction 24 of the M25

This site allocation puts forward an allocation for the provision of a minimum of 30,550 sq m employment floorspace (light and general industrial, storage and distribution, and related sui generis uses). A stipulation of the proposed the land use requirements is that the land must be brought forward in conjunction with the wider land ownership in Hertsmere Borough Council.

The adjacent site has not been included in Hertsmere Regulation 18 Local Plan. The site was submitted to Hertsmere through both the 2021 Employment Call for Sites, and 2022 Call for Sites. An assessment of whether the site was considered suitable, achievable and available was published in the 2024 HELAA, alongside Hertsmere's Regulation 18 consultation. This concluded that;

“Under the current policy framework, only development on previously developed land would be acceptable. Were the impact on the Green Belt considered to be outweighed by the wider employment need, the site could potentially be suitable, available and achievable. However, given the Green Belt and landscape sensitivity analysis, the site would be unlikely to be amongst the initially favoured sites.”

The South-West Herts Economic Study is currently being updated, and will provide an estimate on our required employment land for the plan period. Should the updated study point to a need for additional land to be considered for allocation, this will need to be addressed in the Regulation 19 version of the Local Plan.

Enfield's Exception Circumstances Topic Paper states that, in the absence of reasonable alternative sites, the borough's economic ambitions can only be achieved with the release of Green Belt land. It is noted that, as stated in the Spatial Strategy & Overall Approach Topic Paper, existing Green Belt has been assessed against the Green Belt purposes (as defined in NPPF paragraph 143). The findings of this work were then fed into the site selection process.

Enfield's Green Belt and MOL assessment 2023 Stage 3 identifies the site as being located with EC22, table 9.1 of which identified the Green Belt harm of release as 'Very High'. Hertsmere also undertook a Greenbelt Review between 2014 and 2018, which identified the Greenbelt Parcel in which the site is wholly located, Parcel 33, as performing strongly against the purposes of the Green Belt, and was not recommended for further consideration.

Enfield's Site Allocation topic paper does go into some additional detail as to the justification mainly surrounding its proximity either to Junction 24 or Potters Bar, but does not acknowledge the harm to the Green Belt. It is therefore unclear how the

impact on the Green Belt has been considered in the selection of the site, if it has at all.

The strategic vision for Hertsmere does not include extending the town of Potters Bar to the south of the M25 as this could erode the Green Belt gap between London and Potters Bar. We are not able to support a proposal that sees development to the south of the strong and permanent Green Belt boundary provided by the motorway, resulting in encroachment into the countryside and a narrowing of the gap between Hadley Wood and Potters Bar.

Furthermore, Junction 24 serves Potters Bar, one of Hertsmere's primary towns, so any highway impacts of the proposed uses of the site are likely to have an effect on this junction and on access to Potters Bar, as well as environmental impacts beyond the boundary of Enfield borough. We are unclear as to whether Highways England have expressed a position on the suitability of the site but based on the information published and justification provided, we would object to the inclusion of this site within the plan.

Policy H10 Gypsy and Traveller Provision

It is noted that a separate Gypsy and Traveller Local Plan is being developed, to be informed by the Enfield Gypsy and Traveller's Accommodation Assessment (GTAA) 2020. In the meantime the plan includes Policy H10 which sets out the intention to prepare a separate local plan, and sets local criteria for the consideration of applications.

Hertsmere supports the decision to plan to meet the full identified need for 21 pitches over the plan period (as identified in the GTAA), in addition to any new transit site, but is unclear how or why this should require the preparation of a separate development plan document, rather than allocated within the regulation 19 consultation document.

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

Summary

Hertsmere supports the key principles within Enfield's new Draft Local Plan, including the redevelopment and intensification of land in sustainable locations, and in terms of presentation the document reads very well and is clear and concise.

Concern is raised as to the allocation of employment site SA RUR.04: Land East of Junction 24 of the M25. The site is located in strongly performing Green Belt, as identified in both Hertsmere and Enfield's Green Belt Reviews, and the harm in allocating the site does not appear to have been fully considered. Furthermore,

Hertsmere does not currently intend to allocate the adjacent site within our boundary, which Enfield has identified as being required to come forward concurrently, and therefore the overall deliverability of the site is also questioned. We do not therefore support the allocation of this site in your plan.

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

27_04_2024 – Hertsmere Borough Council's response to London Borough of Enfield's Regulation 19 and Statement of Common Ground

Enfield Local Plan and Statement of Common Ground

Thank you for circulating the draft Statement of Common Ground (SoCG) for our consideration. We have carefully reviewed it and would make the following observations which we hope are of assistance.

General

- We note that Hertfordshire County Council are not identified as a signatory to the SoCG. As three of the parties listed are Hertfordshire authorities and the County Council is the Highways Authority, it may be prudent to extend the SoCG to HCC.

Specific

- On Page 8 under 'Hertsmere', it states: *the borough's strategy of seeking to meet the Enfield's full employment need across both the urban area and selected Green Belt sites is supported.*

LBE is proposing that around 10% of its B2/B8 requirement would be delivered on a site which we would not support due to it being on what we consider to be the 'wrong' side of M25 J24 (in terms of the Green Belt and the southern expansion of Potters Bar). As such we would ask if this can be amended to the following:

the borough's strategy of seeking to meet the Enfield's full employment need across both the urban area and selected Green Belt sites is supported.

- We are not entirely clear about the definition of the Enfield FEMA with the recent Stantec Employment Land Review acknowledging that two FEMA boundaries have previously been considered by AECOM. Both of these include Hertsmere but we would point out that Hertsmere is identified in the South West Hertfordshire FEMA. As such, we would suggest a form of wording which acknowledges the **within the SW Herts FEMA. Each authority will seek to meet its own employment needs within their individual local authority area, recognising that there are already insufficient previously developed sites to accommodate employment land requirements within each authority.**

- In the Green Belt section, we would request that the following is added under Hertsmere:

Presently, Hertsmere Borough Council is of the view that the allocation of land east (and south) of Junction 24 of the M25 (SA RUR.04) would have a significant detrimental effect on strongly performing Green Belt, this forming part of a parcel identified in its Green Belt assessment which prevents neighbouring settlements (Potters Bar and Greater London) from merging and assists in safeguarding the countryside from encroachment. It does not support the proposed allocation and its most recent Regulation 18 Local Plan consultation (April 2024) did not include the portion of the site which extends into Hertsmere.

- Under 5. Areas of Common Ground, we would suggest the following change given that we have concerns in relation to SA RUR.04:

All parties agree that Enfield can seek to deliver their its housing and employment requirements within the boundaries of the Borough.

- In the same section, given the recent Supreme Court Case relating to oil drilling in Surrey, we would suggest the following additional text:

Neighbouring Authorities and LBE agree that the emerging Local Plan adequately makes provision for habitat regulations and potential impacts on the environment within and outside of the borough, **subject to having due regard to any implications arising from R (on the application of Finch on behalf of the Weald Action Group) (Appellant) v Surrey County Council and others (Respondents) (2024).**

We hope that you are able to update the SoCG reflecting these comments but if you would like to discuss any of the above further, please do let me know.

27_04_2024 Summary of joint Statement of Common Ground between London Borough of Enfield and all neighbouring authorities including Hertsmere Borough Council.

STRATEGIC ISSUE THEMES & HERTSMERE'S POSITION

A. Housing & Spatial Strategy

Issue

- Hertsmere Supports Enfields overarching spatial strategy to provide sustainable growth
- Hertsmere is concerned about **overall undersupply of homes in Greater London**, linked to Enfield's housing requirement not contributing to the wider GLA target.

Implication

- Possible challenge to Enfield's housing strategy if London-wide need is not met and boroughs within commuter territories (like Hertsmere) feel pressure.

B. Employment

Issue

- Hertsmere supports Enfield's intention to **meet its full employment need locally**, reducing cross-boundary economic pressure.
- Degree of overland between the Travel to Work areas/Functional Economic Market Areas
- However, **Functional Economic Market Area (FEMA)** definitions differ:
 - Enfield places Hertsmere in its FEMA;
 - Hertsmere sees itself as part of **South West Herts FEMA**.

Actions

- Each Authority will seek to meet its own employment need within their individual local authority area.
- Recognise that there may already be insufficient previously developed sites to accommodate employment land requirements within each authority.

C. Green Belt – Major Concerns

Issue

Hertsmere **does not support** Enfield's proposed Green Belt release at:

SA RUR.04 — Land east/south of M25 Junction 24 (adjacent to Potters Bar)

They consider:

- The land is **strongly performing Green Belt**,
- Development would risk **merging Potters Bar with Greater London**,
- It contributes to safeguarding countryside from encroachment,
- Their own Reg 18 Plan *did not include the part of the site extending into Hertsmere*.

6. Areas of Common Ground

- All parties agree that the Spatial Strategy is an appropriate strategy in delivering sustainable development over the plan period.
- All parties agree that Enfield can seek to deliver its housing and employment requirements within the boundaries of the Borough.
- All parties agree to continue to work together collaboratively on the Strategic Matters of the emerging Enfield Local Plan.
- Neighbouring Authorities and LBE agree that the emerging Local Plan adequately makes provision for habitat regulations and potential impacts on the environment within the borough subject to having due regard to any implications arising from R (on the application of Finch on behalf of the Weald Action Group) (Appellant) v Surrey County Council and others (Respondents) (2024).