

**Sent via email**  
Uttlesford

Please reply to: Helen Murch

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Phone: 020 8132 1714

Textphone:

Fax:

My Ref: Duty to Cooperate – unmet needs

Your Ref:

Date: 7 January 2021

Dear Sir/Madam,

### **Enfield's Local Plan**

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.

**Sarah Cary**  
**Executive Director Place**  
Enfield Council  
Civic Centre, Silver Street  
Enfield EN1 3XY

[www.enfield.gov.uk](http://www.enfield.gov.uk)

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 The adopted 2016 London Plan will shortly be out-of-date and is due to be replaced by the new London Plan.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.

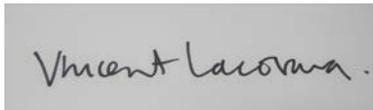
The council does have a very small supply of sites in the Green Belt/MOL that could potentially be used for industrial/distribution uses but this is not expected to make significant in-roads to the 23ha unmet need. We are seeking your assistance with meeting this need.

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.

Yours sincerely

A rectangular box containing a handwritten signature in black ink that reads "Vincent Lacovara".

**Vincent Lacovara**  
**Head of Planning**

**IMPORTANT** – Enfield residents should register for an online Enfield Connected account. Enfield Connected puts many Council services in one place, speeds up your payments and saves you time – to set up your account today go to [www.enfield.gov.uk/connected](http://www.enfield.gov.uk/connected)