



Take back control of the Local Plan at the Extraordinary Council meeting this Wednesday

Dear Councillors,

One of the most important decision-making moments to confront our borough in decades is due to take place at the Extraordinary Council meeting on Wednesday 9th June.

At the meeting, councillors will be asked to agree to a public consultation but may not be aware that in doing so, they will also be agreeing with the council's Preferred Option for Enfield's new Local Plan. This could well be the moment when the development principles for the next 20 years will be established and the Council's stance on the locations and type of development are fixed.

The Preferred Option has been prepared by Officers and Cabinet Members, largely behind closed doors, with minimal input from the majority of councillors i.e. the elected representatives of the people, or residents

The Cabinet's Preferred Option includes information that we believe misrepresents what can realistically be achieved and proposals that will

blight the borough for generations and prove universally unpopular, including building on Enfield's precious Green Belt countryside. The plan also appears to propose building high-rise developments in some of the most sensitive areas of our borough (including conservation areas), although the documents are so poorly drafted it is not possible to be certain what actually is being proposed in some areas.

The Preferred Option is contrary to the Mayor's London Plan and vision for London, who, in response to Enfield proposed plans, has already told a local journalist that he is committed to protecting London's Green Belt. Well over 25,000 people have already signed a petition calling for the council to rethink and local campaign groups have been inundated with messages of concern from residents.

Enfield needs more Social Rent housing, and over the last 3 years Enfield has lost more Social Rent homes than it has built. Yet, despite this, the draft Local Plan proposes reducing the ratio of these much-needed homes. There are also no specific targets for intermediate affordable rent homes, such as London Living Rent, which are needed to provide affordable housing for Key Workers. These are major flaws in the draft plan. Furthermore, we could find no reference to First Home quotas in the draft Plan, which are now required by the Government. To add insult to injury, there are no strict minimum quotas (red lines) for the number of affordable homes that the proposed Green Belt development would deliver, just vague largely unenforceable targets or aspirations. We know from experience that these are rarely met.

Four alternative housing options have been put forward in the consultation. The most realistic alternative to Cabinet's Preferred Option set out in the document (Option B), appears to contain a number of errors, and seems to be presented in a way that is highly misleading. We

think Option B is probably a far more viable solution for Enfield than is being portrayed in the document. For example, the document says that Option B will deliver 17,000 homes when it could clearly deliver 19,000+. We can provide a document that shows the problems and issues with the way the options have been portrayed.

The options must be reviewed so any errors and misleading statements can be corrected. If councillors vote to approve the current consultation options, then we believe that they will have voted to mislead the public. Such an act would do serious harm to Enfield Council's reputation. More time is needed to make sure the options are correct and fairly represented to the public.

The consultation documents are also missing alternative options that should be put forward as part of the consultation. For example, there is potential to intensify some industrial land over the course of the plan period, which would free-up other industrial land for housing or mixed-use schemes.

The Cabinet's Preferred Option is inconsistent with the London Plan and with the evidence base. Remarkably it is also inconsistent with other proposals that councillors are being asked to discuss and approve during the same council meeting. **The consultation should not proceed until these inconsistencies are resolved.**

It is disappointing that Enfield Council has already started marketing its Preferred Option to the public. This seems to be an attempt by the Council to influence public opinion in favour of its Preferred Option before the consultation has even been approved by Council. This puts the consideration of other viable alternative options at an unfair disadvantage and undermines the integrity of the consultation process.

Some of the policies put forward in the draft Local Plan are so vague, and open to such broad interpretation, that they become almost meaningless. Some of the key information, such as maps showing maximum heights of buildings in different areas is impossible to read.

How can councillors vote to approve something if they cannot read and assess some of the most important information? How can the public be expected to respond to a consultation when key information is unreadable? The vote on the consultation should not be proceed until the supporting documentation is improved.

The Cabinet is proposing six weeks for the consultation, which is the minimum allowed and half the time of the previous Local Plan consultation. We think six weeks is a completely unreasonable length of time for a consultation of this scope and significance. There are literally thousands of pages of evidence to consider – an almost impossible task in in just six weeks. Councillors have only been given a few days to read the documents before deciding how to vote.

The emphasis appears to be on rushing this plan through rather than getting it right. Very little democratic and proper consideration seems to have been given to viable alternative approaches and the drafting of policies that are needed to respond to Enfield's needs.

We are concerned that councillors may misunderstand what they are actually agreeing to. There are two issues that are being combined, so councillors may think they are only agreeing to a public consultation but in reality, they are also giving their support to the Preferred Option. This means the opportunity for councillors to have meaningful input into Local Plan in the future will be massively reduced.

Councillors should not vote for the Preferred Option plan until they are entirely comfortable that this is the option which they want to become reality.

Councillors as elected Members of Enfield Council are answerable to residents and have huge power over the principles of development. At the meeting, councillors can reject the recommendations put to them by Officers and the Cabinet. If councillors don't reject the recommendations and the Preferred Option Plan enters the process set out in the Local Development Scheme, councillors' power will start to evaporate as the Plan gains traction through the process set out by the national government. We think the tragic outcome will be that our Borough will suffer irreversible harm. It will be difficult for residents to understand why councillors have given away their power to stand up for them.

Therefore, on Wednesday evening, you as Councillors with a mandate from the people you represent, should reject the recommendations put to you by the Cabinet and Officers and demand a proper opportunity to scrutinise and contribute to development options before a Preferred Option Plan is put on the table.

Instead, you should request:

1. That the consultation period should be of 12 weeks duration, the same as the previous consultation
2. A public consultation **about the development options only, not** the Preferred Option draft Local Plan
3. A public debate in an all-Member panel with powers to decide and agree the Preferred Option prior to endorsement by Full Council

4. Panel reports accompanied by sufficient and accurate information on each option so Councillors' decisions affecting Enfield for the next 20 years are fully informed and transparent to the public, to whom they are accountable

We therefore implore you to reject the Preferred Option Plan with which you will be presented. Enfield faces huge challenges and time is needed for proper reflection and input. Pausing will protect Enfield.