

# Between Sustainable Development and the Climate Emergency: Implications for Policy Making and Planning Practice

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## Abstract

*This paper provides a portrait of how climate change has been considered, weighed up, and incorporated into the preparation and content of a new Local Plan for Enfield. It opens with a reflection on the challenging expectation on planning to solve both the housing crisis and the climate emergency. It then provides a potted history of how climate change and environmental matters have been incorporated into policy and practice, with some personal reflections. Enfield and its Draft Local Plan 2039 is then presented as a case study of current challenges and practices, opening with context on the borough before describing the plan. The paper ends with personal reflection on planning as a tool to tackle climate change and makes a series of recommendations for how it could be improved.*

## Balancing up crises and emergencies ... an impossibility for plan making?

The climate emergency is here: the Environment Agency and local authorities across the UK regularly help residents respond to the effects of climate change and extreme weather. The Government is committed to the Paris agreement, and this June,<sup>1</sup> increased the legal target for the UK to one of reducing carbon emissions by 78% by 2035 compared to 1990 levels. However, the Government's own auditing body believes the UK is moving too slowly to achieve this goal and suggested in their recent June report that a "net zero" test (to help the UK achieve net zero by 2050) should be central to all government policy, including planning policy and planning decisions.<sup>2</sup> As for planning policy, the golden thread of sustainable development<sup>3</sup> was unravelled into a presumption for meeting development need,<sup>4</sup> only for it now to be possibly reinstated as the principal test of a local plan.<sup>5</sup> Public scrutiny of planning decisions and policies in light of climate change continues to grow.

And at the same time, whether you think planning is meeting needs or addressing a crisis, it is difficult to conclude that the country has enough homes for our population. In Enfield, like other areas of London, many residents do not have enough income to afford to purchase a home and are serviced by an unregulated private rented housing market. Many households in Enfield on median and lower incomes are having to spend more than 40% of their disposable income on housing rent or mortgage repayments.<sup>6</sup> This often means choosing whether to stay locally, in overcrowded accommodation, or to move out of the borough, away from local support networks and local employment. There are growing numbers of people becoming homeless, and the lack of supply is leading to overcrowding in renting, insecure tenures, and reliance on local government to house those in crisis in accommodation rented from the private sector.

\* I am heavily indebted to colleagues in Enfield and friends across the industry for helping shape this paper, and I credit the creation of the Draft Local Plan 2039 entirely to the plan making officers and their consultants.

<sup>1</sup> Carbon Budget Order 2021 (SI 2021/750) available at <https://www.legislation.gov.uk/uksi/2021/750/contents/made> [accessed 8 October 2021].

<sup>2</sup> Climate Change Committee Progress Report 2021 available at <https://www.theccc.org.uk/publication/2021-progress-report-to-parliament/> [accessed 8 October 2021].

<sup>3</sup> 2012 National Planning Policy Framework CLG.

<sup>4</sup> 2019 National Planning Policy Framework MHCLG.

<sup>5</sup> Planning for the Future, August 2020 MHCLG.

<sup>6</sup> London Borough of Enfield. Housing and Good Growth Strategy 2020-2030 available at <https://new.enfield.gov.uk/services/your-council/housing-and-growth-strategy-2020-2030-your-council.pdf> [accessed 8 October 2021].

Lack of good quality housing affects more than income; it harms children's ability to learn at home, it reduces access to green space, increases exposure to mould and damp and the pandemic reinforced the importance of access to outdoor space for mental health. There are no easy or quick-fix solutions, and the housing crisis is not something that local authorities can resolve on their own. Opportunity for change lies in national housing policy, in local government partnerships, and in the responsible practice of the private sector. But, the process of enabling new homes through the planning system must be part of the solution.

Housing and new development are inherently carbon emitting in both creation and operation. Policies are in train to reduce those emissions and local plans are expected to shape development to reduce operational emissions through settlement patterns and avoiding vulnerable locations. Building regulations are also slowly reducing carbon emission from buildings. There is a growing movement to challenge infrastructure and plan making generally on the overall carbon or environmental impact. If sustainable development is to be the principal test of a local plan, is it too much to ask local authorities to solve both the housing crisis and the climate emergency?

## **Policy making, sustainable development and the climate emergency**

This section provides a potted history of how planning policy and practice has evolved to incorporate environmental matters and climate change. It builds on previous JPLC papers, as well as "Rising to the Climate Crisis—A Guide for Local Authorities on Planning for Climate Change" by the TCPA<sup>7</sup> and *Town and Country Planning in the UK* by Cullingworth and Nadin.<sup>8</sup>

Environmental matters were first substantially introduced into planning framework as a material consideration through project EIAs in the mid-1980s, arising primarily from European Directives and their incorporation into UK law. There was some previous history with managing significant harm (waste, water pollution) and assessment to localised assessors, but the current systematic and regulatory framework emerged 30 years ago. Litchfield's 1989 conference paper<sup>9</sup> describes an emerging approach to Environmental Assessment applied to major applications and notes its likely extension into spatial planning.

In 1991, Tromans<sup>10</sup> wrote a paper on the balance between land use considerations and environmental protection considerations; and how that balance was shifting towards the latter. It was not until the 1999 Regulations that EIA was introduced for a wider range of individual projects likely to have environmental effects. As for local plans, while Environmental Assessments had been normal for some time it was the Planning and Compulsory Purchase Act 2004 that mandated a requirement for regional spatial strategy and local development documents to be subject to a sustainability appraisal, and Regulations were made in 2004 to introduce the requirement for the environmental assessment of plans and programmes (strategic environmental assessment). The 2008 Planning Act updated the 2004 Planning and Compulsory Purchase Act s.19(1A) to require local plans to contain "policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change".

National Policies trace an inconsistent approach to language, from "sustainable development is the core principle underpinning planning" in the 2005 PPS1, then a presumption in favour of sustainable development as golden thread across planning in the 2012 NPPF, then back to a simple presumption in favour of sustainable development in the 2019 NPPF. The 2019 and 2021 versions of the NPPF contain requirements

<sup>7</sup> *Rising to the Climate Crisis—A Guide for Local Authorities on Planning for Climate Change* 2nd edn (TCPA, 2018) available at <https://www.rtpi.org.uk/practice/2019/september/rising-to-the-climate-crisis-a-guide-for-local-authorities-on-planning-for-climate-change/> [accessed 8 October 2021].

<sup>8</sup> Cullingworth and Nadin, *Town and Country Planning in the UK*, 14th edn available at <http://ndl.ethernet.edu.et/bitstream/123456789/20896/1/7.pdf> [accessed 8 October 2021].

<sup>9</sup> N. Litchfield, "Environmental Assessment" 1989 available at <https://www.jplc.org/past-conferences/past-papers/1989/> [accessed 8 October 2021].

<sup>10</sup> S. Tromans, *Town and Country Planning and Environmental Protection* (1991) available at <https://www.jplc.org/past-conferences/past-papers/1991/> [accessed 8 October 2021].

for local plans to be proactive in mitigating and preparing for climate change, and to improve the environment.

With the departure of the UK from the EU, I refer you first to Elvin's 2019<sup>11</sup> conference paper on the possible changes arising from leaving the EU. Over the past few years, the UK has sought to transpose the requirements simply into UK law, but there is an extraordinary amount of current activity to more fundamentally review the UK's approach to environmental policy including in the planning framework. The changes now arising a few years on are the subject of this year's conference and I will leave the consideration of the detail of more recent changes to other papers this year.

### *Personal reflections on the policy context*

It appears that planning legislation has lagged public environmental awareness and concern by roughly 20 years. Despite the popular environmental movement of the 1970s, it took EU directives in the 1980s for environmental matters to rise in prominence in the UK planning system. While I have practised throughout my career with an awareness that deciding on the best use of land had a strong climate and environmental aspect, the methods and requirements that I work to are relatively new in modern planning policy history, coming some 30 years after the 1947 Act.

I am also mindful of the rapid pace and substantial scale of ongoing transformation in environmental matters in planning and other legislation and policy. For example, the Government is reviewing fundamental environmental principles, seeking to formalise an approach to biodiversity net gain into legislation, and changing assessment methods and approaches; all within the last 12 months. This might be needed, or it might be arising from leaving the EU, but it is difficult to keep up with; even for a keen and active professional.

The trajectory over the past 30 years has been to increase the scope of what plans and development decision making must consider. The authors of the 1947 Act clearly had public health, historic preservation and infrastructure funding at heart when drafting, but I wonder what they would think of the raft of technical assessments that accompany a modern plan consultation, or of "strategic policies" which require developments to consider the health impacts of hot food takeaways and betting shops. Yet this trend of expanded scope and static powers seems here to stay; it is hard to envisage legislation which brings in stronger land use controls to support planning's expanded scope, or reforms which explicitly shrink planning back to let licensing and public health step forward.

Reading older national planning policy documents, it feels to me that those papers were founded on an optimistic and patient "sustainable development as thinking for the next seven generations" mindset. You can trace the arc of environmental thinking in the language used to inform spatial strategies and assess applications, as phrases move from "may cause decline and will only be allowed if ..." to an "expectation of net improvement" in environmental qualities. I compare this with new public concerns about the climate emergency as both a lived experience of unusual weather and growing political and public understanding that rapid change is required. There is a positivity and a measured approach in the older papers which imply that all can be balanced up and addressed; this feels ancient and almost foolish in the face of the world currently trying hard to hold to a two degree change in global temperature. Even the current NPPF, with its explicit requirements to plan for renewable and low carbon energy and heat, does not sit well alongside Greta's exhortations that "the house is on fire".

And finally, I raise a strong concern about the limitations of the current practice of environmental and sustainability assessment in the face of rapidly changing environment. It seems entirely possible that the evidence bases on which the environmental and habitat assessments are done could be changing faster

<sup>11</sup> D. Elvin QC, "Environmental Law and Planning: The Road Ahead" 2019 available at <https://www.jplc.org/past-conferences/past-papers/2019/> [accessed 8 October 2021].

than the policies themselves. As an example, officers could spend five years evaluating and planning to protect a Site of Importance for Nature Conservation which will not be functional as an ecosystem by the end of a 15-year plan due to climate change. I do not challenge the need for evidence-based policy; but I challenge the methods and methodologies themselves. Just as the industry is now finally tearing up the practice book on forecasting retail floorspace needs, are there smarter ways of documenting environmental matters, and new ways of forecasting them?

## **Enfield and its geographies**

### *Enfield*

Enfield LBC is located in north London, between Haringey to the south, the M25 to the north, the Lee Valley to the east and the hills of Brent to the west. It is 12 miles from the centre of London and covers an area of 31.7 square miles (8,219ha). With a population of 340,000 and a large proportion of both 0–14s and older people in comparison to the rest of London. It is a diverse place, which has welcomed communities from across the world; particularly large Turkish, Greek, and Cypriot populations in more recent years. Life expectancy is above the London and UK averages, but health outcomes vary significantly across the borough. Some of the wards are amongst the most deprived in England, while others are relatively affluent.<sup>12</sup> Enfield also has some of the highest levels of obesity in London, especially among children and young adults.

### *Landscape and climate*

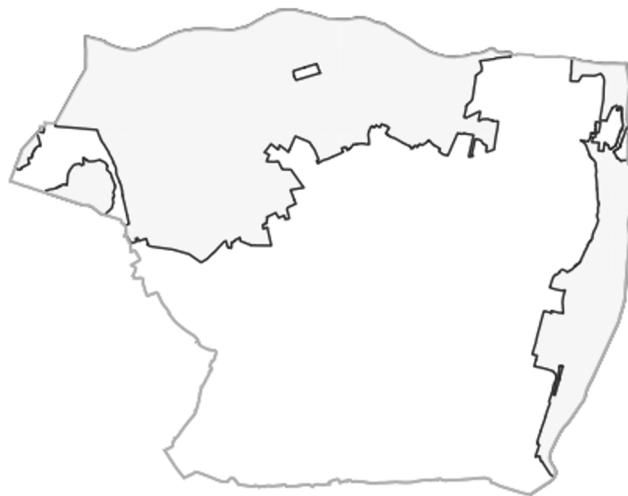
Enfield lies on the edge of the open countryside and forms part of a wider network of open spaces, routes and watercourses, extending from the Lee Valley Regional Park to Hertfordshire, with good links to Central London and the wider southeast. The eastern part of the borough lies in the valley of the River Lea (which includes parts of the Lee Valley Regional Park and Epping Forest). The western half of the borough lies on higher ground and includes a mix of undulating parkland, interwar housing development and farmland.<sup>13</sup> Approximately one third of Enfield is designated green belt.

Enfield has a relatively high proportion of greenspaces per head of population but there remains a significant disparity between affluent wards (in the west) and deprived wards (in the east) in terms of access to public open space and nature. Deprived wards (in the east) also face environmental challenges associated with more densely populated housing estates and former industrial sites, such as poor-quality public realm and inaccessible amenity space.<sup>14</sup>

<sup>12</sup> Enfield LBC, Borough Profile available at <https://new.enfield.gov.uk/services/your-council/borough-and-wards-profiles/> [accessed 8 October 2021].

<sup>13</sup> Enfield LBC, Green and Blue Strategy available at <https://new.enfield.gov.uk/services/planning/blue-and-green-strategy-adopted-planning.pdf> [accessed 8 October 2021].

<sup>14</sup> Enfield LBC, Green and Blue Infrastructure Audit available at <https://new.enfield.gov.uk/services/planning/enfield-blue-and-green-infrastructure-audit-2020-planning.pdf> [accessed 8 October 2021].



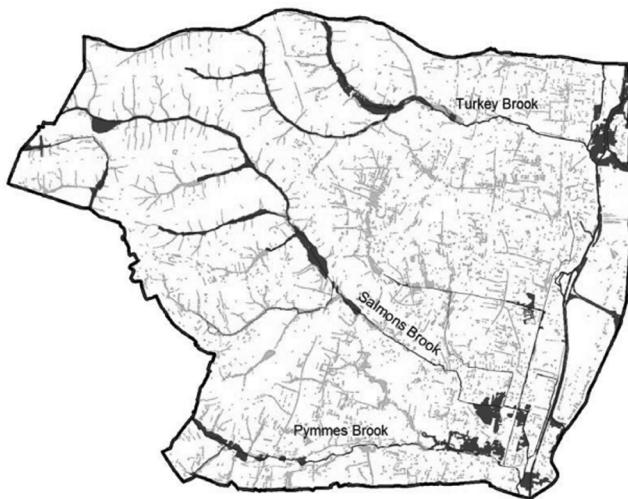
**Figure A: Enfield's green belt<sup>15</sup>**

Water is a distinctive feature of the borough's landscape, although many of the rivers are hidden from view. This includes an extensive network of canals, rivers, and reservoirs which supply much of London's drinking water. The remainder is abstracted from the aquifer underneath north east London.<sup>16</sup> The number of properties at risk of flooding in Enfield is high compared to other local authorities; most of the properties at risk of flooding are in the Lee valley area, which was historically an area of marshland.<sup>17</sup> The council has successfully transformed several park areas into new wetlands and has a substantial rain garden programme underway.

<sup>15</sup> Enfield LBC, Character of Growth Study 2021 available at <https://new.enfield.gov.uk/services/planning/character-of-growth-report-stages1.2.3a-planning.pdf> [accessed 8 October 2021].

<sup>16</sup> Enfield LBC, Green and Blue Strategy available at <https://new.enfield.gov.uk/services/planning/blue-and-green-strategy-adopted-planning.pdf> [accessed 8 October 2021].

<sup>17</sup> Enfield LBC, Flood Risk Management Strategy available at <https://new.enfield.gov.uk/services/environment/flooding-information-local-flood-risk-management-strategy-2016.pdf> [accessed 8 October 2021].



**Figure B. Fluvial (blue) and surface water (green) 1 in 100 year flood map<sup>18</sup>**



**Figure C. Enfield Town Park wetlands scheme<sup>19</sup>**

Enfield contains several priority habitats (e.g. grasslands and wet woodland) and species (e.g. bats, amphibians, reptiles and black poplar), mostly concentrated in the open countryside but also scattered across semi-natural corridors, such as railway lines and watercourses.

Enfield has areas that exceed government objectives for nitrogen dioxide and PM10 at busy roadside locations. As a result, the Council has declared the entire borough an air quality management area and is working towards meeting the Government objectives.<sup>20</sup> For NO<sub>2</sub>, there are widespread exceedances of the annual mean objective along main roads in the Borough; these also include the main centres within the Borough, as well as the M25 sited at the northern boundary. For PM10 there are exceedances of the daily mean objective along parts of the busiest main roads in the Borough, including the M25, A406 North Circular Road and A10.<sup>21</sup>

<sup>18</sup> Enfield LBC, Local Flood Risk Management Strategy, March 2016 available at <https://new.enfield.gov.uk/services/environment/flooding-information-local-flood-risk-management-strategy-2016.pdf> [accessed 8 October 2021].

<sup>19</sup> Enfield LBC available at <https://letsstalk.enfield.gov.uk/blueandgreen/widgets/18576/photos/4340> [accessed 8 October 2021].

<sup>20</sup> Enfield LBC available at <https://new.enfield.gov.uk/services/environment/pollution/> [accessed 8 October 2021].

<sup>21</sup> Enfield LBC, Air Quality Action Plan available at <https://new.enfield.gov.uk/services/environment/air-quality-action-plan-environment.pdf> [accessed 8 October 2021].

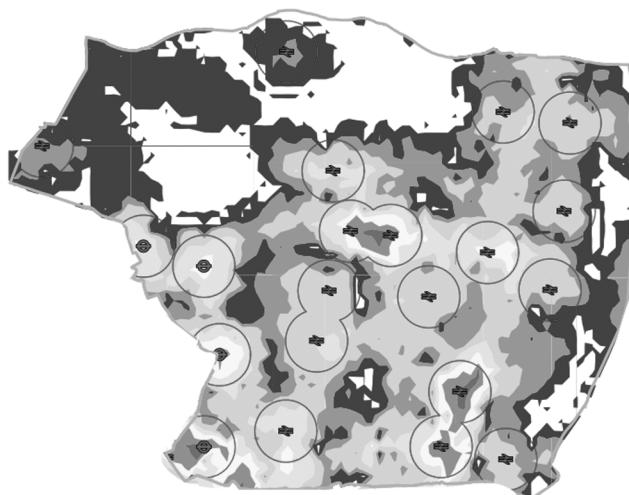
Recent research predicts that Enfield's climate in 2050 will resemble Barcelona's climate now. As the borough's climate gets warmer, residents will experience more and more extreme weather events, such as storms, floods, droughts and intense heat waves. Wildlife loss has accelerated in recent years (largely as a result of global warming) and several priority species in the borough are under threat of extinction, especially amphibians (e.g. great crested newts) and migratory birds (e.g. bitterns). However, many of Enfield's lost or endangered species (e.g. water voles, otters, beavers, storks and goshawks) can be reintroduced into the wild.<sup>22</sup>

Government statistics indicates that the borough as a whole has an estimated footprint of circa 1 million tCO<sub>2</sub>e, which has reduced significantly in recent years due to the UK's grid decarbonisation.

### *Economy, homes and connectivity*

Enfield developed from historic towns and villages along trading and transport routes leaving London. Enfield's town centres are a focus of commercial and civic life, with Enfield Town, Palmers Green, Southgate, Angel Edmonton and Edmonton Green serving as important hubs. The 20th century saw substantial suburban development, capitalising on improvements in public transport. This brought archetypal "Metroland" development, with generous gardens and shopping parades, to many parts of the Borough. Enfield has 22 conservation areas, which range from distinctive urban neighbourhoods to expansive historic parks, many of which are listed landscapes.

There are four main train and tube lines serving 22 stations; these run north to south connecting Enfield with London and villages beyond London. Buses provide some east west connections, but connectivity is limited. The M25 straddles the northern boundary of the borough. The north circular runs across the southern end of the borough. The A10 runs north to south, dividing the borough and serving as physical indicator of east west inequalities. Walking and cycling routes permeate the Borough and are currently being improved as part of the Healthy Streets and Cycle Enfield programmes.



**Figure D. PTAL and proximity to stations<sup>23</sup>**

<sup>22</sup> Enfield LBC, Green and Blue Strategy available at <https://new.enfield.gov.uk/services/planning/blue-and-green-strategy-adopted-planning.pdf> [accessed 8 October 2021].

<sup>23</sup> Enfield LBC, Character of Growth Study 2021 available at <https://new.enfield.gov.uk/services/planning/character-of-growth-report-stages1.2.3a-planning.pdf> [accessed 8 October 2021].

There are approximately 125,000 homes in Enfield, of which 10,080 (8%) are council homes and 8,440 (7%) are owned by a Registered Provider. The housing crisis across London is evident in Enfield, with over 10% of residents living in overcrowded homes (primarily in the East of the borough), 4,500 residents on the housing register and 3,500 households in temporary accommodation. The median house price is 13.7x the median income, and there are a growing number of people on low incomes living in the private rented sector. The unaffordability and insecurity of the local private rented market is illustrated by growing numbers of people becoming homeless and too many people living in homes that do not meet their needs.<sup>24</sup>

Small businesses play a part as well; there are 13,275 businesses registered in Enfield, of which 93% employ fewer than 10 people. Nearly 90% of Enfield's industrial floor space is Strategic Industrial Land ("SIL") which is regionally significant to London's supply chain and wider growth. The majority of this space is consolidated into four main clusters in the Borough. Brimsdown is the second largest industrial estate in London, and is home to firms such as Warburtons, Amazon and Johnson Matthey. The knowledge and creative economy is growing in both the suburban and industrial areas; Metaswitch/Microsoft recently expanded their presence in Enfield Town, and Troubadour Theatres, Netflix and OMA have opened a new film studio complex in the eastern industrial areas.<sup>25</sup>

### *Enfield Council*

Enfield is represented by three MPs and one GLA member. Enfield council's 63 councillors represent 21 wards. It is a Labour Party controlled local authority with 38 Labour members, 18 Conservative, and seven Community First members as of August 2021.

The Council has adopted, in recent years, a strong corporate agenda for Good Growth, taking steps to increase direct construction of new homes, drive inward investment for new jobs, and leading major regeneration projects. This includes being the master developer on Meridian Water, a 10,000 home and 6,000 job new neighbourhood, supported by the Government with a £170m infrastructure grant and in partnership with Tesco and Ikea. Other development projects include a joint venture with Henry Boot to redevelop the Montague Industrial Estate, a council-led development programme of 3,500 homes of estate regeneration and infill development, and a programme to purchase street properties through a Council-owned company, Housing Gateway Ltd.

A 2020 Climate Action Plan sets out how the Council will become a carbon neutral organisation by 2030 and aims to create a carbon neutral borough by 2040.<sup>26</sup> In 2019, the Council emitted 22,000 tCO<sub>2</sub>e in scope 1 and scope 2 emissions, with an estimate of scope 3 emissions around 100,000 tonnes. By way of comparison, Greggs Bakery, which has a large distribution centre in Enfield, has a global corporate scope 1 and 2 footprint of 101,208 tCO<sub>2</sub>e before netting off renewable energy. The borough as a whole has an estimated footprint of circa 1 million tCO<sub>2</sub>e, which has reduced in recent years due to the UK's grid decarbonisation. As part of this commitment, there is a target to plant over 300 hectares of publicly accessible woodland in the north and west of the borough, capturing around 3.9 tonnes of carbon dioxide (per hectare) per annum.

Through membership in the North London Waste Authority, Enfield is also part of the North London Heat and Power project to redevelop a 1970s incinerator in Enfield into an Energy Recovery Facility, generating heat from waste alongside materials repurposing. The facility was the subject of a successful NSIP application in 2017.<sup>27</sup> The Council is also the sole shareholder in Energetik, a heat network company

<sup>24</sup> See <https://new.enfield.gov.uk/services/your-council/housing-and-growth-strategy-2020-2030-your-council.pdf> [accessed 8 October 2021].

<sup>25</sup> Enfield LBC, Enfield Economic Development Strategy available at <https://new.enfield.gov.uk/services/property-and-economy/> [accessed 8 October 2021].

<sup>26</sup> Enfield LBC, Climate Action Plan available at <https://new.enfield.gov.uk/services/environment/enfield-climate-action-plan-2020-environment.pdf> [accessed 8 October 2021].

<sup>27</sup> PINs available at <https://infrastructure.planninginspectorate.gov.uk/projects/london/north-london-heat-and-power-project/> [accessed 8 October 2021].

taking waste heat from the Energy Recovery Facility and piping it into homes. The company currently serves about 400 customers and has a business plan, backed by government grants, to expand the network to a minimum of 19,750 customers by 2039. The heat network will be supplied by low carbon waste heat from the North London Heat and Power Plant when it is completed.<sup>28</sup>

### *Enfield planning context*

The Council receives approximately 4,500 planning applications a year; in 2020/2021, 37 were major applications. As of April 2021, the planning service, including building control, land charges and a design department, has a staff contingent of about 90 FTE, with an annual budget of £6.1m, of which £5.2m is funded from fees and charges, with £900k provided from the council's central revenue fund. The spend per resident for the entire service is £14.25 per resident in 2020, up from £10.09 in 2010; however, the spend per resident paid for by the council's revenue fund has decreased from £4.90 in 2010 to almost £1 in 2021 as charges for the service increased and cuts to local authority budgets have resulted in the revenue fund being directed to prioritise other local authority services.

Over the period 2018–2020, the borough delivered 1,314 net new homes against a target of 2,328 (734 per annum). Going forward the target will be increased to 1246 per annum in line with the Local Plan. The council moved into the status of “presumption in favour of development” in March 2021.<sup>29</sup>

Other relevant performance measures:

- In 2019/2020, an average of 30% (139) of all completed new housing was classified as affordable.
- 9% of homes, on average over recent years, were delivered through permitted development and conversion of retail, office, and industrial space.
- Enfield also receives a high number of applications for conversions of larger homes into flats.

### **Balancing evidence and finding new pathways ... Enfield's way forward**

Enfield Council, in June 2021, brought forward for consultation a Regulation 18 Preferred Option Local Plan to 2039. Consultation closes on 12 September.<sup>30</sup> This section describes relevant elements of the plan, and all credit to the content of the plan lies with the officer and consultant team in charge of preparing it.

The NPPF<sup>31</sup> is clear on the purpose of local plans:

- Paragraph 15: “The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”
- Paragraph 20: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision ...” For (among other things) “conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”

<sup>28</sup> Energetik available at <https://www.energetik.london/> [accessed 8 October 2021].

<sup>29</sup> Enfield LBC available at <https://new.enfield.gov.uk/services/planning/enfield-housing-delivery-action-plan-2020-planning.pdf> [accessed 8 October 2021].

<sup>30</sup> Enfield LBC available at <https://new.enfield.gov.uk/services/planning/draft-new-local-plan/> [accessed 8 October 2021].

<sup>31</sup> HM Government available at <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [accessed 8 October 2021].

- Paragraph 23 (extract): “Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.”

### *Context*

Enfield has a number of adopted spatial plans, but the Core Strategy dates to 2010 and the Development Management Policies date to 2014 at seven years old. A new Local Plan commenced with an opening consultation in 2017, and a Regulation 18 Issues consultation in the winter of 2018/2019.

The new London Plan was adopted in March 2021, which requires Enfield to Plan for 1246 homes per year to 2029 using a process which established a target below London’s needs.<sup>32</sup> It also contains strong policies to protect and enhance Strategic Industrial Land; Enfield has 332 ha of SIL, within a total of 415ha of industrial land. As required by the NPPF, Enfield must plan for at least 15 years, taking the new draft plan to 2039, 10 years beyond the London Plan.

### *Enfield’s objectively assessed needs over a 15-year plan period to 2039*

This section attempts to summarise Enfield’s key needs which should be met by the plan. For readers interested in further detail or the full range of needs, please see the Local Plan Evidence Base including useful summary topic papers by Stantec and Council officers.<sup>33</sup>

On housing, while the London Plan requires Enfield to plan for 1,246 new homes per year to 2029; the Local Plan must look beyond that to 2039. The Government’s standard methodology calculation results in a housing need of 4,373 homes per year; taken across the 15-year life of the plan period that is approximately 55,000 homes; more than one new home for every three existing homes. To address the gap between the London Plan target and the housing requirement obtained from the standard method, officers used further investigation of sources of housing supply in Enfield to consider a deliverable housing target. The Local Plan takes the London Plan target to 2029 and rolled forward to 2039. The preferred approach proposes the provision of 24,920 new homes—against a backdrop of approximately 125,000 existing homes.

Assessment of housing need also found, unsurprisingly, a strong need for social housing as well as other types of affordable housing—at 1,487 homes a year, this is more than the London Plan target and much than would be viable to deliver with current government grant subsidies for London. Other significant needs included larger homes; three bedrooms in particular, and housing for older people.

The assessment of employment (for Enfield, mostly industrial) floorspace need is complicated by the London Plan policies on intensification but arises to 251,505m<sup>2</sup> of industrial floorspace (65ha new land) and 37,030m<sup>2</sup> of office floorspace. This is an increase of almost 20% on the existing industrial floorspace.

The results of the needs assessment are clear that the borough should be planning for a significant change in the built form of Enfield during the plan period. The constraint of one third of the borough as green belt and substantial industrial areas both limit the spatial options available. Duty to cooperate conversations were had, however cooperation opportunities were very limited and nothing forthcoming.

### *Options considered*

Twelve options were considered; grouped into baseline growth options, medium growth options, high growth options and other options.

<sup>32</sup> Housing numbers in the emerging plan, 2021 Stantec available at <https://new.enfield.gov.uk/services/planning/enfield-housing-numbers-paper-2021-planning.pdf> [accessed 8 October 2021].

<sup>33</sup> Enfield LBC available at <https://new.enfield.gov.uk/services/planning/evidence-base/> [accessed 8 October 2021].

The two baseline growth options sought to deliver 17,000 new homes (using London Plan targets to 2029 and then reverting to 500 per year) with some other land uses, including limited nature recovery and green and blue infrastructure improvements. Growth was distributed in the urban areas and/or some employment areas. These were discounted because they will not meet the required housing need that must be planned for and would not deliver the mix of housing types needed (as it would require mostly flats in tall buildings). Other land uses requirements will not be met.

The three high growth options were based on accommodating 55,000 homes and the Government need methodology. There were variations on urban areas only, urban plus SIL, and urban plus SIL and greenbelt. All were discounted because it would result in very high-density development and tall buildings in the urban area resulting in significant change to the borough's character, exceeding environmental limits, and not delivering the mix of housing types needed.

There were four spatial options for medium growth; providing 25,000 new homes and meeting some or all of the employment need.

- Medium growth in the urban area only: Addresses the quantum aspects of the housing crisis but results in high density development that does not meet the mix of housing needs, and employment needs are not met.
- Medium growth in urban and employment areas: Protects the green belt but relies on industrial intensification and relocation of SIL while changing the character of the borough significantly. This also has viability challenges and is likely to lead to less affordable housing.
- Medium growth in the urban, employment and limited green belt areas: This met more needs but not all employment need, nor family housing needs. There continues to be viability challenges.
- Medium growth in the urban and green belt areas: This meets the housing requirement, the mix of housing needs and employment needs and is assessed as viable and deliverable. This option is the preferred option and described in more detail below.

Other options were considered, and all three discounted.

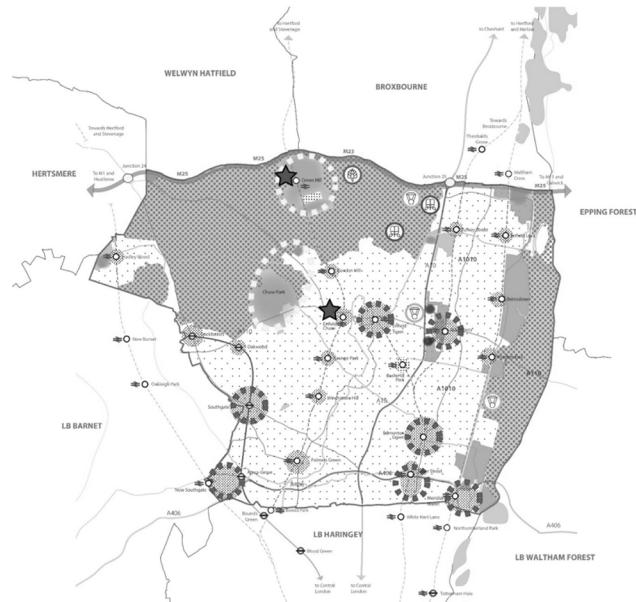
- Need met outside the borough. This was discounted because none of the neighbouring authorities were willing to take Enfield's housing and other land use requirements.
- To accommodate most of the development in the urban area to the east of the A10. This option was put forward by residents during the previous rounds of consultation. Discounted because it would result in very high-density development and tall buildings in the urban area east of the A10 and would not meet the housing need or deliver the mix of housing types needed. It would also require significant use of SIL contrary to London Plan policy.
- To accommodate most of the development in the urban area to the west of the A10. Discounted because it would result in very high-density development and tall buildings in the urban area west of the A10 and would not meet the housing need or deliver the mix of housing types needed.

### *Preferred Spatial Strategy: Medium growth, urban areas + focussed green belt release*

The preferred option<sup>34</sup> accommodates 25,000 new homes, focused in the urban areas with some release of green belt. 18,500 homes are allocated to brownfield land, largely focused in seven urban placemaking areas; with 6,500 homes in two rural placemaking areas which require green belt de-designation. Employment needs are met through green belt release and intensification. A zoning approach is taken for

<sup>34</sup> Enfield LBC, Draft New Local Plan 2021 available at <https://new.enfield.gov.uk/services/planning/draft-new-local-plan/> [accessed 8 October 2021].

the remaining 130ha of rural areas to facilitate development of multi-layered mosaic of sustainable rural land uses. There is a continued intensification of town centres, but limited use of very tall towers.



**Figure E: Key diagram, preferred spatial strategy draft Local Plan 2039<sup>35</sup>**

Family and affordable housing is provided across the development, but particularly in the new rural placemaking areas which are envisaged as new neighbourhoods with terraced family housing and good access to public transport. Crews Hill has an existing train station, and the historic market gardening economy is now a series of garden and equestrian centres mixed with unauthorised and informal development with consistent enforcement challenges. This will be a standalone village, separated from the main urban area of Enfield through existing landscape features. Chase Park infills and extends an existing neighbourhood on the edge of the urban area.

### Rural area transformation

The plan contains a strong vision for the evolution of Enfield's rural areas:

“By 2039, the arc of open spaces and woodland around Enfield Chase and Lee Valley Regional Park will be transformed into the leading outdoor countryside destination in North London and surrounding area, serving as a unique and exemplar place within London’s ‘National Park City’. On the doorstep of the city’s urban communities, a mosaic of sustainable and highly accessible rural activities including local food production, forestry, re-wilding, eco-tourism, sporting activities, natural burial, countryside education, and recreation will enhance the landscape and enable all to benefit from access to wildlife-rich blue-green spaces, clean air, local food production and world-class sporting facilities, achieving the largest environmental and health and wellbeing gains in London. Community involvement and sustainable green enterprises will enable the local rural economy to thrive contributing to significant landscape improvements, jobs, investment and renewal. Rural Enfield will drive deep

<sup>35</sup> Enfield LBC, Enfield Local Plan, Main Issues and Preferred Option 2021 available at <https://new.enfield.gov.uk/services/planning/elp-2039-reg-18-for-consultation-planning.pdf> [accessed 8 October 2021].

into the surrounding urban communities providing better connections to the countryside and bring nature into the heart of the urban fabric.”

The supporting policies aim to transform the arc of open spaces around the edge of the Borough’s urban area as a whole into “a world-leading outdoor cultural and leisure destination, linking disparate landscapes, improving east-west connectivity and landscape quality whilst acting as a stepping-stone to facilitate the movement of wildlife and bring about nature recovery”.

The policies have the potential to achieve a net increase of 25% green cover in Enfield, contributing to significant carbon sequestration and achieving significant increases in biodiversity from the evolution away from modern farming. They will also significantly increase public access to this landscape, not just for local residents who are often in deficiency, but also as a regional destination.

The adjoining developments (known as Crews Hill and Chase Park), which require green belt release, are considered alongside this landscape regeneration and transformation project, providing contributions and routes into, as well as being a partner in, the project. Residents will have doorstep access to park-like landscapes with nature trails; instead of the current intensive farming and low biodiversity.

In addition to the Rural Enfield strategic policy, there is a strong development management policy on urban greening and biophilic principles which supports net gains in biodiversity through urban interventions, such as green roofs and street trees. Officers will use the biodiversity net gain forthcoming requirement, as well as stronger design codes, to support urban green infrastructure across the borough.

### *Character of growth*

Alongside the plan, Enfield published a Character of Growth Report,<sup>36</sup> which assesses the quality of areas, considers drivers of change for growth (e.g. proximity to town centres) and makes recommendations for the level of change by proposing typologies of development which will be supported in different areas. This work was done by officers in-house, and provides a fine grain assessment and recommendation, based on classifications of “limited change”, “medium change” and “transformative change”.

The report’s approach has been informed by the planning reforms trialled in the White Paper. It has also informed site allocations, as the assessments and associated typologies help guide housing numbers. It also provides residents and stakeholders more confidence about what growth will look like.

The Character of Growth Study also establishes proposed areas that can potentially accommodate tall buildings. This builds on the London Plan approach and again helps residents understand how growth might be accommodated in the borough. The next step from this report will be to propose appropriate typologies for each area of the borough, based on the recommendations for scale of change. It will also be updated for the reg.19 plan to include new site allocations which were not assessed during the work leading up to the reg.18 plan.

### *The impacts and effects of the Plan, as assessed*

The council commissioned an Integrated Impact Assessment, pulling together the requirements of Sustainability Appraisal (“SA”) incorporating Strategic Environmental Assessment (“SEA”), Health Impact Assessment (“HIA”), Equalities Impact Assessment (“”), Community Safety Impact Assessment (“CSIA”) and Habitats Regulations Assessment (“HRA”). It appears to be very thorough, with 192 pages assessing the policies and allocations against a set of cumulative effects; it also includes useful, if minor, suggestions for improving the plan drafting and policies.<sup>37</sup>

<sup>36</sup> Enfield LBC available at <https://new.enfield.gov.uk/services/planning/character-of-growth-report-stages1.2.3a-planning.pdf> [accessed 8 October 2021].

<sup>37</sup> Integrated Impact Assessment, LUC 2021 available at <https://new.enfield.gov.uk/services/planning/draft-new-local-plan/> [accessed 8 October 2021].

The summary of findings from this assessment:

Aim	Effect
Reducing the borough's emissions to be a carbon neutral borough by 2040	a cumulative mixed significant positive and minor negative (++/-)
Resilience to climate change, particularly extreme weather	a cumulative minor positive (+) effect.
Deliver housing to meet agreed targets and support an appropriate mix of housing types and tenures, including affordable and specialist housing, including housing for the elderly and disabled people	a cumulative significant positive (++) effect
Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the Borough	a cumulative mixed significant positive and uncertain minor negative (++/-?) effect
Support good access to services, facilities and wider community infrastructure, for new and existing residents, mindful of the potential for community needs to change over time	a cumulative significant positive (++) effect
Encourage social inclusion, promotion of equality and a respect through diversity	a cumulative minor positive (+) effect
Reduce crime and increase community safety	a cumulative minor positive (+) effect
Deliver the "Vision Zero" target for road safety	a cumulative minor positive (+) effect
Support a strong, diverse and resilient economy	a cumulative significant positive (++) effect
Support the vitality of the Borough's town and local centres	a cumulative significant positive (++) effect
Minimise air pollution and Minimise the need to travel and support a modal shift away from the private car	a cumulative mixed significant positive and minor negative (++/-) effect
Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks	a potential but uncertain cumulative significant negative effect (--?)
Sustain and enhance the significance of heritage assets	a potential but uncertain cumulative minor negative effect (-?)
Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes	a potential but uncertain cumulative mixed significant positive and minor negative (++/- ?)
To achieve efficient use of land and materials	a cumulative mixed minor positive and minor negative (+/-) effect
Manage and reduce the risk of flooding	an uncertain cumulative minor negative (-?) effect
Minimise water use and protect water quality	a potential but uncertain cumulative minor negative effect (-?)

In summary:

"The preferred approach set out in the 2021 Enfield Local Plan Regulation 18 consultation document is likely to have an overall positive cumulative effect on the majority of the Integrated Impact Assessment objectives, covering social, economic and environmental issues, health and equalities and community safety. Where there are potential negative effects identified (e.g. on biodiversity, historic environment, landscape/townscape, water quality), these are uncertain because they will depend on the detailed design and layout of new developments proposed on allocated sites, which are unknown at this stage."<sup>38</sup>

<sup>38</sup>LUC Consultants for Enfield LBC 2021 available at <https://new.enfield.gov.uk/services/planning/integrated-impact-assessment-2021-planning.pdf> [accessed 8 October 2021].

## Personal reflections

While for those of us practising it might not always feel so, I remind readers that plan-making and decision-making process in the UK were established to plan for new development. The presumption in favour, and the plan-making process of using evidence on needs to inform decisions, both force planning to consider how places can grow and evolve. They assume and encourage new buildings, new avenues of transport and new sources of renewable energy. The assessment and balancing of impacts of course help understand and mitigate carbon emissions and other environmental or social outcomes; the various Impact and Sustainability Assessments improve and shape development, but rarely stop it.

This fundamental premise is being challenged by those in society who believe that growth cannot be good, that in the face of a frightening and substantial change in our climate, new things should not be allowed. But there are many others who work towards what Kate Raworth<sup>39</sup> call the “safe and just space for humanity”; the space where economics, design, regulation and planning work together to find the doughnut middle between our social foundations and environmental ceilings. This question I ask in this paper is if we are moving fast enough to live within our environmental limits, given the scale of the emergency.

This section provides a personal analysis and reflections on plan making for the climate emergency, building on experience and the portrait of Enfield in the summer of 2021. It provides some initial reflections before turning to answer two questions.

### *Reflection on the content of the draft Enfield Plan 2039*

As officers are in the middle of a consultation process with major stakeholders, I am certain the plan will evolve and change. But the preferred option to date has raised thoughtful discussions among officers at the council about climate change and the role of planning in environmental management. I make my own comments on the plan here, before turning to broader questions.

The way the NPPF has been interpreted by planners and inspectors approving them, proposes—at least to me—a fairly clear prioritisation of how local plans should plan for needs. Housing and employment needs come up top, within some clear environmental boundaries (e.g. high flood risk, national biodiversity sites). Then you try and integrate other needs (e.g. burial, travellers, community facilities) and then finally comes climate adaptation and environmental improvements. This hierarchy of needs is not explicit in policy, but I argue it is in implementation and plan drafting. This is not always clear to politicians and residents.

While green belt is not an environmental designation, if it is going to be de-designated to meet housing need, the draft Enfield Local Plan makes an argument that it is better to do so at a scale which enables local community facilities and reduces the need to travel, or where it is adjoining existing transport infrastructure which can be easily expanded. A few homes here and there, extending existing small communities, does not create the conditions for a lower-carbon lifestyle.

The draft plan has innovative vision for landscape restoration which has arisen from officer passions and expertise acquired organically over the past few years. The Council owns much of the designated area, and property and environmental officers are already working with farm tenants and the local college on plans for tree planting, natural burial grounds, rewilding including introducing beavers, and more sustainable forms of agriculture. Around 60,000 trees were planted last winter and more of the same is planned next winter. The Council has recently closed a council-owned golf course which will be returned to a more natural park setting alongside a proposed women’s football academy.

<sup>39</sup> K. Raworth, “Doughnut Economics: Seven Ways to Think Like a 21st-Century Economist” available at <https://www.kateraworth.com/doughnut> / [accessed 8 October 2021].

Officers have also discussed the ability of local plans to drive activity which is not “development” in planning; tree planting, changes to farming patterns and public access rights. While I recognise the limitations of local plans, they are a corporate document which can drive and influence other stakeholders with a clear vision. The policies in the plan also place projects proposed in the Council’s Green and Blue Infrastructure Strategy, including the rural Enfield goals, on stronger policy footing and prepare them for biodiversity credits and other environmental investments.

In looking forward to the potential changes arising from the White Paper, there were officer concerns that a “protect” designation on rural areas would be easy to apply; but could lead to a continuation of industrial farming and stop ongoing rewilding and tree-planting landscape transitions. The local plan policies help counter that concept of what rural Enfield is for and provides a positive vision for the future. It also gives additional protection to land which is not built on, should a London green belt review be undertaken in the future.

I would prefer a more honest appraisal of carbon emissions arising from the development activity proposed in the plan. After years of counting carbon emissions and reporting them to British Land’s shareholders, it simply does not feel right that carbon emissions were not considered (at least in estimate) in options appraisals for how much development should occur; and where development should be placed to support low-carbon lifestyles. In support of this paper, I have now done some very rough estimations on the carbon impact of the Local Plan; building on work by Jacobs for Meridian Water. I have rounded the numbers for ease.

	Meridian Water by 2050 (by Jacobs) 10,000 homes and 6,000 jobs		
Embodied	600,000 tonnes co2e	1,500,000 tonnes co2e	2 million tonnes co2e
Operational including transport	210,000 tonnes co2e	525,000 tonnes co2e over 30 years	700,000 tonnes co2e over 30 years
Renewable/Low Carbon Energy <sup>40</sup>	Positive 9,000 tonnes co2e	Positive 22,500 tonnes co2e over 30 years	40,000 tonnes co2e over 30 years

To put this in context, the emissions from a year’s operation of Heathrow are 20 million tonnes. The UK’s carbon price in early August was £50 a tonne; that is £135 million for 2.7m million tonnes of carbon. Or planting 15 million trees. These are very rough numbers, but I think the exercise is worth doing to illustrate the scale of emissions under consideration, and the difficulty of expecting development to be “neutral” in carbon terms without affecting the delivery of homes and employment. Development, like many activities, is inherently carbon emitting and expecting that to be somehow offset or avoided within a plan period is very challenging based on current building technologies and carbon prices.

### *Are current and proposed planning processes effective and do they help us live within our carbon and other natural limits?*

I have sympathy with the White Paper’s frustration about the speed of local plan preparation and its proposals to simplify the local plan approval process. It is not just that in a changing climate the evidence goes out of date quickly. The whole process feels to members and to officers like a technical slog. It is hard to be creative while being forced to work on top of several thousand pages of technical evidence. There is something to be said for a lighter touch and fleet of foot approach which would free up planners to focus more on design and shaping how residents live and how to improve access to nature.

<sup>40</sup> this does not include positive carbon benefits of landscape improvements.

The NPPF requires plans and policies to address climate change mitigation and adaptation, but it does not require plans to meet a carbon target or budget. It is my experience that there is a lack of clarity about the carbon impact of development, particularly in plan making but also within development management. Countries and companies are expected to measure their emissions to help meet the Paris agreement, and there are clear methodologies for calculating and reporting. Yet this does not happen in the same way that planners assess volumes of transport, or hectares of employment land, or units of new homes.

If the climate emergency trumped the housing crisis, the Government should set carbon targets for local authorities building on known carbon budgets, and then let local plans determine what other needs can be met within that budget. But as it is the other way around, plans could be honest about the scale of carbon emissions generated from new development, and then use that information to choose wisely between different locations and forms of development. This is, of course, one more thing to weigh up in plan making, but honesty and clarity about the scale of carbon impact would help illustrate how close the plan is to living within our limits and help planners and local authorities shape growth. For example, building detached homes on the edge of a small village without schools or shops means that residents must travel, often in cars, to go about daily activities. Planning for a village dense and large enough to support community infrastructure will reduce that need.

I am also not convinced by how evidence about biodiversity and landscapes is developed and used in plan making. On one hand, the current practice of detailed evidencing of what is there now, on the ground, is expensive, bespoke and time consuming. I have sympathy for government desires to improve this. Much of what is produced could be standardised, linked to a national database and made more easily available to understand through a map-first, report-second approach.

On the other hand, the way that plan-making commissions evidence about future needs risks supplanting the creative thinking that sustainable development demands. Time and experience have undermined the methodologies underpinning retail and transport needs; predictions based on experience always give you more of what you've had before. This predict and provide approach feels increasingly wrong in a world of rapid economic and climate changes, when we have to cut our cloth to fit our limits. Could there be room for more scenario-based needs forecasting, more options which change as the climate, or government policy, changes?

The current system of multiple and overlapping Impact Assessments are not devised to assist planners in making decisions or helping residents understand them. They are comprehensive and thorough, but perhaps at the expense of being useful. Enfield's assessment of the plans' impact on the aim to be a carbon neutral borough by 2040; is "a cumulative mixed significant positive and minor negative (+/-) impact." For resilience to climate change, it is "a cumulative minor positive (+) effect". There must be better options assessment tools in existence than those currently used. I wonder if the move towards digital planning and three-dimensional planning software will produce a quicker and more impactful approach to testing different scenarios.

The Environment Bill also proposes to put spatial planning for nature on a statutory footing with Local Nature Recovery Strategies ("LNRS") and goes beyond conservation to the explicit enhancement of biodiversity in an area. These are new obligations for designated authorities and are not just evidence of what is there now; they will include a schedule of potential opportunities to enhance biodiversity. It is expected that they will inform local plan production, as well as decision taking.<sup>41</sup> In Enfield, I hope the combination of the Biodiversity Action Plan and Green and Blue Infrastructure Strategy is likely to suffice as our LNRS, and both have directly informed our Local Plan to positive outcomes.

There will be cases of direct conflict with planning for nature recovery and planning for development needs. But this is also a positive opportunity to encourage more landscape restoration and urban biodiversity

<sup>41</sup> The Environment Bill requires Government to set out in guidance how LNRSs should be considered by local planning authorities with the objective of embedding local nature recovery within the planning system.

through local plans. The experience of Enfield does ask whether local plans should go beyond “improve the environment” language in the 2021 NPPF to have a specific purpose in planning for landscape restoration and improvement. This calls into question the definition of “development” and the level of control that planning should have. But integrating development and nature plans might be a more efficient and honest approach. At Enfield, the plan is signposting rather than controlling nature improvements, but it supports the aspects of development that will come with the rewilding project.

I do add two notes of caution. There are already many local instruments and plans for the environment, for example, Air Quality Action Plans, Surface Water Management Plans, Biodiversity Action Plans etc. The Local Government Association has pointed out that the aim should be to subsume these various plans into a more coherent plan for environmental recovery, not just add another layer of paper.<sup>42</sup> Also, Defra’s own guidance on this states that “The measures in the nature part of the Bill will encourage and enable, housing to be delivered in a way that enhances the environment whilst having minimal impact on development viability”.<sup>43</sup> My own experience at Enfield, in production of a Green and Blue Infrastructure Strategy, was that many of the opportunities for nature enhancement that officers identified would not be viable if funded solely through development (either directly or through CIL); other sources of funding (farming incentives, biodiversity credits etc) would be needed.

As for biodiversity net gain, I see this as part of a growing and positive trend in environmental regulation and expectation away from assessing and judging impacts toward simple requirements for net gain; or a positive improvement. Companies must positively contribute to the climate emergency, mining lands must be restored to a high quality etc. It is likely that this autumn will see the approval of an Environment Bill which will require a developer to have an approved “biodiversity gain plan” which seeks 10% improvement in biodiversity to obtain planning permission. I am of the view it is a positive thing to put 10% biodiversity net gain above and separate from the other issues that planning weigh up, but is this the beginning of a nature “policy arms race”; with air quality and water quality improvements next?

I have many questions about the practical implementation of the net gain requirement. How realistic and understandable will the calculation process be? Who says the biodiversity plans are any good? And the complexity of applying them to outline applications over many years could be challenging to monitor in practice. The Penfold Review<sup>44</sup> set out principles to ensure that all factors relevant to deciding whether a development can go ahead are considered at the same time, and not later reopened. That Review’s recommendations to merge consents where feasible, and to separate out “showstopper” issues from consenting design features are useful principles to keep in mind when taking forward this legislation.

### *Is planning the right tool for a climate emergency?*

Planning governs the use of land and of development, and it has been a useful regulatory tool to direct and manage flood risk, manage impacts on biodiversity, manage pollution and in some cases support new forms of energy generation. But it is a very local and slow, cumbersome tool for driving down national carbon emissions and for adapting to rapid climate change.

We already recognise the limits of planning in the housing crisis; we do not assume that planning policy on its own will encourage development or encourage households to downsize or upsize to a house that’s the right size for them. We do not assume that planning policy should set fire safety standards. Nor do we assume that plan-making can direct farmers to manage land for biodiversity. But it is now expected to, at least in London, incorporate quite fine grain requirements such as green roofs, the type of tree and plant

<sup>42</sup> Local Government Association available at <https://www.local.gov.uk/nature-local> [accessed 8 October 2021].

<sup>43</sup> HM Government available at <https://www.gov.uk/government/publications/environment-bill-2020/10-march-2020-nature-and-conservation-covenants-parts-6-and-7> [accessed 8 October 2021].

<sup>44</sup> A. Penfold, “Penfold Review” available at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/31621/10-1027-penfold-review-final-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/31621/10-1027-penfold-review-final-report.pdf) [accessed 8 October 2021].

species used, setting operational carbon standards above building regulations, and putting limitations on the amount of embodied carbon per building; at least in major developments. In planning, these policy aims are weighed up and balanced against other needs. But should local plan policies dictate where materials come from? Should we expect local authorities to be expert enough to judge these requirements?

Perhaps as we face a climate emergency, we should consider stronger forms of regulation around carbon emissions in buildings materials and operation. I would argue there is a role for much-strengthened building regulations, removing the discretion of planning while also being a clearer line to push innovation across the nation.

In a similar vein, supporting retrofitting and decarbonisation of existing buildings is a key part of the UK national plan to hit our carbon targets.<sup>45</sup> Planning is limited in its ability to encourage this; loft insulation and boiler replacements are not normally development which requires planning permission. Would extending development to energy efficiency retrofit measures encourage or hinder such activity? I am inclined to think the latter, based on the frustration of Enfield residents whose heat pumps are not considered permitted development. But what about district energy, and the Government's White Paper suggestion that local authorities should have the ability to mandate connection of existing buildings to low carbon heat networks?<sup>46</sup> I would search for more effective, and perhaps new, regulatory powers than local planning policies which might take years to come into force and are applied with balance against development needs and viability.

But on the other side, there are plenty of environmental and climate matters where planning is an effective tool for new development. Where impacts and mitigations are locally specific, such as wind, air quality, water quality and biodiversity, planning is a good tool for climate adaptation and helping local communities be resilient. Enfield's local plan is a good example of this, with policies which reduce the impact of development on local watercourses, and with an ambition to develop specific design codes which encourage additional green infrastructure into the plan. I was pleased to see some small tweaks to the 2021 NPPF to recognise that the planning framework can support better adaptation of landscapes to climate change. The Enfield local plan and the rural Enfield designation moves beyond the purpose of green belt as separation and character, to say clearly that it should have a better ecological value, and that has a purpose in climate change adaptation and in access to nature.

Alongside government investment and regulation, individual behaviours across society must change to help reduce carbon emissions. The way neighbourhoods and places are designed has a clear impact on how we choose to live, where we choose to work and how we get about. I grew up in suburban 1970s US, in a neighbourhood that required a car; the nearest shop was over two miles away down a busy road with no cycle infrastructure. The low density of housing limited investment in parks or the public realm, and the grass-first approach to landscaping limited biodiversity. Whereas in the UK, the RTPI's guidance on planning for climate change stresses that avoiding flood risk, reducing the need to travel by car and using local energy sources are the obvious outcomes to seek when planning for new development.<sup>47</sup>

The UK has a good track record, particularly in recent years, in designing and locating neighbourhoods and buildings which support sustainable living, with public transport and liveable streets, green infrastructure and a thoughtful approach to housing densities and design. It is important that planners and others involved in development continue to push these qualities across the country. This is how planning can help address the climate emergency.

<sup>45</sup> Committee on Climate Change, the 6th Carbon Budget available at <https://www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf> [accessed 8 October 2021].

<sup>46</sup> HM Government available at [https://www.gov.uk/government/publications/energy-white-paper-powering-our-netzero-future](https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future) [accessed 8 October 2021].

<sup>47</sup> TCPA and RTPI available at <https://www.rtpi.org.uk/media/3568/rising-to-the-climate-crisis-1.pdf> [accessed 8 October 2021].

## Recommendations arising

This section provides a series of short recommendations arising from the reflections above.

For local authorities:

- Keep at it! Developing local plans feels like an impossible task because they are expected to do so much.
- Set aside time to use professional creativity in thinking through the options.
- Consider metropolitan open land and green belt as opportunities for nature regeneration, not just to be held in an unchanging “protect” designation. Rural areas around large cities and urban areas have important roles to play in helping address climate change, nature crisis, housing crisis, economic and green skills, addressing poverty and inequality and mental health and wellbeing for urban dwellers. A more sophisticated, fine grain approach to these areas is needed than the monolithic current policy approaches.
- Bring landscape architects, watercourse management teams and passionate environmentalists into your plan making teams. At Enfield, it has been a pleasure to see how different professions can come together and build on the experience of one another.
- Plan making is a slow cumbersome tool, there are often other planning and local authority tools which can be more powerful and flexible to achieve your climate or environmental goals.

For national government:

- A fine grain approach to zoning will support better environmental and social outcomes. Particularly when planning for rural areas around major cities, there are multiple aspects of how that land is and can be used. The green belt designation is a blunt tool and a finer grain, more sophisticated and powerful approach to these rural areas which are significant and sustain pressure will lead to better outcomes for people and the planet.
- Promote good practice for design codes which include green and natural infrastructure, and which encourage low-carbon patterns of settlement and transport.
- If the tests of a local plan are going to change, then policy should set out a clearer hierarchy of social and environmental needs. Expecting authorities to be net zero while also planning for 25,000 homes based on current technology makes both impossible.
- Establish simple to use assessments of carbon impacts in planning to inform options appraisal and support better land use decisions. These should build on the UK’s trajectory for grid decarbonisation and provide standard embodied carbon figures.
- Develop and maintain a database of evidence about the environment across the UK, to reduce the need for costly and time-consuming local studies. Consider the Environment Agency to do this as it aligns with their remit.
- Enable forward looking evidence, for example about housing and employment needs, to be scenario based, evaluating a range of options and allowing local authorities to balance how they plan to meet those needs.
- Integrate the various existing requirements for environmental plans (air quality plans, biodiversity action plans) into the new Local Nature Recovery Strategies and set out clearly how they should be expected to inform local plans.
- Enable and encourage local authorities who want to improve and restore their natural landscape to do that. Perhaps the equivalent of One Public Estate<sup>48</sup> for landscape restoration?

<sup>48</sup> Local Government Association available at <https://www.local.gov.uk/onepublicestate> [accessed 8 October 2021].

- Finally, I cannot speak about a better planning system without a call to either fund local planning authorities more or raise costs of planning and prior approval applications; so that local authorities have the capacity to create visions of how places can be, engaging communities in that process and fostering high quality development. Having consistent and ring-fenced funding for local plan-making will result in a more stable officer team with more experience and efficient ways of working, and better outcomes for residents and for the environment.

## Conclusion

Enfield's officers and members are working hard to prepare a sound plan, to balance all the evidenced needs and thread the needle of assessments, consultation, examination, tests of soundness and political nervousness associated with local plans. The process is exhausting and leaves neither officers, nor residents or politicians happy. But, as an outer London borough with a corporate vision for sustainable growth, including a variety of housing types, a shift to public transport and rewilding large tracts of farmland, the local plan is emerging as a positive long-term vision for how the borough's character and landscape can not only develop but improve and support UK net zero goals. The vision proposed in the Local Plan 2039 is an innovative, and positive one; where landscapes evolve quickly to promote biodiversity, mitigate climate change and improve public health. Growth should improve urban areas and where it goes beyond current boundaries, it comes with a strong framework for development which encourages residents to live within their environmental limits. At the same time, Enfield's experience also shows up areas where plan-making might improve to help communities understand their impact on the climate and manage it better.

Plan-making is a blunt, unwieldy and slow tool in its current form. As with the housing crisis, other policy and regulatory changes are needed to help the built environment change to face climate change: retrofit incentives, better building regulations, investment in cycling and public transport.

But, given the pace of change of the climate emergency, plan making processes should also be quickly improved so that the UK uses its carbon budgets more wisely. I do not think we should stop meeting housing or other needs to reduce carbon emissions. I do not accept that overcrowded housing and poverty due to housing costs is a price to pay to meet the UK's carbon budget. To work within Kate Raworth's useful doughnut economics<sup>49</sup>; if we set societal minimums and carbon maximums and want to keep trying to stay inside that doughnut, I suggest moving to a planning framework which is more transparent about the carbon cost but also much more positive about how built and rural landscape can be developed to mitigate and sequester carbon; to rewild and regenerate ecosystems. We should all be starting to think differently about the presumption in favour of sustainable development, to change how we go about understanding and meeting our needs. This implies more focus on the carbon impact of development in making choices about growth, rethinking how evidence and tests of soundness are constructed and enabling local authorities to use planning tools to promote a positive vision of landscape change.

<sup>49</sup>K. Raworth, 2017 JPLC paper available at [https://www.jplc.org/files/pdf/Raworth\\_Pages%20from%202017\\_JPL\\_Occasional\\_Papers\\_13\\_FINAL.pdf](https://www.jplc.org/files/pdf/Raworth_Pages%20from%202017_JPL_Occasional_Papers_13_FINAL.pdf) [accessed 8 October 2021].