



Enfield Local Plan (Regulation 24) 2024

Stage 1 Matters, Issues and Questions

Matter 4: Green Belt

Wednesday 29 January 2025

London Borough of Enfield

Matter 4: Green Belt

Issue 4.1: Whether all reasonable options for meeting the identified need for housing and employment development on land that is not in the Green Belt fully examined.

Q4.1. What is the identified capacity to meet a) housing and b) employment needs within the Plan area without requiring any alteration to Green Belt boundaries?

Response

Housing Needs

- 4.1.1 ELP Table 8.2 shows a total housing supply of 34,710 dwellings. Within the Plan period, the following delivery is estimated on sites proposed for release from the Green Belt –
- Hadley Wood – 160 homes
 - Land Opposite Enfield Crematorium – 291 homes
 - Crews Hill – 3,350 homes
 - Chase Park – 2,550 homes
- 4.1.2 In total, therefore, during the Plan period, approximately 6,351 homes are expected to be delivered on sites proposed to be released from the Green Belt.
- 4.1.3 This means that the identified capacity for new housing development within the Plan period, without alteration to Green Belt boundaries, is approximately 28,359 homes.
- 4.1.4 The ELP Green Belt land releases are part of a positive and strategic approach to ensuring the Borough can meet its long-term housing needs (including the need for more family and affordable housing). Crews Hill and Chase Park will also provide essential capacity for housing delivery beyond the Plan period (post-2041), in line with the principles of sustainable growth and the guidance set out in the NPPF 2023 (including at paragraph 22).
- 4.1.5 Beyond the Plan period there is an estimated capacity for an additional 2,150 homes at Crews Hill, and an estimated capacity for an additional 1,150 homes at Chase Park.
- 4.1.6 In preparing this MIQ response, the Council has noted an error in ELP Table 8.2, in that the small windfall schemes figure has not been updated. As per Housing Topic Paper [TOP3] Tables 12 and 13, the small windfall scheme figure over the Plan period is 3,544 homes. With this amendment, the sum of the housing land supply components in ELP Table 8.2 is 34,710 dwellings.

- 4.1.7 Accordingly, the Council proposes a minor modification to Table 8.2, correcting the unidentified small windfall scheme figure as follows – *replace 2,839 with 3,544*. The Council has also noted an inconsistency with the figure shown in Table 8.2 for development beyond the Plan period (3,449 homes) and the figures presented elsewhere in the ELP. To ensure consistency, the Council proposes a further minor modification to ELP Table 8.2 as follows – *replace 3,449 with 3,300 and replace the Total figure in column 3 (38,159) with 3,300*.

Employment Needs

- 4.1.8 In terms of employment, the ELP evidence base (Employment Land Review 2023) [EMP1] identifies a need for a minimum 304,000 sq. m of floorspace for industrial and logistics uses (see paragraphs 10.4 and 10.5 , page 135).
- 4.1.9 The Employment Topic Paper [TOP4], page 17, Table 7, sets out a theoretical urban land supply of 305,315 sq. m. However, this supply figure is predicated on achieving significant intensification, the viability and deliverability of which remain uncertain.
- 4.1.10 The Employment Land Review [EMP1] paragraphs 10.27 to 10.92 (pages 139 to 148), consider the issue of intensification in some detail. They conclude that whilst in theory there might be scope to achieve a net gain of 200,060 sq. m through intensification, a far more reasonable assumption, based upon review of material presented by site promoters (developed in alignment with the GLA and Borough material), is that intensification might deliver a net gain of 74,189 sq. m; see the Employment Land Review [EMP1] page 142, paragraph 10.49.
- 4.1.11 On this basis, the total urban supply of employment land for industrial and logistic uses is 179,444 sq. m, indicating a shortfall against the identified need of 124,556 sq. m (see Employment Land Review Table 10.7, page 145 – summing the three tranches of supply and need).
- 4.1.12 The three proposed employment allocations in the Green Belt (sites RUR.03, RUR.04 and RUR.05) have the capacity to deliver 117,195 sq. m (if developed at a plot ratio of 65%, see EMP1, page 145, paragraph 10.67). Together, the Green Belt and urban sites have a potential capacity for approximately 296,639 sq. m of industrial and logistics space, suggesting a very marginal shortfall overall against the identified need (i.e. a shortfall of 7,362 sq. m – see EMP1, page 146, Table 10.8).
- 4.1.13 In preparing this MIQ response, the Council has reviewed the explanatory text relating to Policy E1. The Council can see that whilst ELP paragraphs 9.11 to 9.16 set out the need for industrial and logistics floorspace, the challenges associated with intensification and the exceptional circumstances for Green Belt land releases to meet employment needs, ELP paragraph 9.21 largely duplicates the aforementioned explanatory text. The Council would therefore like to recommend a modification to delete paragraph 9.21 in its entirety.

Q4.2. Were all reasonable opportunities assessed for meeting the need for (a) housing and (b) employment related development outside the Green Belt, including through making as much use as possible of suitable brownfield sites and underutilised land and optimising the density of development?

Response

4.2.1 Yes, the Council has assessed and taken all reasonable opportunities for meeting the needs for housing and employment uses outside of the Green Belt, including through making as much use as possible of suitable brownfield sites and underutilised land and optimising the density of development.

Housing

4.2.2 The Housing and Economic Land Availability Assessment (HELAA) 2023 [HOU1] describes the approach to determining the quantity and suitability of land available for housing development.

4.2.3 As set out at paragraphs 3.12 and 3.14 of the HELAA (page 10), it covers the whole of Enfield Borough and considers all potential housing sites over 0.05ha in size or with a capacity to deliver 5 homes or more. For extant consents, the HELAA includes all schemes with capacity for 1 or more homes.

4.2.4 Table 1 of the HELAA (page 11) lists the range of sources used to identify potential sites. These sources include planning applications (including refused applications), returns from the Council's multiple Call for Sites and Call for Small Sites, public sector land (either surplus or likely to become surplus over the Plan period), the Brownfield Land Register, London Strategic Housing Land Availability Assessment (2017) and the GLA's London Development Database.

4.2.5 Overall, the HELAA took a thorough and comprehensive approach to identifying potential sites for further consideration through the HELAA process.

4.2.6 Stage 2 of the HELAA process (see HOU1, pages 10-12) involved an initial sifting exercise, to exclude sites that were not considered to have any reasonable development potential, taking into account national and local policies and designations. The constraints considered at this stage in the process are set in Table 2 of the HELAA (page 12). Importantly, only sites that were wholly covered by the identified "absolute" constraints were excluded from further consideration. So, for example, the site proforma for the Chiswick Road Estate (LOC1) confirms that the site falls partially within Flood Zone 3 (see HELAA Appendix E, Part 2, pages 1 and 2 – HOU3). The HELAA still found the site to be "developable", and indeed, the site has been taken forward and allocated in the ELP – site SA3.2: Chiswick Road Estate (see ELP Appendix C, page 388).

4.2.7 Stage 2 of the HELAA process also involved an assessment of the availability, suitability and achievability of sites. The process is described in detail at Appendix C of the HELAA (HOU1, page 36). The Inspector will note that the detailed methodology explains that where sites were submitted or suggested for

assessment by a third party that was not the owner, developer or site promoter, the Council's team sought to establish such sites' availability by further investigation and evidence gathering, taking a thorough but proportionate approach (HOU1, page 37).

- 4.2.8 Stage 3 of the HELAA process (HOU1, pages 13-15) involved estimating the projected housing capacity on small windfall sites. Supply from small sites during the Plan period has been established in the HELAA, in line with London Plan Policy H2 (Small Sites).
- 4.2.9 The Council has a Small Sites Programme, which has contributed around 1,500 potential homes to supply through detailed site appraisals of Council owned land (Exceptional Circumstances Topic Paper, paragraph 4.16, TOP5).
- 4.2.10 Further windfall capacity on sites below 0.25 hectares is accounted for with a small sites allowance, benchmarked against historic trends. AECOM and Farrell's London Plan Small Sites Evidence 2019 (see Enfield Housing Topic Paper [TOP3], page 31, paragraph 3.30), also provided further modelling evidence of the potential scope for further small sites delivery in Enfield. This reviewed both local infrastructure and viability of intensification scenarios and found that changes to policies were unlikely to enable small sites delivery to increase dramatically above the historic trend. On this basis, the capacity identified on small sites below the threshold of site allocations is considered to have been maximised in the ELP, accounting for approximately 16% of the envisaged housing delivery over the Plan period (see paragraph 4.18, TOP5).
- 4.2.11 Stage 4 of the HELAA process (HOU1, page 16) involved a brief review of the development needs of the Borough, and Stage 5 (HOU1, pages 16 and 17), preparation of the final evidence base report.
- 4.2.12 The HELAA explains the initial site cleansing process for excluding sites (HOU1, see page 18), with sites excluded because, for example, they fell below the 0.05ha size threshold, overlapped with other site submissions, or because they had already been developed and therefore could no longer be considered available. Of the 1,255 remaining sites, 1,158 sites were assessed in more detail for housing or housing-led mixed use development. Overall, the Council believes that the HELAA gave full consideration to the opportunities for making use of brownfield sites and under-utilised land.
- 4.2.13 In terms of optimising the density of development, for the vast majority of potential housing sites, a design typology case study approach was utilised (informed by the Character of Growth work, DES2 – DES41) This involved the preparation of a set of locally specific and appropriate design case studies, based on local considerations. Each HELAA site was assigned the most appropriate, relevant design typology depending on its own context and characteristics.

4.2.14 Assignment of a design case study for each HELAA site then enabled its capacity to be estimated.

4.2.15 The design-led approach took into account a wide range of factors, including, but not limited to:

- Appropriate building heights
- Infrastructure capacity, including provision of blue green infrastructure requirements
- Development viability
- Climate change, nature recovery and biodiversity requirements
- Provision of car parking
- Piccadilly Line upgrades and other planned improvements to public transport accessibility
- Environmental considerations
- Design and heritage considerations (having appropriate regard to conservation areas and listed buildings)

4.2.16 The Council believes that the approach taken in the HELAA has ensured that development density assumptions are robust and that the assumed development capacity of each site is optimised, taking into account each sites' characteristics and context.

4.2.17 The Site Allocation Topic Paper 2024 [TOP2] explains how the sites identified in the HELAA were then taken through the Council's Site Selection Methodology. Paragraph 4.1 of the Site Selection Methodology (attached as Appendix 1 of TOP2), explains that the site options were assessed to prioritise the allocation of land within the urban area, with an emphasis on brownfield sites. Highest priority was given to previously developed land (PDL) in the urban area, with isolated greenfield sites in the Green Belt given the lowest priority.

4.2.18 The effectiveness of the approach is demonstrated in part through analysis of Appendix 3 of the Site Allocation Topic Paper [TOP2], pages 70-82, with many of the rejected sites being either Green Belt or Metropolitan Open Land.

4.2.19 The Council's approach to the assessment of available land through the HELAA and site selection process had the objective of making the best use of vacant or underutilised employment land. Opportunities for intensification have also been taken, seeking to introduce residential uses alongside existing employment uses. In total, well over 5,000 homes should be delivered on former employment sites over the Plan period (based on data from the HELAA, see TOP5, page 23, paragraph 4.11).

4.2.20 Furthermore, the delivery of a number of Council owned sites through the Joint Venture at Meridian Water demonstrates how the Council is seeking to make most effective use of under-utilised brownfield land.

Employment

4.2.21 The HELAA 2023 [HOU1] also describes the approach to determining the quantity and suitability of land available for employment development. As set out at paragraph 3.12 of the HELAA (page 10), the site search process covered the whole of Enfield Borough. A site threshold of 0.25 hectares was used for industrial and logistics uses, and for office space a threshold of 250m² was used, to reflect the fact that the office market in Enfield is primarily dominated by smaller units (see paragraph 3.15, HOU1).

4.2.22 Table 1 of the HELAA (page 11) lists the wide range of sources used to identify potential sites. As with the approach taken to potential housing sites, the HELAA took a thorough and comprehensive approach to identifying potential employment sites for further consideration through the HELAA process.

4.2.23 Stage 2 of the HELAA process (HOU1, pages 10-12) involved an initial sifting exercise, to exclude sites that were not considered to have any reasonable development potential, taking into account national and local policies and designations. The constraints considered are set out in Table 2 of the HELAA (page 12). Importantly, only sites that were wholly covered by the identified “absolute” constraints were excluded from further consideration.

4.2.24 Stage 4 of the HELAA process (HOU1, page 16) involved a brief review of the development needs of the Borough, and Stage 5 (HOU1, pages 16 and 17) is preparation of the final evidence base report.

4.2.25 The HELAA explains the initial site cleansing process for excluding sites (HOU1, page 18), with sites excluded because, for example, they fell below the size thresholds, overlapped with other site submissions, or because they had already been developed and therefore could no longer be considered available. Of the 1,255 remaining sites, 79 were assessed for employment uses.

4.2.26 The approach to assessing the indicative capacity of potential industrial employment sites is set out at paragraphs 4.37 to 4.44 of the HELAA, with the further work undertaken to determine a capacity figure for each site (as opposed to a range) explained in the Employment Land Review (ELR) December 2023 [EMP1] (see paragraphs 10.19 – 10.56).

4.2.27 In the HELAA two approaches were adopted, with the first being a business as usual approach, that was used to inform the site capacities presented in the Regulation 18 draft ELP (2021) [REG1]. The GLA commented at the time that this approach underestimated the capacity of the identified urban sites, in a policy context which supported and promoted intensification.

- 4.2.28 To inform the submission draft ELP [SUB1-6], the HELAA was updated, applying intensification typologies to the potential employment sites. The Enfield Industrial Intensification Study (2021) [EMP3] profiled several industrial typologies applicable to the Enfield context, and these were further developed by Stantec and Grant Mills Wood in the subsequent Enfield Industrial Intensification Market Deliverability Study [EMP2].
- 4.2.29 As above, the HELAA work generated a range of potential site capacities that were considered further in the December 2023 ELR.
- 4.2.30 The viability outlook for intensified formats worsened between 2021 and 2023 (see Enfield Industrial Intensification Market Deliverability Study) [EMP2]. The ELR shows that 50% of the land promoted, via the calls for sites, for new industrial development, had also been promoted for industrial land release or residential led mixed-use redevelopment (see EMP1, page 139, paragraph 10.27).
- 4.2.31 As set out in Chapter 10 of the ELR [EMP1], Tables 10.1, 10.2 and 10.3, the site capacities in the ELP either reflect a planning permission, the product of the HELAA based scenario work (for urban intensified sites) or bespoke work at Meridian Water as set out at paragraph 3.32 of the Employment Topic Paper [TOP4]. Green Belt sites are assumed to come forward at 65% - the minimum plot ratio that the GLA considers 'intensified' (see EMP1, paragraph 10.67).
- 4.2.32 When considering the intensification ranges developed through the HELAA work, the ELR (paragraphs 10.19-10.56) ultimately recommended minimum capacities that were generally significantly higher than the 65% (ELR Table 10.5, page 140), reflecting a balance between the lack of robust delivery evidence and developer aspirations. But even the plot ratios assumed in the ELP allocations for intensified sites are still in excess of what the Borough's delivery evidence would support, and would still appear to require market conditions / viability to further improve before they can be relied upon.
- 4.2.33 Hence, the ELP does not rely on intensive brownfield redevelopment capacity to meet its short term (pre-2029) economic needs, but a mix of sites with planning permission, Green Belt sites, and intensification at Meridian Water, using land in the Council's control to address its immediate need for more floorspace in the short term.
- 4.2.34 For office sites, as set out in the Employment Topic Paper (paragraphs 3.52 - 3.56) only one site, at Meridian Water was promoted for new office space. That proposal was for 100,000 sqm of new office space west of the River Lee Navigation. The plan has therefore made provision for all its office need (40,000 sqm) in, or around, the new Meridian Water town centre (site allocations 5.2, 5.3, 5.4 and 5.5). There is however considerable resistance from some landowners to any office provision and the Council, as set out in its SoCG with the GLA, is looking to develop Meridian Water specific E class guidance - reflecting the

GLA's view that the ELP should maximise the full flexibility of E class commercial space to meet as wide range of end users as possible.

4.2.35 The Council considers that extensive assessments have been conducted to inform the approach to meeting employment needs, with the available brownfield land evaluated in consultation with the relevant landowners. The ELP employment allocations reflect an evidence-based approach, balancing market viability with the pressing need to meet industrial space demands. The suitability, capacity and deliverability of brownfield and under-utilised land to meet employment needs has been very carefully considered and optimised. A planning judgement has been made that to ensure the identified employment land needs are met, the allocation of some land within the Green Belt is necessary.

4.2.36 As summarised at paragraph 4.45 of the Exceptional Circumstances Topic Paper [TOP5] the strategy for industrial and logistics space seeks to minimise the amount of Green Belt land release. The opportunities for intensification have been fully explored, and the ELP provides a positive framework for intensification, as and when opportunities arise, and viability improves. Policy E5 (Transforming Industrial Sites) states that the intensification of industrial uses through the more efficient use of space, higher plot ratios and the development of multi-storey schemes, will be supported.

4.2.37 Add text here.

Q4.3. Is there any substantive evidence to indicate that relevant neighbouring local planning authorities outside the Plan area could accommodate some of the housing or employment development proposed?

Response

4.3.1 No; as part of the Council's Duty to Cooperate discussions (see Duty to Cooperate Statement, SUB14), the Council asked whether adjoining and neighbouring authorities were able to accommodate any of Enfield's unmet housing needs. Through meetings and formal representations to the Regulation 18 draft Local Plan, it was established that other authorities were not able to accommodate Enfield's unmet needs (paragraphs 6.11 and 6.34, pages 11 and 14, SUB14).

4.3.2 More specifically, in January 2021, Enfield Council wrote to neighbouring authorities and those adjacent to them under the Duty to Cooperate (paragraph 6.13, page 11, SUB14). The letter advised that Enfield could not accommodate all of its housing and employment needs and asked whether neighbouring authorities and those adjacent to them could assist in meeting any of Enfield's unmet needs. Twelve responses were received, including from the adjoining authorities of Barnet, Epping Forest, Haringey, Waltham Forest, Broxbourne, Welwyn Hatfield and Hertsmere, confirming that none of Enfield's unmet needs could be accommodated by these authorities.

- 4.3.3 The Council is not aware of any substantive evidence to indicate that, contrary to the Duty to Cooperate discussions, relevant neighbouring local planning authorities could accommodate some of the unmet housing or employment need from Enfield Borough. Further, the Council notes that none of the Duty to Cooperate bodies have made representations to the ELP suggesting that there has been a failure of the Duty to Cooperate (with regard to unmet development needs, or indeed in relation to any other DtC matter).

Issue 4.2: Whether removing land from the Green Belt as proposed in the Plan necessary to ensure that the identified need for housing and employment development can be met in a way that promotes sustainable patterns of development.

Sustainable patterns of development

Q4.4. What was the Council's approach to assessing the opportunities for altering Green Belt boundaries?

Response

- 4.4.1 The Council's approach to assessing the opportunities for altering Green Belt boundaries has been iterative. The approach has been informed by many elements of the ELP evidence base, including the Housing and Economic Land Availability Assessment (HELAA) [HOU1], the Integrated Impact Assessment work (IIA) [SUB8] and the Green Belt and MOL Assessment [GRE1].
- 4.4.2 The approach has also been informed by the ELP's objectives, including in terms of delivering more family and affordable housing, and the importance of improving access for new and existing residents to the countryside.
- 4.4.3 From the range of sources used to identify potential sites (see HEELA [HOU1] Table 1, page 11), a large number of sites within the Green Belt were assessed as part of the HEELA process. Many of these sites were small and relatively isolated, with the main exceptions being a cluster of promoted sites around Crews Hill, and a large site promoted for development at Chase Park.
- 4.4.4 Appendix 3 of the Site Allocation Topic Paper [TOP2] (page 70) summarises the reasons for not allocating HELAA sites in the ELP, with many of the HELAA Green Belt sites rejected because they were isolated, unsustainable sites.
- 4.4.5 At an early stage in the plan-making process (see Main Issues and Preferred Options document (2018), paragraph 2.12.2) [ISO1], the Council identified Crews Hill as a potential opportunity for development, with large areas of previously developed land, an area of land already excluded from the Green Belt, and importantly, and under-utilised railway station, with a good standard of service into central London. It was also recognised that strategic scale development at

Crews Hill had significant scope to contribute towards meeting the need for more family and affordable housing, provide new supporting community infrastructure and afford opportunities to enhance access to the countryside for new and existing residents.

- 4.4.6 The potential for development of land at Chase Park was first set out in the Main Issues and Preferred Options document [REG1]. Chase Park has good access to the London underground network, which provides direct access into and across London. Further, the expansion of the existing bus network, linking into the railway stations, also provides the opportunity to enhance the existing network to provide a comprehensive public transport network for all existing and future residents. In a similar way to Crews Hill, Chase Park also offers significant scope to contribute towards meeting the need for more family and affordable housing, provide new supporting community infrastructure and afford opportunities to enhance access to the countryside for new and existing residents.
- 4.4.7 The Housing Topic Paper [TOP3], paragraph 6.14, page 56, estimates that Crews Hill and Chase Park could have the effect of increasing the overall supply of family housing in the ELP by around 3,600 homes (i.e. increasing provision from about 8,600 family homes overall, to around 12,200 family homes overall). The Crews Hill Topic Paper [PLA1] summarises the range of new supporting community infrastructure to be delivered at Crews Hill (para 7.7, page 38). The same information is provided for Chase Park in the Chase Park Topic Paper [PLA2], at paragraph 7.7, page 38. Enhanced access to the countryside is addressed at paragraph 5.22 (page 21) of the Chase Park Topic Paper, and at paragraph 5.4 (page 21) of the Crews Hill Topic Paper.
- 4.4.8 No alternative, deliverable, strategic scale growth opportunities were promoted within the Green Belt. The Council does not believe that there are any reasonable alternatives to Crews Hill and Chase Park, in so much as there are no other strategic scale sites (or areas) within the Green Belt in Enfield Borough that have similar merits.
- 4.4.9 Following the identification of Crews Hill and Chase Park as potential locations for development, the Council has undertaken masterplanning work to assess the opportunities for delivering sustainable development. This process has been supported by further work in relation to transport, infrastructure requirements, viability and deliverability.
- 4.4.10 The Green Belt and MOL Assessment [GRE1] divides the Borough's Green Belt into a number of parcels and makes an assessment of the contribution these parcels make to the purposes of the Green Belt. The Assessment also identifies the potential harm arising from releasing each parcel from the Green Belt. Whilst releasing the core of the proposed Crews Hill development area from the Green Belt would result in low to moderate harm, releasing other parts of the Crews Hill development area from the Green Belt would result in high to very high harm.

- 4.4.11 Release of the land parcels at Chase Park would generally result in very high harm.
- 4.4.12 Alongside these identified impacts, the Council has given consideration to the findings of the IIA [SUB8], which identifies, for example, the issues arising from seeking to increase development densities within the urban area (see Table 2.1, page 14), and the implications for family and affordable housing delivery, if no Green Belt land is released (see Table 2.2, page 17).
- 4.4.13 Overall, the impacts on the Green Belt have been an important consideration in the site selection process. Other factors were also taken into account, including the location of the Green Belt land, the extent to which development of the parcel would accord with the emerging spatial strategy, the findings of the IIA, and the opportunity to plan and deliver sustainable development. Specifically in relation to the IIA, Table 5.10 (page 114) and Table 5.11 (page 118) show the significant positive contribution that Chase Park and Crews Hill can make towards the IIA objectives, subject to effective application of the policy requirements set out in Policy PL10: Chase Park and Policy PL11: Crews Hill.
- 4.4.14 The appropriateness of the proposed allocations in the ELP has been kept under review as the evidence base has been further developed and refined. This is particularly the case for Crews Hill and Chase Park.
- 4.4.15 The reasoning for allocation of sites RUR.01 (Land Opposite Enfield Crematorium) and RUR.02 (Land Between Camlet Way and Crescent Way, Hadley Wood) is set out in the Site Allocation Topic Paper, pages 59 – 61 [TOP2]. RUR.01 sits on the edge of the urban area, has good access to local services and public transport, and is capable of delivering family and affordable housing. It will also deliver improved pedestrian and cyclist access to local green infrastructure. RUR.02 lies adjacent to the urban area of Hadley Wood, in very close proximity to Hadley Wood station (and the local amenities and facilities in the immediate vicinity). It will deliver larger family and affordable housing, as well as improved pedestrian and cycle connections, and a new area of open space. Overall, the Council believes that the necessary exceptional circumstances have been demonstrated to remove sites RUR.01 and RUR.02 from the Green Belt and allocate them for development.
- 4.4.16 The reasoning for allocation of sites RUR.03 (Land West of Rammey Marsh), RUR.04 (Land East of Junction 24) and RUR.05 (Land to the Northwest of Innova Park) is set out at pages 63 – 65 of the Site Allocation Topic Paper. RUR.03 and RUR.05 are located at the edge of the urban area, have excellent access to public transport and the strategic road network (M25), and form a logical extension to the existing areas of SIL. The harm arising from release of the land from the Green Belt is assessed as low moderate (RUR.03) and low (RUR.05). RUR.04 is located close to the urban edge of Potters Bar, adjacent to the M25 (Junction 24), making it very attractive for logistics use. Again, overall, the Council believes that the necessary exceptional circumstances have been

demonstrated to remove sites RUR.01 and RUR.02 from the Green Belt and allocate them for development.

Q4.5. In selecting the locations to be removed from the Green Belt, was first consideration given to land which has been previously developed and/or is well served by public transport?

Response

- 4.5.1 Yes; table 3 in the Site Selection Methodology (attached as Appendix 1 to the Site Allocation Topic Paper) [TOP2] explains how sites were prioritised. Outside of the urban area, priority was given to brownfield sites in accessible locations (Priority level 3), with accessibility determined by the Public Transport Accessibility Level (PTAL). Greenfield sites in accessible locations were then prioritised (Priority levels 4-6), with isolated Green Belt sites given the lowest level of priority (Priority levels 7 and 8).
- 4.5.2 The Site Selection Methodology (paragraph 4.2) explains the approach to consideration of accessibility. For residential development, this was largely based on the PTAL, but consideration was also given to access to major service and employment centres, as well as to a range of services and facilities. For industrial/logistics sites, access to the Strategic Road Network was also be given consideration, to minimise the impact of associated traffic on the existing local road network and air quality in these areas.
- 4.5.3 In relation to Crews Hill and Chase Park, the site selection process recognised the opportunity for development to support the provision of significant infrastructure improvements (including in terms of improvements to public transport provision) – see Site Allocation Topic Paper, paragraph 4.7, page 33 [TOP2].
- 4.5.4 The Crews Hill Placemaking Area is a blend of previously developed land and greenfield land. Whilst the PTAL for this Placemaking Area is low at present (consisting of areas of 1b, 1a and 0), these are considered to be out of date as they do not take account of the recent increase in rail service provision at Crews Hill, from 2 trains per hour to 4 trains per hour. Through a combination of increased rail frequencies, more comprehensive bus coverage, and better pedestrian links to public transport nodes, the majority of the site could be uplifted to PTAL 3, 2 and 1b (see Crews Hill Topic Paper, page 31, paragraph 7.13) [PLA1].
- 4.5.5 In relation to Chase Park, through a combination of improved bus services within suitable walking distances, walkable neighbourhoods and community facilities, and better pedestrian links to public transport nodes, the majority of the site's PTAL could be uplifted to a score of 2 to 3 (see Chase Park Topic Paper, page 31, paragraph 6.10) [PLA2]. Such improvements to public transport accessibility would not be achievable on small, isolated Green Belt sites.

Removing land from the Green Belt to provide land for housing and employment development

Q4.6. Is there a quantitative need to remove land from the Green Belt in the Plan area to ensure the provision of at least 33,280 homes in the period by 2041?

Response

- 4.6.1 Yes; as set out in the Council's response to MIQ4.1, the identified capacity for new housing development within the Plan period, without alteration to Green Belt boundaries, is approximately 28,359 homes.
- 4.6.2 Without the proposed Green Belt land releases, in quantitative terms, there would be a shortfall of approximately 4,921 homes.
- 4.6.3 The ELP evidence base demonstrates the likely significant adverse impacts of seeking to accommodate higher levels of development within the urban area. Enfield's Character of Growth Study [DES1-DES41] helps to recognise and establish the character of existing communities in an evidence-led way (in line with NPPF paragraph 130), and through providing clear guidance for plan-making around acceptable building heights, volumes and masses within Enfield's urban areas, optimises the available development opportunities in the Borough. As referenced in the Exceptional Circumstances Topic Paper [TOP5], paragraph 4.21, the Character of Growth Study has indirectly helped to demonstrate that allocating at higher densities (to avoid the need to allocate sites in the Green Belt) would conflict with NPPF and London Plan policies.
- 4.6.4 The impacts of promoting even higher development densities within the urban area are also addressed in the IIA [SUB8]. So, for example, in Table 2.1 (page 15) the reason for discounting Option 3A (high growth focused in the urban area only) is that it would result in very high density development leading to significant (adverse) changes in the Borough's character. It would also not deliver the mix of housing types needed.
- 4.6.5 At the ELP Regulation 19 stage, the IIA considered Option 7 (Revised Baseline Growth), which was based on accommodating 30,000 new homes and some other land uses within the urban areas only. This Option was discounted on the basis that it would not help address the housing shortfall across London as a whole, and because it would not deliver the mix of housing types needed in Enfield (as it would mostly deliver flats, many of which would be in tall buildings, the viability of which is worsening) (see SUB8, Table 2.2, page 17).

Q4.7. Is there a quantitative need to remove land from the Green Belt to ensure that the identified need for additional industrial and warehousing floorspace can be met by 2041?

Response

- 4.7.1 Yes; as set out in the Council's response to MIQ4.1, the Employment Land Review (2023) [EMP1] identifies a need for a minimum of 304,000 sq. m of floorspace for industrial and logistics uses (see Table 10.7, first row). Whilst the Employment Topic Paper [TOP4], Table 7, sets out a theoretical urban land supply of 305,315 sq. m, this supply figure is predicated on achieving significant intensification, the viability and deliverability of which remain uncertain.
- 4.7.2 The Employment Land Review [EMP1], paragraphs 10.19 to 10.92 (pages 138 to 148), considers the issue of intensification in some detail, and concludes that whilst in theory there might be scope to achieve a net gain of 200,061 sq. m through intensification, a far more reasonable assumption, based upon review of material presented by site promoters (developed in alignment with the GLA and Borough material), is that intensification might deliver a net gain of 74,189 sq. m. See Employment Land Review page 142, paragraph 10.49.
- 4.7.3 On this basis, the total urban supply of employment land for industrial and logistic uses is 179,444 sq. m, indicating a shortfall of 124,556 sq. m against the identified need (see Employment Land Review [EMP1] Table 10.7, page 145 – summing the three tranches of supply and need). The three proposed employment allocations in the Green Belt (sites RUR.03, RUR.04 and RUR.05) have the capacity to deliver 117,195 sq. m (if developed at a plot ratio of 65%, see EMP1, paragraph 10.67). Together, the Green Belt and urban sites have a potential capacity for approximately 296,639 sq. m of industrial and logistics space, suggesting a very marginal shortfall overall against the identified need (i.e. a shortfall of 7,362 sq. m – see EMP1, Table 10.8).
- 4.7.4 The Council considers the ELP approach to be evidence-led and pragmatic. Challenging intensification sites are already programmed to contribute towards employment needs in the second part of the Plan period, and in the short term, the Council needs to be cautious, to ensure economic growth is not stifled by a lack of available and deliverable land for industrial and logistical uses. The plan, monitor and manage approach suggested by the GLA does not work in a situation where there is already an identified shortfall in floorspace for industrial and logistical uses.

Q4.8. Overall, are there exceptional circumstances in principle to justify altering Green Belt boundaries for a) housing and b) employment development?

Response

- 4.8.1 Yes, the Council believes there are the exceptional circumstances to justify altering Green Belt boundaries to meet housing and employment needs. National planning policy is clear, in that authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified (NPPF 2023, paragraph 145).
- 4.8.2 The Written Statement of the Minister for Housing and Planning (12th December 2024) "*Building the Homes we Need*" is material and provides important context within which the local plan will be operating. The opening paragraphs state –
- 4.8.3 *"This Government have inherited an acute and entrenched housing crisis. The average new home is out of reach for the average worker, housing costs consume a third of private renters' income, and the number of children in temporary accommodation now stands at a historic high of nearly 160,000. Yet just 220,000 new homes were built last year and the number of homes granted planning permission has fallen to its lowest in a decade.*
- 4.8.4 *That is why the plan for change committed to rebuild Britain, with the hugely ambitious goal of delivering 1.5 million new homes this Parliament..."*
- 4.8.5 The Council's approach towards the delivery of housing in its area aligns with these objectives. The GLA recognises in the SoCG with the Council the changing policy context within which the ELP is being developed.
- 4.8.6 The evidence base that underpins the ELP, including the Local Housing Needs Assessment [HNE2] and the Employment Land Review [EMP1], demonstrates the need for housing (in particular affordable and family homes), as well as the need for more industrial and logistics space to support economic growth and local job creation. LBE is committed to supporting 'good Growth' and wish to ensure that the new housing and employment development is supported by necessary supporting infrastructure, for the benefit of both new and existing residents.
- 4.8.7 The Council has fully explored the opportunities for development within the urban area and has sought to optimise development site capacities, balancing a wide range of considerations, including heritage and character constraints.
- 4.8.8 Development within the urban area is not able to meet the identified needs for housing (in particular the need for more affordable and family homes) and is not able to meet employment land needs, risking stifling economic growth and local job creation. The Employment Topic Paper [TOP4], paragraph 9.7, concludes that relying solely on intensification or the identification of new employment land would likely fall short of meeting the Borough's needs.

- 4.8.9 Adjoining authorities have confirmed that they are unable to assist in meeting any of Enfield's housing and employment needs (see Council's response to MIQ4.3).
- 4.8.10 A Green Belt and Metropolitan Open Land Study has been undertaken, which provides a detailed assessment of the Green Belt in the Borough, the contribution land parcels make to each Green Belt purpose and the assessed level of harm arising from removing a parcel of land (or combination of land parcels) from the Green Belt for allocation.
- 4.8.11 The Exceptional Circumstances Topic Paper [TOP5] outlines the strategic level case for altering the Green Belt boundaries within the Borough, and the Site Allocations Topic Paper [TOP2] addresses the local level exceptional circumstances case for particular sites.
- 4.8.12 The Green Belt Assessment work is one of many inputs into the site selection process (as described in the Site Allocation Topic Paper). The contribution that each parcel of Green Belt land made towards the purposes of the Green Belt was an important consideration in the site selection methodology, but other factors also needed to be taken into account, including the location of the Green Belt land, the extent to which development of the parcel would accord with the emerging spatial strategy, and the findings of the IIA.
- 4.8.13 The Council believes that there are the necessary exceptional circumstances to justify making selective alterations to the Green Belt.
- 4.8.14 The Chase Park urban extension and the Crews Hill new settlement will make a significant contribution towards meeting housing needs (in particular the need for more affordable and family homes), both within the Plan period and beyond. They afford the opportunity to make better use of existing transport infrastructure and deliver new or extended bus routes for the benefit of new and existing residents. They will also deliver significant new community infrastructure and enhanced access to open spaces and the remaining Green Belt.
- 4.8.15 The two other Green Belt housing sites are sustainably located, and again, will make a significant contribution to the delivery of more affordable and family homes.
- 4.8.16 The three proposed employment sites in the Green Belt will support local economic growth objectives, by providing new employment land and floorspace in locations suited to meeting the need for logistics space. The justification for allocation of each site is set out on pages 63 – 66 of the Site Allocation Topic Paper [TOP2].
- 4.8.17 The Council recognises that much of the Green Belt land proposed for allocation contributes strongly to Green Belt purposes, and that the level of harm from allocation in many instances will be high or very high, but a planning judgement has been made taking all factors into account.

- 4.8.18 Importantly, given the current five-year housing land supply position in Enfield Borough (3.45 years), and the measures contained within the NPPF 2024 aimed at boosting new housing delivery, there is a very real risk that piecemeal development would occur within the Green Belt, particularly in and around Crews Hill (where much of the land is previously developed land). The Council believes that it would be far better to plan and manage future growth in the Borough, to ensure effective place-making, to ensure that necessary new infrastructure is delivered alongside development, and to ensure that development best serves current and future generations.

Compensatory Improvements

Q4.9. Is the Plan consistent with paragraph 147 of the NPPF with regard to the provision of compensatory improvements to the environmental quality and accessibility of land in the Green Belt? Are the measures identified in criterion 13 of the Policy SS1 meant to deliver this objective? If so, are they viable and deliverable?

Response

- 4.9.1 NPPF Paragraph 147 states “[Plans] should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”
- 4.9.2 Green Belt PPG Paragraph: 002 Reference ID: 64-002-20190722 sets out ways that plans can set out compensatory improvements to the environmental quality and accessibility of remaining green belt land.
- 4.9.3 Policy SS1 states “To compensate for the loss of Green Belt there will be major landscape restoration and a new country park to improve public access at Enfield Chase and improvements in access and quality to the Lee Valley Regional Park.” Further detail is provided in the Green Belt Exceptional Circumstances Topic Paper [TOP5] (paragraphs 4.55-4.61)
- 4.9.4 As such, the Council can confirm that the measures in Policy SS113. are intended to deliver this objective and in the Council’s view this is considered to be consistent with NPPF Paragraph 147. It is recognised that compensation measures do not in themselves form part of the Exceptional Circumstances required to justify Green Belt release. However, the terminology of ‘compensation’ set out in national policy makes clear that such compensation and offsetting can help to make areas of green belt release more acceptable in planning terms.
- 4.9.5 These measures are further elaborated in Policy BG7: enhancing the beneficial uses of the Green Belt and Metropolitan Open Land, which provides a detailed breakdown of specific compensation measures including estimated costs, as well as setting out a wide range of measures, not detailed here, which are

already funded from a range of sources including Central, Regional and council funding. Many of these measures are already in the process of being delivered and are fully funded as indicated in Policy BG7. already under way for compensation, demonstrating the council's proactive approach and commitment to delivering offsetting for proposed Green Belt releases, particularly on land within its ownership.

- 4.9.6 The explanatory text explicitly recognises the need for flexibility and that there are multiple ways in which the compensating offset measures could be delivered. It is noted that the reference in the explanatory text to Paragraph 142 of the NPPF is incorrect, and that this should be amended to read Paragraph 147.
- 4.9.7 Turning to whether the measures are viable and deliverable, the majority of the land remaining in the Green Belt and encompassed by the Enfield Chase Landscape Recovery Scheme is owned by Enfield Council. Whilst work is ongoing to develop a detailed delivery plan through the statutory landscape recovery scheme, the ELP sets out some ways in which development could contribute to delivering the wider plans, including through a series of costed interventions.
- 4.9.8 The deliverability of these interventions is a matter of planning judgement, but the Council is of the view that, given that limited third party land would be required for their delivery, the remaining question concerns viability. The costs of the compensation measures are assumed to fall within the significant contributions factored into the whole plan viability assessment alongside CIL costs. Appendix 16 makes clear that even at 50% affordable housing, Chase Park (Site 29) is still shown as viable with £70,000 of contributions per home, in addition to CIL payments at the current adopted rate. For Crews Hill the figure is less, at £30,000 per home in addition to CIL.
- 4.9.9 The Council could consider a minor change to the wording of Policy BG7 to reference both "S106 and CIL" under BG7 5. h. and 5. i. to provide additional flexibility to site promoters and the council in meeting this policy requirement.
- 4.9.10 Establishing the requirement for offsite Green Belt compensation - green infrastructure mitigation measures in the manner set out in the PPG referenced above, outside of the red line boundary of these sites and in areas of remaining Green Belt, can help to compensate for the loss of green belt land for housing. This is contemplated by the Delivery Strategies which highlight the need to develop a rolling scheme of mitigation measures as part of the next round of SPD and master-planning.

Policies Map

Q4.10. Is the submitted Policies Map accurate with regard to the boundaries of the Green Belt?

Response

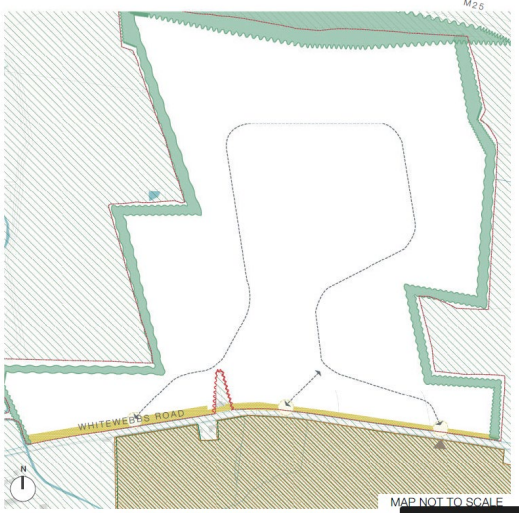
- 4.10.1 This response should be read alongside Q4.11.
- 4.10.2 Yes. The proposed green belt boundary as shown on the submitted policies map is accurate.
- 4.10.3 The Council has identified an inconsistency with regards to maps in Appendix C. These are discussed fully in MIQ – Q4.11. The council propose amending these to align the map with the policies map.

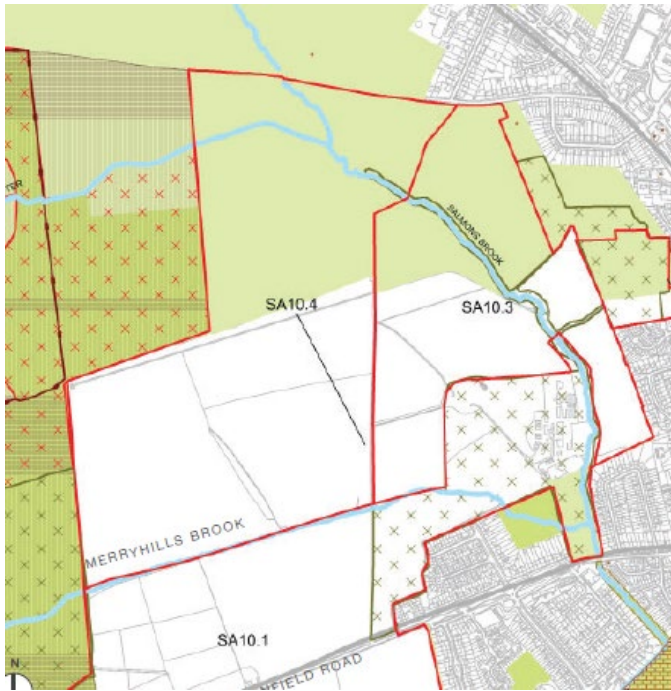
Q4.11. Are the inset maps associated with Green Belt allocations in Appendix C consistent with what appears on the Policies Map?

Response

- 4.11.1 This response should be read alongside Q4.10.
- 4.11.2 All inset maps are consistent with the green belt boundary shown in the policies map apart from R.08 and R.06 where there is a drawing error which limits legibility. The remainder are consistent with the policies map.
- 4.11.3 This is an admin error, and the Council would propose these two issues are amended to align the map with the policies map [MAP1]. Please see table 1, below:

Table 1: Proposed amendments to the Policies Map [MAP1]

Site Allocation	Inconsistency	Proposed Modification
RUR.08	 <p>The cross hatch which represents Green Belt is missing from diagram</p>	<p>Update map with correct cross hatch to encompass the site allocation.</p> <p>This is also shown on RUR.07 which should be updated for completeness.</p>
RUR.06	<p>The hatch colour for green belt and the colour fill for “key open space improvement” are very similar and difficult to read.</p>	<p>Update drawing style to provide clear differentiation</p>
<p>SA10.1 SA10.2 SA10.3 SA10.3 SA11.1 SA11.2 SA11.3 SA11.4 SA11.5</p>	<p>Inconsistent graphic style with other site allocation maps as these maps and figure 17.1 were produced in house, as opposed to by an external consultant. The information shown is consistent with the policies map but could be communicated more clearly to avoid confusion.</p>	<p>Inset maps and figure 17.1 updated with the same graphic style as other site allocations to provide clarity and consistency.</p>

Site Allocation	Inconsistency	Proposed Modification
<p>SA11.6</p> <p>Figure 17.1</p>		

Issue 4.3: Whether other proposals in the Green Belt are justified, consistent with national policy and in general conformity with the London Plan

Q4.12. Other than the allocated housing and employment sites, what other allocations are identified within the Green Belt?

Response

4.12.1 Other than the allocated housing and employment sites, the following sites are allocated for development within the Green Belt:

- SA RUR.06: Land at Picketts Lock
- SA RUR.07: Whitewebbs Golf course and Land at Tottenham Hotspurs Football Club Training Ground
- SA RUR.08: Sloeman’s Farm

Q4.13. Are there any proposed changes to Green Belt boundaries resulting from these allocations?

Response

4.13.1 No, there are no changes to Green Belt boundaries as a result of these allocations as set out in the Council's response to 4.12.

Q4.14. In principle, are the uses proposed within these areas compatible with the Green Belt? Would any development associated with them be considered "inappropriate development in the Green Belt" by the NPPF?

Response

4.14.1 This response should be read alongside the Council's response to PQ30 and PQ31 [E5], provided a summary of the proposed uses, and highlights the Council's commitment to ensuring compliance with NPPF requirements, while reserving site-specific assessments for future planning applications.

4.14.2 The Council confirms that Site RUR.08 – Solemans Farm will remain within the Green Belt. The inset map on page 552 of the Local Plan is incorrect and will be corrected to align with the Policies Map through a forthcoming modifications schedule [DMOD1]. The proposed use of the site is for natural burial space, which involves minimal built form. The Council considers this use to be compliant with paragraph 154(b) of the NPPF, as it preserves the openness of the Green Belt and does not conflict with its purposes. Given the limited scale and nature of development associated with this use, any detailed assessment of whether it constitutes inappropriate development would be undertaken at the planning application stage.

4.14.3 Policy CL4(b) identifies sites RUR.06 and RUR.07 for strategic sport and leisure facilities. For RUR.06, the proposed uses include sports, leisure, and recreational activities that may require significant built form to support their function. The built form is anticipated to be compatible with the urban character of adjacent land uses, and the Council has proposed a modification to the policy to clarify the scope of potential development in a forthcoming modifications schedule [DMOD1]. For RUR.07, the site is intended for a combination of nature recovery, professional sports, recreation, and community sports uses. Development will largely focus on supporting these uses while preserving the rural setting, with much of the site remaining undeveloped.

4.14.4 In principle, the proposed uses for Sites RUR.06, RUR.07, and RUR.08 align with paragraph 154(b) of the NPPF, which supports facilities for outdoor sport, recreation, cemeteries, and other uses that preserve the openness of the Green Belt and do not conflict with its purposes. While no formal assessment of Green Belt compliance has been undertaken at this stage, the Council considers the proposed uses to be acceptable in principle, with detailed assessments

reserved for the planning application stage. This approach ensures alignment with national policy and provides flexibility for site-specific considerations.

- 4.14.5 The Council's full response is set out in Summarising related responses to PQ30 and PQ31, the Council reiterates that proposed uses across the identified sites have been carefully considered to balance development needs with the preservation of Green Belt purposes. The strategic approach to these allocations ensures that Green Belt objectives, including preserving openness and preventing urban sprawl, are maintained, with appropriate checks at the application stage to mitigate potential impacts.

Q4.15. Are the inset maps relating to other proposals in the Green Belt in Appendix C accurate?

Response

- 4.15.1 The Council has compared the relevant inset maps in Appendix C with the draft Policies Map:

- SA RUR.06: Land at Picketts Lock – the inset map indicates that the site remains within the Green Belt.
- SA RUR.07: Whitewebbs Golf course and Land at Tottenham Hotspurs Football Club Training Ground – the inset map is accurate.
- SA RUR.08: Sloeman's Farm – please see the response to PQ30, para 30, which states "The Council confirms that site RUR.08 Solemans Farm is to remain within the Green Belt. The inset map on page 552 (not page 352) is incorrect, and the Council proposes to modify the inset map to ensure consistency with the Policies Map. This correction is included in the modifications schedule [DMOD1].