

Written Statement

Matter 4 – Better Homes Enfield

Introduction.

Thank you for the opportunity to provide a response to the Inspector's questions. We hope our statement is helpful.

This statement is based on our objections:

- 01708-1-1, Response to Housing Topic Paper
- 01708-4-1, Chapter 8: Policy H1: Housing Development Sites
- 01708-5-1, Chapter 8: Policy H2: Affordable Housing
- 01708-14-1, SA URB.10: Alma Estate
- 01708 24-1, PL5: Meridian Water

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?

1. The Plan's *identified* capacity to meet housing needs within the Plan area without requiring any alteration to Green Belt boundaries within the plan period is a minimum of 28,454 homes [**01708-4-1, Chapter 8: Policy H1: Housing Development Sites, point 4**], calculated as follows:
 - The Plan [**page 230, Table 8.2**], identifies capacity for 34,710 homes.
 - The Plan, [**pages 223-228, Table 8.1**] sets out capacities expected from Green Belt sites within the plan period, which is 6,256 (NB: Arnold House is not in the Green Belt)
 - 34,710 minus 6,256 = 28,454
2. This equates to 1,293 homes per year on average, which;

- (a) Significantly exceeds the London Plan ('LP') minimum housing requirement figure for the plan period [01708-4-1, Chapter 8: Policy H1: Housing Development Sites, point 5].
 - (b) Surpasses the Council's Regulation 18 preferred option of 1,250 homes per year [01708-4-1, Chapter 8: Policy H1: Housing Development Sites, point 6].
 - (c) Would enable the Borough to 'roll over' its LP 10-year target [E3.5, PQ5, Appendix 1 GLA and LBE, page 3, point 3.4].
3. The identified capacity will increase because after submission the Council accepted it can meet the GLA's small sites requirement [E3.5, PQ5, Appendix 1 GLA and LBE, page 4, points 4.1-4.3]. Our representation explains this adds 1,140+ homes to brownfield capacity, however having now reassessed the figures we are confident it adds 2,000+, increasing the *identified* capacity to 30,454 [01708-4-1, Chapter 8: Policy H1: Housing Development Sites, points 11-20].
4. Our representation (and others) explain the site allocations underestimate capacities. In response, the Council said '*capacity figures reflect realistic minimum estimates subject to refinement through detailed masterplanning*' [e.g. Sub 12.1, Reg 22, page 383, response to 01945]. Therefore, brownfield capacity is highly likely to exceed 30,454.
5. The capacity figure in the Plan is underpinned by allocations (Table 8.1 of the Plan), and figures in Table 8.2, however:
- (a) Completions are higher than reported [01708-4-1, Chapter 8: Policy H1: Housing Development Sites, points 21-23].
 - (b) Some allocations significantly underestimate capacities [01708-4-1, Chapter 8: Policy H1: Housing Development Sites, points 24-30].
 - (c) Some deliverable sites have been excluded [01708-4-1, Chapter 8: Policy H1: Housing Development Sites, points 31-35].
6. Correcting for these issues increases the identified capacity to meet housing needs within the Plan area without requiring alteration to Green Belt boundaries to 35,000+ homes [01708-4-1, Chapter 8: Policy H1: Housing Development Sites, point 37 (table)].

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?

7. No, all reasonable opportunities were not assessed for meeting the need for housing outside the Green Belt, including through making as much use as possible of suitable brownfield sites and underutilised land and optimising density of development, for the reasons below.

Small Sites

8. The Council accepted, post-submission, the number of homes deliverable via small sites is higher than stated in the Plan [E3.5, PQ5, Appendix 1 GLA and LBE, page 4, points 4.1-4.3]. The opportunities via small sites were clear from evidence before the Plan was published, as were the Policy requirements. Presumably, the Council will at some stage issue a proposed modification to brownfield capacity forecasts.

Major Site Capacities

9. Whilst we recognise it is legitimate for allocations to set a minimum number of dwellings to provide a degree of certainty about what development is likely to come forward without limiting a developer's ability to deliver higher numbers, we still have some concerns.
10. For example, some urban allocations (as minimums) are unreasonably low based on evidence, including planning approvals and adopted masterplans. This gives a false impression of brownfield capacity *reasonably* available to meet housing need and increases the risk of sub-optimal applications coming forward [01708-4-1, Chapter 8: Policy H1: Housing Development Sites, points 24-30].
11. The Council's Regulation 22 responses said capacities are '*realistic minimum estimates*' but committed to working collaboratively with stakeholders... '*to ensure that the final allocations are robust, evidence-based, and supportive of the overarching goals for housing and employment growth*' [e.g. Sub 12.1 Reg 22, page 383, response to 01945]. This collaboration should have taken place earlier, as it is fundamental to ensuring all reasonable opportunities are legitimately assessed for meeting the need for housing outside the Green Belt, and to setting 'realistic' estimates.

Meridian Water

12. Our representation identified particular issues relating to Meridian Water allocations [01708 24-1, **Better Homes Enfield, PL5: Meridian Water, points 4-9**].
13. The Plan identifies the Council's well-documented ambition to build 10,000 homes at Meridian Water [SUB2, the Plan, page 67, point 3.68], with 6,711 within the plan period [SUB2, the Plan, page 68, point 3.75]. However, the Plan does not explain why the remaining homes cannot be delivered, casting doubt over whether as much use as possible has been made of suitable brownfield sites and underutilised land.
14. Our representation explains the capacity of PL5 should be increased from the 6,711 to 9,281 homes plus student accommodation [01708-24-1, **Better Homes Enfield, PL5: Meridian Water, point 4**].
15. Three parcels of land within SA5.1 Meridian Water earmarked by the Council for housing were excluded. The Meridian Water Financial Model (*the MWFM*), adopted in 2023, identified land within SA5.1 as delivering the 977 homes approved, plus a further 761 split across the missing three parcels. These are development ready and underutilised but not included in the Plan, without explanation.
16. In October 2023, the Council informed the ICO that the MWFM is part of the Meridian Water masterplan, but has not submitted it as evidence [[ic-264847-z5j1.pdf](#), point 22].
17. The MWFM allocates 8,647 homes + 535 student rooms across Council owned land at Meridian Water – including Ikea's and Tesco's sites would add 2,300-3,300 homes. The enormous differences between the MWFM and the Plan are unexplained (NB: On 20/12/24, Judge Buckley of the First-tier Tribunal ruled regarding an FOI request for the Meridian Water masterplan documents and ordered the Council to provide the information [**Case Reference: EA-2023-0547**]).
18. Ikea's representation raised concerns regarding underutilisation of SA5.3, and questioned the allocation of 1,500 homes, as it conflicts with their design-led approaches, which suggest 2,600 – 2,800 homes can be accommodated [01921-3-1, **Representations to the Enfield Local Plan, points 2.21 and 2.32**]. Ikea's response notes Officers recognise the allocation could be uplifted [01921-3-1, point 2.36]. As a result, Ikea question whether the Plan is justified and consistent with national policy [01921-3-1, points 2.34-2.37].

19. Ikea also question the uncertainty regarding the 10,000 homes target [01921-3-1, page 15, point 4.14]. In response, the Council said they ‘welcome the opportunity to enter into a Statement of Common Ground with Ikea’ [SUB12.1, REG 22, pages 187-188], but this has not been provided. We question why this did not occur earlier.
20. The LBE Meridian Water team view capacities as minimums ‘to be refined through future masterplanning to optimize the brownfield capacity of these sites via a design-led approach.’ In response, the Council proposed entering into a SoCG to facilitate collaboration [SUB12.1, pages 383, 386, 390, 392]. We question why effective collaboration has not occurred earlier, given the considerable influence the LBE Meridian Water team have over PL5.
21. The MWFM says SA5.2 can accommodate the equivalent of 2,449 homes i.e. 213 more than allocated. Our response questioned the capacity of SA5.2 [01708-24-1, Better Homes Enfield, PL5: Meridian Water, points 4] and Vistry Group raised similar issues [01897-1-3, Icen Draft Local Plan Regulation 19 Consultation, Page 5]. LBE in its response said the policy could be changed, and the intention to enter into a SoCG with Vistry [SUB12.1, page 385].
22. We note in response to our representations regarding under-optimisation of PL5 sites that the Council has said there is ‘Potential to change the plan’ [SUB12.1, pages 383-384 386, 387, 390, 392], accordingly we expect identified brownfield capacity to increase.
23. In summary, the approach taken towards to Meridian Water demonstrates that all reasonable opportunities were not assessed for meeting the need for housing outside the Green Belt, as there are development ready underutilised brownfield sites that have not been identified, and clear examples of a lack of meaningful and timely collaboration with developers and landowners, resulting in site-allocations that do not reflect the sites reasonable potential. Addressing these issues would increase brownfield capacity by 2,500-3,000 homes.

Other Major Sites

24. We noticed the allocation of homes for **URB.10: Alma Estate** did not match the ongoing development, or development potential [01708-14-1, SA URB.10: Alma Estate, page 1, paragraph 5 and 6]. Vistry, the developer on-site, also noticed this and requested the capacity be increased from 127 to 726 homes [01897-1-3, Icen Draft Local Plan Regulation 19 Consultation, Page 5].

25. Likewise, Vistry’s response noted site allocations for **SA4.4**: Southeast corner of North Middlesex University Hospital Trust and **URB.05**: New Avenue Estate, needed to be increased, to better reflect existing permissions and potential. In response, the Council said it would prepare a SoCG with Vistry and noted it would be possible to amend the Plan [**SUB12.1, pages 436, 381, 432**].
26. Our response identified several sites with planning approval which had not been included, or where the allocation was lower than the number of homes granted approval [**01708-4-1, Chapter 8: Homes for All Policy H1: Housing Development Sites, points 24-27 and 31-33**].
27. We note in response to many of our representations regarding under-optimisation sites that the Council has said there is ‘*Potential to change the plan*’ [e.g. **SUB12.1, pages 175, 364, 367, 368, 372, 381, 436, 437, 443**], accordingly we expect identified brownfield capacity to increase.
28. If these issues were addressed, it would result in a further 1,000+ homes on brownfield sites.

Potential sites excluded from site allocations.

29. Our representation draws attention to site omissions, which were reasonable opportunities but were not fairly assessed. This a particular issue as these are large, well located and under used brownfield sites [**01708-4-1, Chapter 8: Policy H1: Housing Development Sites, points 34-36**].
30. Sites were deselected in the site selection process for spurious and inconsistent reasons e.g.
 - Sites with planning applications were deselected e.g. Gladbeck Way Car Park, 1-6 Clock Parade [**TOP2, Site Allocation Paper, page 76**].
 - Sydney Road Car Park was deselected due to not having confirmation of availability, despite it being proposed by LBE at Regulation 18 [**TOP2, Site Allocation Paper, page 76**].
 - Brownfield sites were deselected due to unknown landowner intentions, including those owned by LBE, yet sites within Green Belt allocations with the same issues are selected [**TOP2**].
31. These sites have the potential deliver around 6,000 homes.

32. In summary, there is evidence that all reasonable opportunities for meeting housing need outside the Green Belt were not positively assessed, as (i) there are clear examples of brownfield sites earmarked for development which have been excluded, without explanation, and (ii) there are examples which demonstrate that reasonable opportunities to collaborate with landowners and developers to agree capacity figures which optimise the density of development had not taken place before the Plan was published.

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

33. No, our response shows well over 35,000 homes can be delivered without removing land from the Green Belt [**01708-4-1, Chapter 8: Policy H1: Housing Development Sites, points 10-37**] [**Please also see our answers to Q4.1 and Q4.2**].

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

34. No. The Council's reasoning for exceptional circumstances regarding housing is based around three assertions (1) the need for family-sized homes, (2) the need for affordable homes, and (3) the number of homes needed overall - there are issues with each.

Family-sized homes

35. The Council claims Green Belt sites are required to build the family-sized homes needed [**TOP5, Exceptional Circumstances Topic Paper 2024, points 4.2, 4.7 and 4.26-4.28**].
36. We address inaccurate claims regarding the need for family-sized homes in detail in our representation **01708-1-1, BHE, Response to the Housing Topic Paper, points 72-97** and in our response to **Q2.15**.
37. This claim is based on a highly misleading interpretation of the LHNA 2020 [**HNE2**], which is itself meaningfully out-of-date, and fails to account for the housing needs of a number of groups [**Please see our response to Q2.15**].

38. Once the evidence is interpreted correctly, and considered alongside more up-to-date information, the need for family-sized homes reduces to the extent that it is 1-2 bed properties that are the priority, particularly in market and intermediate tenures. As a result, the argument that Green Belt sites are needed to deliver family-sized homes fails.
39. Notwithstanding this, **the Plan Explanation note 8.34** says 71% of homes at Crews Hill/Chase Park will have 3+ bedrooms whilst the Exceptional Circumstances and Housing Topic Papers say 60% [**TOP5, point 4.30; TOP3, Table 21**]. However, this is diluted to 40% in **Policy H3(1gii)** of the Plan, excluding Intermediate affordable homes, which in practice could reduce the percentage of family-sized homes delivered to 30-33% i.e. similar to the current delivery rate.

Affordable homes

40. The Council claims strategic Green Belt sites will deliver a higher proportion of affordable homes than other sites [**TOP5, Exceptional Circumstances Topic Paper 2024, points 4.32-4.33**] and the Exceptional Circumstances Topic Paper claims Crews Hill and Chase Park will deliver ‘a minimum of 50% affordable housing’ [**TOP5, page 27, point 4.32**], reflected in the Plan’s **Policy H2(2b)**.
41. This claim is based on a misleading interpretation of the Whole Plan Viability Update [**VIA1**] (*‘the WPVU’*).
42. As we explain in our representations and answer to **Q5.14**, claims regarding affordable housing delivery at Crews Hill and Chase Park do not reflect an accurate or a balanced reading of the WPVU, and disregard repeated caveats and limitations it sets out regarding these sites [**01708-2-1, Response to Enfield Local Plan Housing Topic Paper, points 93 and 100-124**] and [**01708-5-1, Chapter 8: Homes for All, Policy H2: Affordable Housing, points 4-26**].
43. We reviewed the representations of 9 developers/landowners of Chase Park/Crews Hill sites, all of whom raised concerns about viability, the WPVU, and/or the Council’s interpretation of it.
44. The viability issues were apparent in the 2021 Viability Assessment; we provided a detailed assessment of these issues at Regulation 18, which the Council seems to have ignored e.g. they do not respond to the issues raised in their Regulation 18 statement.

45. In short, exceptional circumstances related claims made about the level and type of affordable housing strategic Green Belt sites will deliver are unreliable, not genuinely evidenced based and unsound.

Housing requirement

46. The Council claims the housing requirement cannot be met via brownfield sites [**SUB1, the ELP, page 29, point 2.25**].
47. At Regulation 18, the Council claimed 1,250 homes per year were needed. This was the Council's preferred option, which they set out the case for in the Housing Topic Paper [***Housing Topic Paper 2021, page 5, paragraph 2.2**] (*NB: this paper was included in the consultation evidence, but not submitted to Examination).
48. In 2021, the Council claimed delivering 1,250 homes per year required 6,500 homes in the Green Belt at Chase Park and Crews Hill. However, it became clear that over 1,250 homes per year could be delivered via brownfield sites e.g. the updated Plan proposes 1,293+ homes per year, **as explained in our response to Q4.1**.
49. When the Council realised this, they moved the goal posts by increasing the housing need figure by 26% to 1,578 homes a year. The housing need figure became whatever brownfield capacity could be identified *plus* the Green Belt sites the Council wanted to include [**please also see our response to Matter 5, points 12-20**].
50. The Council is hoping to realise income of £800 million through the sale of Green Belt land for development, suggesting it selected the overall housing requirement figure to meet its financial objective and not '*with the objective of contributing to the achievement of sustainable development*'. The Council's approach has therefore not complied with Section 39(2) of the Planning and Compulsory Purchase Act 2004.
51. Notwithstanding this, the new higher target could be met via brownfield sites [**see response to Q4.1, Q4.2 and Q4.3**].
52. As a result, the argument that there is insufficient brownfield land to meet Enfield's housing requirement fails.

53. In conclusion, the Council's exceptional circumstances arguments in terms of housing do not stack up, and work against the delivery of the sustainable housing Enfield needs. The need for family-sized homes is significantly lower than the Council maintains and can be met via urban sites, the number of homes required can also be met via regenerated brownfield/urban sites, and the viability evidence *still* suggests the level of affordable housing delivered at Chase Park and Crews Hill will be far lower than claimed.

54. In terms of modifications, we suggest the Chase Park and Crews Hill sites be removed from the Plan.

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