

**Written Statement 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?

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?

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

The Council will clearly be able to answer the above questions in detail within its Written Response, however, we share the Council's view (as set out in the Exceptional Circumstances Topic Paper TOP5) that exceptional circumstances do exist to justify removing land from the Green Belt. This is set out within our previous representations which included an assessment of the Chase Park Place Making Allocation against the 5 purposes of including land within the Green Belt (as set out in the NPPF – the NPPF was recently updated in December 2024 but there have no material changes to the 5 purposes).

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.

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

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

Comer Homes owns Vicarage Farm and surrounding land in Enfield. The Comer Homes land forms a large part of the Chase Park site allocation proposed under draft Policy PL10. Comer Homes fully supports the allocation of land at Chase Park for residential-led mixed use development to deliver a new sustainable urban extension.

As set out in previous representations submitted on behalf of Comer Homes, the site (which forms a substantial part of the Chase Park Place Making Allocation) is an obvious location for an urban extension with residential development of Gordon Hill to the east and World's End and Oakwood to the south. The site is ideally located for amenities at Oakwood and also in Enfield Chase, which is identified as a Large Local Centre.

Savills on behalf of Comer Homes

It is hard to believe there could be a more sustainable location for this scale of development in Enfield Borough and we are pleased that the local authority has recognised this through allocation of the site (as part of the wider Chase Park Placemaking area). The site would score highly on any sustainability criteria. Within walking distance of the development would be:

- Oakwood Station which offers services every 2-3 minutes to a variety of central London stations
- Ten established bus stops (more would be provided within the development itself) serving five different routes
- Local shops at Oakwood and World's End
- Sports facilities at Trent Park

The Council's Housing Topic Paper 2024 reflects this and states (paragraph 1.15):

'Chase Park is in close proximity to existing public transport services and provides an opportunity for delivering a sustainable urban extension that can help address infrastructure deficiencies in the immediate surrounding area. Both areas are capable of boosting significantly the supply of homes to meet the Borough's needs, particularly in terms of family housing and affordable housing.'

The release of this land from the Green Belt is therefore fully compatible with the need to promote sustainable patterns of development.

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?

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?

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

Response

Paragraph 146 of the NPPF (December 2024) makes clear that exceptional circumstances (enabling release of land from the Greenbelt) include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means.

It is well documented (within E3-LBE-response to-IN1-Planning and the Council's Housing Topic Paper 2024) that the Council has an undersupply of housing. Within E3-LBE-response to-IN1, the Council confirms that since the beginning of the London Plan (2019) period there is a shortfall of 2,500 homes which will now be spread over the remaining plan period beyond the first five years (the Liverpool Method). As of April 2024, the Council could identify 3.66 years of deliverable land supply against the London Plan target +20% buffer. The Housing Topic Paper 2024 (Table 7) shows that in 2019/20, there was under delivery of 817 homes against the plan target.

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As highlighted above TOP5 (Exceptional Circumstances Paper) sets out the exceptional circumstances for removing land from the Green Belt. This also demonstrates the steps that the Council has undertaken to maximise housing delivery on brownfield land and that its housing targets cannot be met without the removal of land from the Green Belt. Paragraph 2.32 of TOP5 concludes:

‘As set out later in this Topic Paper, the Council has considered all reasonable options for meeting its development needs and made planning judgements in determining the Spatial Strategy and related site allocations to be included in the ELP.’

Furthermore, the administrative boundaries surrounding LBE (including Barnet, Haringey, Waltham Forest, Welwyn Hatfield, Broxbourne, Hertsmere and Epping Forest) have their own land constraints and housing supply struggles and it is therefore highly unlikely that they can be relied upon to assist with any shortfalls in housing numbers.

It is also important to highlight that the Government has recently published an updated NPPF which introduces a Grey belt land designation, defined as:

‘For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.’ (underlined by Savills)

We have adapted the table below which was included within our previous representations (the original table demonstrates that the site does not strongly contribute to any of the 5 purposes of including land within the Green Belt). The table has been updated to respond to the purposes referred to in the Grey belt definition: (a), (b) or (d). The definition does not include purposes (c) or (e) and importantly states ‘or’ and **not** ‘and’, meaning land only needs to not strongly contribute to one of the 3 purposes referred to. The table below clearly shows that the Chase Park Placemaking Allocation does not strongly contribute to any of the 3 purposes (a), (b) or (d) and therefore constitutes Green Belt land.

a) To check the unrestricted sprawl of large built-up areas	Vicarage Farm is an inset piece of Green Belt land that is surrounded on three sides by development. Established development at Hadley Wood (west of the Cockfosters Road) and Chase Side (east of the Ridgeway) already protrude much further north into the Green Belt than Vicarage Farm. In closer proximity, development on the former Middlesex University site is north of Trent Park and further extends development northwards. Therefore development on Vicarage Farm would bring the built up boundary of this part of Enfield level with the established built development area. Therefore, on a strategic level, there would be no ‘sprawl’ of development beyond the established wider northern boundaries of development in this part of the Borough.
b) To prevent neighbouring towns from merging into one another.	There are no towns to the north of the site. Trent Park and Trent Park Golf Club bound the site to the west. This prevents the areas of Gordon Hill and Cockfosters from merging into one another. There are no other towns or built up areas that are close enough to cause concern of ‘merging’. Beyond Hadley Road, the land is predominately open out to the M25 and beyond. Therefore a small loss of Green Belt would have no significant impact on the separation of settlements.



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d) To preserve the setting and special character of historic towns.	The site is not directly adjacent to any historic towns. The Trent Park Conservation Areas is to the west but Vicarage Farm is distinct and separated by established landscaping.

Paragraph 148 of the NPPF (December 2024) states that where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. There is not sufficient previously developed land in the borough to meet its housing targets and this Grey belt site therefore offers a sustainable location to provide much needed housing.

The Chase Park Place Making Area represents a unique opportunity to help meet a significant portion of the borough's housing needs. Point 5 within draft Policy PL10 refers to a residential capacity of around 3,700 homes and 2,550 within this plan period (up to 2041). It is important that these numbers are treated flexibly and we acknowledge the use of the word 'approximately'. Design characteristics and housing demand may change over time and it is important that if green belt land is released, it makes the strongest possible contribution to housing supply. Our view is that Chase Farm is capable of delivering many more than the identified number of homes and the current numbers will constrain the site and could present a missed opportunity. It is therefore important that the policy makes clear that these are a minimum figure and not a cap, this is particularly important as it is considered that this land now falls within the new designation (NPPF December 2024) of Grey belt land and the use of this land should therefore be optimised.