



Matter 4 - EnCaf Land Use Working Group (ELUWG)

This Written Statement refers to the following ELUWG objections:

Table 1 - ELUWG Duly made objections.

Representation Number and Title	Hyperlink
01676-9-1, Policy SS1	https://www.enfield.gov.uk/file/PDFs/email/01676-9-1.pdf
01676-2-1, Response to Policy H4	https://www.enfield.gov.uk/file/PDFs/email/01676-2-1.pdf

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.
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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 identifies capacity for 28,454 homes within the plan period, without alteration to Green Belt boundaries (**01676-9-1, Policy SS1, page 2, bullet 3**).
2. This comfortably exceeds the minimum housing requirement of 18,271 homes for the plan period (**01676-9-1, Policy SS1, pages 2-4**).
3. 28,454 equates to 1,293 homes per year - above the 10-year London Plan target (1,246) and the Council's Preferred Option at Regulation 18 (1,250).
4. Furthermore, as our response explains, there is brownfield capacity for 34,000+ homes (**01676-9-1, Policy SS1, pages 7-8**).

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?

5. No, the housing capacities of both small and large brownfield sites have been unreasonably underrepresented (**01676-9-1, Policy SS1, pages 7-8**).

Capacity of unidentified small windfall schemes

6. Table 8.2 of the Plan shows the number of homes forecast to come from 'unidentified small windfall schemes' is 2,839 (**SUB2, the ELP, page 230, Table 8.2**). However, this figure is too low; a more accurate assessment would increase brownfield site capacity by thousands of homes (01676-2-1, Response to Policy H4, pages 1-4) (01676-9-1, Policy SS1, pages 8 & 13).
7. The minimum requirement from Small Sites for the plan period is set by the London Plan at an average of 353 homes per year i.e. $353 \times 22\text{-years} = \mathbf{7,766}$ (**London Plan, Policy H2, Table 4.2, 4.1.11 and 4.2.3**)
8. The London Plan target for small sites is split into the first 10-years 2019/20 -2028/29 (**Policy H2**) and the subsequent 12-years to 2041 (whereby the unidentified small sites requirement should be allocated as a reliable source of windfall sites) (**London Plan, 4.1.11 and 4.2.3**).
9. The small sites target for the first 10 years of the London Plan is 3,530 homes (**London Plan, Table 4.2**).
10. In the first 3-years of the Plan, **1,137** homes came via small sites i.e. 379 per year on average (**HOU1, HELAA, page 14, point 3.33**), so to meet the minimum small sites 10-year target over the remaining 7-years, Enfield needs to deliver $3,530 \text{ minus } 1,137 = \mathbf{2,393}$ homes.
11. The small sites windfall allowance which needs to be included for the remaining 12-years of the Plan is $353 \times 12\text{-years} = \mathbf{4,236}$.
12. This means the unidentified small sites windfall allowance in Table 8.2 of the Plan could be as high as **6,629** (i.e. $2,393 + 4,236 = 6,629$)
13. However, the Housing and Economic Land Availability Assessment (the HELAA), says 1,797 homes via small sites were identified as either Deliverable (702) or Developable (1,095) and therefore need to be removed from the windfall capacity figure to avoid double counting (**HOU1, HELAA, page 14, Table 4**). This means the unidentified small sites windfall allowance in Table 8.2 of the Plan should be **4,832** (i.e. $6,629 - 1,797 = 4,832$).
14. However, the Plan only allows for 2,839 homes coming from unidentified small windfall schemes i.e. at least 1,993 fewer homes than should be included (SUB2, the ELP, page 230, Table 8.2).
15. But the number of homes missing from the 'unidentified small windfall schemes' in Table 8.2 is probably far higher than 1,994. This is because the Developable Small Sites number in the HELAA conflicts with the Total Developable Sites number listed in the Plan.
 - i. HELAA Developable Small Sites = 1,095 (**HOU1, HELAA, page 14, Table 4**)
 - ii. The Plan Total (i.e. Small AND Large) Developable Sites = 1,021 (**SUB2, the ELP, page 230, Table 8.2**)

16. At least one of these figures MUST be incorrect. There are either more Developable sites than Table 8.2 of the Plan suggests or fewer Developable Small Sites than the HELAA suggests. If the latter, then the number of homes delivered via unidentified small windfall schemes needs to be increased further.
17. We suspect the shortfall of unidentified small sites will be far higher than 1,994 because a large number of deliverable/developable sites do not qualify as small sites i.e. under 0.25 hectares e.g. HIP26, HIP27, COP49, BUP22, COP39, SBP13, UPP7, HIP5, EDP9, LOP9, BUP6, CFS276, CFS273, CFS275, CFS269, CFS270, CFS268, CFS267, CFS263, CFS304, PP-08601612, GRC2, TUC6a, SGC8, CFS199-9, CHP19, CHP12, CHP22, COP70, 16/01452/FUL, 18/03508/FUL, 19/04385/FUL, PP-08780079, PP-08746655, 20/02710/FUL, 20/03530/FUL, CFS224.
18. Therefore, the unidentified small sites windfall figure in Table 8.2 is at least 1,944 homes lower than it should be and could theoretically be missing as many as 3,791 homes: the mid-point = 2,900.
19. It is important to note that LBE has now committed to compliance with the London Plan small sites target (**E3.1 PQ5 Appendix 1 GLA and LBE, page 4, point 4.3**) and therefore unidentified windfall estimates need to be updated to reflect this.

Unidentified and excluded brownfield sites.

20. Suitable brownfield sites were not identified in the HELAA.
 - (a) Parcels of development ready land within Meridian Water (SA5.1) were unidentified (Figure 1 below). The Council's Meridian Water Financial Model (adopted 2023), allocated 700+ homes to these parcels.

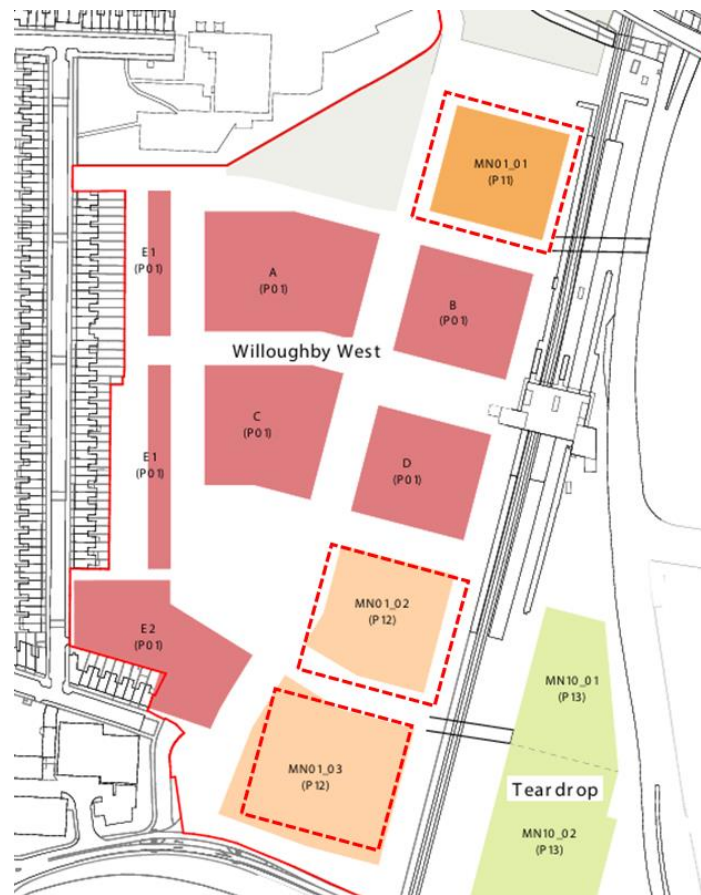


Figure 1 - Image taken from Adopted Meridian Water Financial Model (April 2023), missing parcels marked by red dotted line.

- (b) Brownfield sites not identified in the HELAA appear as 'Infill Opportunities' in the Plan e.g. Little Park Gardens Car Park - a 0.25-hectare Council owned brownfield site (**E5, Council response, pages 31, point 6**). There are numerous other examples (**E5, Council response, pages 30-48**).
- (c) Furthermore, the HELAA did not use all available site source information and has not been updated for well over 2-years (nearly 3 by the time of the Examination), and the Council does not appear to have consulted properly with other public bodies about land they own (**please see our response to Q5, points 6-12**)
21. Many brownfield sites that *were* identified as potential sites for the HELAA, were excluded during an initial site sorting process, without a sound or accurate justification.
- (a) For example, '**refused applications**', sites classified as '**availability unknown**' or '**too small**', or those excluded due to '**Level 1 constraints**' were unreasonably excluded (**please see our response to Q5, points 13-16**)
- (b) Some were excluded without justification provided e.g. Park Avenue Day Centre, 65c Park Avenue and Bullsmoor Library, 58 Kempe Rd, were both rated favourably in the site sorting and able to deliver 70+ homes, but excluded without explanation (**HOU10, HELAA 2021 Appendix, Excluded Sites tab**).

22. Multiple well-located sites were assessed but subsequently excluded from allocation due to uncertainty regarding landowner's intentions, including where the landowner was the Council (**CFS250, CFS251, GRE20**). However, Green Belt sites where the intention is uncertain were allocated. The Council is willing to use its CPO powers to assist development of Green Belt sites, i.e. to overcome landowner uncertainty, but not to assist the development of brownfield/urban sites. This inconsistency in allocation and willingness to use CPO powers in one location but not another is unexplained. GRE20 was submitted as a site by LBE at Regulation 18, so it is unclear why it is now excluded, and is listed as an Infill Opportunity (**E5, Council Response, page 31, Sydney Rd Car Park**). Some sites were excluded after the SA as they did not know of landowners' intentions, but where a planning application as already in place, which is clear intent e.g. GRS7 – 1-6, Clock Parade.

23. In short, these stages of the site selection process were not sufficiently robust or objective and has resulted in a substantial reduction of the brownfield site capacity.

Optimising density of development

24. The Council said an overarching principle of the HELAA was to '*make the best use of land*' (**HOU1, HELAA, page 42**), and '*Assessing site capacity using up to date evidence*' (**HOU1, HELAA, page 12, point 3.24, Table 3**). However, capacity estimates for multiple sites are clearly unreasonably cautious, or do not reflect the up-to-date evidence or the sites genuine potential.

(a) For example, there were applications granted for a significantly higher number of homes than the capacity identified in the Plan e.g. see Table 2 below.

Table 2 - Examples of Sites where identified capacity does not reflect up-to-date evidence.

Site Reference	Site capacity - Number of homes (HELAA)	Number of Homes (Planning Approval)	Uplift
LP463	52	100	48
UPP9	58	110	52
EHP34	91	148	57
21/01140/FUL	19	81*	62
SGP28	19	24	5
EHP14	25	38	13
SBP15	9	12	3
CFS177	54	95**	41
SA urb.11	115	156**	41
SBC7	1,587	1,800	213

Total			535
Notes: *is a now refused application, where officers have supported the principle of development, height, and density but not the proposed design ** Care homes: LP21 (4.1.9) says "Net non-self-contained accommodation for older people (C2 Use Class) should count towards meeting housing targets on the basis of a 1:1 ratio, with each bedroom being counted as a single home."			

- (b) There is also evidence of major sites where the developers' and landowners' have design-led plans and masterplans that are far more ambitious than the HELAA or Site Allocation.
- (c) This is most apparent for Council owned land at Meridian Water, where there is an enormous disconnect between the capacity identified for sites within the corporate strategy for PL5 Meridian Water, (e.g. set by the Meridian Water Financial Model, adopted in April 2023), compared to capacity estimates shown in the Plan (**SUB2, the ELP, pages 223-228, Table 8.1**).
- (d) Other significant underestimates include the Meridian Water Ikea site, and the Alma and New Avenue estates. Table 3 below summarises differences between capacity estimates for Site Allocations and design-led capacity estimates.

Table 3. Examples of Plan site capacity vs. design-led/master planned capacity

Site Reference	Number of homes (HELAA/Site Allocation)	Number of Homes (design-led/masterplans)	Uplift
SA5.1 (a)	978	1,738	760
SA5.3 (b)	1,507	2,800	1,293
SA5.5 (c)	356	530-629	224
SA5.2 (d)	2,236	2,449	213
SA5.6 (e)	815	2,465	1,650
SA URB.10 (f)	127	725	598
SA URB.05 (g)	204	298	94
Total			4,832
Notes/sources: (a) Meridian Water Financial Model (2023) (b) 01921-3-1, Representations to the Enfield Local Plan, page 8, point 2.7 page 11, point 2.36; and 01921-1-1.pdf THE LAND OWNERSHIP OF IKEA, pages 1-78 (c) Meridian 13 Arup Spatial Strategy for LBE (2018), LBE public consultation (March 2024) (d) Meridian Water Financial Model (2023), including accounting for Student Accommodation with planning approval (e) Ibid (f) Vistry state 679 homes completed of 1,080 approved + application in progress to increase overall capacity to 1,404 (01897-1-1, Representations on behalf of Vistry, page 3) (g) Ibid			

25. We recognise the need to set realistic and deliverable estimates, but even within this context the capacity estimates set within the Plan are far too low and do not reflect the evidence of capacity if a design-led and more realistic but aspirational approach is followed i.e. as required by national and regional policy (**London Plan D3**). The current capacity estimates in the Plan risk viability of sites and increase the risk of sub-optimal applications being submitted as they artificially and mechanistically constrain a site's true capacity, which would not be sustainable development, and should not be supported.
26. Throughout the responses to developers e.g. Ikea Properties, LBE Meridian Water and Vistry, the Council commits to '*refining these figures based on up-to-date evidence*' (**SUB12.1, Reg 2, page 302**), and '*acknowledges the importance of refining site requirements and addressing any gaps or inconsistencies in the accompanying plans*' (**SUB12.1, Reg 2, page 302, Page 383**), and to entering into SoCG with developers (**SUB12.1, Reg 2, page 187**). However, none of these SoCG have been published and given the lack of progress made we question the extent to which the Plan has been being shaped by early, proportionate, and effective engagement with, amongst others, businesses (**NPPF 16c**).
27. It is clear from these examples that the Plan is not reasonably making as much use as possible of suitable brownfield sites and underutilised land, including by optimising density of development based on the evidence available, and In view of the above, it is evident that this aspect of the Plan is neither justified, nor consistent with national/regional policy: **NPPF 31, 123, 129a, 135e, 146a, 146b; London Plan D3**.

Sustainability Assessment

28. Some sites assessed in the HELAA were subsequently not assessed in the Sustainability Assessment (the SA) e.g. CFS215, CFS254, and GRE20, were not assessed, without explanation.
29. There is an unexplained inconsistency in how sites have been allocated based on the outputs of the SA.
- (a) For example, as we set out in our response to Matter 5 (**points 34-37**), Meridian East (**SA5.6**) and Brimsdown (**CFS149**) are very similar propositions, with very similar site characteristics, constraints and policy requirements, but the Brimsdown site was not allocated despite it performing better in the SA than the Meridian East site, which was allocated as mixed-use. The London Plan indicates BOTH should have been allocated before exceptional circumstances can be demonstrated i.e. **London Plan 6.4.8** says Boroughs proposing changes to Green Belt boundaries should demonstrate that they have made as much use as possible of suitable brownfield sites and underutilised land, including – in exceptional circumstances – appropriate industrial land in active employment use. The approach taken by the Plan does not reflect this.
- (b) There are other SIL sites requiring consideration e.g. **CFS236** in Southbury was proposed for 113 additional homes and rated in the SA as one of the most sustainable mixed-use site options. The site is currently a gym, offices, and car parking, fronting Southbury Rd and disconnected from the adjacent SIL. All other similar offices in the vicinity have been converted to housing via permitted development. Not allocating this site for mixed-use risks the site being lost to permitted development and not optimised. Whilst we recognise the need to protect industrial space, the LPA's response to this site is not justified.

30. Table 4 below summarises the approximate brownfield capacity based on the above.

Table 4 - Summary of brownfield capacity

Source	Homes (Uplift)	Cumulative Total
Brownfield Capacity identified in the Plan	28,454	28,454
+ Unidentified small windfall schemes	+2,900	31,354
+ Unidentified and excluded brownfield sites	+1,000	32,354
+ Optimising the density of development	+5,000	37,354
+ other issues e.g. the SA	+4,000	41,354
TOTAL APPROXIMATE CAPACITY VIA BROWNFIELD SITES	41,354	

31. In short, all reasonable opportunities for meeting the need for housing outside the Green Belt, have clearly not been assessed.

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.
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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?

32. No. The Plan itself identifies 28,454 homes coming via brownfield sites (**please see answer to Q4.1**) and we can comfortably demonstrate that capacity for a further 4,826 can reasonably be identified via a range of small and large sites (**please see answer to Q4.2**).

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

33. No, as we set out in our representations, the Council has put forward three arguments which they claim justify exceptional circumstances required to alter Green Belt boundaries, but each is flawed (**01676-9-1, SS1: Spatial Strategy, pages 9-13**).

(a) **The overall housing requirement** – we have demonstrated in our responses above the housing requirement is circular and could in any regard be met via brownfield sites.

(b) **The need for family-sized homes** - this is based on a misrepresentation of the findings of the Local Housing Needs Assessment 2020 (the LHNA). This misrepresentation is based on ignoring the needs of Students, Concealed Households, People needing HMO accommodation, Private Renters claiming housing benefit (but

not eligible for social housing), Older households looking to downsize and existing households, amongst others. The Council's interpretation of the LHNA also ignores the profile of the Borough's existing housing stock, as well as ignoring the impact of incorporating more up-to-date information into the assessment. The impact of this is that the need for newly built family housing is significantly overstated in the Plan and Housing Topic Paper in the owner occupied and intermediate affordable tenures. The level of need for family-sized homes would reduce very significantly if the LHNA were interpreted reasonably, or if more up-to-date information were used.

- (c) **The need for affordable homes** – The Council claims PL10 (Chase Park) and PL11 (Crews Hill) will deliver a substantially higher proportion of affordable housing than brownfield/urban sites, but this is based on a biased misrepresentation of the Whole Plan Viability Assessment, which repeatedly stresses the need for further testing to establish the impact of infrastructure costs at these key sites, including for schools, GP practices, highways, public transport, decontamination of land, noise reduction measures etc. Once these are considered the proportion of affordable housing at these sites will significantly decline and be far below the 50% claimed.
 - (d) In short, the exceptional circumstances arguments are not supported by an objective and impartial assessment of the evidence.
34. The underutilisation of sustainable urban brownfield sites, in favour of unsustainable sites, including greenfield sites, would lead to a pattern of development that ELUWG wholly oppose as it would not reflect EnCaf's core objectives e.g. in regard to addressing climate change.

Word count: 2,989