

I am writing to highlight a key piece of, what is to me, new information that I was unable to find while researching the Enfield Local Plan when I made my first representation statement against the development of Vicarage Farm known as Chase Park (PL10) development. It is pertinent to the Planning Inspector’s Matter 4 Green Belt and Question 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?

In the Word Document “Enfield Councils response to Inspectors IN1 Document Planning” of 24 October 2024 on page 10 of 12 the Council state that they will pursue Statements of Common Ground for Crews Hill with Property Developers with the potential to deliver i.e. complete the houses within the first 5 years of the approval of the Enfield Local Plan. The developers in question are Comer Homes and Fairview Homes.

I have reproduced the table below:

Document Title	Justification	Anticipated time scale for completion
<p>Chase Park</p> <p>SA10.1 – Chase Park South</p> <p>SA10.2 – Arnold House (66 Ridgeway) & Land to the rear of 66 the Ridgeway (west)</p> <p>SA10.3 – Chase Park North East</p> <p>SA10.4 – Chase Park North West</p>	<p>SOCGs for Crews Hill to be pursued for the larger land interests and those with potential to deliver within the first 5 years:</p> <ul style="list-style-type: none"> • Comer Homes • Fairview Estates (Housing) Ltd. 	<p>Before the end of 2024</p>

There is no doubt that these developers have the capacity and incentive to complete this task. The unspoiled land is a blank canvas for the construction industry. Work could obviously start immediately. Enfield Council also have the motives to enable this. They, along with the developers will gain from the rapid turnaround in huge financial profits. Profits which they desperately need, no doubt from the release of the land and the taxes that come with these developments. Enfield council will also gain through easily meeting critical housing targets early on in their housing target plans.

Exactly the same statement regarding the potential for delivery in 5 years is made for the other Green Belt area of Crews Hill (PL11). No other 5 year delivery claim has been made elsewhere in the document. This would hardly be feasible for the two other main placemaking areas in the plan. These other two main placemaking areas being brown field development sites i.e. Meridian Water (PL5) and Southbury (PL6). Meridian Water is never going to deliver the returns of 10,000 homes and 6,000 jobs proposed by Enfield Council. The Greater London Authority will not release Strategic Industrial Land, Enfield is having to sell other property assets just to service the £7million interest on

the project, safety concerns exist over single staircase tower blocks and the Master Plan was not made available for scrutiny by the public amongst many other issues. The planning permission for Colosseum Park at Southbury expired this year showing that the developers and Enfield did not have true intentions to develop this site.

Enfield also refused to even consider development of the Brimsdown Industrial Estate when approached by a property developer recently as reported by Better Homes Enfield (Enfield's Missed Housing Opportunities, 27th Sep 2024). This could have delivered 7,500 homes and increase employment by 1,600 jobs. Better Homes Enfield estimated that the large number of brown field sites in Enfield could deliver 40,000 homes. The Space to Build, Enfield (January 2019) report by Enfield RoadWatch, The Enfield Society and CPRE London estimated space to build 37,000 homes on previously developed land.

This disregard for brownfield sites is in direct opposition to the National Planning Policy Framework. Paragraph 146 of the NPPF states that before concluding exceptional circumstances exist to justify changes to Green Belt boundaries, the plan-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This is clearly inconceivable in the case of Enfield Council. Enfield Council seem to ignore, botch and drag their feet on all potential brownfield development projects while jumping at Green Belt site development. As postulated, again by Better Homes Enfield, this is likely to be in order to make development of the Green Belt seem like the only option left available in order to create the exceptional circumstances needed to justify building when many others are actually available. As per the Better Homes Enfield article:

“Enfield Council wants to sell publicly owned Green Belt land for development, which they estimate could generate £800 million. However, the Green Belt is protected and building homes on Green Belt land can usually only be justified if there is a lack of available brownfield sites. We think the Council are rejecting perfectly good brownfield sites to justify the sale of Green Belt land. “

Enfield is a wonderful borough with perhaps the closest proximity to central London of all the outer Greater London Boroughs that also border rural countryside. It has one of the highest percentages and largest areas of Metropolitan Green Belt of the London boroughs. This creates a huge dichotomy with urbanised inner London areas and rural outer areas and even a heavily industrialised zone running up the length of the east side along the Lea Valley. This vibrant dynamic should be preserved for many years to come. I urge the Planning Inspector to insist that Enfield Council demonstrate fully that all other available brown field options have been truly shown to be non-viable and exceptional circumstances to develop Green Belt have not been manufactured by their own wilful mismanagement and costly wastefulness of perfectly good brownfield options.

Word Count – 946 words