



Enfield RoadWatch Action Group

Hearing Statement

Matter 4: Green Belt

8/1/2025

Representations to which this hearing statement relates:

ID/Policy	Hyperlink/brief description
01687-2-1 ¹ SS1 para 13	https://www.enfield.gov.uk/file/PDFs/email/01687-2-1.pdf Extension to Trent County Park
01687-6-1 PL11 para 7	https://www.enfield.gov.uk/file/PDFs/email/01687-6-1.pdf Viability of Crews Hill
01687-35-1 SS1 para 3	https://www.enfield.gov.uk/file/PDFs/email/01687-35-1.pdf London Plan housing target
01687-8-1² PL11 para 15	https://www.enfield.gov.uk/file/PDFs/email/01687-8-1.pdf Sprawl into Crews Hill 'Green Belt'
01687-38-1 SARUR.04	https://www.enfield.gov.uk/file/PDFs/email/01687-38-1.pdf Land East of Junction 24
01687-40-1, SARUR.07	https://www.enfield.gov.uk/file/PDFs/email/01687-40-1.pdf Whitewebbs Golf Course
01687-39-1 SP PL9	https://www.enfield.gov.uk/file/PDFs/email/01687-39-1.pdf Rural Enfield policy
01687-19-1 ³ SA10.3	https://www.enfield.gov.uk/file/PDFs/email/01687-19-1.pdf Country Park extension
01687-4-1 PL11	https://www.enfield.gov.uk/file/PDFs/email/01687-4-1.pdf London Plan policy G2: London's Green Belt

Note: many of the 'duly made' representations submitted by Enfield RoadWatch appear within the Representations Database under the wrong policy, ID reference or hyperlink.

¹ Mistakenly labelled "general and whole plan" in database 23/12/2024

² Paragraph number not shown in database of 23/12/2024

³ Incorrect link to an individual's representation

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 have been 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?

a) Housing

We have been unable to carry out our own detailed review and therefore the assessment below relies on the Council's own figures. Table 2.2 within Local Plan Policy SS1 (Local Plan p27) states that 33,280 dwellings in total should be delivered through all Local Plan sites. Based on Local Plan Table 8.1 (p223-228) a total of 6,351 homes are proposed for Green Belt sites, leaving a total of **26,929 homes over the Local Plan period to 2041 without any release of Green Belt land**. Enfield RoadWatch is highly sceptical of the Council's figures, but as we show in relation to Q4.6 below, even based on the Council's own capacity estimates, with the proper application of the housing need calculations from the London Plan there is a surplus of brownfield capacity and Green Belt sites are not needed.

Issue 4.2: Whether removing land from the 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.

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

See our representations ([01687-8-1](#)) regarding sprawl of development west of the railway line at Crews Hill. Even by the Council's own estimation, the removal of the majority of the proposed land to the west of the railway line at Crews Hill is not necessary to meet development needs as it is shown as undesignated 'white' land in Figures 3.13 p105 and 3.14 p106 and on the Policies Map.

It appears to us that the Council has continually sought to a) inflate the housing target and b) reduce the brownfield capacity in order to demonstrate 'exceptional circumstances' at sites in its ownership. This perception is reinforced by the Council's response to Thompsons of Crews Hill as shown below.

"The Enfield Housing Needs Assessment outlines that while Meridian Water has substantial capacity, the total housing demand exceeds what can be accommodated in urban areas alone. The difference in the reported housing capacities for Meridian Water reflects evolving estimates and planning adjustments. The Council's approach involves continuously updating and refining these figures to ensure accurate planning and to justify the inclusion of Green Belt sites where necessary"

Document SUB12.1, Council response to Thompsons of Crews Hill, Policy SS1

This statement reflects the Council's pattern of behaviour throughout the Local Plan process in terms of seeking evidence to justify the inclusion of its Green Belt sites. In our view the main reason so much land is proposed for removal from the Green Belt in Area SA11.2 is so that the Council can avoid Mayoral Call-in when it submits an application to itself for a large residential housing scheme over the very sensitive landscape recently planted with trees at Kings Oak Plain, Rectory Farm. This appears to be why this area is shown as 'white land' in Figure 3.2 and on the Policies Map.

The Council's approach was to build a case for release of Green Belt land in its ownership, particularly at Crews Hill Golf Course, and then seek to justify this retrospectively.

It is also important to note from the timings in Appendix C that the Council is proposing that development of open countryside in SA11.2 will come forward significantly ahead of the development of the 'core' Crews Hill new settlement. Given the difficulties with deliverability of brownfield land at Crews Hill that the Council itself has noted as part of the justification for both Crews Hill and Chase Park (IIA pI-13), which is a particular issue with the fragmented landownership as acknowledged in the Crews Hill Topic Paper ([document PLA1](#), paragraph 4.24 p19) it is reasonable to believe that the ultimate outcome will be sprawl into the countryside with the central 'core' delivered much later, if at all.

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?

No. Based on our experience over the past five years, we believe the process was as follows:

1. The Council's directors realised that there were big financial problems and that selling Green Belt land for development would raise money. They also realised that the Local Plan provided the mechanism to achieve an uplift in land values by de-designating the Green Belt, and also ensure that the GLA could not intervene when it granted permission for developments in those former Green Belt areas;
2. It then asked the Council's planners where the best place would be to release a large area of land for development.
3. The planners advised that the best chance of convincing a planning inspector would be close to the west of Crews Hill station where a semi-plausible argument about sustainable transport could be made;
4. The Council's planners also advised that it would be impossible to remove land from the Green Belt west of the railway line without securing backing from the Planning Inspectorate for a much larger new settlement;
5. They also advised that in order to avoid suspicions about its real motives it would need to allocate land not in its ownership at Owls Hall Farm and Vicarage Farm;
6. Council planners then sought to demonstrate that there was insufficient brownfield capacity and that allocation of Green Belt in its ownership was the inevitable conclusion of that process.

Even if the Council was able to demonstrate convincingly that the answer to this question is "yes", the proposed release of Green Belt would still not be in general conformity with the London Plan as the sites are isolated in London Plan terms.

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?

No. We agree with the housing need calculations set out by Enfield Climate Action Forum (EnCaf) Land Use Working Group in their Hearing Statement for Matter 2, which demonstrates that the total **housing need should be 18,271** new homes by 2041, PLUS any local capacity agreed in consultation with the Greater London Assembly. Local Plan Table 8.1 suggests that **26, 929 homes can be delivered without release of Green Belt**. Therefore, even accepting the brownfield capacity figures proposed by the Council at face value, there is a substantial surplus of available land for housing without the release of any Green Belt land.

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

Based on the Council's own figures, there is no need to release land from the Green Belt for housing need. [As demonstrated in the Enfield Society's Matters 2 and 3 hearing statements.

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?

We submitted representations regarding paragraph/criterion 13 of policy SS1, however at the time of writing they do not appear in the Representations Database.

There are two main proposals for 'compensatory improvements' addressed in paragraph 13: The proposed 'Country Park Extension' with PL10: Chase Park; and secondly the wider 'Rural Placemaking Area' PL9. Please refer to the assessment made by *The Enfield Society* in their Matter 4 hearing statement regarding these latter proposals.

The 'Country Park extension'

From Comer Homes' Regulation 19 consultation response ([Representation ID01929-1-1](#)) it is clear that this 'compensation land' is not available and not deliverable. An extract from their representations is provided in the box below, and similar concerns are raised under 13c and near the start of the section on PL10 on page 3 of their representations.

"13e states that the development should create a range of new open spaces including a hilltop view park at the highest part of the placemaking area. Again we fully support the objectives the Council is trying to achieve, however, as set out above in relation to point 13c, we are concerned about how this will work in practice. Vicarage Farm is one of the highest parts of the placemaking area. Vicarage farm is a working farm and it is therefore not practical for it to be formally designated as open space as currently shown on Figure 3.2 (Illustrative Framework Plan). The fields need to accommodate crops and/or livestock and cannot be safely open to the public. The open space designation is not shown on the

draft proposals map and should be removed from the illustrative plan. It could be possible to provide public access across the land through rural style footpaths (a conventional arrangement on farms of course). We could establish a modest area of public open space but it would affect the viability of the farm. There is more than sufficient public open space designated across the remainder of the Chase Farm allocation.”

Savills on behalf of Comer Homes, May 2024, page 4
Representation ID01929-1-1

This position also demonstrates the threat to the permanence and openness of the Green Belt in the long term. Contrary to Comer Homes’ assertion, Vicarage Farm hasn’t been a working farm for a number of years, and so we suspect that this statement is positioning in order to safeguard future development on the remaining open space identified for the Country Park extension.

Even if it accepted the policy as a short-term expedient, in the longer-term Comer Homes would almost certainly use the weak Green Belt boundary (which follows a gallop/hedgerow) to seek release of the remaining area of Green Belt for housing development as far as Hadley Road at the next review of the Local Plan, potentially in just five years’ time. Furthermore, in light of Comer Homes’ comments about viability, it seems unlikely that sufficient funding would be available to provide and maintain the Country Park extension.

View south-west from the junction of Hadley Road and Oak Avenue across Vicarage Farm to Trent Country Park. Will this be a farm, a ‘country park’, or future housing



Even if Comer Homes was to change its stance and agree to provision of the Country Park extension, there are other fundamental problems with the concept of compensatory

improvements that the Local Plan is proposing. In our representations regarding PL10 paragraph 13 (another example of missing representations within the Representations Database) we drew attention to paragraph 3.145 of the Local Plan (p101), which is reproduced below with highlights added. Even by Local Plan standards it is remarkable for the number of misleading statements it contains.

3.145 The existing neighbourhoods and wards surrounding Chase Park are shown in the evidence base to be wards with higher levels of deficiency of access to open space. As such it will be essential that new development provides a network of green and blue spaces that connect to existing communities for the benefit of existing and future residents. New publicly accessible parks and open spaces should capitalise on the areas existing assets such as the brooks which run through the site and uncover and enhance the heritage within and around Chase Park. The area also has a gently rolling topography which enables extraordinary and expansive views in the north western part of the area, which are not currently open to the public. Locating parks and open spaces in these areas can introduce highly valuable opportunities to open up access for existing and future residents.

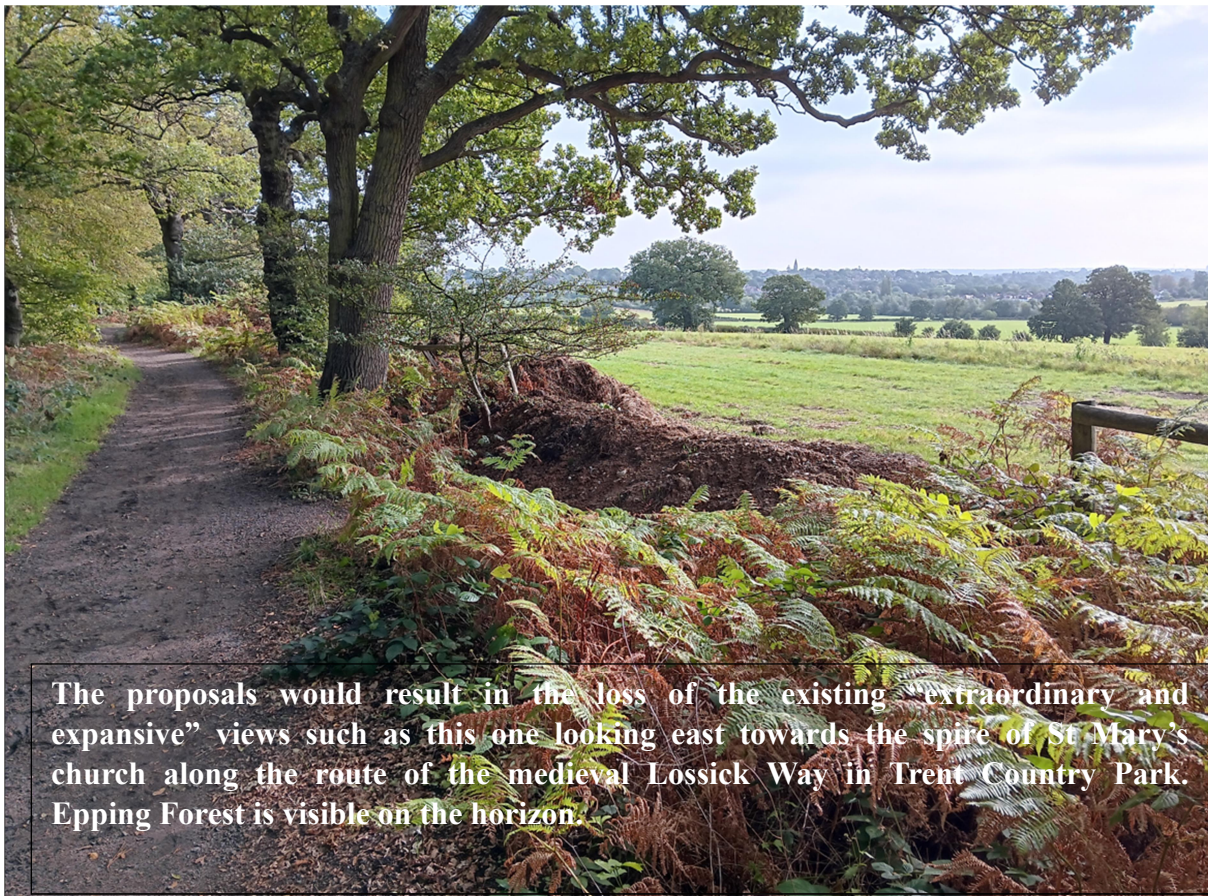
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The first paragraph is correct only in relation to formally designated open spaces such as play areas. What it fails to convey is that the London Plan defines privately owned land as open space. The land at Vicarage Farm and South of Enfield Road makes a huge contribution as existing open space to the character of the area and the wellbeing of residents. The Merryhills Way is a popular place for walks and running for people of all ages and family groups, as is clear from the survey of users of the Merryhills Way submitted by the Enfield Society. Therefore, the statement at Paragraph 3.145 that ‘new spaces’ will be created is misleading – in fact far more, and far more important, open space will be lost.

The second sentence refers to providing a “*network of green and blue spaces*”. The Preliminary Ecological Survey of Vicarage Farm submitted by the Friends of Trent Country Park (which also does not appear in the Representations Database) demonstrates that the fields of Vicarage Farm act as a critical steppingstone for various fauna travelling between the SINCS at Trent Park and Vicarage Farm and Rifles Site. The proposed development would result in the loss of that.

The same sentence refers to ‘enhancing the heritage’ but as The Enfield Society has demonstrated (see Matter 5) the development would destroy what remains of South Walk of Enfield Chase, causing fundamental harm to the Chase as a whole.

The last sentence refers to providing “*extraordinary and expansive views in the north-west part of the site, which are not currently open to the public*”, however if the development proceeds, those views would be across urban sprawl, which would be a very poor substitute for the existing extraordinary views that can be enjoyed from the historic and accessible Lossick Way along the southern edge of Trent Country Park as shown below. The development would destroy these vistas. Far from providing “*access to existing residents*”, the existing residents would be left with an existing deficit in (formal) open space and the (London Plan) open space/countryside gone.



Percentage release of Green Belt

We note that the [Local Plan Inspector asked at PQ29](#): “*Could the Council confirm how much land is proposed to be removed from the Green Belt, both in absolute terms and as a proportion of its existing extent?*” and we also note the Council’s response in [document E5](#) that “*The Council confirms that it proposes the removal of 436.8 hectares of land from the Green Belt via allocated development sites. In absolute terms, this equates to 14.2% of Enfield’s current total Green Belt area, which spans 2,630.8 hectares.*”

Percentage release is an unreliable guide to the harm to the Green Belt overall.

- The areas proposed for deletion are exceptionally harmful because of their impact on open landscapes unspoiled by power lines or other intrusions; harm to the character of local areas, to accessible and highly valued countryside walks such as the Merryhills Way and the green entrance to Trent Park; and to the historic landscape of Enfield Chase. The proposed Green Belt releases would fundamentally harm the openness and permanence of the Green Belt, as demonstrated by the Landscape Appraisal (EnPlan) submitted by The Enfield Society;
- Furthermore, a substantial proportion of the Borough’s Green Belt is completely inaccessible as it forms part of the large reservoirs in the Lee Valley, and the remaining parts of Enfield Chase are remote from the built-up area compared with the simple, flat stroll to the Merryhills Way at Vicarage Farm/Chase Park. For all these reasons, it is misleading to cite either the total area of release or the percentage of release as evidence of limited harm; and
- Finally, the total area of 436.8 hectares illustrates the magnitude of the discrepancy with the London Plan ‘Good Growth’ approach, which is particularly stark in the context of other outer London Boroughs which have not proposed any large-scale Green Belt releases. At another outer London Borough (Barking and Dagenham) Local Plan Inspectors recently stated that the exceptional circumstances to justify release of two housing sites combined totalling 108 dwellings did not exist⁴. This was a tiny amount both in absolute terms as a proportion of the Barking and Dagenham Green Belt, throwing the Enfield proposals into sharp relief, particularly considered against the London Plan context.

⁴ document EX191, dated 9 January 2024 [weblink here](#)

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

Q4.14: 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?

A number of proposals for inappropriate development in the Green Belt are proposed. An extract from the masterplan from the current planning application for Tottenham Hotspurs Football Club (planning reference 24/00987/FUL) is shown below. This is part of the proposed allocation SARUR.07. The perimeter will be surrounded by a 1.8m high security fence and will not be accessible to the general public. This proposal will have a major adverse impact on the openness of the Green Belt. Paragraph G-67 of the IIA states in relation to the Tottenham Hotspurs Training Ground proposal: *“Due to the fact the site is allocated as a sport and recreation site which could contain built development in the future, its development could affect the landscape.”*



Aerial photograph showing the existing training facilities including built structures and pitches and the proposed extension site at the Golf Course to the left. The harm to the openness of the Green Belt is clear from comparison with the existing pitches and structures to the right. The Local Plan does not explain the inclusion of land north of Whitewebbs Road within the allocation.



From the location of the site boundary north of Whitewebbs Road shown on p550 and the Policies Map it appears that further extensions of the facilities north of Whitewebbs Road as far as the M25 are proposed but this is unexplained in the text.

There is also inappropriate development proposed at SARUR.08: Sloeman's Farm as explained in *The Enfield Society's* representations, with which we agree.

Tottenham Hotspurs FC provides rental income to the Council, and it appears that the Council is looking to generate income from Sloeman's Farm and other areas of Green Belt. Concerns about the Green Belt and public access appear to be secondary considerations.

3000 words including Inspector's questions