

Kings Oak Equestrian Centre

Our Ref: 1204

Stage 1 Matters, Issues and Questions

20 December 2024

Introduction

This statement has been prepared on behalf of Rockwell London Ltd (“Rockwell”) and the Leaseholders of the above site who made representations on the Enfield Local Plan- Regulation 19 in May 2024. This statement relates to Issue 4.2 removal of land from the Green Belt. Having reviewed the Inspectors initial matters Rockwell does not wish to appear at the Hearings on this matter or the other issues identified under Stage 1.

A draft Statement of Common Ground has been prepared with the Council. There are some areas of ‘uncommon ground’ remaining. These are largely site (and area) specific matters and work is ongoing to try to resolve these ahead of the opening of Examination.

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.

Overall, Rockwell considers the release of Green Belt necessary to meet housing needs. Whilst the plan has been submitted under the 2023 Framework, there has been a significant shift in ambition and the desire to deliver more homes to address the worsening of the Housing crisis.

As an SME Housebuilder, Rockwell commends Enfield for addressing the issues through its plan and pushing forward with its approach. It is considered, by reference to Crews Hill in particular, that the release of Green Belt will promote sustainable patterns of development building on the potential to improve transport accessibility and deliver communities which are able to experience the benefits of proximity to central London, together with the historic countryside and landscape around the northern fringes.

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

Paragraph 144 of the framework states that once established *there is no requirement* for Green Belt Boundaries to be reviewed or changed when plans are updated. However, Authorities may choose to do so where exceptional circumstances are fully evidenced and justified. The justification(s) for the review of Green Belt is dealt with under Matter 2 (Rockwell has no further observations on that matter and relies on its representations made at regulation 19).

The Green Belt and Metropolitan Open Land Study (LUC 2021) **GRE1** assesses the main parcels of Green Belt across the district, having regard to the contribution each has to the 5 purposes of Green Belt (paragraph 143 of the Framework). The methodology is consistent with similar approaches, and highlights consistency with relevant Inspectorate and other decisions. Rockwell believes this evidence base is a robust basis from which to assess and alter Green Belt Boundaries. Appendix D to LUC report **GRE7** contains the specific assessments pertaining to Kings Oak Equestrian Centre within Crews Hill and sets out the contribution that the constituent parcel(s) make towards the five purposes.

Rockwell acknowledge that there are several ways in which parcels can be drawn up and this can, to an extent, alter the conclusions as to whether (or not) the Green Belt Boundaries should be amended in specific locations. In this case, the approach underpinning the review of the Green Belt captured the differences within the parcels (particularly at Crews Hill) providing the Council with opportunities to review Green Belt Boundaries without necessarily concluding entire parcels should be released from the Green Belt. The evidential basis from which to inform the planning judgement is therefore a justified and effective approach to alter the boundaries of the Green Belt.

Q 4.5: 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?

The Kings Oak Equestrian Centre, which sits within the wider Crews Hill area, meets the definition of Previously Developed Land as set out within Annex 2 of the National Planning Policy Framework (December 2023). This wider area also includes large areas of businesses and nurseries (the latter of which would not meet the definition being in “agricultural” use). This makes the wider area of Crews Hill challenging for the purpose(s) of reviewing and considering PDL Land.

Whilst Rockwell is supportive of the allocation of Crews Hill more generally (and its release from the Green Belt) there is no clear evidence that in selecting sites or the areas for release beyond recording the status of the site at Stage 6 of the Site Allocation/Site selection process (see paragraph 5.4 of **TOP2**) and then as transposed into Appendix C of the Site Allocations of the Plan which does not properly record the uses. Therefore, there is no evidence in our view that priority has been given to Previously Developed sites in the Green Belt such as Kings Oak (CFS169) (Cluster 6 of the Green Belt Review **GRE1/ GRE7**) over and above commercial nurseries (agricultural uses and therefore not Previously Developed Land as per the definition within the Annex of the Framework) which sit within the wider area and the other open fields.

Notwithstanding this observation, Rockwell do not consider that this makes the objectives and overall decision to select Crews Hill as a large-scale allocation as part of the plan’s strategy ‘unsound’ per se and the observations made are more relevant to phasing of development *within* the allocation. Moreover, Rockwell note that the overall character of this area is one of piecemeal encroachment with extensions, conversions and other permitted uses eroding the ‘openness’ that may be expected.

The choice to progress with an allocation at Crews Hill is generally supported and Rockwell share the vision for this area as one that has strong potential to be well connected via the railway and bus links to both the centre of Enfield, but also capitalising on opportunities to offer alternatives to those accessing the borough via car from the neighbouring districts in Hertfordshire. For this reason, Crews Hill offers the potential to fully accord with Paragraph 89 of the Framework to exploit opportunities to make an area more sustainable.

Removing land from the Green Belt to provide land for housing and employment development

Q 4.6: 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?

Rockwell notes the content of **TOP5** and agrees with its conclusion that the need for homes cannot solely be met on Previously Developed Sites within the existing built-up area or through further urban intensification.

In Rockwell’s experience, which includes progressing smaller sites within these areas, the approach to urban intensification and an over reliance on flatted development is also unlikely to meet the

market demand for affordable family housing outlined in the Housing Topic Paper (**TOP3**) and in particular paragraph 6.6-6.8 and required to create mixed and balanced communities.

In Table 19 of **TOP3** this shows that delivery has been skewed towards one- and two-bedroom units with over 71% comprising one- and two-bedroom homes arising from flatted development and subdivision. This contrasts with the Local Housing Need Assessment which suggests a need for 60% larger homes of 3+ bedrooms. To achieve this objective, there is a necessity to look at sites and areas where a lower density is likely to be viable, including areas currently within the Green Belt.

Q 4.8: Overall, are there exceptional circumstances in principle to justify altering Green Belt boundaries for a) housing and b) employment development?

For the reasons set out in response to 4.6, Rockwell agrees with Enfield Borough Council that there are exceptional circumstances that would justify the alteration to Green Belt Boundaries, particularly at Crews Hill, to meet the needs for housing across the Borough at a time when increasing numbers of people are struggling to access high quality housing, close to their places or work and social networks.

As Rockwell stated, it is important that London is able to meet its needs for housing; pushing this into the adjoining Hertfordshire authorities (Hertsmere, Welwyn and Hatfield and Broxbourne) who themselves have a combined housing need of some 2,657 homes (December 2024) and Green Belt pushes development further from the City embedding unsustainable patterns of housing and excessive travel. These authorities have confirmed they would be unable to meet any unmet needs (**SUB14**).

Rockwell highlight the response it made at Regulation 19 that meeting housing needs in themselves would amount to exceptional circumstances ((see for example Compton Parish Council & Ors v Guildford Borough. Council & Ors. [Case Number: CO/2173/2019]). This should be a significant consideration when understanding the exceptional circumstances which apply for Enfield.

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For and on behalf of Smith Jenkins Planning & Heritage

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