



The Enfield Society
conserving our heritage and environment

Enfield Local Plan Examination

Matter 4: Green Belt

This hearing statement relates to the 'duly made' representations at [01794-1-1](#)
(hyperlink)

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

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 sites¹, leaving a total of **26,929 homes over the Local Plan period to 2041 without any release of Green Belt land.**

b) Employment

Table 9.1 of the Local Plan (p254) sets out 19 proposed employment locations², of which the first 16 do not involve Green Belt release and amount to a total capacity of 175, 868sqm as shown below.

Sites from Table 9.1 not in the Green Belt

Policy	Address	Sqm
SA2.2	Heritage House	22,060
SA2.7	Crown Road Lorry Park	4,495
SA2.8	Martinbridge Industrial Estate	25,000
SA4.3	Lanhedge Lane Industrial Estate	4,000
SA5.6	Meridian east (Harbet Road)	20,080
SA5.7	Ravenside Retail park	32,500
SA5.8	Keninghall Industrial Area (metals and waste)	0
URB.28	Land and buildings South East of Stockswater Lane	25,375
URB.29	Land to the south of Millmarsh Lane, Brimsdown Industrial Estate	13,500
URB.30	Montagu Industrial Estate	17,902
URB.31	Snowbird foods extension	3,289
URB.32	Claverings Industrial Estate	3,219
URB.33	6 Morson Road	2,600
URB.34	5 Pickets Lock Lane	0
URB.35	Riverwalk Business Park	924
URB.36	Riverwalk Business Park	924
		175,868sqm

¹ 2,250 at Chase Park, 3,350 at Crews Hill, 291 at Land Opposite Enfield Crematorium, and 160 at Land between Camlet Way and Crescent West, Hadley Wood.

² Including 5 sites comprising extant permissions shown in ELR Table 5, and six sites in ELR Table 6 (Crown Road Lorry Park, Stockswater Lane, Millmarsh Lane, Claverings, 6 Morson Road and 5 Pickets Lock Lane)

However, the Local Plan identifies two further potential sources of supply which are missing from Table 9.1 as follows:

- The tables within Local Plan Policy E12 (p278) states that intensification of floorspace at Meridian Hinterlands will result in an additional 119,370sqm of Strategic Industrial Land (SIL)³ and 6,060sqm of Locally Significant Industrial Land (LSIS floorspace). This totals 125,430sqm additional employment floorspace(. Table 9.4 (p276) suggests that 110,870sqm⁴ of that figure can be delivered in the 'short term'⁵. This is significantly more than suggested by Local Plan Table 9.1 which states that only 20,080sqm will be provided at Meridian East/Harbet Road. This appears to be an error, which if corrected would add a **further 105,350sqm** to the brownfield supply (or a minimum of 90,790sqm if 'short term' means 'by 2041').
- 5 Pickets Lock Lane is shown as 0 supply in Table 9.1 when it is shown as **2,296sqm** in Table 6 of the ELR. It appears that this is an error and should be added to the total brownfeld capacity.

If those two missing sites are added then the total supply amounts to **283,512sqm of net additional employment floorspace by 2041 without requiring any alteration to Green Belt boundaries.**

Finally, given the past delivery of employment land on existing employment sites, and the large amounts of employment land within the borough, it is reasonable to assume that applications for unplanned intensification will continue to come forward as employers seek to upgrade their sites. There should be some quantified recognition of this within the Local Plan in a similar way to the windfall allowance for small sites.

³ The *Industrial Intensification Market Deliverability Study* ([document EMP2](#)) – suggests that Harbet Road would be an ideal location for viable intensification of employment floorspace, so there is evidence to support the approach. Local Plan paragraph 9.77 bullet 2 regarding Meridian East also states that “*this area give priority to industrial and logistics uses, exploiting its excellent links to the strategic road network*”.

⁴ 110,870sqm = 160,878sqm short-term employment minus 50,008 employment baseline

⁵ It is clear from the Council’s response to PQ39 and PQ40 ([document IN5](#) paragraphs 46-57) that it is ‘confident’ in this approach.

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?

The Green Belt Topic Paper purports to demonstrate that that the Council first looked to brownfield land. As set out in our hearing Statement to Matter 1 Q1.1, it appears that there is good reason to believe that in fact the Council first sought sites in its ownership that it wished to develop, and then sought planning arguments to justify those sites by increasing the housing need figure and reducing the estimated brownfield capacity. There appears to have been no regard to the London Plan context and the importance of Green Belt as open space within that document.

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?

As set out in our response to Matter 1, the pattern of behaviour displayed by the Council suggests that first consideration was given to releasing land in the Council's ownership at Crews Hill Golf Course and then other sites in the Council's ownership, and then retrospectively justifying those Green Belt releases by inflating the 'need' for housing and employment land.

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) 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.

Q4.7: 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?

No. Please refer to our response to Matter 3 Q3.1. The total need for additional industrial and warehousing floorspace is 304,000 under the Council's 'most optimistic' scenario, however a more realistic scenario is a need for at most **142,833sqm**. As set out in our response to Q4.1 part b, Table 9.1 suggests that **175,868sqm** can be delivered without the release of Green Belt land, and that including 'missing' capacity at Harbet Road and 5 Pickets Lock Lane this rises to 283,512sqm. Therefore there is no quantitative need to remove land from the Green Belt in the period to 2041.

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

As demonstrated above, purely on the basis of the fact that the supply of brownfield land exceeds the total need, there are no exceptional circumstances in principle to alter Green Belt boundaries for either housing or employment development.

As the Council itself has set out in the Green Belt Topic Paper, the Calverton Parish Council court rulings make clear that there are a number of tests that must be applied before it can be concluded that 'exceptional circumstances' exist for release of Green Belt, including harm to specific parcels of Green Belt, and potential for amelioration of harm. It is not possible to conclude on 'overall' exceptional circumstances' prior to considering those points.

We note that the [Local Plan Inspector asked at PQ29](#) regarding the proportion of Green Belt that would be lost. The Enfield Society supports the comments made by Enfield RoadWatch in relation to this. Percentage release is an unreliable guide to the harm to the Green Belt overall.

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?

In our representations we made the point that most of the Enfield Green Belt was purchased by Middlesex County Council for the purposes of protection in perpetuity as a public amenity (see reps at [01794-11-1](#)), and the development of parts of it to improve other parts is not within the spirit of this purpose.

Representations submitted by the *Friends of Enfield Chase* ([01759-1-1](#)) confirm that money from developments is not required to fund the programme of nature-based improvements. The Friends of Enfield Chase and The Enfield Society are both very concerned about "transformation" of the countryside implied by the associated "compensation" argument, which could encourage inappropriate development and would run counter to the agricultural and low-key nature of the historic Chase as a place for nature and country walks. It is upsetting to the many volunteers who have been working on nature-based projects since 2022 to find that projects are now being rebadged as "compensation" to justify development on other parts of the historic Chase.

The 'Country Park extension' (PL10: Chase Park)

From Comer Homes' Regulation 19 consultation response ([Representation ID01929-1-1](#)) it is clear that this 'compensation land' is not available and not deliverable. Similar concerns are raised under 13c and near the start of the section on PL10 on page 3 of their representations. This is addressed further in the Hearing Statement submitted by *Enfield RoadWatch*, and The Enfield Society agrees with their comments.

The “Rural Place-Making Area” (PL9: Rural Area)

As set out in our representations (p43), the various costs for items in policy BG7 are not accounted for in the viability work. From the response by Comer Homes it seems unlikely that it would be viable for development at Chase Park to make any significant contribution towards ‘compensation’ measures in the wider Green Belt. It is also unclear that the Council-owned sites at Crews Hill would make any significant contribution, particularly in light of the viability issues associated with the provision of new infrastructure including schools and railway bridges identified in our Regulation 19 consultation responses.

The proposals do not increase the accessibility of the Green Belt. The Enfield Society submitted an electronic copy of our popular [Footpaths Map \(rep ID 01794-7-1\)](#) which shows the full extent of the permissive paths that the Society negotiated with the Council as landowner. On the contrary, the proposals will reduce Green Belt accessibility through the urbanisation and loss of the Merryhills Way as a rural path, and as we observed in relation to BG7 para 5 (p43 of our reps) the proposed enhancements not walkable from existing urban areas.

The Council has informed us that it does not wish to see the farms removed from the land, therefore there is unlikely to be a need for contributions from developments.

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?

London Plan Policy G2 part 2 states that “appropriate” multi-functional beneficial uses should be supported but is clear these need to be consistent with national policy.


Given the Council’s financial asset strategy (see Q1.1), there is a strong incentive for the Council to grant itself ‘very special circumstances’ permission for proposals that comprise inappropriate development in the Green Belt. For example, Policy RE3 (part 8) states “*Camping, caravan, chalet or similar facilities that respond to an identified local need will be supported*”. This wording, read in conjunction with the ambitious plans for ‘transformation’ in Policy PL9, could be cited in a future Case Officer’s report as allowing inappropriate developments with the Green Belt site allocations, and could foreseeably be used to justify not only tents and caravans but a range of ancillary built facilities including car parks, toilet blocks, fencing and other inappropriate structures.

Two further examples illustrate the Council’s approach to inappropriate development in the Green Belt: SARUR.07 and SARUR.08. The proposal for inappropriate development at SARUR.07 Tottenham Hotspurs Football Club is addressed by *Enfield RoadWatch*, and The Enfield Society supports their analysis.

Sloeman's Farm (SARUR.08)

Sloeman's Farm is a good example of how, by using the Local Plan to legitimise sites identified in the Green Belt for various uses, the Council is able to grant permission to itself for inappropriate uses through use of the 'very special circumstances' mechanism.

Paragraphs 31 to 32 of the Council's response to the Inspectors Preliminary Questions [document E5](#) are shown below.

<p>Enfield's Local Plan Examination 2024: LBE's response to Inspector's Preliminary Questions</p>	 <p>ENFIELD Council</p>
<p>31. The proposed use for the site to provide additional land for natural burial space. Given the nature of this land use, no assessment of inappropriate development in the Green Belt has been undertaken, as the extent of development would be limited to natural burial space only.</p> <p>32. The Council is confident that the proposed land use complies with paragraph 154(b) of the NPPF, which supports certain uses in the Green Belt that preserve openness and do not conflict with Green Belt purpose.</p>	

Despite these assertions, the Council has recently submitted to itself an application for development at Sloeman's Farm⁶ which includes the construction of a 'hub building' or ceremony building, which according to the Schedule of Accommodation submitted with the application extends to 474 square metres Gross Internal Area (GIA), to be located at the most visually prominent part of the site. According to Page 38 of the Design and Access Statement the ceremony building will be located to the west of the ridgeline and provide 'excellent views'.

The Enzygo Burial Needs study suggests that there is a need for 10-15,000 spaces in Enfield up to 2036⁷. This is far fewer than the 38,000⁸ plots proposed in the Planning Statement that accompanies the planning application. In light of the Enzygo evidence, it appears likely that Sloeman's Farm would meet a need for burial space originating outside the borough. The Council currently charges £2,251 for a single burial plot⁹. The proposal for burial plots at Sloeman's Farm would generate a significant revenue stream for the Council. However, in planning terms, the extent of the site is not justified by the evidence.

This application is not consistent with SA RUR.08 (Local Plan p553) Design Principle G, which states "*should locate ancillary building close to the main vehicular access*", which is at the lower part of the site, however as the Site Section AA (shown below) indicates, in fact the proposal is for the main building to be located at the high part of the site, which would be visually intrusive within the landscape and therefore not consistent with paragraph 154b of the NPPF.

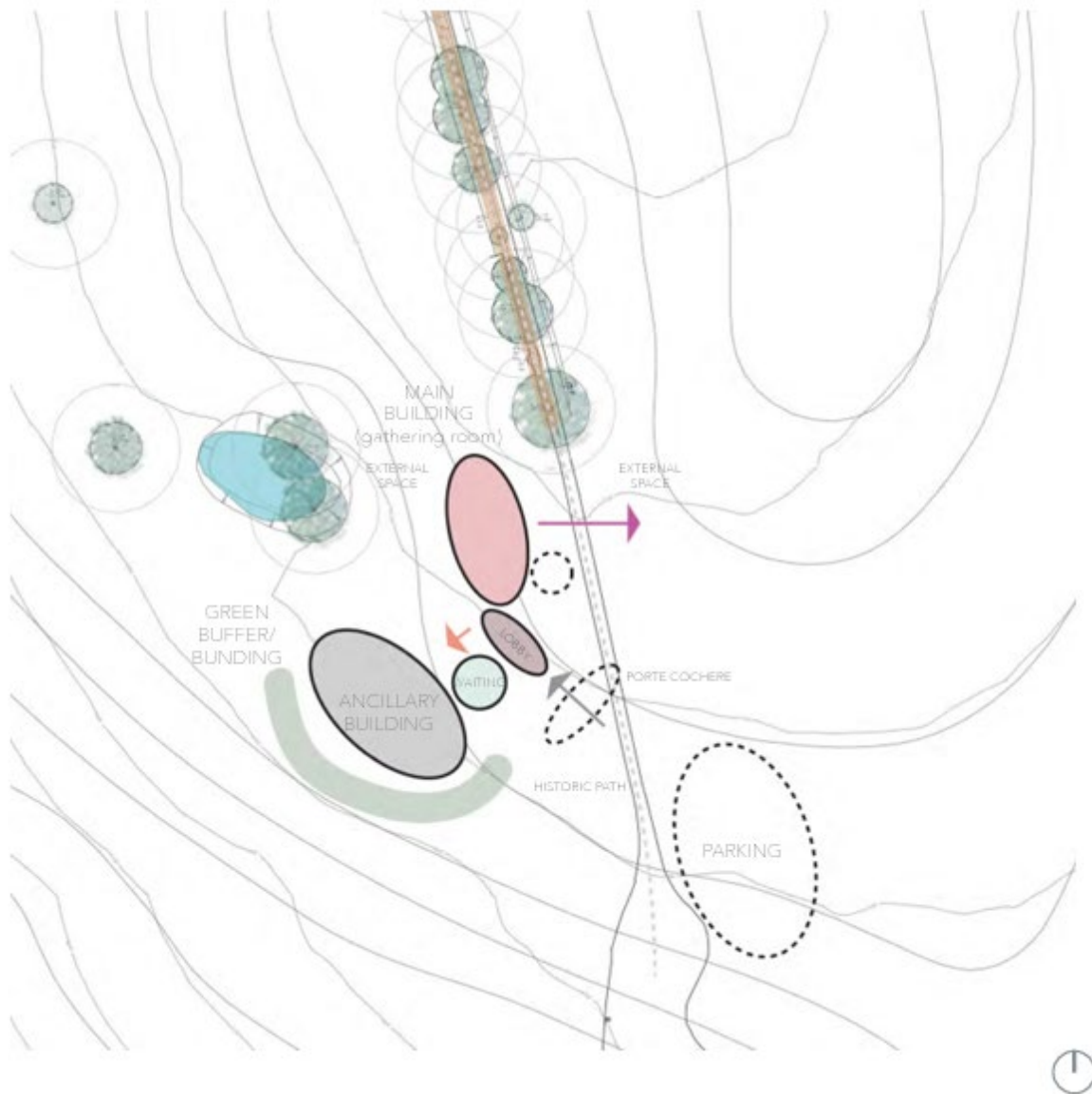
⁶ Application reference 24/02266/RE4

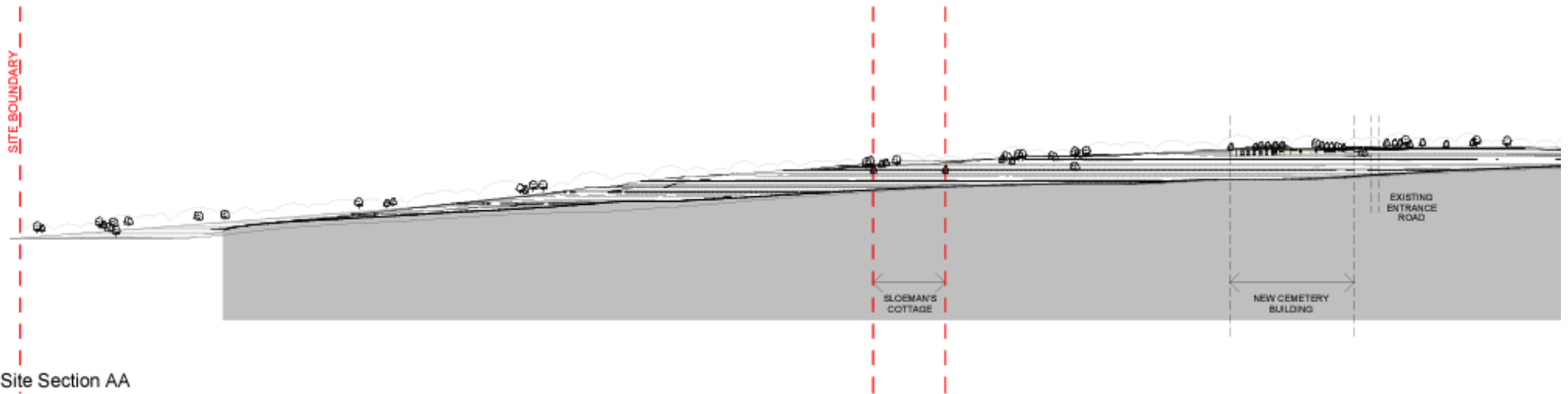
⁷ Document Library reference INF6

⁸ Sloeman's Farm Planning Statement p4 paragraph 3.6.

⁹ <https://www.enfield.gov.uk/services/births-deaths-and-marriages/paying-for-a-funeral>

Below: Extract from the *Design and Access Statement* (p39) showing the preferred option for the location of the Main Building and the Ancillary Building in relation to contour lines.





and Site Section AA

Sloeman's Farm, Enfield

PB230001

01.05.2024

Schedule of Accommodation

Revision First issue: 05.07.2024 Planning submission



Schedule of Accommodation							total room no	total NIA SQM	SQFT	total GIA SQM	SQFT	% NET:GROSS	unit %
TOTAL							17	391	4208.7	474	5102.1	82%	
Floor Level	Function	Room Number	Room Name	Occupancy	Unit Number	Unit NIA (SQM)							
Level 00								391.0		474.0		82%	
	Staff	00.001	Plant	2	1	20							
		00.002	AWC	1	1	3							
		00.003	Shower	1	1	5							
		00.004	Unisex WC	1	1	2							
		00.005	Cleaners cup'd	1	1	2							
		00.006	Staff Room	6	1	19							
		00.007	Staff Office	6	1	32							
	Public	00.008	Waiting Area	12	1	44							
		00.009	Entrance	120	1	66							
		00.010	Hand Wash	8	1	7							
		00.011	AWC	1	1	3							
		00.012	Unisex WC	1	1	2							
		00.013	Changing Place WC	2	1	13							
		00.014	Store	0	1	6							
		00.015	Gathering Room	120	1	156							
		00.016	Unisex WC	1	1	3							
		00.017	Chair Store	0	1	8							

Source: Planning Application reference 24/02266/RE4

MODIFICATIONS

Given the Council's financial interests in the Green Belt, it is not sufficient to rely on modifications to delete references implying Green Belt developments from policies such as RE3. It is necessary that the Local Plan should contain a very clear statement of national Green Belt policy, including that openness and permanence are fundamental features of Green Belt and that developments of any size that conflict with those aims are unlikely to be considered acceptable. However due to the length of the Local Plan it would be easy for decision-makers to overlook such a statement and therefore it should also be included within Policies PL9: Rural Enfield, SARUR.07, SARUR.08 and BG7, as well as in SS1 relating to the Area of Special Character.

As set out in our comments at the end of our hearing statement for Matter 1, we are very concerned that the length and complexity of the Local Plan makes it almost impossible for any decision-maker to understand the plan read 'as a whole'. We therefore fear that without very substantial changes to reduce this complexity and remove the uncertainty, Enfield-Council owned Green Belt will be under threat from the grant of inappropriate permissions.

TOTAL 2674 WORDS