

# **Draft Enfield Local Plan Regulation 18: Main Issues and Preferred Approaches Consultation - Representations**

Berkeley Homes (North East London) Ltd.

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## Executive Summary

Lichfields has prepared these representations to the London Borough of Enfield Regulation 18 draft Local Plan consultation on behalf of Berkeley Homes (North East London) Ltd. Berkeley controls land to the east and west of Crews Hill station. Overall, Berkeley supports the draft Local Plan's overarching aims, objectives and decision to allocate the Crews Hill area for growth. The emerging direction of the plan provides an appropriate framework with which to respond to the land use planning challenges in Enfield, whilst addressing the requirements of the London Plan. This includes the proposed release of Green Belt to help meet the challenge of significantly boosting the supply of homes in an area of extremely high housing need. In these representations, we identify the basis on which the Plan's approach is supported and set out areas where further work will be required as the plan is worked up for its submission to the Secretary of State.

### Justification for Green Belt release and proposed housing requirement

The Local Plan seeks to address acute local housing needs and worsening affordability. There are significant levels of unmet housing need in the Borough (in terms of both the total number of market and affordable homes, but also for specific types of accommodation, including family homes). The Council's proposal to release land currently in the Green Belt – including at Crews Hill – is supported with an approach that follows policy and guidance, with Exceptional Circumstances demonstrated to justify the approach. The ability of Local Plans to release land from the Green Belt to address housing need is well established.

The Council has considered whether it can meet higher levels of need through a review of land (including Green Belt) across the whole Borough. The conclusion is that (1) it could only meet higher levels of need (albeit even then not in full) if Green Belt land is released and (2) there are exceptional circumstances to justify removal in the locations it has selected for growth, including at Crews Hill. Overall, the draft Local Plan seeks to meet as much housing need – for this plan period and beyond – as is possible when applying its spatial strategy. This approach is wholly supported.

### Crews Hill

The area around Crews Hill station presents an exciting opportunity for much needed housing, community infrastructure, and other supporting uses to be delivered around an under-utilised transport link. Historically, the area had a longstanding horticultural function, but over time this diversified into disparate retail and industrial uses. This has done little to enhance the character of the area.

A new settlement at Crews Hill can make best use of an area of Metropolitan Green Belt which already has an urbanised character. It offers a sustainable location for growth, has the ability to deliver a large number of houses (including family homes), and deliver its own community infrastructure. It can be a landscape led settlement, improving the quality of and access to new and existing green spaces, and be climate resilient from the outset. A new community at Crews Hill can help meet the challenges and objectives faced in Enfield over the plan period and beyond. Its allocation is wholly supported.

### Next steps to support a Regulation 19 draft Local Plan

The plan is at an early stage, but there are various matters that should be addressed for the Regulation 19 version due in 2022. The precise form of the Crews Hill allocation should be informed by an iterative masterplan-led process undertaken by the Council working with key stakeholders. This should define the extent of the allocation and set new defensible Green Belt boundaries that are consistent with the objectives for the new community. It should take account of land ownerships, focusing initial phases of build out on the western land (where there are only two main landowners) to support the site's deliverability. This will need to be underpinned by a fully worked-up infrastructure delivery plan and site-specific viability assessment. We make several suggestions as to how Strategic Policy PL9 could be clarified, but ultimately this should be informed by the process set out above.

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## 1.0 Introduction

- 1.1 Lichfields, on behalf of Berkeley Homes (North East London) ('Berkeley'), has prepared these representations to the London Borough of Enfield ('LB Enfield') draft Local Plan Regulation 18 'Main Issues and Preferred Approaches' consultation. They relate to Berkeley's land interests in the Crews Hill area including the Owls Hall Estate immediately west of the station and Wyevale Garden Centre on Cattlegate Road.
- 1.2 The format of these representations is set out to respond to specific themes across the draft Local Plan and also incorporates an initial review of the relevant evidence base documents, which are also referred to where necessary.
- 1.3 Overall, Berkeley is supportive of the draft Local Plan's overarching aims, objectives and proposed allocations for growth. The emerging direction of the plan provides an appropriate framework with which to respond to the land use planning challenges faced by LB Enfield, whilst addressing the requirements of the new London Plan 2021. The draft Local Plan, being at Regulation 18, is clearly still at an early stage and – whilst we support its headline approach – there are various areas of work the Council will need to consider further to bring forward and finalise how the Local Plan will deliver on its spatial strategy. In that context, we provide our thoughts on what the next steps should be and how the plan could evolve between this Regulation 18 draft Local Plan and a subsequent Regulation 19 draft Local Plan, and beyond to adoption.

### Revised National Planning Policy Framework

- 1.4 The Regulation 18 draft Local Plan was approved for consultation on June 9<sup>th</sup> and was drafted with reference to the NPPF published in February 2019. Since the consultation period began, the Government has published a revised NPPF in July 2021. While there are transitional arrangements for certain aspects of new policy these do not apply to Enfield. The revised NPPF (2021) in full will therefore be the relevant national policy for the preparation and examination of the Regulation 19 Local Plan.

## 2.0 Proposed Housing Requirement

2.1 This section of the representations examines the approach of the Local Plan to setting the housing requirement in the context of the NPPF and the London Plan.

### Policy context: setting a housing requirement in London

2.2 Local plans should “provide a clear strategy for bringing sufficient land forward... to address objectively assessed needs over the plan period.” (NPPF Paragraph 23) and set out strategic policies for the scale of development planned in an area and make sufficient provision for, inter alia, housing (Paragraph 20). The NPPF also states (Paragraph 22) that “strategic policies should look ahead over a minimum 15-year period from adoption”. Recent revisions to Paragraph 22 in the updated NPPF (July 2021) – published after the draft Local Plan was put out for consultation – go on to state:

*“Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”*

2.3 Strategic policies should also be informed by a Local Housing Needs (‘LHN’) assessment conducted using the ‘standard method’ (NPPF Paragraph 61). Enfield’s standard method LHN figure is currently 2,355 dwellings per annum (‘dpa’); including a urban centre uplift of 35%. However, the PPG (ID: 2a-034) says the 35% uplift component of the ‘standard method’ applies to London as a whole and that “the responsibility for the overall distribution of housing need in London lies with the Mayor as opposed to individual boroughs so there is no policy assumption that this level of need will be met within the individual boroughs.”

2.4 The London Plan (2021) sets out (Table 4.1) a ten-year housing target for Enfield totalling 12,460 homes (equivalent to 1,246 homes p.a.). Of this 3,530 (353 homes p.a. – equivalent to 28%) should be delivered on small sites below 0.25ha in size. It goes on to state:

*“If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.”* (Paragraph 4.1.11)

2.5 In addition:

- The ‘London Plan Panel Report’ indicated that rolling forward targets without further local evidence, or simply applying housing needs beyond the 10-years, would not be appropriate (Paragraph 151);
- The London Plan’s overall housing target (52,300 p.a.) is well below the housing need figure for the capital of 66,000 from the London SHMA (and even further below the standard method figure of 93,700); and
- The London Plan (Paragraph 1.4.4) says that “Boroughs are not required to take account of nationally-derived local-level need figures” but it does not say that those needs cannot (or should not) be relevant to how Boroughs set their approach for beyond the ten year target period (such a stipulation would not be consistent with NPPF Paragraph 61).



2.6 Given the adopted London Plan does not meet London’s full housing need, the Secretary of State Robert Jenrick stated<sup>1</sup>:

*“... you still have a very long way to go to meet London’s full housing need, something your plan clearly and starkly fails to achieve. Londoners deserve better and I will be seeking to work with those ambitious London Boroughs who want to deliver over and above the housing targets you have set them...” (our emphasis)*

2.7 Government’s objectives are thus clear, from this statement and the NPPF, that housing needs should be addressed, and that up-to-date – and ambitious – plans should be brought forward to deliver that objective. For Boroughs, the London Plan specifically places no impediment to authorities that wish to go above and beyond the housing targets set.

### **Proposed housing requirement: H1 and SS1**

2.8 Point (1) within Policy H1 states that *“The Enfield Local Plan will provide for at least 24,920 new dwellings in the plan period up to 2039, equating to 1,246 homes per year.”* In Policy SS1 this figure is rounded to 25,000. This represents rolling forward the current London Plan Table 4.1 figure beyond 2029 across the 20-year plan period. Against this the plan makes provision for 30,192 new dwellings through specific allocations (capacity for c.23,566 homes via allocations, plus other deliverable sites and unidentified windfalls).

2.9 Overall, we conclude that – in accordance with policy and guidance – the proposed requirement is, broadly (based on the evidence to date), appropriate. Below we consider how the Council came to this required as a preferred figure against policy and guidance; and explain why the overall conclusion is broadly supported in comparison to other growth scenarios.

### **National policy and guidance: steps to set a requirement**

2.10 Considering the policy analysis above, the steps Boroughs need to take in setting a requirement beyond the London Plan (2021) ten-year period is not wholly clear. Taking the NPPF as a whole, it requires plans to set out strategic policies to meet housing needs for a minimum 15-year period from adoption (with a vision for 30 years were large scale development is planned – as is the case in LB Enfield), but the PPG also states it is for the Mayor to distribute need across London. But insofar as the Mayor has done so, the outcome is that:

- 1 The adopted London Plan housing targets are only set up to 2028/29. Boroughs must therefore set their own target beyond this date to ensure a minimum 15-year period from adoption.
- 2 How that is done is not prescribed in the London Plan policy. Boroughs are – for example – not obliged to meet the full standard method figure nor to simply roll forward the existing London Plan target. Boroughs can take a range of factors into account. However, logically, Plans will need to test options that seek to address that unmet need; and
- 3 Capacity for development can come from various sources, in line with the requirements of the NPPF and the London Plan. For example, both provide for Boroughs to amend Green Belt boundaries based on exceptional circumstances should they exist.

2.11 The task for the Local Plan is to set a proposed housing requirement with reference to the NPPF while being in general conformity with the London Plan. Breaking this down into its logical steps means:

<sup>1</sup> In his 29<sup>th</sup> January 2021 letter to the Mayor of London

- 1 **Starting with “development needs”** as per NPPF Paragraph 11 (and Paragraph 460 of the London Plan Inspectors’ Panel Report). Assessments of London’s (and specifically Enfield’s) housing needs vary. However:
  - a The 2017 London SHMA identified a need of 66,000 homes p.a. across the capital;
  - b The Standard Method calculates London’s need to be c.93,000 homes p.a.; and
  - c Using the same methodology, LB Enfield’s need is calculated to be 2,355 homes p.a.

The underlying housing needs of LB Enfield are nearly double the policy requirement of 1,246 p.a. with a similar position London-wide. The obligations of the NPPF mean it is, logically, necessary for Boroughs to at least try to address London’s longer-term needs.
- 2 **Recognising those needs, apply London Plan Paragraph 4.1.11 for the period beyond the 10-year target.** This would mean Boroughs apply the following steps:
  - a **Explore capacity in the 2017 London SHLAA** albeit recognising that:
    - i the London SHLAA, whilst covering the period to 2041, “*does not attempt to robustly identify capacity beyond 2029*”<sup>2</sup>; and
    - ii it ascribes all Green Belt sites as being ‘unsuitable’; an approach which can be at odds with local evidence once a Green Belt review has been undertaken and also would not conform with the PPG<sup>3</sup>; and
  - b **Produce and examine any local evidence of identified capacity.** This would be, for example, a Borough-level SHLAA to identify suitable sites or broad locations not factored into the 2017 SHLAA (including suitable Green Belt capacity – as per PPG ID: 3-010). Both A and B would need to be done in consultation with the GLA, but policy is not prescriptive on what that consultation would need to entail, nor that it would have to result in the GLA agreeing with a Borough’s assessment of capacity; and
  - c **Identify any additional capacity that could be delivered as a result of any committed transport infrastructure improvements.** This similarly would come through any Borough-level SHLAA exercise to inform the Plan; and
  - d **Roll forward the housing capacity assumptions applied in the London Plan for small sites.** For Enfield this would be rolling forward the target of 353 homes p.a., but without this placing a constraint on the overall target which should apply.
- 3 **Ensure consistency with NPPF policy** including that the Plan’s policies extend 15-years (with a 30-year vision) and, inter alia, that Green Belt policy has been complied with. This would include:
  - a Whether Boroughs have explored Green Belt review in order to meet housing needs reflecting NPPF Paragraph 11 a), 20-23 and 140-143; and
  - b If strategic policies establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term so they can endure beyond the plan period (NPPF Paragraph 140).

2.12

In short, an approach following the NPPF and conforming with the London Plan would start with needs, consider local evidence of capacity, consider the necessity of Green Belt release in accordance with national policy and come to a planning judgement on the degree to which local housing needs can be met, consistent with said land availability and local spatial strategies.

<sup>2</sup> London Plan Paragraph 0.0.13

<sup>3</sup> PPG ID3-025 sets out that where assessments indicate insufficient land to meet needs “*authorities will need to revisit their assessment... changing assumptions about the development potential of particular sites*”, for example considering the necessity to review Green Belt.

## LB Enfield's approach

2.13 To consider a future housing requirement, the Council commissioned an 'Enfield Housing Numbers Paper' prepared by Stantec (2021). This report proposes three main options for testing which are summarised in Table 8.3 in the Local Plan:

- 1 **Baseline option:** providing c.17,000 homes; taking the London Plan ten-year requirement of 1,246 p.a. to 2029 and then 500 p.a. thereafter (based upon the 2017 London SHLAA residual beyond 2029 of 152 p.a. and an ongoing small site allowance of 352 p.a.);
- 2 **Medium growth option:** providing 24,930 homes; taking the London Plan ten-year requirement of 1,246 p.a. to 2029, and then the rolling it forward to 2039 (the Council's preferred option); and
- 3 **High growth option:** providing c.55,000 homes; taking the London Plan ten-year requirement of 1,246 p.a. to 2029 and then the uncapped standard method of 4,373 p.a. after to 2029.

2.14 To 2029, all three scenarios accord with the London Plan. Beyond this point, each approach differs taking into account the various interpretations of both Paragraph 4.1.11 and the NPPF.

### Option 1: Baseline

2.15 As detailed in the Stantec report, the baseline option considered the identified large site capacity in the 2017 London SHLAA. However, beyond 2029 the London SHLAA only identifies a capacity – within the current London Plan constraints (i.e. not including Green Belt) – of 152 dpa and 236 dpa in Phases 4 and 5 respectively (highlighted in Table 2.1). When combined with the London Plan small site requirement (353 dpa), this would mean the Council would need to plan for c. 500 dpa beyond 2029. As noted in the Stantec report, Enfield is an outlier as the 2017 London SHLAA identifies at least a similar capacity in these periods. The Council's own assessment of its supply in the 2021 HELAA identifies a supply of c.493 dpa across the same period (Table 4) on currently available sites.

Table 2.1 LB Enfield Large Site Capacity by Phase

	Phase 1	Phase 2	Phase 3	Phase 4	Phase 5
Period	17/18 to 18/19	19/20 to 23/24	24/25 to 28/29	29/30 to 33/34	34/35 to 40/41
Years in Period	2	5	5	5	6
Total Capacity	731	4,049	4,638	761	814
Annualised Capacity	366 dpa	810 dpa	928 dpa	152 dpa	136 dpa

Source: London 2017 SHLAA (Table 10.1) \*figures rounded

2.16 Adopting this approach would result in a figure well below the current adopted London Plan figure and considerably lower than housing need; leading to significant unmet needs arising. The Stantec report concludes that – while this option would be the one “*the London Plan promotes*”<sup>4</sup> – progressing with it would not be in accordance with the NPPF; running against the Government's objective to significantly boost the supply of housing (Paragraph 60).

2.17 It should be noted that whilst we agree that it would not accord with NPPF and the Government's objective to significantly boost the supply of housing; we consider that the Stantec report's conclusion that this option is the one that the London Plan “*promotes*” is not correct. The London Plan does not promote any given figure beyond 2029, but instead provides a framework at Paragraph 4.1.11 for assessing what that figure should be informed by. One such

<sup>4</sup> Paragraph 3.3.15

consideration is “*local evidence of identified capacity*” which in Enfield, as evidenced by the SHLAA and Growth Topic Paper, is much greater than the capacity identified within the London SHLAA.

### **Option 3: high growth (meeting need)**

- 2.18 The Stantec report advocates testing a high growth strategy that would address housing need using a standard method figure called ‘without London Plan cap’; with a total plan period requirement of up to 56,190 homes. This is made up of 1,246 homes p.a. to 2029 and then a ‘without London Plan cap’ standard method figure of 4,373 homes p.a. Testing such an option is logical, in accordance with the NPPF requirements.
- 2.19 It should be noted that the 4,373 dpa figure put forward by Stantec does not represent the true ‘uncapped’ local housing need for Enfield; which is in fact 5,014 dpa<sup>5</sup>. The Stantec 4,373 dpa figure relates to a notional scenario in which the London Plan 2021 was not adopted (i.e. where the adopted local plan is more than five-years old and thus the cap is applied – in this case – to the average annual household growth). Applying the 5,014 dpa figure beyond 2029 results in a plan-period requirement of 62,600 homes.
- 2.20 Regardless of the ‘uncapped’ housing need figure, the starting point for determining the minimum number of homes needed is LHN (NPPF Paragraph 61). We therefore consider that this is a material factor that cannot be ignored, and in this respect, we disagree with the overarching conclusion of the Stantec report (paras 3.2.9-3.2.13) that housing needs in the London context are of no, or little, relevance at the current point (albeit we agree with the following Stantec proposition at para 3.2.15 that, irrespective, it is pragmatic to consider housing needs). Housing needs are critical and highly relevant to planning for housing in London insofar as they are factor which must inform policy choices around the scale of development planned for (and any identification of ‘local capacity’ to accommodate development). Notwithstanding, the Borough’s LHN is far greater than the both current London Plan requirement the 2017 London SHLAA capacity. The key question that arises is how far the emerging Enfield Local Plan can realistically address those needs in accordance with the NPPF taken as whole.
- 2.21 Based on the Council’s current evidence, it would appear that there are insufficient sites available to meet needs in full. The Enfield HELAA (2021) identifies a total plan-period supply of 40,723 homes; including delivery from ‘potentially developable’ sites. Even if all these sites were taken forward and delivered – irrespective of other factors to ensure a sustainable development pattern across the Borough – there is not enough supply to meet uncapped needs. With such a high need figure and correspondingly high unmet needs, the Council should seek to address as much need as is realistically deliverable.

### **Option 2: medium growth (rolling forward London Plan requirement)**

- 2.22 The medium growth option rolls forward the current London Plan requirement across the whole plan-period; resulting in a requirement of 24,930 homes. Through the draft Local Plan, the Council have taken forward the findings of the local SHLAA (2020) and applied its spatial strategy in order to promote a sustainable pattern of development across the Borough. From this, LB Enfield concludes there are sites sufficient to deliver c.30,000 homes by 2039. This includes land that would be made available via a Green Belt review.
- 2.23 Taking the requirements of the NPPF as a whole – including the need to be “*be flexible enough to accommodate needs not anticipated in the plan... and to enable rapid response to changes in*

<sup>5</sup> Calculated using a 2021 base date, 2020 median affordability ratio, and applying the 35% uplift.

*economic circumstances*” (NPPF Paragraph 82c-82d) – rolling forward the current London Plan requirement across the whole period appears to deliver an appropriate middle ground as it both:

- 1 Seeks to go above the 2017 London SHLAA identified urban capacity in order to try and close the gap between need (calculated using LHN assessment) and supply; and
- 2 Provides some flexibility to the plan were some of the sites not to come forward as anticipated.

2.24 However, it should be noted that this conclusion is on the basis of the current identified supply. Were additional sites identified that could realistically be delivered then the minimum requirement should correspondingly increase in line with defining ‘local capacity’ at London Plan Paragraph 4.1.11. This will further reduce unmet needs that will arise across the plan period. Delivering 24,930 homes in the plan-period should therefore be a baseline position based on the current Borough wide capacity.

## Conclusions

The consultation Draft Local Plan asks the following questions in respect of the spatial strategy and the housing requirement therein:

1. Do you consider the Council has selected the right spatial strategy option as its preferred option?
  - If yes, please explain why you think this.
  - If not, which spatial strategy option do you think the Council should adopt. Please explain why you think this.

2.25 In setting a housing requirement for the Plan period, the requirement to 2029 is set by the adopted London Plan (2021). Beyond this, there is no definitive approach; however, Boroughs’ plans need to balance the requirements of the NPPF (2021) and be in general conformity with London Plan (including Paragraph 4.1.11).

2.26 Following the NPPF and seeking to follow the steps within the London Plan, the Council has come to a preferred option. This has been arrived at considering local housing needs (including figures close to uncapped needs). It has been concluded that there is not sufficient local capacity to meet that need even when considering suitable sites currently within the Green Belt. Without Green Belt release, the Council’s urban supply to 2039 would be c. 24,000 homes. This figure is itself reliant on the release of existing retail sites, industrial land and partly reliant on unidentified windfalls. It would also be reliant on the delivery from complex urban sites (e.g. including existing shopping centres).

2.27 Enfield has therefore come to a planning judgement on the degree to which local housing needs can be met including Green Belt release, consistent with said land availability and local spatial strategies. Doing so provides Enfield with some flexibility to meet needs across the plan period and also sets up housing provision into the next plan period. On this basis it considered that a proposed requirement which at least meets the rolled-forward annual requirement but looks to options meet the higher Local Housing Needs, is substantiated and can be justified by policy.

2.28 By contrast, were the ‘baseline’ option from Stantec’s report adopted i.e. rolling forward the identified SHLAA capacity and ignoring potential suitable Green Belt capacity there would be significant unmet needs arising during the plan period, and would:

- 1 Run against the Government’s objective to significantly boost the supply of homes (Paragraph 60);

- 2 Run against the NPPF requirements (Paragraph 11a, 20-23 and 140-143) in relation as to whether Boroughs have explored a Green Belt review in order to meet housing needs;
- 3 Ignore the starting point for determining the minimum number of homes needed through a LHN assessment using the standard method in national planning guidance (Paragraph 61); and
- 4 Fail to reflect the 'local evidence of identified capacity' prepared within the Enfield HELAA (2021) and therefore not properly accord with London Plan Paragraph 4.1.11.

2.29 Adopting such an approach would therefore be contrary to the requirements of the NPPF (2021) and would also not be in general conformity with the London Plan.

### **Considering a 30-year vision**

2.30 The recently published revised NPPF (2021) required a 30-year vision for LPAs seeking to address needs via larger scale developments; as is the case in LB Enfield. The need for a 30-year 'vision' does not mean the Enfield has to plan for a 30-year plan period. Further guidance from Government is expected on this new policy provision, but it does not currently mean that the preferred housing requirement – set over a 20-year period – would be unsound. Indeed, it firmly supports the proposition that when looking over a 30-year vision for how Enfield will change (and the growth needs that will continue to arise over that longer horizon) the spatial strategy, including the necessity for Green Belt allocations at sustainable locations, is a fully justified response to the challenges that Enfield faces and the objectives the Council hold.

## 3.0 Green Belt and Exceptional Circumstances

### Approach to Green Belt

- 3.1 The Council's overarching approach to Green Belt is supported. The pressing need for new homes (as set out above) and the requirement within NPPF, whereby at Paragraph 61 it requires local housing needs to inform the level of housing planned for, ultimately necessitates that London Boroughs should demonstrate that they have reviewed the Green Belt to see whether it could help to meet development needs.
- 3.2 The London Plan 2021 does not look at Green Belt to consider how it can meet more of London's housing needs. However, the London Plan Panel Report (Paragraph 176) sets out:
- “Furthermore, the question of [housing] supply is based on capacity and given that this would be maximised as far as realistically possible it is difficult to see how the number of deliverable housing units could be increased without consideration being given to a review of the Green Belt or further exploration of potential with local authorities within the wider South East.”*
- 3.3 In essence, the London Plan 2021 did not assess if housing needs could be met via Green Belt options or indeed outside of London (via unmet need distribution through the duty-to-cooperate). Therefore, to adhere to the requirements of the NPPF this continues to be a responsibility of LB Enfield, and the London Plan does not in any way fetter the Council's ability (nor necessity) to review its Green Belt.
- 3.4 In this context, it is considered LB Enfield is correct to have considered the role and nature of Green Belt in arriving at its spatial strategy. This step is further necessary to demonstrate that Paragraphs 140 and 141 of the NPPF have been addressed; i.e. that Green Belt boundaries should only be altered in exceptional circumstances, and through the preparation of plans, whilst requiring that *“strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period”*.
- 3.5 It is worth reflecting that other London Boroughs have similarly reviewed their Green Belt. For example, the London Borough of Redbridge successfully revised its Green Belt boundaries in its adopted Local Plan (2018). In that instance, the review of the Green Belt and subsequent Green Belt release came from the Borough's inability to meet its housing needs on brownfield land alone, as set out in Paragraph 6.1.6 of the Redbridge Local Plan:
- “The Strategic Housing Land Availability Assessment (2013) demonstrates that there is not enough suitable brownfield land to meet the borough's challenging growth requirements. The Council therefore considers that this demonstrates “exceptional circumstances” to justify a review and adjustment of the borough's Green Belt boundaries to release additional land to ensure the Council can plan positively to meet the development and growth needs of the borough.”*
- 3.6 The Inspector's report into the Redbridge Local Plan<sup>6</sup> acknowledged this indicating that the Green Belt allocations were supported by the fact that the Council had done all it reasonably could to meet its housing requirements from existing 'brownfield' sites but with a resulting shortfall (IR para 44), that the record of housing delivery in Redbridge had been “poor” (IR para 46) and that the housing needs of Redbridge were much higher than both housing requirement and supply, leaving a significant gap (IR para 46). These contextual factors remain relevant for LB Enfield.

<sup>6</sup> Redbridge Local Plan 2015-2030, Inspector's Report January 2018



- 3.7 Overall, we are supportive of the way LB Enfield has sought to address growth opportunities currently constrained by Green Belt. To not do so would not have been consistent with national policy.

### Exceptional Circumstances

- 3.8 As set out above, the NPPF requires that in amending Green Belt boundaries exceptional circumstances must be demonstrated. There is no definition set out in policy as to what “exceptional circumstances” are (or are not) but it is to be formed by a planning judgement on the circumstances of any particular case and can draw on a breadth of factors that when taken together rationally form the exceptional circumstances required.<sup>7</sup>
- 3.9 The Council has set out its approach to the overall spatial strategy within the Growth Topic Paper. At section 4.0, the Growth Topic Paper sets out how the spatial strategy evolved and the ‘top-down’ sequential approach for how growth options have been identified; looking at urban/brownfield land first, then seeking assistance from Duty-to-Cooperate partners, then considering the release of protected employment sites for non-employment uses and then considering Green Belt and Metropolitan Open Land. We support this approach and it follows the requisite steps at NPPF Paragraph 141 of what is necessary before concluding that exceptional circumstances exist. The paper then at Section 8.0 sets out the specific approach to Green Belt and the overarching and strategic (‘top-down’) exceptional circumstances that exist within the Borough (Paragraph 8.27) including:
- Acute housing need
  - Affordability
  - Housing supply, including family housing
  - Sustainable patterns of development
  - Compensatory measures; and
  - Infrastructure provision.
- 3.10 This approach is supported, and it is considered the Council has clearly demonstrated that exceptional circumstances do exist within LB Enfield for amending Green Belt boundaries. It is well established that meeting housing needs is an exceptional circumstance justification to review the Green Belt, but this is compounded within LB Enfield given the nature of housing need – both in the Borough and across London – including acute affordability pressures and the need to deliver family homes (which becomes difficult/impossible within a spatial strategy that is overly focussed on delivering urban intensification via high density redevelopment within the existing urban area). Whilst these exceptional circumstances are supported and fully justified, they are largely borne out of Borough-wide, ‘top-down’ type factors. It is considered that in respect of Crews Hill there are a wide range of ‘bottom-up’ factors which present site-specific exceptional circumstances as to why Green Belt amendments in the area are justified.
- 3.11 At present, most of the Crews Hill area is designated as Green Belt land, save for an inset area around Rosewood Drive. The Green Belt around London dates back to 1944 where it formed part of Abercrombie’s ‘The Greater London Plan’ commissioned by the Ministry of Town and Country Planning. The land around Crews Hill was identified primarily as land for recreational use and the extent of the Green Belt within Enfield remains largely as historically designated except for minor changes (arising from more accurate mapping) and amends to the Enfield Island Village (a large development on brownfield land in the 1990s). There are several Crews

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<sup>7</sup> Compton Parish Council and others vs. Guildford Borough Council and SoS for Housing, Communities and Local Government [2019] EWHC 3242 (Admin)



Hill specific reasons why the proposed allocation benefits from and presents exceptional circumstances, and these should be considered alongside the wider factors identified in Growth Topic Paper. These **exceptional circumstances** which are applicable to the particular case of Crews Hill include:

- 1 **A train station providing genuine opportunities for sustainable patterns of growth** - A new community at Crews Hill would delivery growth surrounding the existing train station alongside enhanced public transport (including rail services), walking and cycling links. The train station currently has regular trains to Moorgate; a c. 40 minute journey via key interchange stations such as Highbury & Islington and Old Street. Whilst the Growth Topic Paper recognises the opportunity for sustainable patterns of development, including at Crews Hill, as being an exceptional circumstance, the location of the train station as an underutilised asset will itself enable significant modal shift away from the private car (compared to other less accessible locations, including if development were to be channelled beyond the Green Belt). This accords with NPPF Paragraph 142.
- 2 **Regeneration of an area which includes elements of previously developed land** – Parts of Crews Hill comprise previously developed land, as the former horticultural nature of the area has diversified into more retail and low grade general industrial type uses. A framework for development of the area will help manage a changing Crews Hill and make best use of land as the nature of Crews Hill continues to change from its horticultural origins. Actively managing that change via a growth focussed policy would retain and re-provide the best of the existing whilst making effective use of underutilised land, which would not be achieved if the area remained Green Belt. This accords with NPPF Paragraph 142;
- 3 **Potential for significant social, economic and environmental benefits** – the redevelopment of Crews Hill can deliver significant enhancements to nature via net biodiversity gain, climate resilience through net zero carbon homes and delivering significant investment into the Borough, generating a net increase in jobs for the Crews Hill area. It will also improve access to open space and currently inaccessible areas of Green Belt.
- 4 **Creating an exemplar place** – Crews Hill provides the opportunity and circumstances (including value uplift, relative absence of constraints and the right cornerstones for good growth, such as the train station) to set and then achieve a comprehensive vision for a beautifully-designed new community. Government has reaffirmed its commitment to ‘beauty’ and through comprehensive placemaking, Crews Hill could shape the future growth of the Borough and set a benchmark for quality.
- 5 **Compensatory Green Belt improvements** – Much of Crews Hill is privately owned and with limited (or managed in the case of the retail/horticultural uses) public access. Improved recreational access and enhanced nature/biodiversity schemes on within the allocation area and beyond within the wider Enfield Chase area, would provide significant benefit alongside development, and mitigate removal of the area from Green Belt (according with NPPF Paragraph 142).

3.12

In this respect Crews Hill is a relatively unique location with a set of specific circumstances that cumulatively amount to the exceptional circumstances required to be demonstrated. Other site-specific options for Green Belt release, either within Enfield or even more widely across greater London, are unlikely to provide to the same degree the combination of site specific factors which lead the conclusion that exceptional circumstances are demonstrated.

## Green Belt Review

- 3.13 The draft Local Plan is supported by a Green Belt Review (2021) prepared by LUC on behalf of the Council. The Green Belt review assesses various parcels within Crews Hill for its contribution to Green Belt purposes and the harm that would arise to Green Belt from releasing land for development. It is noted that whilst this evidence is an important component of the Plan's evidence base, it is not – and should not – be the sole driving factor as to whether a parcel should be released from Green Belt; that is a planning judgement that has to be made around preferred site options by the Council, including in cognisance of the national policy at NPPF Paragraph 142 which directs where Local Planning Authorities should consider releasing Green Belt when it is deemed to be necessary.
- 3.14 Berkeley and its consultants, Incola Landscape Planning, have reviewed the Green Belt Review. It is particularly noted that the Council's assessment limits the detailed assessment of land parcels to those adjacent settlement edges, meaning it only provides a higher-level assessment of wider strategic areas. This therefore:
- 1 Limits the ability of the study to inform decisions around the release of land and new boundaries and/or compensation/enhancement measures that can accompany site options; and
  - 2 Does not allow for the identification of variations and features in wider strategic areas beyond those detailed parcels assessed, meaning it potentially overstates the contribution to Green Belt purposes and/or harm of release in those areas (i.e. they are simply assessed as high contribution, high/very high harm due to their size/scale)
- 3.15 This leads to the Council's assessment of parcels around Crews Hill potentially overstating contributions. By way of example, in respect of Purpose 1 – to check the unrestricted sprawl of large built-up areas, where the Study identifies large areas situated within the M25, but separated from the urban edge of Greater London as making a “*relatively strong contribution*”, whereas a finer grain analysis may identify land which makes a lower contribution than those parcels closest to the edge of London to the south. Similarly, Purpose 2 – to prevent neighbouring towns merging into one another, the Green Belt Study assesses land west of Crews Hill towards Potters Bar as making a “*relatively strong contribution*”, despite the study recognising the influence of the M25 and woodland in providing physical and visual separation and the clear distance and perception of separation from Potters Bar that exists.
- 3.16 The Green Belt Study (Table 8.1) assesses the LP9 Crews Hill allocation area concluding the release of Crews Hill would have a “*major*” impact on the distinction of adjacent Green Belt land and would be associated with “*very high*” levels of harm to the Green Belt. However, this conclusion does not reflect the overall findings of the study, which recognises that strategic site LP9 would only have a “*minor*” impact on the distinction of adjacent Green Belt land to the north, east and west and also doesn't reflect the potential for mitigation to reduce any harm further.
- 3.17 Overall, it is not clear that the Green Belt Study has directly informed the proposed boundaries adopted for the allocation area. The concept plan (drawn from the Hyas Associates Crews Hill Topic Paper) seems to simply limit development east-west to the land contained within the Turkey Brook and Cuffley Brook watercourses based on a mapping exercise.
- 3.18 The Green Belt Study is only one component, and we agree with the Council that, even with these findings, the allocation of growth at Crews Hill is justified once all factors are appropriately balanced (i.e. the benefits and exceptional circumstances for Crews Hill, including NPPF Paragraph 142, would outweigh even the “*very high harm*” to Green Belt purposes identified). However, it is recommended that, with the scope of the Green Belt Study being

limited, a further assessment of Crews Hill is undertaken to support the further development of a masterplan and help inform the definition of the allocation.

3.19

In doing so, the Council should:

- 1 Reflect on and assess the finer grained nature of the contribution of parcels to Green Belt purposes, and the potential for Green Belt mitigation, in considering the finite extent of the Crews Hill allocation area;
- 2 Set any future Green Belt boundaries for Crews Hill in the context of:
  - a A masterplanning exercise which delivers sensitive development, incorporating environmental constraints, and opportunities for robust new Green Belt boundaries;
  - b The need for any safeguarded land for the future (NPPF Paragraph 143);
  - c How any Green Belt boundary dovetails with maintaining/enhancing Green Belt purposes for the remaining Green Belt in the future, including mitigation/enhancement measures (such as new woodland and tree planting to the west of Crews Hill to respect and respond to views across the valley from The Ridgeway).
  - d The scale of land required to be released to enable the new settlement to incorporate necessary infrastructure (including social and community facilities) and achieve a critical mass with a housing mix and form of development appropriate to its setting and location. We address some of these issues later in these representations.
- 3 Consider the area west of Crews Hill in the context of the physical and visual separation from the urban edges of London and Potters Bar, which would indicate the contribution to Purposes 1 and 2 would be lower than assessed.

## 4.0 Crews Hill Allocation

4.1 Crews Hill is proposed to be allocated for development of a “mixed” community under draft Strategic Policy PL9. Berkeley welcomes the inclusion of Crews Hill as an allocation and agree with the Council that Crews Hill is an appropriate location – surrounding an underutilised train station – for the development of a mixed community that can deliver a large quantum of housing as well as the infrastructure and services that would be associated with a new settlement of this scale.

4.2 This section of the representations first considers the principle for development at Crews Hill before considering the relevant policy associated with the site. This includes the proposed allocation and need for a supplementary planning document.

### The principle of growth at Crews Hill

4.3 As detailed in these representations, the draft Local Plan needs to address a range of issues; including addressing the acute housing needs in LB Enfield. The NPPF (2021) encourages a plan-led approach to meeting local housing needs which can often be achieved through planning for larger scale development; such as new settlements where well located, well designed and supported by necessary infrastructure (Paragraph 73). It must also address the climate crisis and ensure development is sustainably located, is climate resilient, and improves our natural environment.

4.4 In this context, Crews Hill is a particularly exciting location that offers a unique opportunity within LB Enfield to deliver much needed development for this plan period and in the next – including on partly brownfield land – centred on a well-placed but underutilised train station with excellent links into Central London.

### Site context

4.5 The site is split to the east and west of the railway. Historically, the wider area was used for deer hunting but the eastern area developed in the early 20<sup>th</sup> Century following the opening of the railway station in 1910. This was followed by the development of the golf course to the west of the railway line with nurseries producing wholesale fruit and vegetables to the east. In the 1930's the central housing estate off Theobalds Park Road was built and in 1944 the site became part of the wider Metropolitan Green Belt. Since this time the eastern area's established use as a specialist horticultural location has declined and become diversified; with a transition to retail and other general business/industrial/economic uses. Recognition of this shift is noted in the 2011 'Enfield Characterisation Study' that notes “*Crews Hill represents an increasing problem for the Green belt*” and “*would benefit from further policy development and more effective management of change*”.

4.6 As the eastern side of Crews Hill has transitioned to retail, cafes and business uses – including logistics and light industrial uses – it now has a far more urban character despite it being almost entirely Green Belt. Many of the uses are now of lower grade, are of poor quality, and are relatively low intensity. This is further acknowledged in the 2011 'Enfield Characterisation Study':

*“Crews Hill is experiencing particular issues with respect to degrading quality and character” and later considers that “Crews Hill is in the Green Belt, however the character and quality of much of the area is poor. The large areas of glass houses, warehouses and ancillary buildings are visually intrusive and reduce the sense of openness of the area.”*

- 4.7 The western area remains in use primarily as a golf course but also farmland and private land. Its ownership is therefore straightforward - with only two major parcels of land ownership - when compared to the fractured patchwork of ownerships on the eastern developed land.
- 4.8 Crews Hill presents a significant opportunity to make best use of an underutilised train station. The western land is available for development and close to the station. Its immediate availability aids its deliverability and its development can act as a catalyst for the future regenerate of the eastern area. The location of Crews Hill, the nature of housing needs in the area (see Section 2.0) and the exceptional circumstances that exist for reviewing the Green belt (see Section 3.0) all justify the principle of delivering a significant new-settlement scale development at Crews Hill. It is a well-founded response to the challenges that face spatial planning within the London Borough of Enfield.

### Benefits of a new settlement at Crews Hill

- 4.9 There are clear benefits to the Borough in allocating and delivering a new settlement at Crews Hill to support the Council in meeting its stated objectives; including to address growth needs. The benefits of Crews Hill include the following, which could be secured through the allocation and any future masterplanning exercise:
- 1 **Sustainable location centred on an underutilised train station:** Part of the site is previously developed land and at its heart is the existing underutilised Crews Hill train station. As part of the Crews Hill development, the train station could be easily upgraded to increase service frequency to facilitate increased passenger numbers, enabling the development to make best use of existing sustainable transport opportunities. This train station can and should be the centre of the new settlement and, correspondingly, the allocation. This is not the case as set out in the Local Plan;
  - 2 **Ability to deliver a large number and wider range of new homes:** Crews Hill can deliver significant numbers of new homes and provide for a wider range of house types than what would be possible on infill and town centre sites; particularly family houses. It can therefore act as a counterbalance to the denser forms of development associated with the intensification of LB Enfield's urban land. In recent years development in LB Enfield has weighed predominantly in favour of flatted and smaller homes. For example, in the two years from 2016/17 to 2017/18 only 20% of development was three or more-bedroomed compared to a policy target of 60%<sup>8</sup>;
  - 3 **On-site community infrastructure provision:** A key benefit to Crews Hill is the opportunity to deliver new social and community infrastructure – to serve both the new settlement and northern part of the Borough – as part of a planned new community; rather than needing to plan for piecemeal upgrades to existing provision. Its community infrastructure could be self-contained and self-funding, with the settlement able to deliver new local day to day facilities. This, for example, could include children's nurseries; Primary Schools; a Secondary School; a health centre; leisure and sports facilities; formal community spaces; and civic services in a new centre;
  - 4 **Improved green infrastructure:** The delivery of Crews Hill could sensitively reflect the existing landscape features, have a clear emphasis on improving the natural environment and protect existing habitats where possible. This could include re-forestation and re-wilding areas around Crews Hill;
  - 5 **Improved access to open space:** Much of the wider Green Belt and area around Crews Hill is currently inaccessible. The development would create a new network of integrated green spaces and linked with the limited existing walking and cycling paths. The delivery

<sup>8</sup> Table 12, 'Enfield Annual Monitoring Report and updated Housing Trajectory' (May 2019); Policy CP5

could therefore unlock sites and greatly improve access to the countryside and existing high-quality Green Belt;

- 6 **Employment provision:** Delivery could provide employment, skills and training opportunities both during construction and operation through the delivery of flexible business spaces, live-work opportunities and community infrastructure. This would more than off-set any loss in economic activity from the loss/displacement of the existing uses, creating significant net economic and employment benefits; and
- 7 **Climate resilience:** The delivery of a new settlement can incorporate climate resilience measures, significantly benefitting from a community-wide approach (rather than a focus just on buildings) as well as incorporating development-wide measures, such as on-site renewable energy generation, to achieve net zero carbon targets in line with draft Strategic Policy SP SE1.

4.10 These benefits serve to highlight why Crews Hill can help meet the challenges and objectives that face Enfield over the plan period and beyond.

### Meeting policy objectives

4.11 As set out above, the NPPF encourages a plan-led approach to meeting local housing needs providing encouragement for larger scale development such as new settlements where appropriate. The 2020 White Paper “Planning for the Future” seeks to challenge the system to build more homes and build them better. The Local Plan also needs to address the acute housing needs that exist over the long term within Enfield and Greater London and the Plan has demonstrated Exceptional Circumstances for amending Green Belt boundaries (see section 3.0). The purpose of the Crews Hill allocation would be to create permanent Green Belt boundaries that will endure beyond the current plan and into the next (NPPF Paragraph 140/143e).

4.12 The principle of Green Belt release as Crews Hill would also accord with the provisions of NPPF Paragraph 142. The Council has concluded that it is necessary and there are exceptional circumstances to release Green Belt, including to help address housing need (as set out in Sections 2.0 and 3.0). In doing so it is recognised that Crews Hill contains elements of previously-developed land within the wider area; can be well-served by public transport (including via enhancements to the train station, other public transport and walking and cycling routes linking them); and can offset the loss of Green Belt through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt.

4.13 Furthermore, the proposed allocation of Crews Hill fundamentally does not conflict with any policies within the London Plan. Whilst earlier versions of the London Plan had sought to fetter the ability of Borough Local Plans within London to review and release Green Belt to meet Borough-level aims and objectives where Exceptional Circumstances exist, this was rejected by the Inspector Panel with such wording removed from the final version, such that the published version of the London Plan reflects the tests at a national level within the NPPF. The Panel Report at Paragraphs 455-460 is highly relevant here and should be read in whole<sup>9</sup>, but it found that the Mayor would be wrong to preclude or unilaterally rule out Green Belt release and that demonstrating exceptional circumstances should (Paragraph 460): *“be left as an option to provide boroughs some flexibility in deciding how best to meet their development needs, including those specifically identified in the Plan”*. Therefore, it is considered that the approach to allocating Crews Hill is in accordance with both the NPPF and the London Plan.

4.14 However, the NPPF was revised in July 2021 (after the publication of the Draft Local Plan for consultation) and sets out new requirements in Paragraph 22, requiring Local Planning

<sup>9</sup> [https://www.london.gov.uk/sites/default/files/inspectors\\_report\\_and\\_recommendations\\_2019\\_final.pdf](https://www.london.gov.uk/sites/default/files/inspectors_report_and_recommendations_2019_final.pdf)



Authorities to set larger scale development proposals, such as new settlements or significant extensions, within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery (notably something the London Plan does not do). The strategic site at Crews Hill will play an important role in ensuring that the Council can deliver growth over the long term, both in terms of housing and in terms of local services and infrastructure improvements. It will be necessary for the Council to place Crews Hill into this 30 year vision for how the place would develop, including how the overall scale of development planned would deliver the long term growth objectives for Enfield over the next 30 years (noting that the London Plan only looks a 10 year horizon).

## Strategic Policies PL9 and H1

- 4.15 Policy PL9 proposes the allocation of Crews Hill for a new settlement setting out a range of place-making principles. Hyas Associates has also produced a supporting ‘Crews Hill Placemaking Study’ topic paper (2021) with the Council.

### Proposed allocation area

- 4.16 The main Crews Hill area identified for development is a contained and limited area called the “core ‘hill’ area”. This comprises land between the two main watercourses through the Crews Hill area; the Turkey and Cuffley Brook. The primary driver for the chosen allocation area appears to be landscape considerations; as detailed in the Crews Hill Topic Paper (“the Topic Paper”). For example, Paragraph 3.4 sets out that the “*topographical setting of the hill, extending up to the surrounding brook*” provides the setting whilst the paper also states the “*Brooks are natural features creating permanent boundaries to a newly defined extent of Green Belt.*”
- 4.17 In addition, the Topic Paper’s contextual plans place the centre (or heart) of the Crews Hill placemaking area closer to the Cattlegate Road/Theobalds Park Road bend, just south-east of the Plough Pub. The maps for example show walking distances from this point despite the railway station being the logical centre of the allocation and one of the key features that make Crews Hill a sustainable location for growth.

Figure 4.1 Crews Hill Concept Plan



Source: Figure 3.10, LB Enfield draft Local Plan (Regulation 18)

- 4.18 Whilst the principle of the allocation within the Crews Hill area is supported, we qualify this by observing that the proposed boundaries for the “core area” need to be logical and well defined, based on all of the relevant considerations. There are some shortcomings in this regard based on the work to date. We acknowledge that the drive to establish this core area has so far been on landscape grounds, but it is further necessary to consider the limits of development in respect of other interlinked considerations not addressed in the Topic Paper. These include:
- 1 **Placemaking and transport considerations:** The current core area proposed in the Topic Paper has ‘centre point’ for the settlement away from the train station; with walking distances taken from this point. Taking this approach forward could mean the assumed centre of gravity for the area is well away from its principal transport node with sufficient capacity to support the intended and expected growth in population, which is the main reason Crews Hill will be able to deliver sustainable patterns of development and achieve a sustainable transport strategy (e.g. a 15-minute neighbourhood centred on the train station).  
  
The implication of this is that, in placemaking terms, the allocation may deliver growth in areas less likely to have good access to the train station (e.g. nearer to Clay Hill which would be a 20-minute walk from the station). This could lead to more people relying upon private cars resulting in less use of public transport for the growth area; an outcome that would not accord with the Council’s declared climate emergency (declared July 2019);
  - 2 **Defensible green belt boundaries and how these can be formed:** Including consideration wider aspects of openness, visual containment of growth and potential for mitigation and new features along boundary edges;
  - 3 **How the boundaries relate to the scale of development and proposed uses sought within a masterplan for the area:** For example, including which uses sit within Green Belt boundary, and those that might sit beyond, such as sports/recreation. This assessment will include how the quantum of new homes sought (with the appropriate mix and density), as well as the infrastructure to support it, can be delivered in that space; and
- 4.19 This further highlights the need for an iterative approach based on a masterplan to inform the final allocation area for the future Regulation 19 Local Plan. This will enable specific land characteristics to be taken into account so that the most appropriate use of the land can be utilised across a phased form of development.
- 4.20 This further consideration could further clarify the allocation policy text to make clear what development can occur within and outside this core area. Paragraph 4 to Policy PL9 is unequivocal in referring to the watercourses as boundaries; however, Paragraph 3 states development should ‘predominately’ be limited to this area. An appropriate masterplanning exercise – undertaken in consultation with landowners - might help to define how this should be formed.

## Quantum and delivery

### (1) Size

- 4.21 We understand that the Crews Hill allocation area is intended to deliver 7,500 homes, 3,000 of which is to be in the Plan Period. This is confirmed in the covering committee report from the 9<sup>th</sup> June 2021, where there is an acknowledgement of the fact that the 3,000 homes figure is that which can be accommodated at Crews Hill within the plan period, and that in planning for the long term future, Crews Hill can potentially deliver 7,500 homes in total.



4.22 We agree with the Council that the delivery of c.7,500 homes would provide an appropriate scale for Crews Hill to be self-sufficient. This size of settlement would have the scale and critical mass to support its own shops, services, economy and deliver its necessary infrastructure in a viable manner. For example, it would crucially have sufficient mass to support a secondary school. By contrast, if the Council's strategy was only to allocate and envision 3,000 homes at Crews Hill then this might not be of a sufficient scale to viably support and deliver key community infrastructure, for example supporting a secondary school.

4.23 In this respect we consider the allocation amount should be set out more clearly in the policy. We note within Policy H1 the estimated capacity for Crews Hill within the plan-period is 3,000 homes. The corresponding Crews Hill site pro-forma at Appendix B (which Policy H1 states carries the status of policy) identifies the site having an area of 82.40 ha that will support 'approximately 3,000 homes'. Taken together it might be interpreted that Crews Hill's allocation is for 3,000 homes across the whole development. The draft Local Plan therefore needs to clarify the scale of allocation (7,500 homes) within policy PL9; also reflecting the new requirements of NPPF (2021) Paragraph 22 to set this within a longer-term vision for the area and Borough.

## **(2) Phasing and delivery**

4.24 It may be necessary within the allocation area to identify safeguarded land, or secure the phasing of the delivery, with part of the allocation coming forward within the Plan period and part coming forward beyond. The Crews Hill allocation area is bisected by the railway line, with land to its east and west. How these are phased will have considerable impacts on whether Crews Hill will achieve a comprehensive and coherent development.

4.25 We consider that the allocation policy should specify that the western parcels of Crews Hill will come forward first. This includes land at the Owls Hall Estate and Crews Hill Golf Course. Logically, this would leave large parts of the eastern land allocated for later development (including beyond the plan period). The policy already indicates (PL9 Point 1) that some land/sites within the allocation area are anticipated to come forward in the next plan period, post-2039, and that these will be removed from Green Belt but safeguarded from development, to come forward later upon Local Plan review. However, these areas are not yet specified, and the proposed area of Green Belt release will be identified at the Regulation 19 local plan stage.

4.26 The rationale for this approach is that the parcels of land west of the station are in only two main landownerships and are relatively free from development constraints. These together mean this area has a far greater ability to be brought forward in the short to medium term. This would ensure earlier delivery of housing to help address local needs and ease pressures on the Council's five-year housing land supply. It would also deliver a significant quantum of homes in close proximity to the train station: generating the critical mass to delivery early necessary infrastructure including schools. It would also provide the necessary catalyst for future development across the wider Crews Hill area (mainly the eastern land). Overall, this land can robustly be evidenced as being in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged. Being clear on this point will help demonstrate that the overall allocation is justified and deliverable; being available and developable within the plan-period.

4.27 By contrast, the land to the east of the railway line is in multitude landownerships which may require careful masterplanning and phasing, in order to avoid piecemeal development coming forward.

### Placemaking and density

- 4.28 We would further note that the if the total allocation seeks to deliver 7,500 homes, the current allocation area of 82.40ha would results in a site wide notional density of c.91 dwelling per hectare. Whilst it is recognised that any development at Crews Hill will want to achieve an efficient form of development (particularly for a site released from the Green Belt), one of the key benefits and reasons for allocating Crews Hill is that is can provide a location for a significant number of larger family homes to meet a key identified need in the Borough. Further, it does not appear realistic to expect that such a density - equivalent to that the Council is pursuing within an already dense urban area at Meridien Water – would be appropriate to an urban edge setting, with a new boundary to the Green Belt.
- 4.29 The development needs to provide for a range of on-site community infrastructure, green spaces, and transport infrastructure within that allocation area as well. As such, we consider that further evolution of the allocation around a masterplan-led process, supported by a fully worked-up infrastructure delivery plan, would help to inform the appropriate nature of development at Crews Hill (as may occur as part of the SPD process below). This would establish how the 7,500 homes and supporting infrastructure as well as a mix of other uses could be delivered within an allocation area.
- 4.30 In simple terms, it is likely that achieving the scale of settlement necessary to support the necessary infrastructure, at a density appropriate to its location and setting, would require a greater area of developable land than the 82.4 ha suggested. Our work to date exploring the capacity of the Crews Hill location suggests that there is land available – east and west of the railway line – to achieve that.

### (3) Vision for Crews Hill

- 4.31 Policy PL9 also sets out directions relating to the form, design and supporting infrastructure of development at Crews Hill including:
- 1 An area of land – to the south of Crews Hill between the built-up area and Gordon Hill – for the re-provision of the horticultural uses;
  - 2 Desire for the architecture and public realm to reflect the horticultural heritage (covered spaces, winter gardens, glass house spaces in homes);
  - 3 Compact urban form, with mixed use development focused around existing station (which appears to conflict with the ‘centre’ focus utilised in the Topic Paper which is not on the existing station);
  - 4 East-west green corridors and links, improving cycle and pedestrian routes and access to open space and surrounding landscapes;
  - 5 Mixed/inclusive community; and
  - 6 A requirement for (unspecified) facilities and services to meet day-to-day needs of residents.
- 4.32 We support the main vision for Crews Hill set out by the Council. This includes, but is not limited to, that the main focus of the development of the new settlement should be the train station and providing enhanced accessibility to the wider countryside. However, there are some areas of this part of the policy that require further consideration:
- 1 PL9 (11) states “Retention of existing rural uses is considered important, including equestrian and horticulture uses, which should be re-provided in suitable alternative locations if existing sites prove unsuitable for retention.” (our emphasis). This appears to suggest existing glasshouses should actually be retained as the starting preference (in and

amongst the new settlement) which would evidently run counter to actually achieving the development sought at the density currently proposed. There are also placemaking implications to consider if this is correct.

- 2 The policy acknowledges the various needs for different physical and community infrastructure. However, we would note that the draft Infrastructure Delivery Plan (IDP) at the current point provides little information on the infrastructure necessary to support the delivery of Crews Hill. It is considered that there will be a need for a comprehensive IDP to support Crews Hill, which it is understood will come forward as part of the next stage of plan-making and will be necessary to support the masterplan and any future land budget, with those infrastructure needs reflected within the allocation policy. For example, how many primary and secondary schools, the scale of health facilities, and the approximate size of retail provision.

#### **(4) Crews Hill Supplementary Planning Document**

- 4-33 Draft Policy PL9 states that planning permission on the allocated sites will only be granted following the approval by the Council of a comprehensive masterplan in the form of a Supplementary Planning Document ('SPD'), for the area as a whole. Overall, the requirement for a comprehensive masterplan is supported as it will help to ensure that design typologies and placemaking have a consistent base from which to evolve across all phases of the Crews Hill development.
- 4-34 However, our support for an SPD process to deliver this comprehensive masterplan is qualified in that it is essential that the SPD:
- Be brought forward in co-operation with stakeholders and drafted concurrently with the Local Plan such that it can support the allocation;
  - Be clear in its requirements for the masterplans to be submitted as part of future planning applications in accordance with Policy D2 so as not to require duplicate work; and
  - Does not delay delivery of the allocation at Crews Hill.
- 4-35 In addition, Policy PL9 should be more specific on the parameters of the SPD. For example, there is no link to Policy D2 that sets out the parameters for development masterplans (to be submitted by developers in support of planning applications for allocation sites). In this respect, the requirement for an SPD in Policy PL9 should link directly to Policy D2 and/or define the parameters of the future SPD. Building on Policy D2, the wording for the SPD parameters should also define:
- The more detailed phasing of the site (i.e. with the western land largely coming forward first followed by the eastern land);
  - The requirements of future planning application submissions (i.e. what specific documents are required); and
  - That the SPD should be drafted to focus on visual guides and frameworks to enhance its usability.
- 4-36 The above is considered important so that once adopted, with the site allocated and removed from the Green Belt, there is sufficient clarity as to how delivery of the site can quickly commence, in order to meaningfully contribute to the objectives and vision for this plan period in a timely manner.

## Conclusions

The consultation Draft Local Plan asks two sets of questions in respect of the Crews Hill allocation:

- 1 Is the vision for Crews Hill appropriate for the future of this place? If not, what components do you think should be changed or are missing?; and
- 2 Will the proposed placemaking policy for Crews Hill help to adequately deliver the aspirations set out in the vision? If not, what proposed changes, omissions or additions are required in the policy to help deliver the vision?

4.37 Overall, the allocation and broad principles in the vision for Crews Hill are supported. There are clear benefits to the allocation including the delivery of a significant quantum of new homes (up to 7,500), community infrastructure, and employment uses; delivering a bio-diversity net gain alongside a network of integrated green spaces with enhanced links to the countryside; ensuring climate resilience; and make best use of an underutilised train station and underutilised previously developed land.

4.38 Strategic Policy PL9 is also generally supported and it considered that it can form a solid base from which Crews Hill can deliver the vision for a mixed community. However, there are some specific amendments to the plan and Policy PL9 that should be considered:

- 1 The proposed scale of Crews Hill as a new settlement of 7,500 homes is supported but Policy PL9 should be clearer on its overall quantum of homes and the type of supporting community infrastructure required. For example, the total number of homes to be built at the site should be noted in the policy – i.e. up to 7,500 homes – alongside, for example, the number of primary and secondary schools required to support that level of provision;
- 2 The Policy should be clear that the station should be the central focus of the masterplan. This is to ensure development is focused around the principle sustainable access point to the site; making best use of an underutilised asset;
- 3 That Policy should set out a clear approach in respect of phasing, with the western areas coming forward first. This is both to ensure that comprehensive and coherent development can come forward but also to help demonstrate the site's deliverability given the differing landownership structure east and west of the railway line;
- 4 Whilst a consolidated and compact urban form is supported in terms of making the most efficient use of land released from the Green Belt, this should not be at the expense of providing the mix of homes, and particularly family homes, that is needed in Enfield and a balance should be struck in terms of how the vision delivers both objectives alongside critical social, transport and green infrastructure;
- 5 Consider further the vision and requirements for Crews Hill including how the retention of glass houses would work in practice (Point 11); and
- 6 More clearly define the parameters of a future SPD.

4.39 Moving forward, the final allocation area and Green Belt boundaries that will make up the core area should be informed by an iterative masterplan-led process. This will ensure that Policy PL9 provides an allocation that meets the vision and aspirations for Crews Hill, including the right types of housing within the right placemaking framework, and can deliver all the necessary components of the new place (e.g. schools, open space, infrastructure). This will need to be completed ahead of the Regulation 19 draft Local Plan and supported by a fully worked-up infrastructure delivery plan with a site-specific viability assessment as set out in Section 5.0.

## 5.0 Viability Evidence

### Policy and guidance

5.1 Paragraph 34 of the NPPF (2021) states:

*“Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.”*

5.2 In addition, Paragraph 58 states:

*“Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable.”*

5.3 Taken together, the financial requirements of up-to-date policies are assumed to be at a level where development can come forward viably. Therefore, the viability implications of strategic policies in the plan must be tested at the plan-making stage to ensure said policies do not undermine the deliverability of the plan (including by extension the deliverability of specific strategic sites). In support of the NPPF, the PPG states:

*“These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106.” (ID: 10-001)*

5.4 It also states that when assessing the viability of plan, plan-makers are not required to assess the viability of each site individually. Instead, plan-makers should assess a representative sample of typologies – for example, flatted development or lower rise greenfield development – to determine the viability of policies in the plan (ID: 10-003). Following the typology approach allows plan-makers to ensure the viability of policies at a high level in a proportionate manner. However, the PPG goes on to state that:

*“In some circumstances more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies.” (ID: 10-003).*

5.5 In respect of strategic sites, the PPG goes further stating:

*“It is important to consider the specific circumstances of strategic sites. Plan makers can undertake site specific viability assessment for sites that are critical to delivering the strategic priorities of the plan. This could include, for example, large sites, sites that provide a significant proportion of planned supply, sites that enable or unlock other development sites or sites within priority regeneration areas. Information from other evidence informing the plan (such as Strategic Housing Land Availability Assessments) can help inform viability assessment for strategic sites.” (ID: 10-005).*

### Viability evidence to support the draft Local Plan

5.6 HDH Planning & Development Ltd has prepared a ‘Whole Plan and CIL Viability Update’ (April 2021) report. This seeks to update the viability evidence base to support the emerging Local Plan. This work will need to evolve ahead of the Regulation 19 draft Local Plan in respect of Crews Hill in order that the new settlement is properly justified.

### Approach to assessing the viability of Crews Hill

- 5.7 The PPG highlights the importance of considering the specific viability circumstances associated with strategic sites (ID: 10-005). Large strategic sites are required to deliver significant levels of supporting infrastructure and will include the development of a range of housing typologies across a single site. In the case of Crews Hill specifically, some homes will be built at higher densities around the station with lower densities further out. Some development will be on brownfield land while other parts will be on greenfield. It will deliver schools, health, employment, and green infrastructure to provide for future residents. This is all in addition to new active travel infrastructure, road infrastructure, and railway upgrades. Strategic sites – such as Crews Hill – are therefore an entirely different proposition in terms of assessing viability compared to a typical urban or greenfield site.
- 5.8 In this context, the ‘Whole Plan and CIL Viability Update’ (April 2021) report does not specifically consider the viability of Crews Hill based on the likely known infrastructure requirements associated with it. It also does not consider the likely range of land values and development typologies across the site. Instead all sites are assessed using the typology methodology with the largest site being 5,000 units on a greenfield site. While this approach may be appropriate for other sites in the draft plan, a proposed new settlement – such as that at Crews Hill – will warrant a bespoke approach which reflects the nature of the allocation.

### Developing this evidence to support the future allocation

- 5.9 Moving towards a Regulation 19 Local Plan, the boundary of Crews Hill will need to be determined and its masterplan developed. In addition, there must be further consideration of its infrastructure needs; in form of a site-specific infrastructure delivery plan. These can then inform a site-specific viability assessment to demonstrate that the site could be viably developed at the point envisaged.
- 5.10 This bespoke viability assessment should consider:
- The range of housing typologies across the site and the associated costs with each;
  - The likely values to be generated in this geographical area within a less established market at Crews Hill. Values here may well be less than a generic Borough wide assumption;
  - The amount, phasing, and costs associated with delivering community, transport, and green/blue infrastructure required to support Crews Hill specifically, including the likely phasing of said housing development (i.e. with the western areas being developed first);
  - Land values across the site taking account of the sites likely phasing with the western land (greenfield) largely coming forward first followed by the eastern (brownfield) land;
  - Types of employment development likely to come forward within the allocation area and when; and
  - Various sustainability measures likely to be implemented as part of the development.
- 5.11 By undertaking the above, the emerging Local Plan – which relies in part on the successful allocation of Crews Hill – will be better able to demonstrate this strategic site is viable. It will also demonstrate that the precise infrastructure requirements have been considered; which in turn have supported the masterplanning process for the site in preparing a future SPD. Taken together, this will support the overall soundness of the plan.



## 6.0 Conclusions and Summary

- 6.1 Berkeley supports the draft Local Plan’s overarching aims, objectives and proposed allocations for growth. The emerging direction of the draft Local Plan can provide an appropriate framework to respond to the land use planning challenges that LB Enfield faces; whilst also addressing the requirements of the new London Plan (2021) and NPPF (2021).
- 6.2 The Local Plan importantly seeks to address the significant challenges posed by the housing crisis. Simply put, not enough homes have been built and there are significant levels of housing need (in terms of the total number of market and affordable homes, but also for specific types of accommodation, such as family homes) across both London and specifically in Enfield. In rising to this challenge, the Council proposes to release land currently in the Green Belt; including the release of Crews Hill. In our view, this approach is wholly justified in accordance with policy and guidance. We draw this conclusion because:
- 1 To 2029, the Council’s requirement for housing is set by the London Plan (2021) but beyond this the London Plan (2021) does not promote any given figure. Instead it provides a framework at Paragraph 4.1.11 for assessing what that figure should be informed by; including the 2017 London SHLAA but also local evidence of identified capacity for housing.
  - 2 Were LB Enfield to set its housing requirement based just on the 2017 London SHLAA – which considered Green Belt release as unsuitable – there would be significant levels of unmet need arising. This would worsen housing outcomes locally and not accord with Government’s objective to significantly boost the supply of homes.
  - 3 LB Enfield has therefore sought, correctly in accordance with the NPPF, to determine whether it can meet higher levels of need through a review of suitable land across the whole Borough: including Green Belt land. The conclusion is that (1) it could only meet higher levels of need (albeit even then not in full) if Green Belt land is released and (2) there are exceptional circumstances to justify removal in the locations it has selected for growth, including at Crews Hill
- 6.3 Overall, we support the draft Local Plan in its objective to meet as much housing need as is possible when applying its spatial strategy; balancing the various growth needs for the Borough. The draft Local Plan’s proposed release of Green Belt is justified and specifically its allocation of Crews Hill is supported. Crews Hill offers a unique opportunity within LB Enfield to deliver much needed development – including on partly brownfield land – centred on an underutilised train station. It can deliver on the Council’s overarching objectives and provide a self-sufficient sustainable development.
- 6.4 Looking ahead, while the plan is at an early stage there are various matters that will need to be considered between now and the publication of a future Regulation 19 draft Local Plan. Focusing on Crews Hill specifically, there should be further iteration to the allocation to be undertaken around a masterplan-led process. This will ensure that Policy PL9 provides an allocation that meets the vision and aspirations for Crews Hill, including the right types of housing within the right placemaking framework, and can deliver all the necessary components of the new place (e.g. schools, open space, infrastructure). This will necessarily be supported by a fully worked-up infrastructure delivery plan with a site-specific viability assessment.
- 6.5 Berkeley – which controls land on both sides of the railway at Owls Hall Estate and Wyevale Garden Centre - will engage with the Council to help shape and develop a shared vision to deliver the exciting proposals at Crews Hill.







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