

Planning Department
Enfield Council
Civic Centre
Silver Street
Enfield
EN1 3XY

Date: 10 September 2021
Our ref: SS/ITL/20046749v1
Your ref:

Dear Sir/Madam

Enfield Local Plan Regulation 18 Consultation - August 2021

We write on behalf of our client, Taylor Wimpey Strategic Land (TWSL), in response to the above consultation. TWSL welcome the opportunity to engage with the London Borough of Enfield (LBE) on the new Local Plan.

This letter sets out TWSL's response to the Regulation 18 stage 'Main issues and preferred approaches' version of Enfield's draft Local Plan dated June 2021. The comments will be organised by the policy that they relate to.

Strategic Policy SP SS1 – Spatial Strategy

Strategic Policy SP SS1 sets out the Council's overarching spatial strategy, which includes provision for at least 25,000 new homes largely provided within four main placemaking areas. This includes areas of Green Belt release, including at Crews Hill. TWSL supports this policy.

Policy Considerations for Green Belt Release

The NPPF states in paragraph 60 that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

Paragraph 68 state that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period; and
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

Further, the NPPF states in paragraph 140 that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified and 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. The London Plan (2021) Policy G2 sets out that exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan.

In paragraph 141 of the NPPF, it is stated that: *'before concluding that exceptional circumstances exist, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.'* Paragraph 142 confirms that where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport.

Housing Need

TWSL consider that LBE's (and the wider London) housing needs constitutes one of the exceptional circumstances required to justify Green Belt release in Enfield.

As noted in the Inspector's Report for the London Plan (2021), the London Plan's ten-year targets are 'far below the assessed need' (para 177). The London-wide SHMA (2017) identified an annual need for 66,000 homes and London's local housing need (assessed using the Standard Method with an urban centres uplift) currently stands at 93,700 homes per annum. By comparison, the London Plan provides for only 52,285 units per annum. The Inspectors of the London Plan were of the view that in order to increase supply of housing to the required level, a review of the Green Belt would be necessary (para 176 of their Report). The Secretary of State, Robert Jenrick, was also clear that the London Plan does not go far enough to meet London's housing need. In a letter to the Mayor of London (29th January 2021), he stated:

"... 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..."

The draft Local Plan will provide for at least 24,290 new dwellings in the plan period up to 2039, equating to 1,246 homes per year, as set out in Strategic Policy SP H1. This in effect rolls forward the London Plan's (2021) annualised ten-year housing target for Enfield beyond 2029 across the whole plan-period. In doing so, the Council are seeking to deliver homes above its assessed urban capacity beyond 2029 of c.500 homes per annum (as identified in the 2017 London SHLAA – Table 10.1). As confirmed in the Enfield HELAA (2021), the only way to try to address housing needs – which are greatly above this 500 per annum figure – is via Green Belt release; albeit housing needs cannot be met in full. This approach accords with the Government's objective to significantly boost the supply of homes as well as London Plan paragraph 4.1.11 in terms of setting housing requirements beyond 2029.

On this basis, it is considered that housing needs constitute an exceptional circumstance to justify Green Belt release in Enfield as it is necessary to help address Enfield's housing needs. If the Council only delivered housing in the existing urban area there would be significant unmet needs arising against the Government stated objective to significantly boost supply.

Alternatives:

LBE have also demonstrated that all reasonable options for meeting identified need have been examined in the preparation of the draft Local Plan.

We note that LBE have provided a number of documents in the Local Plan evidence base, which we have reviewed, and which demonstrate that a thorough process of examining all reasonable growth options has been undertaken. These include the Growth Topic Paper (May 2021), which describes in detail how the spatial strategy has evolved.

As described in Table 2.2 of the Draft Local Plan, seven spatial strategy options were considered in detail. Options that did not include Green Belt release were considered unsuitable because, among other reasons, they would not address the housing crisis. Green Belt release would also enable the delivery of larger houses to meet the need for additional family housing, as identified in Ealing's 2020 Housing Needs Assessment.

TWSL are supportive of the selected option, 'Medium Growth 1', which includes targeted Green Belt release and will deliver approximately 25,000 homes including family and affordable accommodation at scale.

Green Belt Release at Crews Hill

Crews Hill in particular is a suitable and sustainable location for Green Belt release, when considered against paragraph 142 of the NPPF (2021) which states that:

'Where it has been concluded that it is necessary to release Green Belt land for development, plans should first give consideration to land which has been previously-developed and/or is well-served by public transport.'

Crews Hill contains significant areas of previously developed land. The 2021 Green Belt Assessment found that the Green Belt adjacent to the existing urban area of Crews Hill comprises some of the lowest contributing Green Belt in the Borough, due to inappropriate development associated with commercial and industrial estates.

Crews Hill is also well-served by public transport; the existing settlement is hinged around the Crews Hill train station, which has regular direct services to London. There are also a number of existing bus stops in Crews Hill with services to Edmonton and Enfield Town. It is therefore a highly sustainable location for Green Belt release, in line with the requirements of the NPPF.

TWSL therefore strongly supports the Council's approach to releasing land at Crews Hill to deliver much needed new housing and confirm that this is sustainable, viable and deliverable.

Strategic Policy SP PL9 – Crews Hill

Further, TWSL fully support the allocation of Crews Hill as a placemaking area as set out in Strategic Policy SP PL9. As outlined above, Crews Hill is a sustainable location for new development and can play an important role in meeting LBE's housing need, including its requirement for family-sized homes.

The principle, as set out in draft Policy SP PL9, of extending the boundary of the placemaking area to include land to deliver more development beyond the plan period, is supported and in line with paragraph 143 of the NPPF (2021), which states that plans should identify areas of safeguarded land to meet longer-term development needs. It is noted that the exact areas of Green Belt release will be determined at the Regulation 19 stage, as stated on the draft Proposals Map.

Draft Policy SP PL9 states that a comprehensive masterplan, in the form of an SPD, will be prepared to ensure that development at Crews Hill comes forward in a strategic and comprehensive manner. TWSL agree that a comprehensive masterplan is appropriate for this area to ensure that development at Crews Hill is well planned and coordinated.

TWSL consider that a comprehensive masterplan could be dealt with via a development brief, rather than an SPD, but if it is considered that an SPD is considered necessary, this should not delay the delivery of development at Crews Hill, as this could have a detrimental impact on LBE's ability to meet their housing need.

It will be essential that the SPD is brought forward through collaboration with stakeholders to ensure that the proposed development is viable and deliverable. Work should commence on this simultaneously with the Local Plan.

Summary

TWSL welcome the opportunity to comment on the emerging Enfield Local Plan. Overall, the approach that has been taken in relation to the Spatial Strategy is in accord with national policy guidance and is fully supported. It is clear that there are exceptional circumstances to justify Green Belt release and that all reasonable options for meeting the identified housing need have been considered.

In particular, the identification of Crews Hill as a placemaking area is supported as a viable and deliverable option and as a highly sustainable location for development. It is, therefore, suitable for Green Belt release as the land performs poorly in this regard. The draft allocation at Crews Hill is fully supported.

Should you wish to discuss comments within these representations further please do not hesitate to contact me or my colleague Simon Slatford.

Yours faithfully