
Vicarage Farm (“Chase Park”, SA28 and LP10_ext) should remain as Green Belt

1. Vicarage Farm should remain as Green Belt. The site can then continue to make an important contribution to the most urgent of the five purposes of Green Belt defined in the National Planning Policy Framework (NPPF): to assist in urban regeneration by encouraging the recycling of derelict and other urban land.
2. Releasing this 370-acre* parcel from the Green Belt to provide 3000 homes would discourage much-needed regeneration of many urban sites in Enfield. The Draft Local Plan proposes to delay the recycling of land at Meridian Water, sufficient for 5000 new homes, beyond 2039. Retaining Vicarage Farm as Green belt would encourage LB Enfield Council to seek ways to accelerate that development, benefiting the whole borough. On the currently proposed timetable, the benefits of that urban regeneration would be delayed by 20 years. If the growth projections of the Plan are wrong, the potential benefits could be lost forever. The untapped potential of Meridian Water is only one documented example. The Draft Local Plan shows that Enfield Council has not been sufficiently encouraged to proactively seek out other urban land for additional housing.
3. The Green Belt fulfils its recycling purpose by obliging suburban Local Planning Authorities to regenerate urban areas to meet their housing targets instead of choosing the easier option of developing greenfield sites. The authors of the Draft Local Plan have not understood this. For example they have ignored the relative contribution of different-sized parcels of Green Belt to the purpose of urban regeneration by assuming that “all Green Belt land is considered to make an equally strong contribution to this purpose”. But the larger the parcel of Green Belt, the more its release will discourage urban regeneration. The proposed release of 370 acres at Vicarage Farm would cause areas of the London Borough of Enfield to remain blighted indefinitely.
4. The Draft Local Plan does not assess the harm to communities left in deprivation due to poor housing by its proposed release of Green Belt. It assesses harm to the other four purposes of the Green Belt which directly concern the lives of the affluent communities who live close enough to benefit from rural areas. The Plan rates each parcel of Green Belt on the level of harm caused to these communities if released. It assesses the harm caused by the release of the Vicarage Farm site as Very High. Document 2 states that limiting the release to preserve the best views could mitigate this harm, reducing the level to Low or Moderate. This again shows unawareness of the impact on urban renewal: the release of an acre of Green Belt will cause the same amount of harm to residents and potential residents of areas in need of regeneration, however unattractive the landscape.
5. Enfield Council and developers have seized on the sentences in the London Plan which permit the release of land from the Green Belt ‘in exceptional circumstances’. It is unfortunate that when adding these sentences to the Mayor of London’s text the Secretary of State did not

impose any obligation on the Council to explain what 'exceptional circumstances' exist. Enfield Council has not volunteered any explanation. The Council should be aware that 'exceptional circumstances' also allow them to redeploy 'industrial land in active employment use' in urban areas to meet their housing targets (Council's Housing Numbers Paper 2021 at para 2.1.7). That paragraph also quotes the London Plan's requirement that Councils should 'demonstrate that they have made as much use as possible' of such alternatives before releasing Green Belt land. The Council has not demonstrated this.

6. When assessing the potential contribution of industrial land to housing, the experience of the Covid-19 pandemic should encourage the Council to consider '*how industry can be integrated in residential areas*' as stated in the Mayor of London's *Draft Industrial Intensification Primer* (2017). There will certainly be more home working in some industries, to the benefit of the economy.

7. The Draft Local Plan tries to convince affluent communities that they will benefit from new housing on the Green Belt. The 'placemaking vision' for the Vicarage Farm ('Chase Park') site on page 82 of Document 2 states that building on the Green Belt will facilitate access to the rural landscape. This presumably means that populating some parts of the Green Belt will increase the number of people able to see the remaining parts. On page 85 it avers that rewilding and wetland creation will enhance the ecological potential of the site, as if releasing open land from the Green Belt and covering it with housing will solve the problem that the Green Belt is not green enough.

8. As a resident of Hadley Road living directly opposite Vicarage Farm I feel that a revised Draft Local Plan that describes how the Green Belt helps urban regeneration will appeal to both affluent semi-rural residents and residents of areas in need of regeneration. Even we who live on the Green Belt are inconvenienced by deprivation caused by poor housing elsewhere in the Borough.

9. A revised Draft Local Plan should focus on its placemaking vision for regeneration, giving credit for this focus to the constraints of the Green Belt. Enfield has unequalled opportunities for recycling urban land in a way that benefits all residents of the Borough. It has many run-down areas with exciting potential for developing additional housing.

* The Draft Local Plan describes the Vicarage Farm proposal extensively in the two documents below. The first calculates the area of the site as 149.52ha, the second as 59.74ha.

Document 1: page 59 of https://new.enfield.gov.uk/services/planning/green-belt-and-mol-assessment_appendices_part4-luc-2021-planning.pdf

Document 2: page 347 of <https://new.enfield.gov.uk/services/planning/elp-2039-reg-18-for-consultation-planning.pdf>

From the National Planning Policy Framework (NPPF):

138. Green Belt serves 5 purposes:

- (a) to check the unrestricted sprawl of large built-up areas;
- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns; and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict**

and other urban land.