



## Enfield New Local Plan

# Green Belt Exceptional Circumstances Topic Paper

March 2024

## Background Topic Papers

A series of background topic papers have been prepared to support the proposed Submission Version Enfield Local Plan (Regulation-19). These are as follows:

- Spatial Strategy and Overall Approach Topic Paper
- Exceptional Circumstances Topic Paper
- Site Allocations Topic Paper
- Housing Topic Paper
- Employment Topic Paper
- Crews Hill Topic Paper
- Chase Park Topic Paper

These papers are intended to help explain the Local Plan spatial strategy, policies and associated allocations, with reference to the Local Plan evidence base.

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# 1 Introduction

## Purpose of this document

- 1.1 This Topic Paper forms part of the evidence base for the new Enfield Local Plan (ELP), which covers the period 2019 – 2041. It has been produced to support the Plan process and seeks to justify and outline the exceptional circumstances for the release of Green Belt land to meet housing and employment needs.
- 1.2 This Paper needs to be read in conjunction with the Spatial Strategy and Overall Approach Topic Paper, the Site Allocation Topic Paper, the Housing Topic Paper and the Employment Topic Paper, which explain the processes that were followed to determine the proposed scale and distribution of development within the Borough.
- 1.3 The Topic Paper should also be read alongside the Green Belt and Metropolitan Open Land Study<sup>1</sup> (prepared by LUC on behalf of the Council), which provides an assessment of the Green Belt and Metropolitan Land (MOL) within the Borough.
- 1.4 This Paper is divided into 6 chapters:
  - Chapter 2 – Sets out the context. It provides a brief overview of the Green Belt in the Borough and summarises planning policy and guidance (and related case law) in relation to the Green Belt and exceptional circumstances matters.
  - Chapter 3 – Outlines the assessed scale of housing and employment needs in the Borough, and the constraints on land supply to meet these needs. Chapter 3 also explains some of the difficulties in achieving sustainable development without amending the Green Belt boundary.
  - Chapter 4 – Sets out the strategic level exceptional circumstances case for amending the Green Belt boundary, and the compensatory improvements that can be made to the land that is to remain in the Green Belt.
  - Chapter 5 – Briefly addresses the local level exceptional circumstances for the proposed allocations in the Green Belt, by cross referencing to the Site Allocations Topic Paper.
  - Chapter 6 – Provides the overall conclusion, confirming exceptional circumstances that justify the proposed development in the Green Belt.

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<sup>1</sup> [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0030/54678/Green-belt-and-MOL-assessment-2023-Stage-3-LUC-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0030/54678/Green-belt-and-MOL-assessment-2023-Stage-3-LUC-Planning.pdf)

## 2 Background and Planning Policy Context

### The Green Belt in Enfield

- 2.1 There are two main areas of Green Belt in Enfield: the majority lies in the north western part of the borough between the edge of London's built-up area and the M25; the remainder lies at the eastern edge of the borough within and directly adjacent to the Lee Valley Regional Park.
- 2.2 Beyond the Borough boundaries the Green Belt continues:
- West into Hertsmere District and the northern fringe of the London Borough of Barnet;
  - North beyond the M25 into Welwyn Hatfield District and Broxbourne District; and
  - East from the Lee Valley into Epping Forest District and a narrow strip of the Lee Valley within the London Borough of Waltham Forest.
- 2.3 The Borough's Green Belt covers approximately 40% of the Borough's land area (see **Figure 1** overleaf), and contains a mixture of arable farmland, green space, woodland and waterways, as well as areas of existing development.
- 2.4 Hadley Wood and Cockfosters are inset from the Green Belt, as is a small residential area in Crews Hill. The Green Belt washes over the Hamlet of Botany Bay.
- 2.5 The Green Belt boundary in Enfield was amended through the 1994 Unitary Development Plan, after Enfield Island Village was transferred into the Borough from Epping Forest District Council, and the land designated as Green Belt. More recently, the 2010 Core Strategy<sup>2</sup> (paragraph 8.68) confirmed that a detailed review of the Green Belt boundaries in the Borough would be undertaken to inform the Development Management Development Plan Document<sup>3</sup> (DM DPD). This review was undertaken<sup>4</sup>, and the detailed amendments made to the Green Belt boundary upon adoption of the DM DPD. The amendments made were mainly minor in nature and justified on the grounds of providing a more robust, logical and defensible Green Belt boundary.

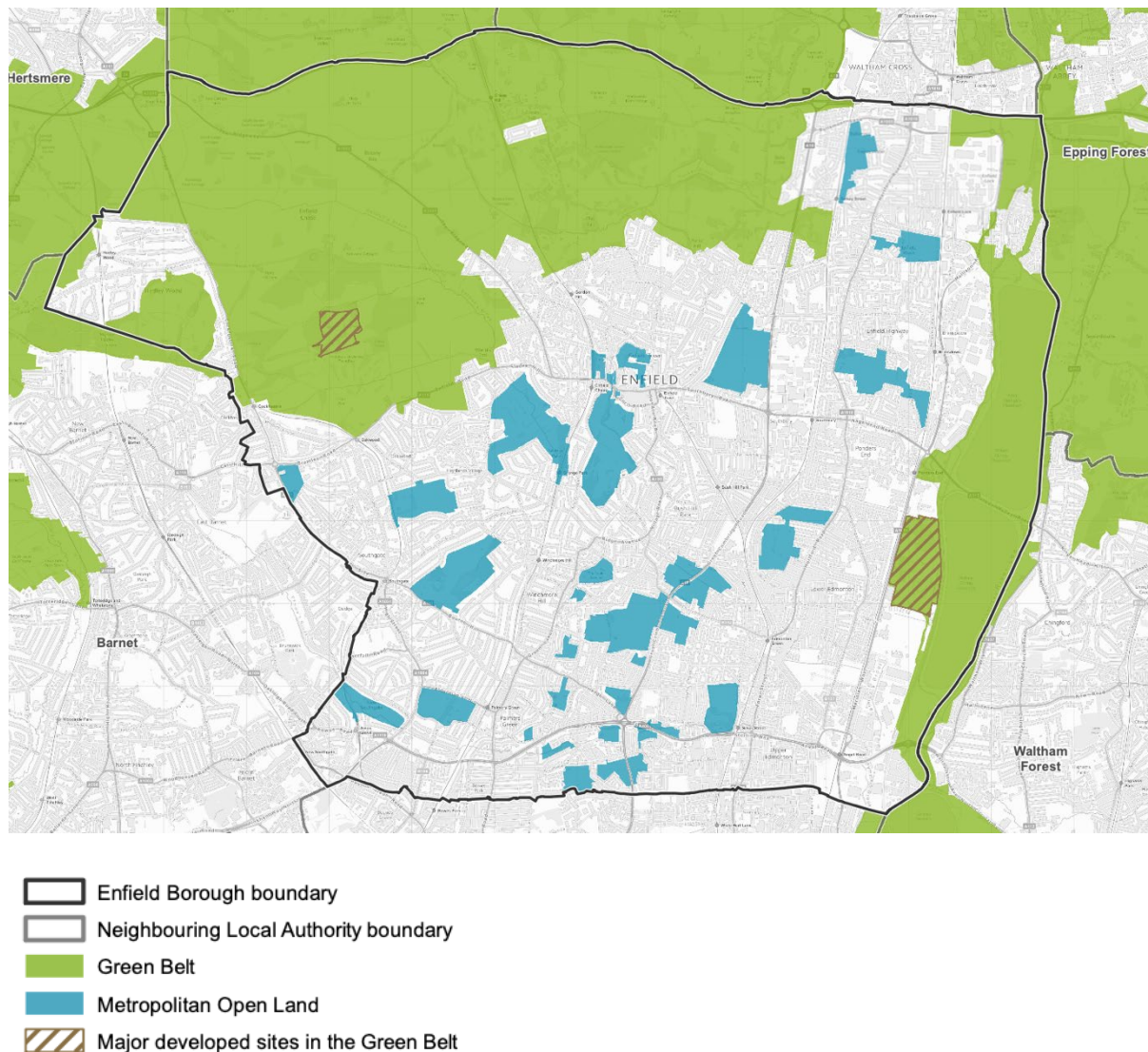
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<sup>2</sup> [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0015/4623/planning-policy-information-the-enfield-plan-core-strategy-november-2010.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0015/4623/planning-policy-information-the-enfield-plan-core-strategy-november-2010.pdf)

<sup>3</sup> [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0021/2946/dmd-adopted-planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0021/2946/dmd-adopted-planning.pdf)

<sup>4</sup> [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0024/5883/planning-policy-information-enfield-green-belt-boundary-review-april-2012.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0024/5883/planning-policy-information-enfield-green-belt-boundary-review-april-2012.pdf)

**Figure 1: Existing Green Belt and MOL in Enfield Borough**



## National Planning Policy and Guidance

### National Planning Policy Framework (2023)

2.6 Government policy on the Green Belt is primarily set out in the National Planning Policy Framework (NPPF), the Planning Policy for Traveller Sites (updated December 2023) and the national Planning Practice Guidance (PPG).

- 2.7 At the heart of the NPPF is the presumption in favour of sustainable development. Sustainable development is that which best balances economic, social and environmental factors.
- 2.8 NPPF paragraph 11 explains what this means for plan-making. Plans are to promote sustainable patterns of development, meet the development needs of their area, align growth and infrastructure, improve the environment and mitigate and adapt to climate change. Strategic policies should, as a minimum, provide for the objectively assessed needs for housing and other uses, unless:
- i) *“the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
  - ii) *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*
- 2.9 The policies referenced in i) are listed in full at footnote 7 of the NPPF, and include land designated as Green Belt.
- 2.10 NPPF paragraph 74 advises that the supply of larger numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).
- 2.11 NPPF Chapter 13 addresses the Green Belt. Paragraph 142 states that *“the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”*.
- 2.12 This is elaborated in NPPF paragraph 143, which states that Green Belts serve five purposes:
- 1) To check the unrestricted sprawl of large built-up areas.
  - 2) To prevent neighbouring towns merging into one another.
  - 3) To assist in safeguarding the countryside from encroachment.
  - 4) To preserve the setting and special character of historic towns.
  - 5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.13 The NPPF makes clear that authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified (paragraph 145). It goes on to state 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.”*

- 2.14 Paragraphs 146 and 147 set out the national policy approach for defining and altering Green Belt boundaries. These paragraphs require that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, a Council should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. Through the examination process, consideration will be given to whether the Local Plan strategy:
- a) *“makes as much use as possible of suitable brownfield sites and underutilised land;*
  - b) *optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
  - c) *has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground”.* (paragraph 146).
- 2.15 NPPF paragraph 147 explains that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Further, 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. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”.*
- 2.16 When defining Green Belt boundaries NPPF paragraph 148 states local planning authorities should:
- a) *“ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*
  - b) *not include land which it is unnecessary to keep permanently open;*
  - c) *where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
  - d) *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
  - e) *be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
  - f) *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*



2.17 NPPF paragraph 150 states that once Green Belts have been defined “*local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.*”

### Planning Practice Guidance

2.18 The NPPF's Green Belt policies are supplemented by additional national Planning Practice Guidance (PPG).

2.19 The guidance also elaborates on NPPF paragraph 150, which requires local planning authorities to set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. These improvements could include:

- *“New or enhanced green infrastructure;*
- *Woodland planting;*
- *Landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
- *Improvements to biodiversity, habitat connectivity and natural capital;*
- *New or enhanced walking and cycle routes; and*
- *Improved access to new, enhanced or existing recreational and playing field provision.”* (paragraph: 002 Reference ID: 64-002-20190722).

2.20 The Planning Practice Guidance also states that “*identifying the scope for compensatory improvements is likely to require early engagement with landowners and other interest groups, once the areas of land necessary for release have been identified. Consideration will need to be given to:*

- *Land ownership, in relation to both land that is proposed to be released for development and that which may be most suitable for compensatory improvements for which contributions may be sought;*
- *The scope of works that would be needed to implement the identified improvements, such as new public rights of way, land remediation, natural capital enhancement or habitat creation and enhancement, and their implications for deliverability;*
- *The appropriate use of conditions, section 106 obligations and the Community Infrastructure Levy, to secure the improvements where possible. Section 106 agreements could be used to secure long-term maintenance of sites.”* (paragraph: 003 Reference ID: 64-003-20190722 Revision date: 22 07 2019)

## The London Plan (2021)

2.21 The role of the Green Belt is also reflected in the London Plan. Policy G2 of the adopted London Plan<sup>5</sup> 2021 states:

a) *The Green Belt should be protected from inappropriate development:*

1) *development proposals that would harm the Green Belt should be refused except where very special circumstances exist,*

2) *subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.*

b) *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.*

2.22 The supporting text to Policy G2 states that the Mayor strongly supports the continued protection of the Green Belt and will work with Boroughs to enhance access to it and improve the quality of derelict areas of Green Belt.

2.23 The adopted London Plan also affords Metropolitan Open Land (MOL) the same status and level of protection as Green Belt land, through Policy G3. Policy G3 states that MOL should be protected from inappropriate development in accordance with national Green Belt policy and should be enhanced to improve its quality and range of uses. In the supporting text reference is made to the following potential objectives and uses: improving public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage. Policy G3 also states that the extension of MOL should be supported where appropriate.

2.24 To designate land as MOL boroughs need to establish that the land meets at least one of the following criteria:

1. *It contributes to the physical structure of London by being clearly distinguishable from the built-up area.*
2. *It includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities which serve either the whole or significant parts of London.*
3. *It contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value.*

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<sup>5</sup> London Plan - [https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2021.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf)

4. *It forms part of a strategic corridor, node or link in the network of green infrastructure and meets one of the above criteria.*

## Local Planning Policy

- 2.25 The current extent of the Green Belt in the Borough is shown on the Policies Map<sup>6</sup>, which provides a visual representation of the Local Plan policies.
- 2.26 The Local Plan for Enfield currently comprises of the Core Strategy (2010), the Development Management Document (2014), the North Circular Area Action Plan (2014), the Edmonton and Leaside Area Action Plan (2020), the North East Enfield Area Action Plan (2016) and the North London Waste Plan. All of these development plan documents (other than the North London Waste Plan) will be replaced and consolidated by the new ELP (upon adoption).
- 2.27 As set out above, the Core Strategy (2010) paved the way for a detailed Green Belt boundary review as part of the process of preparing the DM DPD. This review was undertaken<sup>7</sup>, and some detailed amendments made to the Green Belt boundary.
- 2.28 A review of the Borough's MOL and Green Chains was carried out in 2013, also to support the policies in the DM DPD. The review identified and recommended proposed changes to the list of open spaces designated as MOL or Green Chains. Of the 45 spaces assessed, there were no changes proposed to 14 of them. The boundaries of 22 spaces were amended due to past cartographic inconsistencies or subsequent development. One local open space was designated as MOL. The Council extended the MOL designation to include Green Chains that met one of the MOL designation criteria set out in the London Plan. As a result, nine green chains were designated as MOL.

## The Exceptional Circumstances Test

- 2.29 The definition of 'Exceptional Circumstances' was set out in the Guildford judgment, [Compton and Ockham Parish Councils V Guildford Borough Council and SoS \(2019\) EHCW 3242](#). Sir Duncan Ousley confirmed that:
  - i. There is no definition of the policy concept of "exceptional circumstances". This itself is a deliberate policy decision, demonstrating that there is a

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<sup>6</sup> [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0022/3487/adopted-polices-map-planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0022/3487/adopted-polices-map-planning.pdf)

<sup>7</sup> [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0024/5883/planning-policy-information-enfield-green-belt-boundary-review-april-2012.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0024/5883/planning-policy-information-enfield-green-belt-boundary-review-april-2012.pdf)

planning judgment to be made in all the circumstances of any particular case. It is deliberately broad, and not susceptible to dictionary definition.

- ii. Whether a particular factor was capable of being an "exceptional circumstance" in any particular case was a matter of law; but whether in any particular case it was treated as such, was a matter of planning judgment.
- iii. A judicial decision that a factor relied on by a planning decision-maker as an "exceptional circumstance" was not in law capable of being one is likely to require some caution and judicial restraint. All that is required is that the circumstances relied on, taken together, rationally fit within the scope of "exceptional circumstances" in this context. The breadth of the phrase and the array of circumstances which may come within it place the judicial emphasis very much more on the rationality of the judgment than on providing a definition or criteria or characteristics for that which the policy-maker has left in deliberately broad terms.
- iv. "Exceptional circumstances" is a less demanding test than the development control test for permitting inappropriate development in the Green Belt, which requires "very special circumstances."
- v. The phrase does not require at least more than one individual "exceptional circumstance". The "exceptional circumstances" can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary.
- vi. General planning needs, such as ordinary housing, are not precluded from its scope; indeed, meeting such needs is often part of the judgment that "exceptional circumstances" exist; the phrase is not limited to some unusual form of housing, nor to a particular intensity of need.

2.30 In terms of what matters should be considered, the case of [Calverton Parish Council v Greater Nottingham Councils \[2015\] EWHC 10784](#) is relevant.

2.31 This sets out that the planning judgements involved in the consideration of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) of the Planning and Compulsory Act 2004. At the very least, the planning judgement should identify and grapple with the following matters;

- i. the acuteness/intensity of the objectively assessed need (matters of degree may be important);
- ii. the inherent constraints on supply/availability of land prima facie suitable for sustainable development;
- iii. (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
- iv. the nature and extent of harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and

- v. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.

2.32 There is no requirement that Green Belt land be released as a matter of last resort (see [IM Properties Development Ltd v Lichfield DC\[2014\] EWHC 2240](#)). The Council considers that this remains the case following publication of the NPPF 2023. As above, NPPF paragraph 146 requires that *“before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority must demonstrate that it has examined fully all other reasonable options for meeting its identified need for development”*. As set out later in this Topic Paper, the Council has considered all reasonable options for meeting its development needs and made planning judgements in determining the Spatial Strategy and related site allocations to be included in the ELP.

### Examples of the successful demonstration of Exceptional Circumstances

2.33 Planning Magazine in May 2020 scrutinised 18 local plan examination reports from 2018/19 and 2019/20 to identify the factors most commonly agreed by inspectors to contribute to the presence of exceptional circumstances. The most frequent factors cited by inspectors to justify Green Belt land release are:

#### **Unmet need for development**

2.34 In making a case for exceptional circumstances, local authorities invariably start by identifying unmet need. Much of the time, the strongest emphasis is on housing need. In the Guildford local plan examination, the Inspector partly justified the Green Belt releases on the grounds that the area *“has a pressing housing need, severe and deteriorating housing affordability and a very serious shortfall in the provision of affordable homes”*.

2.35 However, other kinds of development needs may also contribute to exceptional circumstances, in particular the need for land to accommodate employment growth. Examining the Cambridge Local Plan, the Inspector concluded in August 2018 that the expansion of Peterhouse Technology Park on Green Belt land should be allowed in part because of the *“importance of research and development to the Cambridge economy and, in turn, to the national economy”*.

#### **The release is the most sustainable option**

2.36 The 2018 Inspector's report on East Hertfordshire's local plan, stated: *“For reasons of lack of access to services and facilities, and access to sustainable modes of transport, locating significantly more development outside the Green Belt would not be a sustainable approach.”*

#### **Lack of contribution to Green Belt purposes**

2.37 In the October 2019 report on Broxtowe's Local Plan, the Inspector stated that *“the need for housing, the lack of alternatives in sequentially preferable locations outside of the Green Belt and their limited impact on the openness and purposes of the Green Belt constitute exceptional circumstances”*.

- 2.38 However, it is important to note that it is not necessary for land to contribute little to Green Belt purposes, for exceptional circumstances to exist.

### **Creation of defensible boundaries**

- 2.39 Inspectors frequently give weight to considerations around whether a new defensible boundary can be established after a site is released from the Green Belt. Clear boundaries may be provided by existing roads, woodland, hedgerows, railways lines and other physical features. In other cases, the release of land or associated work on site is considered to contribute to a sensible and well-defined boundary, more likely to bolster the permanence of the Green Belt and provide a more robust barrier to future encroachment.
- 2.40 In the examination of Cambridge's Local Plan, the Inspector concluded that having two Green Belt housing sites "*gives rise to an opportunity for planting along the eastern boundary to form a stronger, landscaped edge to the city in this location*".

### **Limited visual impact**

- 2.41 In February 2020, the Supreme Court's judgment in the [Samuel Smith Old Brewery \(Tadcaster\) v North Yorkshire County Council](#) opined that, while there is no express requirement in policy to take visual impact into account when considering the impact of development on Green Belt openness, it could still be a relevant factor for decision-makers exercising their planning judgement. Planning's analysis shows inspectors commonly consider whether there are features that would visually separate proposed Green Belt development sites in local plans from the surrounding open countryside, or make them less prominent in the wider landscape, thereby avoiding such allocations appearing to contribute to urban sprawl.
- 2.42 Green belt sites are sometimes judged to be urban in character, particularly where they are already surrounded by buildings on two or three sides. Where historic buildings or settlements are present, lack of harm, or limited harm to their settings, can make a contribution to the existence of exceptional circumstances. For example, the Guildford Local Plan Inspector's report, published in March 2019, states that one of the sites released from the Green Belt is "*well separated from the historic centre of Guildford by extensive development and does not contribute to the setting of the cathedral or its historic core*".

### **Provision of infrastructure**

- 2.43 Larger developments may play a role in providing transport or social infrastructure for surrounding communities. In some cases, allocation of Green Belt land is judged to be the only possible way of enabling a scale of development sufficient to fund new provision and avoid strain on existing facilities.

### **Reuse of brownfield land**

- 2.44 Where some or all of the Green Belt land proposed for release from the Green Belt is occupied by buildings, inspectors may rule that the recycling of derelict and underused land is an exceptional circumstance.

## 3 Development Needs and the Delivery of Sustainable Development

### Introduction

- 3.1 This chapter summarises the housing, employment and other development needs in the Borough. It also outlines some of the main factors that constrain land supply, and the related implications for the delivery of sustainable development.

### Housing Needs

- 3.2 NPPF paragraph 60 advises that the overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.
- 3.3 The London Plan includes a housing target for Enfield Borough for the period 2019 to 2029 of 12,460 dwellings (equivalent to an annual average of 1,246 dwellings per annum over the 10-year period). Since the start of this period, insufficient new homes have been delivered in Enfield to meet the annualised target, and delivery rates therefore need to increase (and increase still further, if housing delivery in Enfield is to better meet local needs). The Housing Topic Paper 2024<sup>8</sup> sets out in more detail the challenges around meeting housing needs.
- 3.4 It is important to differentiate between the housing target set within the London Plan (for London as whole, and for Enfield) and the assessed level of housing need. In examining the London Plan, the Inspector Panel identified an unmet housing need across London as a whole of 13,000 dwellings per annum in the period 2019-2029.
- 3.5 The Standard Method for calculating housing need suggests that some 64,789 new homes are required in Enfield in the period 2021-2041.
- 3.6 As well as the number of new homes needed, consideration must be given to the type of new homes needed.

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<sup>8</sup> [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0022/54526/Enfield-Housing-Topic-Paper-2024.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0022/54526/Enfield-Housing-Topic-Paper-2024.pdf)



- 3.7 The Enfield Local Housing Needs Assessment (LHNA)<sup>9</sup> modelling indicates that the largest requirement is for three and four-bedroom properties, accounting for over 60% of the new homes need. However, an analysis of recent housing completions data shows that since the start of the London Plan period in 2019/20, to 2021/22, nearly 75% of the new homes delivered in Enfield have been one or two-bedroom properties.
- 3.8 In relation to affordable housing, the Local Housing Needs Assessment (LHNA) suggests a need for more than 700 social or affordable rented homes per annum in the Borough, as well as in addition, a need for nearly 700 intermediate and affordable owned homes.
- 3.9 There is currently a substantial and widening gap between affordable housing delivery in the Borough and the estimated level of need. It is a Council priority to address this issue (as well as the need for more family housing), whilst recognising that it will not be possible or desirable to meet the estimated needs in full. The Integrated Impact Assessment (IIA) considered spatial strategy options involving delivery of up to 55,000 new homes, and these higher growth options were found to have significant adverse impacts on townscape and landscape character, as well as on the Historic Environment (IIA, Appendix E<sup>10</sup>).
- 3.10 The ELP housing target of at least 33,270 new homes over the Plan period seeks to strike an appropriate balance between addressing the acute needs for more housing (in particular, the need for more affordable and family housing), and a wide range of other economic, social and environmental objectives, with a view to achieving ‘Good Growth’ (see further commentary in paragraphs 3.27-3.31 below).

## Employment Needs

- 3.11 NPPF paragraph 85 states that planning policies should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 3.12 The London Plan has a strong focus on maximising the capacity of designated industrial sites to meet economic needs.

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<sup>9</sup> [https://www.enfield.gov.uk/\\_\\_data/assets/pdf\\_file/0025/5569/enfield-local-housing-needs-assessment-full-report-2020-planning.pdf](https://www.enfield.gov.uk/__data/assets/pdf_file/0025/5569/enfield-local-housing-needs-assessment-full-report-2020-planning.pdf)

<sup>10</sup> [https://www.enfield.gov.uk/\\_\\_data/assets/pdf\\_file/0014/55040/Appendix-B1-ELP-REG19-IIA-and-appendices-councillors-and-democracy.pdf](https://www.enfield.gov.uk/__data/assets/pdf_file/0014/55040/Appendix-B1-ELP-REG19-IIA-and-appendices-councillors-and-democracy.pdf)



- 3.13 The need for more office, industrial and warehouse space in Enfield is assessed in the Employment Land Review (ELR)<sup>11</sup>. The ELR recommends that the ELP plans for some 304,000 sq m of additional industrial and warehousing floorspace over the Plan period to 2041, addressing the NPPF requirement for Council's to plan positively (but of course realistically) for growth (paragraph 7.74 of the ELR). In terms of office space, the ELR recommends planning for some 43,000 sq m of additional floorspace over the Plan period (paragraph 7.77 of the ELR).
- 3.14 The ELR and Employment Topic Paper<sup>12</sup> outline the challenges in planning for economic growth, including in terms of the likely scope for industrial intensification over the Plan period.
- 3.15 As outlined above, there is a need for approximately 304,000 sq m of additional industrial and warehouse space over the Plan period, which equates to a need for circa 14,000 sq m of additional space per annum. The Council has given very careful consideration to the scope for intensification of existing industrial areas. A theoretical assessment of potential capacity for intensification has been made (as referenced in the ELR), but there are viability and deliverability challenges (and therefore uncertainty) in turning this theoretical capacity into additional floorspace on the ground, at the very least, in the short to medium term.
- 3.16 There is an existing pipeline of industrial and warehousing space of circa 50,000 sq m, but that means in the first five years of the Plan period, there is already a shortfall between demand and supply (i.e. the 5-year requirement is for 70,000 sq m).
- 3.17 In the second five-year period (2024-29), the only source of additional supply available (without recourse to Green Belt land) is at Meridian Water, where capacity for circa 50,000 sq m of additional floorspace has been identified. However, whilst this additional floorspace at Meridian Water is considered developable, with a reasonable prospect of delivery, as set out at paragraph 10.16 of the Employment Land Review<sup>13</sup>, there are complex displacement and relocation requirements, meaning that early delivery of the space is needed to accommodate users displaced through the regeneration of other land parcels across the Meridian Water area. Therefore, Meridian Water as a whole is unlikely to deliver net additional employment space until towards the end of the wider regeneration programme.

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<sup>11</sup> [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0022/54751/Employment-land-review-2024-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0022/54751/Employment-land-review-2024-Planning.pdf)

<sup>12</sup> [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0021/54525/Enfield-Employment-Topic-Paper-2024-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0021/54525/Enfield-Employment-Topic-Paper-2024-Planning.pdf)

<sup>13</sup> [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0022/54751/Employment-land-review-2024-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0022/54751/Employment-land-review-2024-Planning.pdf)

- 3.18 There is therefore a clear need for additional industrial and logistics space in the period to 2029. Confining industrial and logistics development to the urban area would risk both under-delivery if sites are not intensified as anticipated, and a lack of delivery in the early years of the Plan period, when the prospects for the realistic delivery of intensified formats are the least certain.
- 3.19 The Council is therefore proposing to allocate three Green Belt sites for industrial and logistics space, in locations that are well suited to the main need, which is for logistics space. The approach will provide flexibility and choice in the market and help ensure that the supply of industrial and warehouse space is not a constraint on economic growth and the creation of local employment opportunities.
- 3.20 The additional office space needs can be accommodated within the Enfield urban area.

### Other Development Needs

- 3.21 It is essential that the development promoted in the ELP is supported by necessary new and improved infrastructure (including new community infrastructure, public open spaces and sustainable transport infrastructure).
- 3.22 The Infrastructure Delivery Plan (IDP)<sup>14</sup> sets out the principal infrastructure needs over the Plan period, with the ELP policies and associated Site Allocation Proformas (ELP, Appendix E) setting out site-specific infrastructure requirements.
- 3.23 Within the site allocations that form the Chase Park urban extension and Crews Hill new settlement, the land released from the Green Belt will accommodate not only the new housing proposed, but also the required supporting community infrastructure.

### Land Supply Constraints

- 3.24 There are clearly significant development needs in Enfield, but the supply of developable land is constrained by a range of factors, including NPPF policy objectives. In brief summary:
- Approximately one third of Enfield is designated as Green Belt. Under NPPF policy, the construction of new buildings in the **Green Belt** is restricted, and exceptional circumstances must be demonstrated where a Local Plan proposes amendments to Green Belt boundaries (including that the authority has examined fully all other reasonable options for meeting its identified need for development);

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<sup>14</sup>[https://www.enfield.gov.uk/\\_\\_data/assets/pdf\\_file/0035/54998/Emerging-Infrastructure-Delivery-Plan-Planning.pdf](https://www.enfield.gov.uk/__data/assets/pdf_file/0035/54998/Emerging-Infrastructure-Delivery-Plan-Planning.pdf)

- The Borough lies in close proximity to nationally and internationally significant nature conservation sites (including the Epping Forest Special Area of Conservation), and within the Borough there are 41 sites of Metropolitan, Borough and Local importance for Nature Conservation. Seeking to conserve and enhance the **biodiversity** is a core NPPF planning principle;
- There are over 1,000 hectares of **open space** within the Borough, comprising parks and gardens, natural and semi-natural green space, amenity green space, allotments, cemeteries and outdoor sports and recreation areas. Open spaces are afforded protection in the NPPF;
- Enfield is home to 22 conservation areas, expansive historic parks and numerous listed buildings. Local Plans should set out a positive strategy for the conservation and enjoyment of **heritage assets**, which will impact on whether land is developable, and in many cases also, the form and scale of development that is appropriate. It is important to note that all of the borough's town centres, towards which growth would typically be expected to be directed, are also partially covered by conservation area designations – to varying degrees;
- Different places within the Borough have their own distinctive characters that have evolved over time and that are part of the heritage of the area (see Character of Growth Study<sup>15</sup>). Taking into account the **character** of different areas will, in some circumstances, but not all, impact on the capacity of development opportunities.

3.25 There are also policies in the London Plan that serve to constrain the supply of developable land, for example the policies that seek to protect Strategic Industrial Locations.

3.26 Chapter 4, below (and the Site Allocations Topic Paper) provide more detail around how the Council have considered these constraints through the HELAA and site selection process.

### Good Growth and Delivering Sustainable Patterns of Development

3.27 In accordance with the London Plan and NPPF, the ELP must promote good growth, i.e. growth that is socially and economically inclusive and environmentally sustainable. This means that the identified needs for housing and employment development must be carefully assessed, to ensure that the growth can be accommodated in a way that

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<sup>15</sup> [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0019/53191/Character-of-Growth-Report-Rev-B-Part-2-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0019/53191/Character-of-Growth-Report-Rev-B-Part-2-Planning.pdf)

will be socially and economically inclusive and avoid unacceptable environmental impacts.

- 3.28 The Integrated Impact Assessment (IIA) process has had a key role in this ‘balancing exercise’ - exploring the likely social, economic and environmental impacts of accommodating different levels and distributions of development within the Borough. The IIA also considers the scope for mitigating any identified potential adverse impacts.
- 3.29 The IIA process has helped to ensure that the Council is able to make an informed decision on the amount of new growth to be accommodated in the Borough, balancing the need for new homes (including family and affordable homes) and additional employment floorspace, with the need to protect and enhance green spaces, biodiversity and the varied character of the Borough.
- 3.30 The Local Plan evidence base (including the IIA Appendix E<sup>16</sup> and Housing Topic Paper, pages 50 and 56) indicates that the promotion of lower levels of new housing development than promoted in the ELP would have adverse social impacts, arising from the delivery of lower levels of new family and affordable housing. In a similar vein, planning for lower levels of new employment floorspace would stifle economic growth and local job creation.
- 3.31 The IIA also considers the potential impacts of accommodating higher levels of growth within the urban area. Such an approach was considered to risk significant adverse impacts on the character and heritage of existing urban areas and would deliver far fewer family and affordable homes. It would also be far more difficult to coordinate and deliver the necessary supporting infrastructure.

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<sup>16</sup>[https://www.enfield.gov.uk/\\_\\_data/assets/pdf\\_file/0014/55040/Appendix-B1-ELP-REG19-IIA-and-appendices-councillors-and-democracy.pdf](https://www.enfield.gov.uk/__data/assets/pdf_file/0014/55040/Appendix-B1-ELP-REG19-IIA-and-appendices-councillors-and-democracy.pdf)

## 4 Strategic Level Case for Exceptional Circumstances to amend the Green Belt boundary

### Introduction

- 4.1 NPPF paragraph 145 states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. This chapter of the Topic Paper sets out the strategic level exceptional circumstances case for the proposed amendments to the Green Belt boundary. The next chapter of the Topic Paper (Chapter 5) presents the local level case (the site specific or area specific factors relevant to the proposed Green Belt land releases).
- 4.2 The exceptional circumstances case for reviewing Green Belt boundaries at the strategic level includes consideration of the following factors:
- The need to identify an appropriate growth and spatial strategy, having considered other reasonable alternatives;
  - The need to identify sufficient land to meet housing needs, including in terms of the provision of more family and more affordable homes;
  - The need to promote sustainable patterns of development, make best use of existing infrastructure, and ensure that new development is supported by the provision of new infrastructure;
  - The need to identify sufficient employment land to meet the overall economic growth strategy for the Borough;
  - The capacity and other restrictions on meeting housing and employment needs;
  - An assessment of the overall harm caused by the releases from the Green Belt;
  - The opportunities available to help increase the beneficial use of the remaining Green Belt, including interventions that meet green infrastructure and biodiversity net gain objectives.
- 4.3 These factors are considered below, with reference to supporting evidence where appropriate.

### An appropriate Growth and Spatial Strategy to meet needs

- 4.4 The NPPF requires local plans and spatial development strategies to meet the tests of soundness, and one of these tests relates to the plan being 'justified' i.e. having "*an appropriate strategy, taking into account the reasonable alternatives*" (NPPF paragraph 35).
- 4.5 In preparing the ELP, different levels of housing and employment growth were considered, along with alternative spatial strategy options for accommodating this growth (see the Integrated Impact Assessment). To support the Regulation 18 Main Issues and Preferred Approaches consultation, the Council published a Growth Topic Paper (2021), which summarised the future development needs in the Borough (with reference to the Local Plan evidence base), outlined the options considered in

preparing the emerging ELP, and explained the reasoning behind the preferred spatial strategy (and the associated level of growth).

- 4.6 Taking into account the feedback received on the Main Issues and Preferred Approaches document, further updates to the evidence base, national policy and the London Plan, and the findings of the Integrated Impact Assessment (IIA)<sup>17</sup>, the strategy set out in the Regulation 19 Publication Draft ELP is considered by the Council to be an “appropriate” strategy, taking into account the reasonable alternatives.
- 4.7 The reasons for this view include:
- In recent years, insufficient new homes have been delivered in Enfield to meet the currently adopted London Plan target, meaning that only 58% of the requirement has been delivered in the first three-years of the Plan period, leading to substantial “backlog” of 1,590 homes. Delivery consequently needs to increase in future years to meet the London Plan housing target for the period 2019 to 2029, and further still if local housing needs (including affordable housing needs) are to be better addressed.
  - There is a significant need for more family housing (new properties with three or more bedrooms). Monitoring evidence shows that over 70% of the new housing development within the urban areas of the Borough, in recent years, has been in the form of 1 and 2-bedroom flats, and there is limited scope to materially change the housing mix coming forward on sites within the urban area.
  - The Council has sought to identify all suitable, available, and deliverable previously developed sites in the Borough, through a number of calls for sites exercises. Further, through the HEELA process, the Council has looked to optimise development densities, taking into account local character, heritage constraints and viability matters.
  - Through Duty to Cooperate discussions, it was clear that adjoining authorities are not able to assist in accommodating any of Enfield’s unmet housing (or employment) needs. Therefore, without development in the Green Belt to help meet future housing needs, the ELP would fail to appropriately address the need for more housing, in particular the need for more affordable and family housing.
  - The proposed housing allocations in the Green Belt will make a significant contribution to family and affordable housing provision in the Borough. They will make effective use of existing transport infrastructure and deliver significant new community infrastructure and accessible open spaces, benefiting both new and existing residents.

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<sup>17</sup> See IIA Appendix E.

- There is a need to retain most of the existing employment floorspace and provide additional industrial/ logistics land and office floorspace to support economic growth.
- Careful consideration has been given to the scope for intensification on existing employment sites (to support economic growth), but there is uncertainty over the viability and deliverability of this intensification. Accordingly, to avoid constraining economic growth and to provide new employment opportunities, three new employment sites are proposed on Green Belt land.

4.8 The approach taken to determining the ELP strategy, which includes Green Belt land release to meet housing and employment needs, accords with NPPF paragraph 146. All other reasonable alternatives have been explored for meeting identified development needs, before concluding that the necessary exceptional circumstances exist (see further commentary below).

4.9 To be clear, the Council has undertaken the following steps:

**Made as much use as possible of suitable brownfield sites and underutilised land**

4.10 As above, the Council has conducted multiple call for sites exercises, to seek to identify as many potential development sites as possible.

*Large Sites*

4.11 Enfield benefits from a significant amount of existing employment land. Some of this land is vacant or underutilised and is suitable for residential redevelopment. Other areas of employment land provide the opportunity for intensification, introducing residential uses alongside existing employment uses. Significant efforts have been made to deliver residential uses alongside employment uses in Enfield, with well over 5,000 homes delivered or to be delivered on former employment sites over the Plan period (based on data from the HELAA<sup>18</sup>).

4.12 The Character of Growth Study<sup>19</sup> addressed industrial locations and has enabled the proposed site allocations to maximise both residential and industrial capacity, including through co-location, where appropriate.

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<sup>18</sup>[https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0030/54894/Housing-and-Economic-Land-Availability-Assessment-HELAA-April-2023-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0030/54894/Housing-and-Economic-Land-Availability-Assessment-HELAA-April-2023-Planning.pdf)

<sup>19</sup>[https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0019/53191/Character-of-Growth-Report-Rev-B-Part-2-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0019/53191/Character-of-Growth-Report-Rev-B-Part-2-Planning.pdf)

- 4.13 Furthermore, the delivery of a number of Council owned sites through the Joint Venture at Meridian Water demonstrates how the Council is seeking to make most effective use of under-utilised brownfield land. Meridian Water has been subject to a number of planning policy processes including the Edmonton Leaside Area Action Plan (ELAAP) adopted in 2020, and more recently the Meridian West Bank Supplementary Planning Documents. These documents demonstrate that the capacity of Meridian Water as identified in the ELP has been optimised in line with London Plan 2021 policies.
- 4.14 The Council has also carried out extensive testing to scrutinise the potential opportunities and capacity of development within major brownfield opportunity areas through the HEELA, as well as wider Character of Growth work to assess the capacity of development areas. It has sought to do this whilst taking a placemaking-led approach, which recognises the character and constraints of various locations, and then sets out principles and criteria within which development can be optimised.

#### *Small Sites*

- 4.15 Supply from small sites (under 0.25 hectares) during the Plan period has been established in the HELAA in line with London Plan Policy H2 (Small Sites). Extensive work has been undertaken to ensure the thoroughness of the HELAA, including via the deep dive performed in AECOM's Urban Capacity Study 2020<sup>20</sup>, and through the updated HELAA process which considers all sites over 0.05 hectares/ five units.
- 4.16 The Council has a Small Sites Programme, which has contributed around 1,500 potential homes to supply through detailed site appraisals of Council owned land.
- 4.17 Further windfall capacity on sites below 0.25 hectares is accounted for with a small sites allowance, benchmarked against historic trends. AECOM and Farrell's London Plan Small Sites Evidence 2019<sup>21</sup>, also provided further modelling evidence of the potential scope for further small sites delivery in Enfield. This reviewed both local infrastructure and viability of intensification scenarios and found that changes to policies were unlikely to enable small sites delivery to increase dramatically above the historic trend.

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<sup>20</sup> [https://www.enfield.gov.uk/data/assets/pdf\\_file/0024/4794/enfield-capacity-study-policy-review-2020-planning.pdf](https://www.enfield.gov.uk/data/assets/pdf_file/0024/4794/enfield-capacity-study-policy-review-2020-planning.pdf)

<sup>21</sup> [https://www.london.gov.uk/sites/default/files/ad\\_75\\_enfield\\_small\\_sites\\_research\\_2018\\_31\\_january\\_2019.pdf](https://www.london.gov.uk/sites/default/files/ad_75_enfield_small_sites_research_2018_31_january_2019.pdf)



- 4.18 On this basis, the capacity identified on small sites below the threshold of site allocations is considered to have been maximised in the Plan, accounting for approximately 16% of the envisaged housing delivery over the Plan period.

*Optimised the density of development, and promoted a significant uplift in minimum density standards in accessible locations*

- 4.19 Nearly 80% of new supply in the Plan period will come from Site Allocations. These sites have been assessed and selected in line with the NPPF and PPG (see Site Allocations Topic Paper).
- 4.20 Enfield's Character of Growth Study<sup>22</sup> is a key evidence document underpinning the Local Plan and the HELAA and has been developed internally to guide growth in a sustainable manner while optimising site capacities. The Study helps to recognise and establish the character of existing communities in an evidence-led way (in line with NPPF paragraph 130), and through providing clear guidance for plan-making and decision taking around acceptable building heights, volumes and masses within Enfield's urban areas, seeks to optimise development opportunities in the Borough.
- 4.21 The Character of Growth Study has helped to demonstrate that allocating at higher densities on key strategic site allocations in the Plan would conflict with NPPF and London Plan policies.
- 4.22 The average density of schemes assessed as developable in Enfield's HELAA (excluding extant planning permissions) is 90 dwellings per hectare, representing a significant uplift on existing densities within the Borough. For example, dividing Enfield into Census Super Output Areas, even the highest household densities are not higher than 66 households per hectare. Whilst it is recognised that the two density methodologies differ, this still demonstrates that new sites assessed for development in the HELAA are at the upper end, if not higher than existing housing densities in Enfield, and will provide a significant uplift in minimum densities in town centres and other locations served by public transport.

**Held discussions with neighbouring authorities as part of the Duty to Co-operate, to establish if any are able to accommodate any of the Borough's outstanding development needs**

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<sup>22</sup> [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0019/53191/Character-of-Growth-Report-Rev-B-Part-2-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0019/53191/Character-of-Growth-Report-Rev-B-Part-2-Planning.pdf)

- 4.23 The Duty to Cooperate Statement<sup>23</sup> confirms that adjoining authorities are not able to assist in accommodating any of Enfield's unmet housing or employment needs.
- 4.24 Despite the steps outlined above being taken (in accordance with the requirements of NPPF paragraph 146), insufficient land could be identified either within the urban area, or within neighbouring authorities' areas, to meet the identified housing and employment needs.
- 4.25 This strategic planning position has formed part of the evidence-based process the Council has followed in line with NPPF Paragraph 146, before concluding that exceptional circumstances exist to justify changes to the Green Belt boundaries in the Borough.

### **Need for more housing, in particular affordable homes and family homes**

- 4.26 NPPF paragraph 60 advises that the overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.
- 4.27 Chapter 3 of this Topic Paper summarises the housing needs in the Plan period. There is a need to increase housing delivery in the Borough to better meet local needs (including in terms of the delivery of more affordable and family homes).
- 4.28 The proposed housing development on greenfield, Green Belt land will contribute generally to meeting housing need in the period post 2029, will achieve a more balanced pattern of growth (increasing the scale of new housing delivery in the west of the Borough), and will make a significant contribution towards meeting the need for more family and affordable housing.
- 4.29 Without Crews Hill and Chase Park, the Housing Topic Paper<sup>24</sup> estimates that approximately 470 new affordable homes will be delivered on average, per annum, over the Plan period. With Crews Hill and Chase Park on stream, an additional circa 250 affordable homes will be delivered on average, per annum, from 2029 to 2041.
- 4.30 In terms of the housing mix, Crews Hill and Chase Park will also make a significant contribution to the delivery of family housing, with approximately 60% of the new homes built across these areas being in the form of family homes. The Housing Topic Paper estimates that the addition of Crews Hill and Chase Park to the allocations in

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<sup>23</sup>[https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0034/54979/Duty-to-Cooperate-Statement-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0034/54979/Duty-to-Cooperate-Statement-Planning.pdf)

<sup>24</sup>[https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0022/54526/Enfield-Housing-Topic-Paper-2024.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0022/54526/Enfield-Housing-Topic-Paper-2024.pdf)

the Plan, could have the effect of increasing the overall supply of family housing in the Plan by around 3,600 homes (i.e. from circa 8,600 family homes (30% of the total) to 12,200 family homes (35% of the total). This remains far below the target mix of 60% family housing, but these sites would make an important contribution to meeting the target mix set out in the LHNA.

4.31 The four proposed Green Belt sites for housing (or housing with other land uses, including supporting infrastructure) are:

- **Chase Park Urban Extension**, comprising 4 site allocations -
  - SA10.1: Land at Chase Park South (approximately 2,130 homes, local centre, strategic green infrastructure and playing pitch provision);
  - SA10.2: Arnold House and Land to the Rear (approximately 95 homes/units of care, with potential for some further development, subject to SINC and TPO constraints);
  - SA10.3: Chase Park North East (approximately 640 homes, local parade, strategic green infrastructure, public open space, new country park and new pedestrian and cycle routes); and
  - SA10.4: Chase Park North West (approximately 890 homes, local parade and strategic green infrastructure).
- **Crews Hill New Settlement**, comprising 6 sites allocations –
  - SA11.1: Land North of Cattlegate Road (approximately 800 homes, new school, community hub, local parade, open space and playing pitch provision);
  - SA11.2: Land South of Cattlegate Road (approximately 200 homes, open space and playing pitch provision);
  - SA11.3: Land South of M25 (approximately 700 homes (440 in the Plan period), public open space and playing pitch provision);
  - SA11.4: Land North and South of Cattlegate Road (approximately 2,250 homes (1,000 in the Plan period), new local centre, public open space and playing pitch provision);
  - SA11.5: Land East of Theobalds Park Road (approximately 550 homes (370 in the Plan period), new primary school, public open space and playing pitch provision); and
  - SA11.6: Land South West of Theobald Park Road, Crews Hill (approximately 1,000 new homes (700 within the Plan period), public open space, community hub and local parade).
- SA RUR.01: **Land Opposite Enfield Crematorium** (approximately 291 homes).
- SA RUR.02: **Land between Camlet Way and Crescent Way** (approximately 160 homes).

4.32 Greenfield developments tend to be the most viable, and this is reflected in ELP Policy H2 (Affordable Housing) which requires a minimum of 50% affordable housing at Crews Hill, Chase Park and on the two other Green Belt housing site allocations. In a similar vein, Crews Hill and Chase Park (as well as the two other Green Belt housing

sites) are better placed to deliver new family housing (three and four-bedroom properties). This is reflected in the relevant Site Allocation Proformas (see ELP Appendix C).

- 4.33 Urban development, particularly in the eastern parts of the Borough, has viability challenges (see Whole Plan Viability Assessment Update, paragraphs 12.75- 12.79<sup>25</sup>). Alongside issues with site assembly and the provision of supporting infrastructure, this creates some uncertainty around housing delivery timescales in the second half of the Plan period. Whilst development at Crews Hill and Chase Park will take some time to coordinate and plan in detail, they will in due course deliver a significant and reliable proportion of the new housing needed in the Borough in the second half of the Plan period (and indeed in the period beyond 2041).
- 4.34 Indeed, in this regard, NPPF paragraph 145 requires the ELP to be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the Plan period. The scale of planned development at Crews Hill and Chase Park, and the delivery trajectory set out in the ELP and related supporting evidence, demonstrate that the urban extension at Chase Park and the new settlement at Crews Hill will continue to deliver new homes in the period post 2041, meaning that the Green Belt boundary in Enfield should endure beyond the end of the Plan period.
- 4.35 The need for more housing forms part of Enfield's exceptional circumstances case.

### **Provision of new sustainable communities with wide-ranging benefits**

- 4.36 The selective release of Green Belt land has been informed by a site selection process (see Site Selection Topic Paper), which prioritised sites best able to contribute to promoting sustainable patterns of development. Appendix 1 of the Site Allocations Topic Paper sets out the site assessment process in Table 1, with the second stage of the process being "promoting a sustainable pattern of development". The sequential approach adopted is described, which:
- *"Prioritises land in the urban area, then*
  - *Prioritises the most accessible sites in the Green Belt (considering previously developed land first before considering greenfield sites in the Green Belt, starting with the lowest performing against the Green Belt purposes), then*
  - *Prioritises the least accessible isolated land in the Green Belt (considering previously developed land first)."*

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<sup>25</sup>[https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0025/54952/Enfield-Viability-Update-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0025/54952/Enfield-Viability-Update-Planning.pdf)

- 4.37 As a result of following this process, the two strategic allocations in the Green Belt at Crews Hill and Chase Park:
- Are well served by public transport (with scope for further enhancement);
  - Make use of existing underutilised infrastructure, and are capable of delivering the necessary new supporting infrastructure alongside planned development;
  - Have considerable capacity to deliver transformational change; and
  - Offer significant opportunities to enhance sustainable public access to the surrounding countryside.
- 4.38 The ELP approach reflects NPPF paragraph 74, which recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns (provided they are well located and designed and are supported by the necessary infrastructure and facilities).
- 4.39 Development at Crews Hill will make use of a significantly under-utilised existing railway station and help facilitate the redevelopment of areas of previously developed land. There is an opportunity for Crews Hill to serve as a sustainable gateway for visitors to the wider countryside surrounding Crews Hill, and significant investment in new community infrastructure will ensure day to day facilities and services will be accessible to new residents via a range of sustainable travel options. See ELP Policy PL11 (Crews Hill), the associated Crews Hill Placemaking Vision (in the ELP) and the Crews Hill Topic Paper for further detail.
- 4.40 Chase Park adjoins the current western edge of Enfield and provides an opportunity to deliver a sustainable new neighbourhood with around 3,700 new homes. The development will provide enhanced access to existing and improved services, facilities and related infrastructure (for both new and existing residents), and there will be a strong emphasis within the development on active travel and sustainable movement. See ELP Policy PL10 (Chase Park), the associated Chase Park Placemaking Vision (in the ELP) and the Chase Park Topic Paper for further detail.
- 4.41 The two other Green Belt housing sites, SA RUR.01 (Land Opposite Enfield Crematorium) and SA RUR.02 (Land between Camlet Way and Crescent West, Hadley) are sustainably located, will make further contributions to the provision of family and affordable housing and are well located in terms of transport and active travel opportunities.

### **Need for increased growth and quality opportunities for employment**

- 4.42 NPPF paragraph 55 advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 4.43 A key part of the ELP vision for Enfield is deliver new spaces for logistics and manufacturing (as well as new office space) to support job creation and leverage Enfield's strategic position within the UK Innovation Corridor. The assessed needs for

employment land and premises are set out in the Employment Topic Paper (and summarised in Chapter 3 above).

- 4.44 Having carefully considered the scope for intensification on existing employment sites, and to avoid stifling economic growth and local job creation, the Council is proposing to allocate three Green Belt sites for industrial and logistics space, in locations that are well suited to the main need, which is for logistics space. These sites are:
- SA RUR.03: Land West of Ramney Marsh (a minimum of 70,200 sq m of industrial/ distribution space)
  - SA RUR.04: Land East of Junction 24 (30,550 sq m of industrial/ distribution space)
  - SA RUR.05: Land to the North West of Innova Park (16,445 sqm of industrial/ distribution space)
- 4.45 The strategy for industrial and logistics space seeks to minimise the amount of Green Belt land release. The opportunities for intensification have been fully explored (see Employment Topic Paper, and Chapter 3 above), and the ELP provides a positive framework for intensification, as and when opportunities arise, and the viability improves. Policy E5 (Transforming Industrial Sites) states that the intensification of industrial uses through the more efficient use of space, higher plot ratios and the development of multi-storey schemes will be supported.
- 4.46 On the land that is proposed for release from the Green Belt for industrial and logistics space, the ELP requires a minimum level of employment floorspace provision (with the requirement set to ensure most efficient use of the land).
- 4.47 Overall, in the absence of reasonable (and deliverable) alternatives, namely higher density redevelopment on existing sites in the urban area, it has been concluded that the ELP's economic ambitions can only be achieved with the release of Green Belt land.

### **Harm to the strategic functioning of the Green Belt can be justified and net loss has been minimised**

- 4.48 The Green Belt and Metropolitan Open Land Study (LUC) finds that all of the Green Belt land in the Borough meets at least one of the five purposes of the Green Belt as set out in NPPF paragraph 143. All of the Green Belt land in the Borough is considered to make a strong contribution to Green Belt purpose 5 (assisting in urban regeneration, by encouraging the recycling of derelict and other urban land).
- 4.49 National policy does not require all the purposes of Green Belt land to be met simultaneously, and a strong rating against any purpose on its own could be sufficient to indicate an important contribution.
- 4.50 In terms of the other Green Belt purposes, the Green Belt and Metropolitan Open Land Study found:

- **Green Belt purpose 1 - to check the unrestricted sprawl of the large built-up area.** The land which sits immediately adjacent to the inset urban edges of Greater London is generally considered to make the strongest contribution to purpose 1, by virtue of its close proximity to the large built-up area. Farther away from the urban edge of Greater London the Green Belt's contribution is considered to be lower; however, relative to the size of the Greater London conurbation, all open and more remote Green Belt land within the Borough is considered to be relatively close to Greater London and therefore makes at least a relatively strong contribution to purpose 1.

There are areas around Crews Hill that make a weak/no contribution to Green Belt purpose 1, and the land Opposite Enfield Crematorium and the parts of the Chase Park strategic allocation closest to the urban edge make only a moderate contribution to Green Belt purpose 1. Other parts of the proposed Chase Park strategic allocation, and the land to the west Hadley Wood are deemed to make a strong contribution to Green Belt purpose 1.

- **Green Belt purpose 2 - to prevent neighbouring towns merging into one another.** Much of the Green Belt land within the Borough makes a relatively weak or weak/no contribution to purpose 2, due to the fact that the vast majority of the Borough's Green Belt does not sit within a fully functioning gap between two neighbouring separate towns. However, in the west of the Borough there are areas of land that contribute moderately, relatively strongly, and strongly to Green Belt purpose 2.

Crews Hill and land to the east, the parts of the proposed Chase Park strategic allocation closest to the urban edge, the land North West of Inova Park and West of Ramney Marsh, and the land Opposite Enfield Crematorium make a weak/ no contribution to Green Belt purpose 2. The land at Junction 24 makes a strong contribution to Green Belt purpose 2.

- **Green Belt purpose 3 - to assist in safeguarding the countryside from encroachment.** The vast majority of the Green Belt land in the Borough is open and has a strong distinction from the urban areas, and therefore makes a strong contribution to purpose 3.

Some of the areas around Crews Hill are an exception, making a weak/no contribution, or a relatively weak or moderate contribution to Green Belt purpose 3. The parts of the proposed Chase Park strategic allocation closest to the urban edge, and the land North West of Inova Park and West of Ramney Marsh make only a moderate contribution to Green Belt purpose 3.

- **Green Belt purpose 4 - to preserve the setting and special character of historic towns.** Consideration has been given to whether any of the historic elements within and associated with historic London have a physical and/ or visual relationship with the Borough's Green Belt land. Following this assessment, Crews Hill and surrounds, most of the proposed Chase Park strategic allocation, the land North West of Inova Park and West of Ramney Marsh, and the land at Junction 24 were found to make a weak/ no contribution to Green Belt purpose 4.

The land Opposite Enfield Crematorium, and the land west of Hadley Wood were found to make a strong contribution to Green Belt purpose 4.

- 4.51 The assessed harm to the individual parcels of land that make up the proposed Green Belt site allocations is addressed in more detail in Chapter 5 of this Topic Paper. The local level assessment sets out, with reference to the Site Allocations Topic Paper, what other factors have been taken into account (alongside the harm caused to the Green Belt), when determining the sites to be included within the ELP. Evidence on the Green Belt is just one consideration in the list of evidence base findings that influence the decision-making processes to allocate sites and release them from the Green Belt – with other considerations including housing need, employment need and other benefits such as green infrastructure delivery and biodiversity net gain.
- 4.52 Chapter 9 of the Green Belt and Metropolitan Open Land Study presents an assessment of the cumulative harm to the Green Belt arising from the site allocations proposed on land currently in the Green Belt. This concludes at paragraph 9.21:

*“All of the areas earmarked for release are sufficiently isolated as to have no notable relationship with one another, inhibiting their cumulative visual influence. There would be no significant cumulative harm to the functioning of the Green Belt in Enfield, i.e. in combination there would be no more harm than that already identified through the assessment of the individual sites.”*

- 4.53 The Council’s approach to minimising the net loss of Green Belt land is multi-faceted. In summary, the approaches taken include:
- Making best use of previously developed land in the first instance and optimising the development densities on previously developed sites within the urban area (see Site Allocation Topic Paper<sup>26</sup>).
  - Exploring whether adjoining authorities are able to assist in meeting any of Enfield’s development needs (see Duty to Cooperate Statement<sup>27</sup>).
  - Promoting efficient use of the land removed from the Green Belt. For example, on housing sites establishing placemaking frameworks to ensure suitable development densities, and on the sites released for employment use, requiring minimum levels of new employment generating floorspace, derived from ambitious plot ratio assumptions (see the site allocation proforma for RUR.03: Land West of Ramney Marsh, RUR.04: Land East of Junction 24 and RUR.05: Land to the North West of Innova Park).

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<sup>26</sup>[https://www.enfield.gov.uk/\\_\\_data/assets/pdf\\_file/0028/54955/Site-allocation-topic-paper-for-regulation-19-Planning.pdf](https://www.enfield.gov.uk/__data/assets/pdf_file/0028/54955/Site-allocation-topic-paper-for-regulation-19-Planning.pdf)

<sup>27</sup>[https://www.enfield.gov.uk/\\_\\_data/assets/pdf\\_file/0034/54979/Duty-to-Cooperate-Statement-Planning.pdf](https://www.enfield.gov.uk/__data/assets/pdf_file/0034/54979/Duty-to-Cooperate-Statement-Planning.pdf)



- Seeking higher density development on the proposed Chase Park strategic allocation along Enfield Road, around the new local centre and within walking distance of Oakwood Station (see Policy PL10: Chase Park).
  - Seeking the highest densities on the Crews Hill strategic allocation to the east of Crews Hill Station, other local centres and in areas with the highest public transport accessibility (see Policy PL11: Crews Hill).
  - The Green Belt boundaries for the site allocations have been carefully assessed and refined, to minimise the amount of land needing to be released from the Green Belt (whilst ensuring newly defined defensible boundaries, and whilst ensuring sufficient land is available to meet development needs).
- 4.54 With regard to the Green Belt land being released for housing development, a careful balance has been struck between making efficient use of the land and ensuring that the new development addresses the objective of delivering more affordable and family homes.

### Provision of opportunities for beneficial use of remaining Green Belt

- 4.55 Where it is concluded that is necessary to release land from the Green Belt, NPPF paragraph 147 encourages local authorities to explore whether compensatory improvements can be made to the environmental quality and accessibility of remaining Green Belt land.
- 4.56 Similarly, NPPF paragraph 150 requires local planning authorities to plan positively to enhance the beneficial use of Green Belt land, for example, by looking to provide access, to provide opportunities for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity, and to improve damaged and derelict land. The Green Belt and Metropolitan Open Land Study (Table 9.1) provides an overview of the potential measures that can be applied to mitigate harm to Green Belt and MOL, and where appropriate, these measures have been taken forward in the ELP Site Allocation Proformas.
- 4.57 ELP Policy BG7 (Enhancing the Beneficial Uses of the Green Belt and Metropolitan Open Land) sets out a strategy, including a detailed list of projects that will enhance remaining areas of Green Belt, and seeks to secure the delivery of these projects from the allocated sites (as a condition of their development).
- 4.58 Policy BG7 sets out that *“Planning permission for the development of sites that have been removed from the Green Belt or Metropolitan Open Land through this plan will not be granted unless appropriate measures to enhance environmental quality and accessibility in the remaining parts of the Green Belt/MOL have been secured. These enhancements should be obtained through developer contribution or alternative means. Where enhancements have been identified as part of the Placemaking Frameworks included as part of the Local Plan, such improvements must be included in the development proposals.”*
- 4.59 Furthermore, Policy BG7 sets out that the priorities for enhancements to retained areas of Green Belt are the Proposed Enfield Chase Landscape Recovery scheme and the Lee Valley Regional Park (as shown on the Policies Map), and the green linkages to these projects. Specific enhancement projects are also set out in Policy

BG7, which tie holistically into the Enfield Chase Restoration Project, to form an integrated Green Infrastructure vision for the Borough (in line with Natural England's Green Infrastructure Framework and Standards).

- 4.60 The Enfield Chase Restoration Project has already received seed funding from DEFRA as a trial for new Environmental Land management Schemes and aims to deliver a wide range of environmental, economic and societal benefits by restoring rivers, wetlands, woodlands and grassland landscapes, creating 100s of hectares of connected blue and green spaces within easy reach of millions of people. Work is ongoing as part of this project, working closely with the Environment Agency, Natural England, and the GLA to develop a detailed spatial plan of green infrastructure projects as set out in the ELP.
- 4.61 The project will restore habitats and create a new publicly accessible space for various recreational and cultural activities in a natural environment and will to cover more than 1,500 hectares, primarily consisting of farmland owned by the Council. The Enfield Chase Landscape Recovery Project offers an opportunity to re-purpose Enfield's Green Belt for the 21st century. By reinstating the land and transforming it from farmland into woodlands, meadows and wetlands, all while enhancing public access and promoting sustainable commercial activities, there is significant potential to provide a wide range of benefits.

### Summary of case for strategic exceptional circumstances

- 4.62 The strategic case for exceptional circumstances to justify the altering of Green Belt boundaries can therefore be summarised as follows (with reference to the relevant paragraphs in the NPPF):
- LBE has chosen to review and alter the Green Belt boundaries in the Borough, and has evidenced and justified the necessary exceptional circumstances (NPPF paragraph 145);
  - The Spatial Strategy and related allocations are justified, having examined all other reasonable options for meeting the identified need for development (NPPF paragraph 146);
  - The opportunities for development on suitable brownfield sites and on underutilised land have been fully explored, ensuring that the ELP makes as much use as possible of such land (NPPF paragraph 146, a));
  - The density of development on sites proposed for allocation has been optimised, with a significant uplift in development densities in the town centres within the Borough, and in other locations well served by public transport (NPPF paragraph 146 b));
  - In relation to employment needs, the scope for intensification of existing sites within the urban area has been fully assessed, but insufficient capacity can be delivered to meet the need for industrial and logistics space (NPPF paragraph 146);
  - Neighbouring authorities are unable to assist in meeting Enfield's development needs (NPPF paragraph 146 c));
  - There is insufficient capacity to meet the identified housing and employment needs on urban sites alone.

- The allocations on land currently in the Green Belt have been proposed following a rigorous site selection process, which gave first consideration to land which is previously developed and/ or is well served by public transport (NPPF paragraph 147);
- The net loss of Green Belt land has been minimised.
- The ELP supports and promotes compensatory improvements to the environmental quality and accessibility of remaining Green Belt land (NPPF paragraph 147).

## 5 Local Level Case for Exceptional Circumstances to amend the Green Belt boundary

- 5.1 Alongside the strategic case set out in Chapter 4 above, there are local exceptional circumstances specific to each proposed allocation. The details are provided in the Site Allocation Topic Paper (including at Appendix 2, which provides an overview of the justification for allocating specific sites, including sites currently in the Green Belt).
- 5.2 It is important to emphasise that the evidence on Green Belt harm (as set out in the Green Belt and Metropolitan Open Land Study) is only one part of the evidence base. Consequently, where the Green Belt Assessment has found that high harm is to be caused by release of a parcel of land from the Green Belt, this finding must be balanced against other important factors that could make up exceptional circumstances, including, sustainability, accessibility, meeting development needs, viability and deliverability.
- 5.3 The Site Allocation Topic Paper includes at Appendix 1 the Site Selection Methodology used by Officers in preparing the ELP. Table 1 in the Appendix sets out the site assessment process, including the sequential approach taken to promoting sustainable patterns of development. The site selection process firstly prioritises land in the urban area, followed by the most accessible sites in the Green Belt (with first priority given to previously developed land in the Green Belt, before considering greenfield sites in the Green Belt, starting with those areas that are lowest performing against the Green Belt purposes).
- 5.4 The site allocation process took into account the contribution that sites made to the purposes of the Green belt, the harm caused to the Green Belt through allocation of a site for development, the scope to create a new permanent Green Belt boundary (following allocation) and the opportunities to mitigate the identified Green Belt harm.

### *Note*

- 5.5 The Green Belt and Metropolitan Open Land Study suggests at Chapter 9 (paragraph 9.3) that the Exceptional Circumstances Topic Paper outlines the local exceptional circumstances for the proposed Green Belt allocations. As the evidence base work has been further refined (and finalised), the Council recognised that there would be overlap between the site selection process (reported in the Site Allocation Topic Paper) and the content of the Exceptional Circumstances Topic Paper (if the latter included an assessment of the local exceptional circumstances for the proposed Green Belt site allocations).
- 5.6 Accordingly, the local exceptional circumstances case for the proposed site allocations in the Green Belt are addressed in the Site Allocations Topic Paper only, with the reasoning for allocation presented at Appendix 2 of the Site Allocations Topic Paper.

## 6 Summary and Conclusion

- 6.1 National planning policy states that authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified (NPPF paragraph 145).
- 6.2 The evidence base that underpins the ELP demonstrates the need to deliver more housing (in particular affordable and family homes), as well as the need for more industrial and logistics space to support economic growth and local job creation. LBE is committed to supporting 'good Growth' and wish to ensure that the new housing and employment development is supported by necessary supporting infrastructure – for the benefit of both new and existing residents.
- 6.3 The Council have fully explored the opportunities for development within the urban area, and have sought to optimise development site capacities, balancing a wide range of considerations, including heritage and character constraints.
- 6.4 Development within the urban area is not able to meet the identified needs for housing (in particular the need for more affordable and family homes) and is not able to meet employment land needs, risking stifling economic growth and local job creation.
- 6.5 Adjoining authorities have confirmed that they are unable to assist in meeting any of Enfield's housing and employment needs.
- 6.6 A Green Belt and Metropolitan Open Land Study has been undertaken, which provides a detailed assessment of the Green Belt in the Borough, the contribution land parcels make to each Green Belt purpose, and the assessed level of harm arising from removing a parcel of land (or combination of land parcels) from the Green Belt for allocation.
- 6.7 This Topic Paper outlines the strategic level case for altering the Green Belt boundaries within the Borough, and the Site Allocations Topic Paper addresses the local level exceptional circumstances case for particular sites.
- 6.8 The Green Belt Assessment work is one of many inputs into the site selection process (as described in the Site Allocation Topic Paper). The contribution that each parcel of Green Belt land made towards the purposes of the Green Belt was an important consideration in the site selection methodology, but other factors also needed to be taken into account, including the location of the Green Belt land, the extent to which development of the parcel would accord with the emerging spatial strategy, and the findings of the IIA.
- 6.9 The Council strongly believes that there are the necessary exceptional circumstances to justify making selective alterations to the Green Belt.
- 6.10 The Chase Park urban extension and the Crews Hill new settlement will make a significant contribution towards meeting housing needs (in particular the need for more affordable and family homes). They afford the opportunity to make better use of existing transport infrastructure and deliver new or extended bus routes for the benefit

of new and existing residents. They will also deliver significant new community infrastructure and enhanced access to open spaces and the remaining Green Belt.

- 6.11 The two other Green Belt housing sites are sustainably located, and again, will make a significant contribution to the delivery of more affordable and family homes.
- 6.12 The three proposed employment sites in the Green Belt will support local economic growth objectives, by providing new employment land and floorspace in locations suited to meeting the need for logistics space.
- 6.13 The Council do recognise that much of the Green Belt land proposed for allocation contributes strongly to Green Belt purposes, and that the level of harm from allocation in many instances will be high or very high, but a planning judgement has been made taking all factors into account.
- 6.14 There are significant social benefits in providing more affordable and family homes, new and enhanced community infrastructure and improved access to open spaces and the countryside. There are also significant economic benefits in meeting employment land needs, in terms of supporting economic growth objectives and creating local jobs. There are also environmental benefits, helping to off-set the planned development within the Green Belt, which include the Council's ambitious plans to transform its rural Green Belt Estate.