

Statement for Enfield EiP

22 January 2025

Thank you.

Briefly set out the Mayor's position under delegation from the Mayor in relation to Enfield's local plan.

It is the Mayor's opinion that Enfield's local plan is not in general conformity in relation to green belt release and tall buildings. It is not proposed to set out the position on tall buildings which is sufficiently covered in the Regulation 19 response and Statement of Common Ground.

In relation to Green Belt, the Mayor's opinion in May 2024 at the Regulation 19 stage was that the local plan was not in general conformity with the London Plan in relation to green belt, as exceptional circumstances had not been demonstrated that would justify the release of green belt at Chase Park and Crews Hill. That view was essentially based on four concerns:

1. There was no need, given the housing numbers used in the London Plan
2. The Mayor was not satisfied that Enfield had done enough to maximise the use of brownfield sites
3. The locations chosen were unsustainable, and the number of dwellings proposed was not enough to change that
4. The density of development was too low and failed to maximise the opportunity.

In the light of these concerns, the Mayor's position *at that time* was that the only remedy to the general conformity issue was to remove the sites at Crews Hill and Chase Park from green belt release in the local plan.

If Enfield's proposals are considered *solely* in the context that was in place at that time in relation to the previous NPPF and the 2021 London Plan, that position remains the same. However, it is recognised that since that time and following the general election, there has been a new revised NPPF. While the transitional arrangements mean that the Enfield Plan should still be assessed by reference to the old NPPF, it is the Mayor's view that the new NPPF is a material consideration which can be taken into account when deciding whether, if the question is asked as at today, there are "exceptional circumstances" which would justify the release of green belt.

In particular, the new NPPF has removed text from paragraph 61 of the previous NPPF, which stated that:

“There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals.”

Previous London Plans used para 61 to establish London’s housing need figure, and we may well have done so again for the next London Plan had this not been removed from national policy. However, that option is no longer available and the next London Plan will therefore apportion London’s housing need, as established by the national standard method, across London’s planning authorities in the form of housing targets enshrined in the London Plan.

Under the new NPPF, London’s cumulative housing need figure is 88,000 homes per year. Over a 10 year period (which is the usual planning period for a London Plan) this amounts to 880,000 homes. This is a significant increase and is broadly the same as the number of homes delivered between 1991 and 2023, over 32 years. Clearly this will require a step-change in delivery.

In order to achieve this, the Mayor will continue to optimise delivery of housing on brownfield sites first in accordance with the NPPF. However, this will be insufficient to plan for the number of homes required. In broad figures, the current London Plan originally planned for 66,000 homes a year to be delivered within London’s existing urban form. This was reduced to 52,000 homes a year following the Examination in Public. Current delivery rates are below 40,000 homes a year. Therefore, even with significant interventions (both policy changes and other mechanisms), land supply and reasonably anticipated delivery from windfall and urban intensification, it would be unreasonable to argue that the jump to 88,000 homes a year can be achieved *wholly* within London’s existing urban extent.

In accordance with the December 2024 NPPF, where the need for housing and other development cannot be met through other means, the green belt should be reviewed and alterations to the green belt proposed to meet these needs in full. [para 146]

However, in light of the new circumstances relating to both London's housing need and the very different approach to green belt set out in the new national policy, and in responding to LB Enfield's proposed release of green belt, it is noted that (as the Mayor has made clear in his response to the draft NPPF and at other opportunities) any green belt release should be on the basis of building sustainable, liveable neighbourhoods with access to public and active transport options, making the best use of land.

In other words, the rationale for looking at locations well-served by public transport first is that they give more ‘bang for your buck’ or more homes for the amount of green belt released and therefore a greater contribution towards meeting London’s mandatory, nationally-established housing need.

As this national picture has evolved, we have kept our response to LB Enfield under review, including the Mayoral opinion of general conformity, and whether exceptional circumstances exist. Across London as a whole, it is intended that this analysis of exceptional circumstances will be done through a London-wide green belt review, but this matter has been accelerated in Enfield due to the timing of the local plan examination and the borough’s proposed release of green belt land.

London’s green belt has a limited number of locations served by public transport. The green belt within proximity to Oakwood and Cockfosters stations on the Piccadilly line is one such location. This connectivity could facilitate higher densities than are possible in locations poorly served by public transport, and therefore more homes (more sustainably) on any green belt land that was released.

In order to explore this, a piece of work was commissioned from independent qualified professionals to assess the Chase Park area.

The fundamentals of the analysis were:

- to make best use of any land released from green belt
- significantly increase the number of homes to address the housing crisis
- landscape-led development
- net gains in accessible public open space
- net gains in tree coverage and woodland
- support nature recovery
- climate positive

This review concluded that there were potentially other options for Chase Park which would be transformative in the number of homes that could be provided - approximately three times the number of homes for release of 40 percent additional green belt.

The scale of this level of development would support other opportunities in terms of transport connectivity – in turn enabling the increase in the number of homes that could be supported on the parcels already proposed by LB Enfield for release at Chase Park. This opportunity could concurrently increase publicly available open space by retaining existing natural assets and parkland, providing compensatory land for any parcels of land lost, and significantly extending the accessible area of

Trent Park. It could also increase woodland and tree cover overall as compared to the current situation.

It is important to stress that the timing of this work is running in advance of London-wide work, including a London-wide green belt review and further work to fully understand the potential housing capacity within London's existing urban form.

We recognise the speed at which we have had to prepare this analysis, its limitations and the overarching need for proposals to be embedded in their local community and subject to public consultation. Notwithstanding this, it is also recognised that it would have been inappropriate and unhelpful for the GLA to give an opinion on Enfield's proposed green belt release just based on assertion and conjecture. We do not, at this stage, endorse the specific option identified in the review, but we believe the general conclusions it has reached about the scale of contribution which is possible, and the key principles on which it is based, are sound. I also want to be clear that the work that has been undertaken does not constitute proposals for development. If that additional potential is not realised, this is likely to increase the amount of green belt land that needs to be released across London overall if we are to plan for an increase in housing supply to 88,000 homes per year. It is noted that the land take for homes that need to be planned for on sites with poor public transport accessibility is significantly higher per home.

In the light of that work, the position in relation to the draft Local Plan remains that it is not in general conformity with the London Plan because exceptional circumstances have still not been demonstrated, but the reasons which underpin that assessment have been reduced. In principle, the need for some green belt release to contribute towards meeting London's housing need to tackle the housing crisis appears unavoidable given the changes to national policy about needing to release green belt where housing and other development needs cannot otherwise be met and the significant increase in London's mandatory housing need figure. However, the question whether exceptional circumstances exist is not one which can simply be answered in the abstract: it will always depend upon a combination of factors which include the particular characteristics of the site which is proposed for release, and the way in which it is proposed to develop that land. This is entirely consistent with para 148 of the new NPPF, which advises that

"... when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework."

In the present case with LB Enfield's proposals on the table, the Mayor remains concerned that Chase Park and Crews Hill are not sustainable locations, and cannot

be made so by the levels of development currently being proposed; and that the current allocations do not make best use of the land which it is proposed to release. In the Mayor's view, these issues are sufficiently important to mean that exceptional circumstances do not exist which justify the release. There is therefore a fundamental conflict with Policy G2 of the London Plan which is sufficiently important to mean that the Enfield Plan is not in general conformity.

However, whereas the Mayor's view when it was considered that there was no need for the release at all was that the only way of remedying that non-conformity was to delete the allocations, we now consider this could be done in one of the three ways. The Mayor would therefore invite the Inspector to consider three possible potential main modifications to make the local plan acceptable.

In order of preference, these are:

1. Complete the relevant documentation and consultation for a different release of land overall from the Green Belt than that proposed by LB Enfield, together with a very significant increase in the number of houses which the allocation is expected to deliver, within the scope of this EiP. The associated policy would need to specify the infrastructure needed to ensure the scheme was sustainable, and would almost certainly require a comprehensive scheme or masterplan before individual sites could be brought forward. If this can be done, it is likely to be the quickest way of bringing the proposed allocations forward. However, the Mayor recognises that the work required may take some time. It is a matter for the Inspector whether it would be appropriate to delay the plan for this to take place.
2. If that first option is not possible (for example because it would take too long) a compromise would for the Local Plan to be amended so that it establishes both the principle of releasing a different area of land for a significantly more ambitious development at Chase Park and reconsider the potential of Crews Hill, but defers the actual release (and any decisions as to the precise extent of that release) to an Area Action Plan. In order to assist that process the Local Plan could identify an "area of search" across a wider geography, with which the AAP was expected to identify the precise boundaries. The associated Local Plan policy would also need to be amended to better reflect the potential of the opportunity presented by locations with good public transport accessibility, and to ensure that all development is brought forward through the AAP in a way that supports appropriate housing numbers, and sustainable neighbourhoods (i.e. sufficient to support the necessary public transport infrastructure to unlock 10,000+ homes). One of the advantages of this approach is that it would tie in with the London Plan timetable, which

requires timely progress for work towards London LPA housing targets in any case to support a draft London Plan publication before 1 March 2026.

3. If neither of these solutions is considered possible, the Mayor considers the only way in which the Local Plan can be amended which would ensure general conformity with the London Plan is by removing the sites at Chase Park and Crews Hill from the local plan. These could then be reconsidered for an early review once further work has progressed on a new London Plan and accompanying housing apportionments. While this would be the least preferable of the three modifications we suggest, it would ensure that the opportunity represented by Chase Park and Crews Hill is not squandered, and would therefore be better than the Plan as it currently stands.