

STATEMENT OF COMMON GROUND LONDON BOROUGH OF ENFIELD and

BERKELEY HOMES (NORTH EAST LONDON) LTD In relation to land in the Crews Hill Area MAY 2025

1. Introduction

- 1.1 This Statement of Common Ground (SoCG) has been produced in order to set out areas of common agreement between the London Borough of Enfield (LBE) and Berkeley Homes (North East London) Ltd ('Berkeley') and any areas of disagreement in relation to Policy PL11 and proposed site allocations at Crews Hill which form part of the emerging Enfield's New Local Plan 2019 2041.
- 1.2 Enfield Council is the local planning authority responsible for preparing an upto-date Local Plan for the administrative area of Enfield.
- 1.3 Berkeley has an interest in several areas of land within the Crews Hill Placemaking Area as part of Policy PL11 and in particular at Owls Farm within Site Allocation area SA11.1: Land North of Cattlegate Road, and the Enfield (previously Wyevale) Garden centre, which is situated east of the railway within the SA11.4 site allocation area.
- 1.4 Berkeley (represented by Lichfields) submitted representations on the following policies in response to the New Enfield Local Plan Regulation 19 Consultation:
 - PL11 (Regulation 19 Consultation Submission Reference 9075-1).
 - SA11.1 (Regulation 19 Consultation Submission Reference 9074-1).
 - SA11.2 (Regulation 19 Consultation Submission Reference 9073-1).
 - SA11.4 (Regulation 19 Consultation Submission Reference 9076-1).

- 1.5 Site PL11 Crews Hill is proposed for residential-led mixed use development to deliver a new sustainable settlement within the emerging Enfield's New Local Plan.
- 1.6 A site location plan setting out the promoter's land interests is attached at Appendix 1.
- 1.7 This SoCG reflects the current position between London Borough of Enfield and Berkeley.

2. Areas of Common Ground

- 2.1 Berkeley agree that Crews Hill is a suitable, sustainable and deliverable location for the creation of a new settlement.
- 2.2 Berkeley support the overall spatial Strategy identified within the New Local Plan and the overall overarching aims, objectives and the decision to allocate the Crews Hill as a placemaking area for growth.
- 2.3 Berkeley is supportive of Policy SS1's target to deliver 33,280 new homes over the plan period 2019/20 to 2040/41.
- 2.4 Berkeley is broadly supportive of the proposals set out in the Local Plan at Policy PL11 and Site Allocations which allocate land at Crews Hill for development to deliver a new sustainable settlement.
- 2.5 Berkeley agree with the release of land at Crews Hill from the Green Belt, to enable the Council to reach their target for new homes up to 2041.Berkeley agree with the case set out by the Council's background evidence base for releasing land from the Green Belt at Crews Hill.
- 2.6 Berkeley has a strong desire to bring the land forward promptly and are supportive of housing coming forward during the plan period and beyond.
- 2.7 Berkeley agree with the Council's approach that the current 'illustrative spatial framework' is merely illustrative for now, and that further work is appropriate to be brought forward as a Supplementary Planning Document or other planning mechanism.
- 2.8 Berkeley are working collaboratively and proactively with Enfield Council and adjoining landowners/developers via an ongoing Developer Forum.
- 2.9 This collaboration is further formalised through a Memorandum of Understanding (MoU) (see appendix 3) between the local landowners, developers, site promoters and the Council. The MoU outlines a shared commitment to the coordinated development of the Crews Hill area.
- 2.10 Berkeley agree to continue to work with relevant statutory consultees and Enfield Council to ensure that the comprehensive development of Crews Hill is brought forward in accordance with the Local Plan and the Council's aspirations.

3. Outstanding Matters

- 3.1 This section summarises the main areas which Berkeley and Enfield Council are not agreed on. Further detail is provided in relation to the points/issues raised in Appendix 2. In headline terms these are:
 - 1. The potential bridge over the railway line of any form either as public transport road bridge or an active travel pedestrian/cycle bridge identified as a 'must' requirement within the Plan and SA11.1.
 - The location of the primary school as stipulated by SA11.1 and the requirement to fully fund and provide land (and the degree of flexibility allowed for).
 - The location of the local parade as stipulated by SA11.1 (and the degree of flexibility allowed for).
 - 4. The degree of flexibility expressed in the capacity figure for SA11.1.
- 3.2 Berkeley are keen to address any outstanding issues with modifications to policies PL11, SA11.1, SA11.2 and SA11.4.

AGREEMENT

Signed on behalf of London Borough of Enfield by:



Brett Leahy – Strategic Director of Planning & Growth

Enfield Council

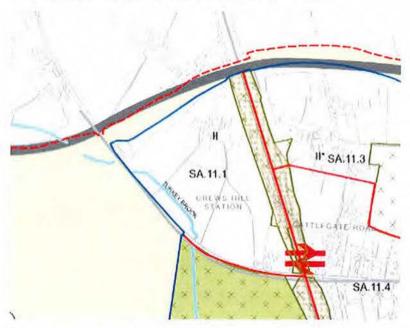
Dated: 23rd May 2025

Signed on behalf of Berkeley Homes (North East London) by:

Harry Lewis, Berkeley Homes (North East London)

Dated: 28th May 2025

Appendix 1
Site Allocations SA11.1 & SA11.4: Crews Hill



Berkeley land Interests Site Location Plan



Appendix 2: Berkeley Regulation 19 Representations: Matters raised

Representations from Berkeley Homes	Policy	Councils Response	Proposed Change	Berkeley Homes Response	Agreed?
Berkeley disagree with the estimated housing capacity of 200 homes to the northern end of the Golf Course in Site Allocation SA11.2. Berkeley consider it has the potential to deliver 340 homes including taking into consideration the Golf Course Grade I SINC, and the potential for compensatory measures to be included beyond the boundary of the defined placemaking area. Berkeley suggest the following modification is required to reflect the potential of SA11.2. Policy SA11.2 – Table C1.80 "Approximate Estimated Housing Capacity – 200-350 new homes (as may be refined through potential mitigation and compensatory measures for Crews Hill Golf Course SINC)" Berkeley suggest the following modification is also required to Policy SA11.2 – Table C1.81 to set out that some compensatory habitats and/or uses may need to be provided on related land beyond the 'placemaking area': "Design Principles - B. must retain existing trees and compensate for habitat loss within the wider SINC by enhancing retained habitats (subject to soil sampling and biodiversity net gain assessment) and/or providing linked compensatory habitats on retained Green Belt land to the west of the Crews Hill Golf Course SINC, as identified within a masterplan framework SPD (or equivalent)."	PL11 & SA11. 2 Tables C1.80 & C1.81	The Council's evidence base has carefully considered the balance between development and the SINC at SA11.2. SA11.2 is anticipated to play a wide role in providing open space as part of the comprehensive redevelopment of the area. The wording of SA11.2 refers to "around 200 new homes" and is considered to provide for a degree of flexibility in site capacity. The capacity of the Site Allocation area is considered robust and has been informed by design and capacity testing as part of the preparation of the Crews Hill Spatial Framework published as part of the evidence base. No evidence has been provided to define any new higher number. LBE notes that a proposed modification could provide additional clarity on the aspects which would influence an alternative site capacity. and would be supportive of a modification being made if it	If considered necessary by the Inspector to provide clarity on the aspects which would influence an alternative site capacity: Modification to Policy SA11.2 – Table C1.80: "Approximate Estimated Housing Capacity – 200 new homes (as may be refined through potential mitigation and compensatory measures for Crews Hill Golf Course SINC)"	Berkeley considers such a proposed change in relation to capacity refinements would be necessary to provide flexibility for later masterplanning, and the proposed wording is considered to appropriately reflect this.	Yes.

Berkeley suggest the following modification is required to Policy PL11 – Paragraph 2 to clearly set out the potential geographic scope of the future comprehensive masterplan (to come via the SPD or equivalent process) and also to recognise that this may extend beyond the immediate boundaries of the placemaking area where necessary: "A detailed comprehensive masterplan for the placemaking area must be prepared, building on the illustrative framework prepared to date (Figure 3.14). The comprehensive masterplan should address the placemaking area, as well as retained areas of Green Belt beyond the placemaking area boundary where these are proposed for complementary or compensatory uses associated with development at Crews Hill. This must be adopted prior to planning permissions being granted within Crews Hill"		was considered by the Inspector to be necessary. In relation to whether the wording should be explicit about further masterplanning being able to consider land beyond the placemaking boundary, the Council do not consider such a change to be necessary. The current policy wording places no limit or restriction for such masterplanning to consider compatible uses in the vicinity of the boundary.		It is noted that that the Council consider the masterplanning exercise can look beyond the placemaking boundary defined on the proposals map in order to address complementary and/or compensatory uses within the remaining Green Belt and that the Council consider this would be consistent with the current policy wording. Berkeley expect this principle to flow through to the SPD.	Yes.
Berkeley consider that the capacity for SA11.1 is lower than stated within the policy (approximately 650 as opposed to 800 homes). Berkeley also consider that the current degree of precision in respect of naming specific infrastructure requirements within site allocations is premature and creates an unnecessary constraint on future masterplanning. Berkeley suggest the following modifications are required to be consistent with the Plan's Policy PL11 which sets out that the precise location of uses will be set out within a detailed comprehensive masterplan to be adopted as an SPD. Stipulating the location of strategic infrastructure via the site allocations – such as	PL11 & SA11. 1	SA11.1 is well located to Crews Hill Railway station and offers high opportunities for improved public transport accessibility. The capacity of the Site Allocation area is considered robust and has been informed by design and capacity testing as part of the preparation of the Crews Hill Spatial Framework published as part of the evidence base. The wording of SA11.1 refers to "around 800 new homes" and is considered to provide	If considered appropriate by the Inspector to provide clarity on the aspects which would influence an alternative site capacity: Modification to Local Plan Page 445 – Table C1.78: SA11.1: "Land Use Requirements - Development should provide around 800 new homes, educational facilities including a new school, with local public open space; local formal play provision, and a local	Berkeley agree that the provision of infrastructure at Crews Hill is imperative, but nonetheless consider the lack of flexibility in policy SA11.1 around how individual infrastructure items are planned and delivered for Crews Hill – with the precise form and location of infrastructure set within policy, in advance of a full masterplan framework being prepared – is	Yes (in part) save for (1) railway crossing being identified as 'desirable' (2) the need for flexibility to point F and (3) the dwelling capacity of SA11.1 which will

a primary school – in advance of this process, elevates the existing 'illustrative framework' to policy, which is not supported, is not its intended purpose and would not be sound.

Local Plan Page 445 - Table C1.78: SA11.1

"Land Use Requirements - Development should provide around 800 650 new homes, educational facilities including a new school, with local public open space, local formal play provision, and a local Multi-functional community hub including retail as part of a Local Parade. Provision of other land uses — for education and playing pitches - will be subject to it being identified as required within a subsequent SPD masterplan framework (or equivalent).

And:

"Approximate Estimated Housing Capacity – 800 650 new homes"

Berkeley suggest the following modification is required in relation to provide flexibility in the location and funding of the proposed primary school:

Local Plan Page 446 - Table C1.79: SA11.1

"IV. must provide <u>financial contributions</u> <u>towards and, where identified within a</u> <u>subsequent SPD masterplan framework (or equivalent),</u> land <u>for and finance-the</u> construction of a 2FE primary school."

Berkeley suggest the following modification is required in relation to the proposed public transport road bridge as it cannot be demonstrated to be required at this stage: for a degree of flexibility in site capacity.

The Council consider that it is important that the Plan provides clarity over infrastructure requirements, and that SA11.1 is an appropriate location for a primary school given the scale and type of housing envisaged for this allocation.

The Council recognise that some flexibility could be included should an alternative location for the primary school be identified through the process of preparing an SPD.

The Council consider that a connection across the railway is important to enhance permeability across the whole Placemaking Area, but that some flexibility could be included as to the form of such a link. This should as a minimum provide active travel (foot/cycle connectivity) to improve permeability. As referenced in the accompanying Infrastructure Delivery Plan, it is desirable for the connection to provide a public transport connection should this be necessary to improve public transport accessibility in this part of the area, but some flexibility could

Multi-functional community hub including retail as part of a Local Parade. Provision of other land uses (other than residential) will be subject to being identified as required within a subsequent SPD masterplan framework (or equivalent) and would only not be required within SA11.1 if such land uses can be secured at an appropriate location elsewhere within the Crews Hill Placemaking Area."

If considered appropriate by the Inspector to provide clarity on the provision of the primary school and connections:

Modification to Local Plan Page 446 – Table C1.79: SA11.1 Infrastructure requirements:

"IV. must provide financial contributions towards and, where identified within a subsequent SPD masterplan framework, land for and finance-the construction of a 2FE primary school."

"VI. must provide land for and contribute funding

not a sound approach, does not reflect the evidence on deliverability and is inconsistent with Policy PL11 which sets out the such matters will be dealt via the SPD.

Berkeley support a change to the wording at Page 445 – Table C1.78: SA11.1 as being necessary.

In respect of the primary school Berkeley consider the agreed change to Local Plan Page 446 -Table C1.79: SA11.1 is necessary for soundness: the existing Plan wording indicates Berkeley must finance the [full] construction of a school, which would not be consistent with the CIL Reg 122 tests (fairly and reasonably related in scale and kind).

In respect of a bridge over the railway line, Berkeley consider the Plan's current wording which sets it as a be influenced by land take for any bridge, school or local parade identified via the SPD.

(4)the need for flexibility on the location of the primary school and the requiremen t for full funding of the primary school (noting this has been put forward as a suggested change)

"VI. must provide land for and contribute funding towards a new public transport road bridge over the railway connecting to allocation SA11.3."

Berkeley suggest further modifications are required to be consistent with the preceding change and pending the outcome of future infrastructure delivery work.

"C. must provide a new public transport corridor connecting to Cattlegate Road at the south of the site via a new road bridge connection across the railway. The location of the bridge connection should minimise the impact on the railway SINC. The design of the bridge should minimise impact on the setting of the heritage assets."

and

F. must provide a new local parade aligned to a new connection across the railway.

and

G. Where identified within a subsequent SPD masterplan framework (or equivalent), must provide a new primary school in close proximity to the local parade and public transport corridor.

Berkeley consider that consequential changes to paragraph 3.165 of the Local Plan would be necessary to bring the explanatory text into line with the above. Berkeley note that connections across the railway are referenced in Policy PL11 (albeit not specific as to where and what the type the connections are).

Berkeley consider that Policy PL11 para 18c might be amended to delete the word "two"

be included should alternative proposals be put forward to improve public transport accessibility in an equivalent and acceptable way. towards a new <u>active</u> <u>travel link (and as a public</u> transport road bridge <u>should this be required to improve public transport</u> <u>accessibility to the site</u> <u>allocation, is viable and deliverable</u>) over the railway connecting to allocation SA11.3."

Modification to Local Plan Page 446 – Table C1.79: SA11.1 Infrastructure requirements:

"C. must provide a new active travel public transport corridor connecting to Cattlegate Road at the south of the site via a new road bridge connection across the railway. The location of the bridge connection should minimise the impact on the railway SINC. The design of the connection bridge should minimise impact on the setting of the heritage assets. The connection may need to be capable of accommodating public transport services, should this be required to improve public transport accessibility to the site

'must' (i.e. mandatory element) is not iustified by the evidence and is therefore not sound. We note the IDP (E7.12) identifies the road/public transport element as 'desirable' but only the active transport elements as 'essential' (though Berkeley is unaware of the justification underpinning this, with no costing provided and the viability testing only testing this element as 'desirable'). The Council's proposed wording introduces some flexibility but we consider both the active travel link as well as the public transport road bridge (whichever form the connection takes) should be identified as 'desirable' elements and subject to viability and deliverability - if they are to be included at this degree of prescription at all:

"VI. Where viable, deliverable and

from "two new connections across the railway line" and reference instead "appropriate crossings of the railway line") and at Para 3.165 the language talks about an "envisaged" link as per the illustrative masterplan; this then contrasts with the Policy SA11.1 requirement of "must provide".

<u>allocation, is viable and</u> <u>deliverable</u>.."

and

G. must provide a new primary school in close proximity to the local parade, and public transport corridor active travel connection and in an area with good public transport accessibility. unless an acceptable alternative location for the school has been identified within an SPD masterplan framework and can be secured at an appropriate location elsewhere within the Crews Hill Placemaking Area."

identified within a subsequent SPD, should must provide land for and contribute funding towards a new active travel link (and as a public transport road bridge should this be required to improve public transport accessibility to the site allocation) over across the railway connecting to allocation SA11.3."

"C. Where viable, deliverable and identified within a subsequent SPD. should must provide a new active travel public transport corridor connecting to Cattlegate Road at the south of the site via a new road bridge connection across the railway. The location of the bridge-connection should minimise the impact on the railway SINC. The design of the connection bridge should minimise impact on the setting of the heritage assets. The connection may need to be capable of accommodating public

Berkeley is considering a primary school's location in Crews Hill, possibly at the Enfield Garden Centre (Wyevale) site. Berkeley state	PL11 &	The Council recognise that some flexibility could be included should an alternative	If considered appropriate by the Inspector to provide clarity on the	will have an impact on capacity. Berkeley consider this change is necessary for soundness, and	Yes.
				explicitly recognised within Policy SA11.1 (in the same way it is proposed for SA11.4), with the 'around' number of homes ultimately to be determined by the SPD. This is necessary to reflect that the land take of infrastructure that might be identified by the SPD (e.g. bridge, school, local parade)	
				Berkeley continue to consider flexibility on the number of new homes should be	
				Berkeley continue to consider flexibility is required to be introduced into the location for the local parade within point F.	
				transport services, should this be required to improve public transport accessibility to the site allocation, is viable and deliverable."	

it would be more accessible and contribute to the central area's vitality. Berkeley believes this is a matter for the comprehensive masterplan, requiring flexibility.	SA11. 4	location for the primary school be identified through the process of preparing an SPD.	delivery of a primary school in the area: Modification to Local Plan Page 452 – Table C1.85:	that the existing Plan's wording pre-judges the location of infrastructure ahead of
Berkeley suggest the following modification is required to reflect the potential of SA11.4 to accommodate the primary school, if future masterplanning shows this is an appropriate and preferred location for delivering it.			SA11.4 Infrastructure requirements: "III. must contribute to the off-site construction of a 2FE primary school and a	the masterplan framework SPD and is not justified. Berkeley is content with the Council's suggested wording, which largely
Policy SA11.4 – Table C1.85 – Infrastructure Requirements "III. must contribute to the off-site construction of a 2FE primary school and a secondary school, to be delivered within the Crews Hill placemaking area and to be identified within the comprehensive masterplan."			secondary school, to be delivered within the Crews Hill Placemaking Area and to be identified within an SPD masterplan framework."	matches its own suggested wording.



MEMORANDUM OF UNDERSTANDING

between

LONDON BOROUGH OF ENFIELD (LBE)

and

LANDOWNERS, DEVELOPERS AND PROMOTERS OF LAND WITHIN THE CREWS HILL PLACEMAKING AREA

1. Purpose

- 1.1. This document forms the agreed Memorandum of Understanding (MOU) between London borough of Enfield (LBE) and landowners, developers and site promoters within the Crews Hill Placemaking Area. LBE is the local planning authority responsible for preparing an up to-date local plan for the administrative area. This area is defined by Strategic Policy SP PL11: Crews Hill within the draft Enfield Local Plan 2019-2041 as shown in Appendix A. Collectively the signatories are referred to as 'the Parties'.
- 1.2. The purpose of this MoU is to set out the key matters and strategic principles which have been agreed between the Parties. It confirms the shared ambition for the comprehensive development and change across the Crews Hill Placemaking Area and a commitment to work positively and through a collaborative process to ensure successful and proactive delivery. It has been prepared to assist the forthcoming Examination of the New Local Plan, and specifically the consideration of policies and site allocations related to Crews Hill.

2. Background

2.1. From December 2018 to February 2019 LBE consulted on the issues and options for the Local Plan which included a consultation to identify future development sites ("Towards a New Local Plan 2036", December 2018). A further consultation was held on a Draft Plan between June to September 2021 ("Main issues and preferred approaches" June 2021). The Draft Plan identified a Placemaking Area at Crews Hill which was considered to be suitable for a new sustainable community to come forward in a strategic and comprehensive manner.

- 2.2. The Parties have been working collaboratively on exploring and developing the concept further. They have come together in what was called the "Developer Forum" to agree and fund (through a PPA) additional work, including the preparation of a Spatial Framework and related evidence base studies. This work has informed the Regulation 19 version of the New Local Plan.
- 2.3. The Regulation 19 Local Plan includes policies that confirm Crews Hill as an area proposed to be allocated for residential-led mixed use development to deliver a new sustainable settlement centred around the existing train station and key movement corridors. Strategic Policies SS1, PL11 and H1 set out key policy requirements and site allocations SA11.1-11.6 allocate land at Crews Hill for residential-led mixed use development to deliver a new sustainable settlement centred around the existing under-utilised train station.

3. Principles of Collaboration

- 3.1. The Council and the landowners/developers agree to be governed at all times by the following principles:
 - Principle 1: To work together positively and constructively, and in good faith, and to respect each other's interests and confidentiality.
 - **Principle 2:** To commit and promptly provide information to support and manage the process of Local Plan submission and examination.
 - **Principle 3:** To be transparent and consistent at all times between all parties so that outcomes are anticipated, defined and understood.
 - Principle 4: To provide effective involvement and consultation with the surrounding community, statutory and other stakeholders, and any individual or group with a legitimate interest.
 - Principle 5: To be solution focused and reach identified milestones, unless otherwise agreed by all parties.
 - Principle 6: All parties will encourage landowners and promoters of land within the allocation who are not subject to this MOU to engage on an equal and fair basis.

4. Commitment to Delivery

- 4.1. A new sustainable community of this type and scale will take time to evolve. The allocation of this area within the emerging Local Plan is the start of the process.
- 4.2. The Parties agree that based on the information that is available at this time, there are no reasons to consider that the overall proposals, as set by the vision and strategic policies in the New Enfield Local Plan, are not viable and capable of being delivered.

- 4.3. The Parties agree that given the timescales involved and the current status of work undertaken to date, that some matters will require further assessment and flexibility will be required to adapt to changing circumstances over time. The Parties agree that details will evolve over time and therefore it is anticipated that specific assumptions and proposals will be subject to ongoing consultation and refinement.
- 4.4. The Parties agree to the following matters on the approach to delivery:
 - To work positively and collaboratively to progress the proposals.
 - To enable sites and proposals to deliver against the housing trajectory set alongside the EC housing trajectory and housing land supply projections.
 - To ensure community consultation and participation in the evolution of more detailed plans, planning policies and individual scheme designs.
 - To undertake further work on comprehensive design and master planning to be secured through a 'Supplementary Planning Document'.
 - To work together to prepare additional supporting evidence for the local plan and related planning applications.
 - To establish and implement further 'Planning Performance
 Agreements' to set the basis of the work required, tasks, roles and
 responsibilities between the Parties and to ensure adequate resources
 are made available to undertake the work required.
 - To prepare planning applications and supporting material in accordance with the needs of LBE and wider stakeholders, including appropriate early engagement and consultation, and ensuring that applications are accompanied by a full and comprehensive set of supporting material to enable determination.
 - To deliver the appropriate infrastructure required to support the allocation, including a wide range of improvements and mitigations to be funded via developer contributions in line with all relevant national and local planning policies, planning guidance and law;
- 4.5. This MOU demonstrates the willingness to work collaboratively and an intention to co-operate collectively through and beyond the planning system. It will be a "living document" and will be reviewed and updated to reflect the advancement of the development proposed and the parties involved.
- 4.6. It is anticipated that additional agreements including 'Statements of Common Ground' will be prepared in due course, as required, to capture and enable the specific positions of any Party in respect of individual representations made on the New Local Plan.

4.7. In addition, 'Planning Performance Agreements' will be established to define specific tasks and work programmes in respect of working through subsequent planning stages for each individual site. It is anticipated PPAs could be on an individual site and/or parcel basis, to respond to individual parties requirements. This is anticipated to also include the preparation of additional guidance, working through scheme specific pre-application stages, and on into the determination of specific planning applications and potentially beyond. It is anticipated that this MoU will be appended to future agreements to provide a consistent position between the Parties.

5. Declaration

5.1. This MOU is signed on behalf of the following parties:

Organisation	Authorised Person	Date	Signature	
London Borough of Enfield	Brett Leahy	23 rd May 2025	Im lun	
Berkeley Homes (North East London)	Harry Lewis	28 th May 2025	ym_	

Appendix A - The Place Making Area

