

Transport for London

Written Statement on Matter 4

Green Belt

Issue 4.1: Whether all reasonable options for meeting the identified need for housing and employment development on land that is not in the Green Belt fully examined.

Q4.2: Were all reasonable opportunities assessed for meeting the need for (a) housing and (b) employment related development outside the Green Belt, including through making as much use as possible of suitable brownfield sites and underutilised land and optimising the density of development?

For meeting housing need, the viability of brownfield land to provide affordable family housing has been cited as one of the reasons for considering sites in the Green Belt. We recognise that the Plan is supported by a high level viability assessment that includes assessment of the Green Belt sites of Chase Park and Crews Hill. As evident from the emerging Infrastructure Delivery Plan (published 30 September 2024), the costs of providing substantial public transport, active travel infrastructure and other services have not been considered which will be necessary to make the Green Belt genuinely sustainable as per the vision. A thorough consideration of these costs may further affect the viability of the Green Belt sites (especially Crews Hill) to provide family affordable housing, especially considering the relatively low density, car dependent development proposed through the spatial frameworks for these placemaking areas. Therefore, we are not sure if the viability argument for accommodating denser housing in brownfield sites that may not require substantial infrastructure investment is robust.

For the Green Belt sites of Crews Hill and Chase Park, we expect a robust viability assessment underpinned by a costed and funded Infrastructure Delivery Plan as part of the formal statutory process through a planning mechanism to allow for adequate opportunity for collaboration and agreement.

In terms of employment, there is a need established for 304,000sqm of industrial floorspace over the Plan period, including 190,000 sqm of

B8 uses, it is not clear how the remaining 120,000 sqm is broken down for example, Class E uses which have the potential to be accommodated on other brownfield sites, such as town centres that are better connected.

Issue 4.2: Whether removing land from the Green Belt as proposed in the Plan is necessary to ensure that the identified need for housing and employment development can be met in a way that promotes sustainable patterns of development.

Sustainable patterns of development

Q4.5: In selecting the locations to be removed from the Green Belt, was first consideration given to land which has been previously developed and/or is well served by public transport?

No. While selecting locations to be removed from the Green Belt, the first focus should be on sites that are well served by existing public transport and have existing local amenities. This will be critical to support sustainable development and optimise densities to make the best use of land.

We believe that land west of current Chase Park site along the Piccadilly line stations of Oakwood and Cockfosters provides an alternate opportunity of sites within Green Belt that are well connected with access to local centres, jobs with frequent train services (see Figure 1 & 2 below).

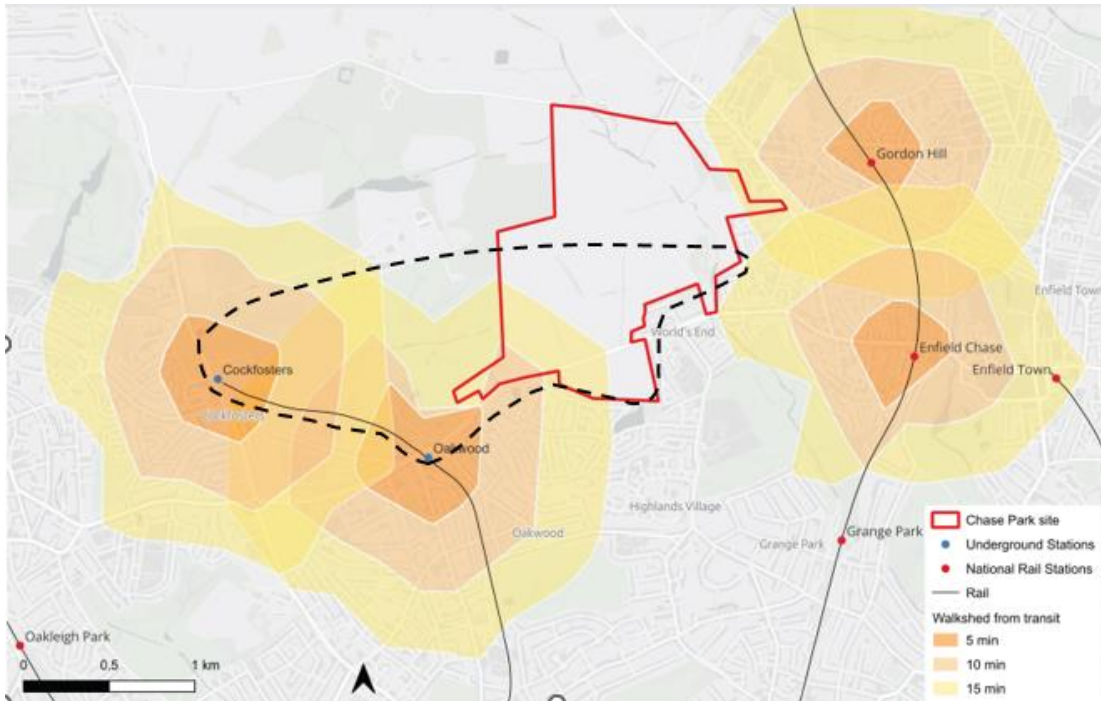


Figure 1: Walk catchments of 5-15 minutes around Oakwood and Cockfosters stations which are west of current Chase Park red line boundary

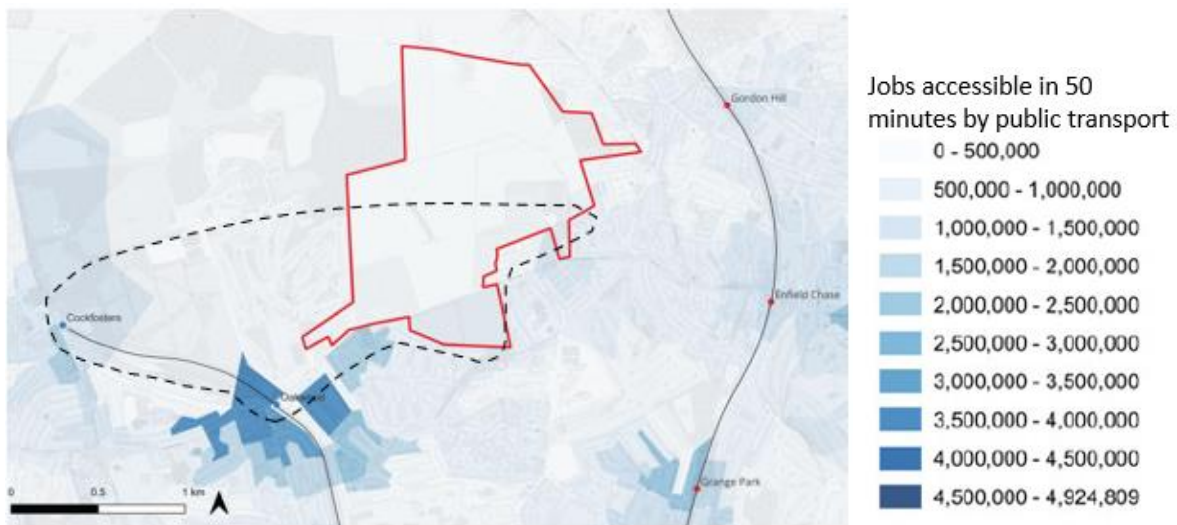


Figure 2: Access to jobs by public transport in 50 minutes

Considering these areas first before the current Chase Park site has the potential to deliver optimised densities without substantial transport investment upfront. These optimised densities can provide much larger number of homes, including better prospects for affordable family housing as well as support further investment in bus services to serve the current Chase Park site.

Further assessment will be needed to understand the ecological and heritage constraints of these sites. We present below a preliminary Green Belt assessment of this wider area based on the purposes, land

use, previously developed land (PDL), and public transport access in Figures 3-9. Figure 9 summarises the assessment and indicates the most suitable site to be the western most site, then the middle site and then the eastern most is the least suitable. Figure 10 is from Enfield's Green Belt evidence that determines the level of harm.



Figure 3: Character and Land Use. The western part of the site comprises primarily recreational land uses and contains areas of developed land / sports pitches. The eastern part of the site is comprises predominantly pastoral land.



Figure 4: NPPF para 143, purpose a: to check the unrestricted sprawl of large built-up areas. The western part of the site is influenced by its association with the built up area / land use and is contained by Trent Park Registered Park and Garden to the north. The eastern part of the site is typically less closely associated with the built-up area and is more open.



Figure 5: NPPF para 143, purpose b: To prevent the neighbouring towns merging into one another. The site lies in a gap between two parts of Greater London, Cockfosters to the south west and Enfield to the northeast and east, although the urban area is already continuous. Furthermore, the Trent Park Registered Park and Garden maintains separation.



Figure 6: NPPF para 143, purpose d: To preserve the setting and special character of historic towns. While the site has a relationship to the Trent Park Registered Park and Garden / partly falls within the Trent Park Conservation Area, it does not preserve the setting / character of an historic town.

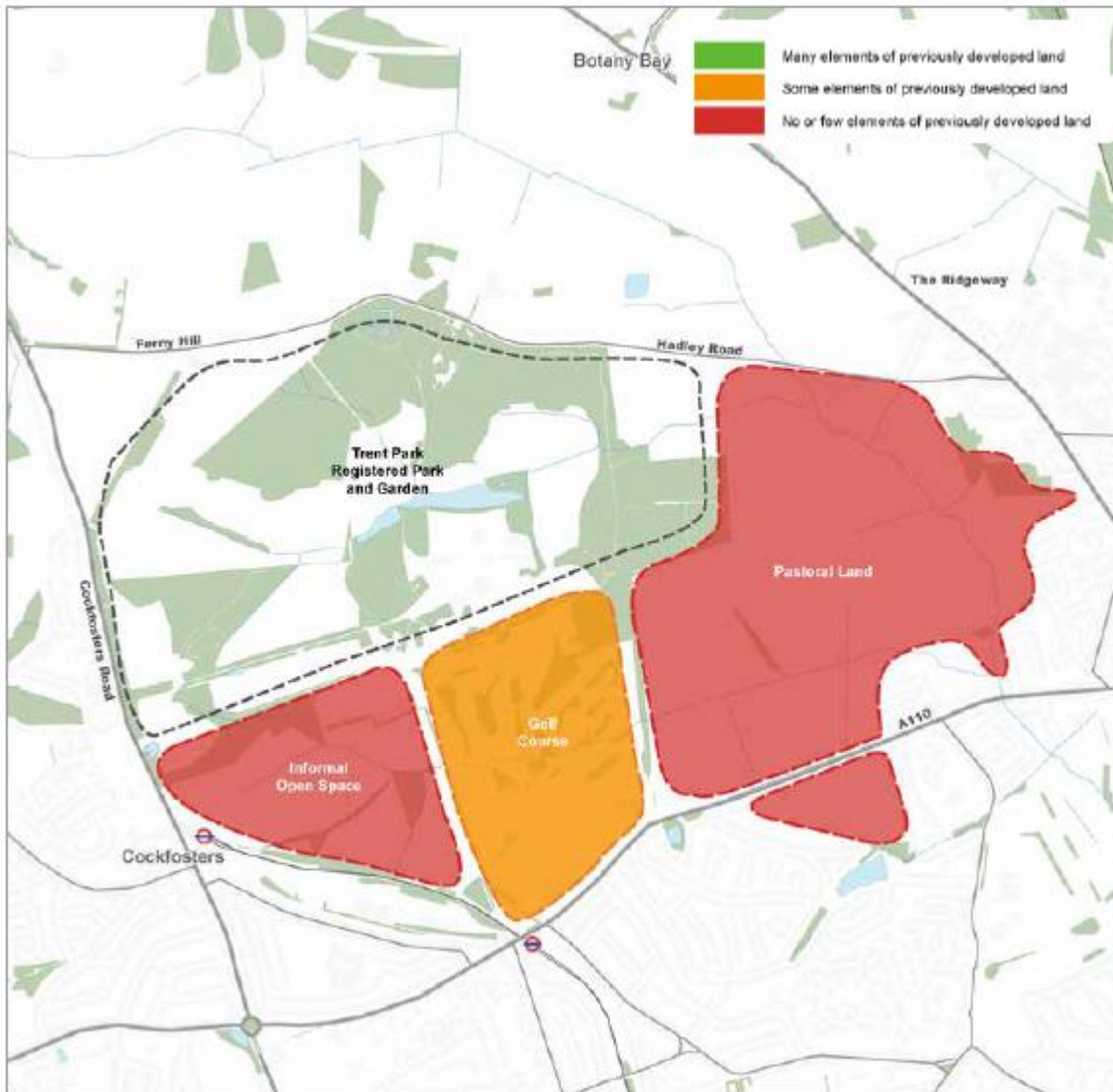


Figure 7: Consideration to land which has been previously-developed. The central part of the site contains some areas of previously developed land, principally associated with the Trent Park Golf Course and Trent Park Equestrian Centre. The eastern and western most parts of the site contain relatively few areas of previously developed land.

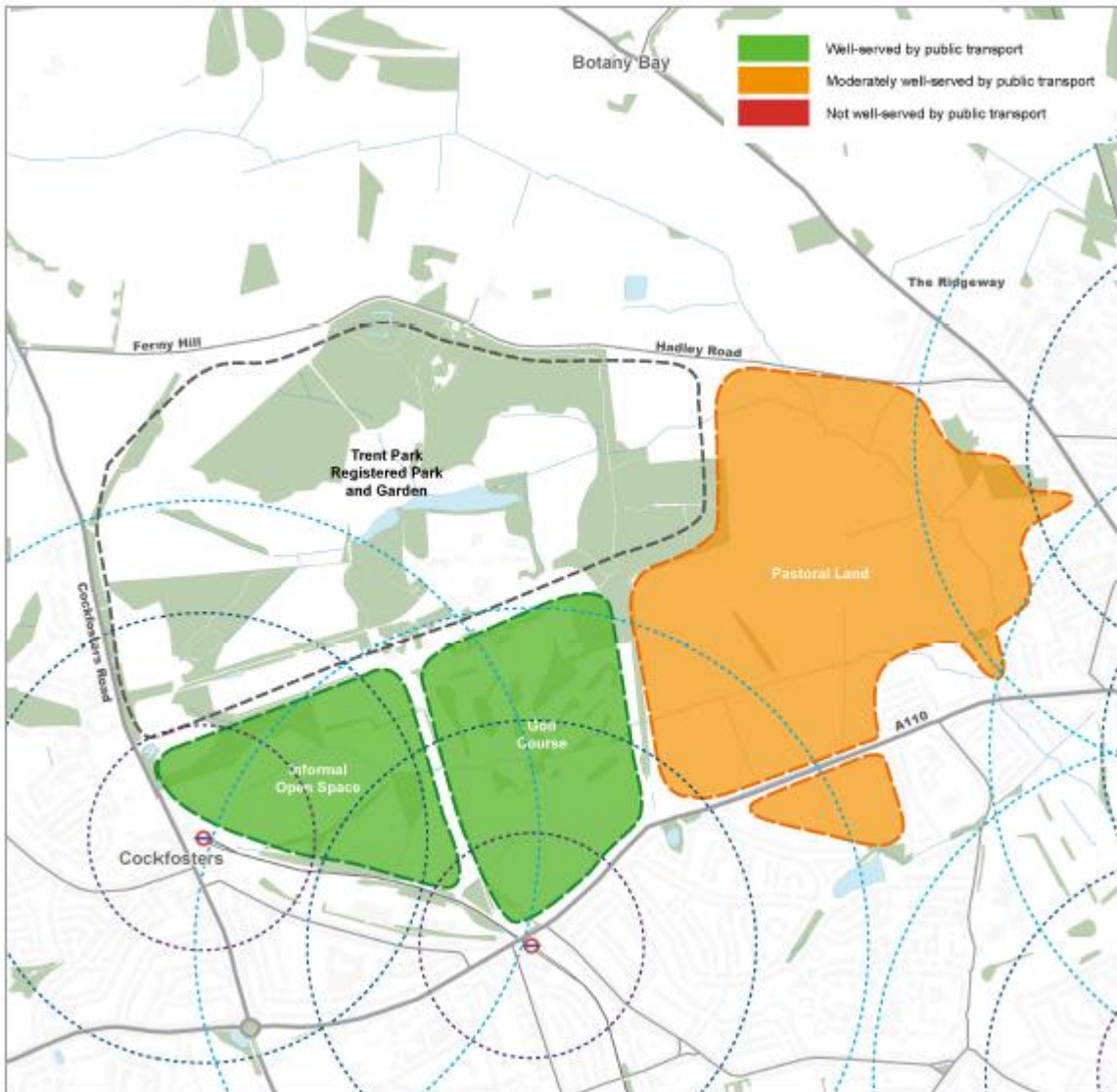


Figure 8: Consideration to land which is well-served by public transport. The western part of the site is in close proximity to two London Underground Stations. The eastern part of the site is not well served by access to railway stations.

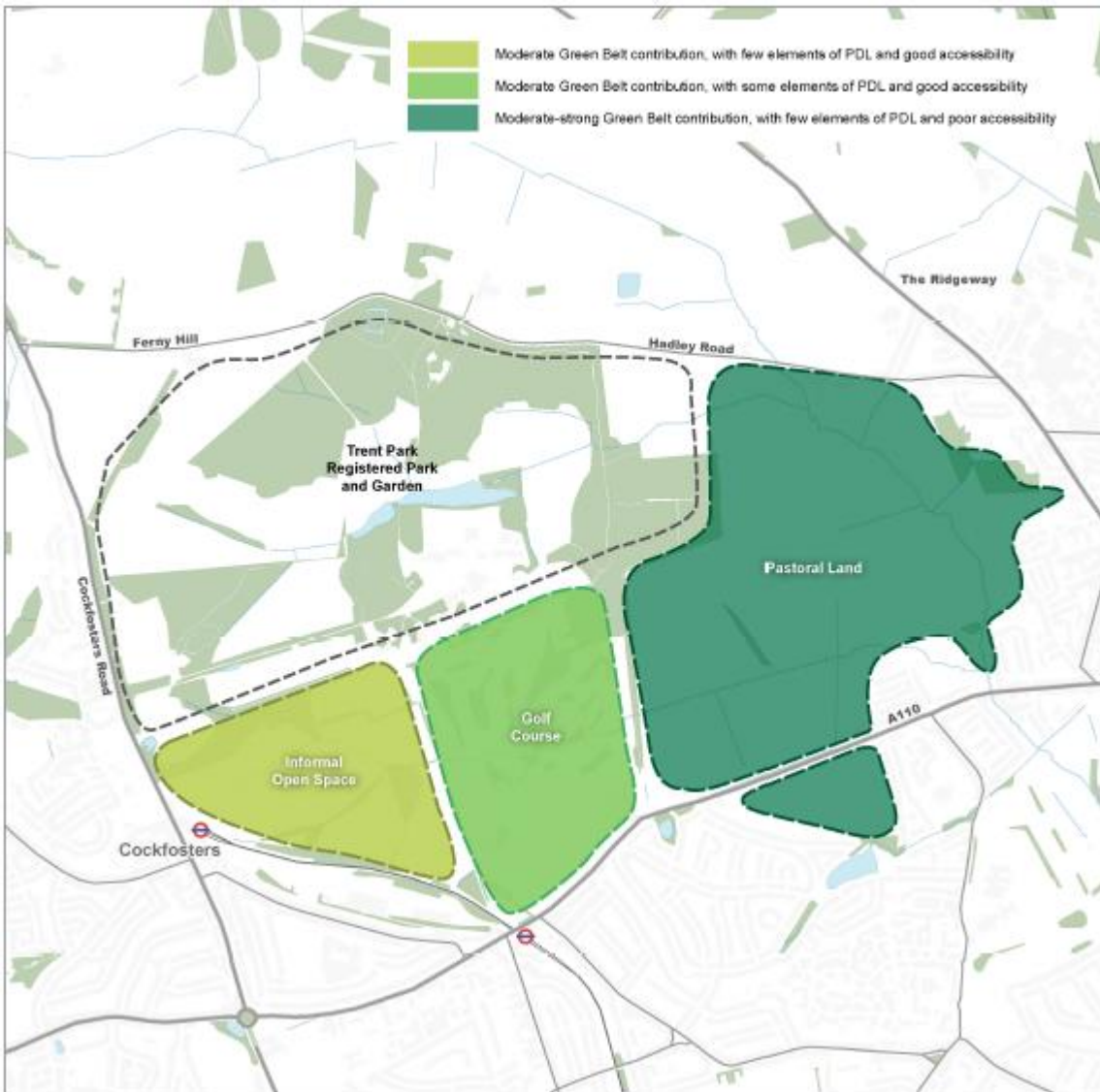


Figure 9: Summary. While all sites have moderate contribution to Green Belt purposes, the westernmost site has few elements of PDL with good public transport access, the middle portion has some PDL with good public transport access and the easternmost part has few elements of PDL with poor public transport access.

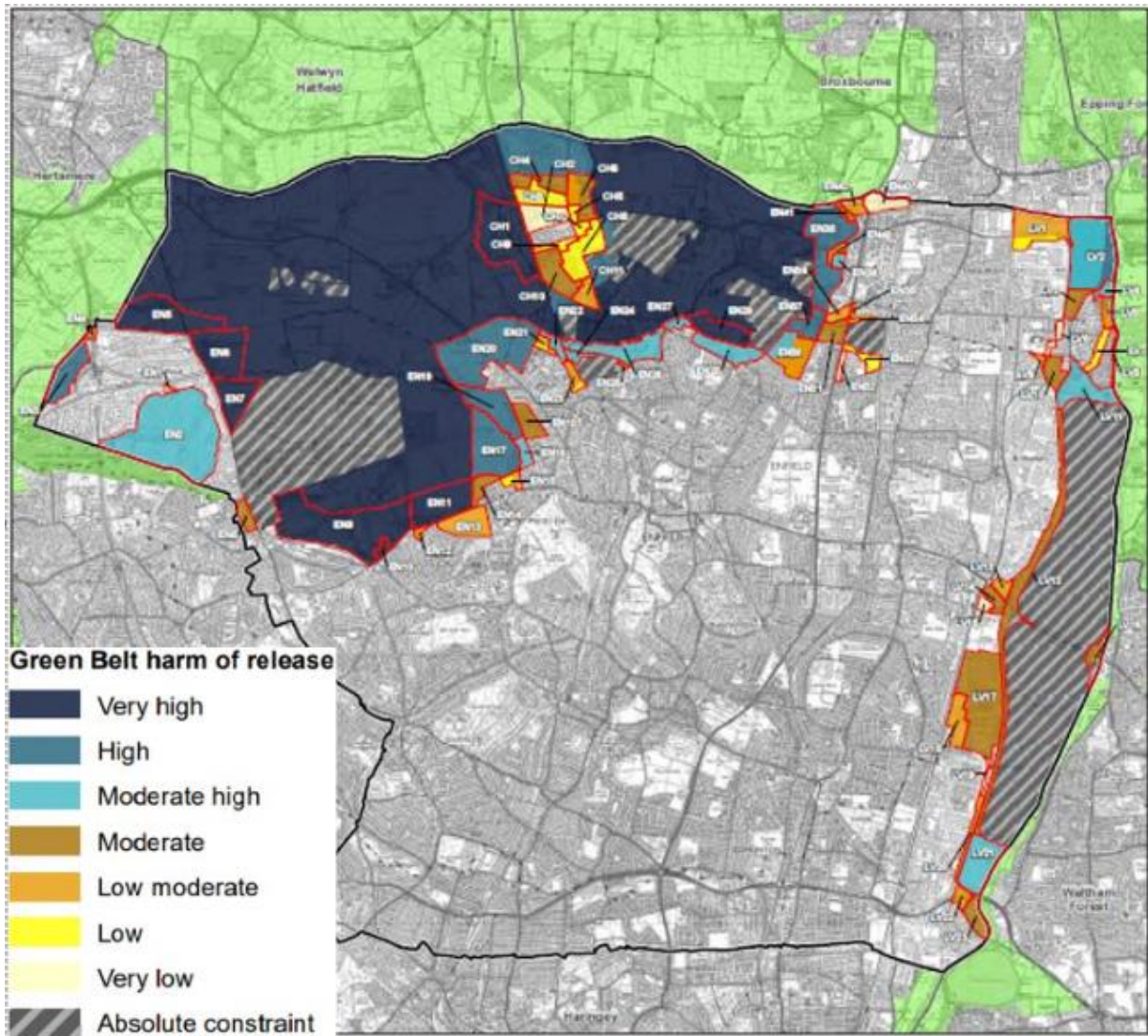


Figure 10: Enfield's Green Belt Harm Assessment. Some of the areas of current Chase Park and Crews Hill are identified as very high and high harm. This is the case of wider area suggested near Oakwood and Cockfosters stations.

This alternative approach has the potential to provide 10,000+ homes, including 75 per cent family homes and expansion of the Trent Park area (see Q4.6). While this proposal is not viability tested, given the existing infrastructure, there is a potential to deliver more affordable housing and earlier than expected from current Crews Hill and Chase Park sites. These number of homes is also greater than what Enfield is expecting from the combined Crews Hill and Chase Park Green Belt release (5,900 homes) within the Plan period starting from the later half of the Plan period.

Q4.6: Is there a quantitative need to remove land from the Green Belt in the Plan area to ensure the provision of at least 33,280 homes in the period by 2041?

The strategic Green Belt sites currently contribute around 5,900 homes toward the 33,280 homes target.

We believe that the need for London to increase its cumulative housing target to 88,000 homes per year is a new and significant consideration that should be taken into account during this examination. If the sites are released at Chase Park in the way proposed, this represents a very significant opportunity loss thereby undermining potential housing development. Given the national commitment to deliver 1.5 million homes to very short timescales, we maintain that there is now a quantitative need to remove better connected land from the Green Belt and avoid undermining the overall development potential of the area for a new-town scale of development.

As indicated in the answer to Q4.5, if better connected land on the west of Chase Park is considered, there is a potential to deliver many more homes than combined Chase Park and Crews Hill sites, especially given the densities and typologies that are currently proposed within the placemaking spatial frameworks. If alternative approaches nearer to public transport that provide access to jobs and local amenities are considered, then there is a potential to consider releasing lesser area Green Belt, especially within Crews Hill that are not previously developed land and not near the train station.

By way of illustration, below we provide some preliminary assessment of the site potential when Chase Park site is considered along with land parcels nearer Oakwood and Cockfosters stations. In terms of phasing, the area near Oakwood station needs to be considered first, then the area near Cockfosters. Consideration of these well-connected areas first will help support additional transport infrastructure needed to serve most of the current Chase Park area to the north east. Further detailed analysis is needed to fully consider ecological, heritage, viability, and deliverability constraints. Figure II shows the land ownership of the wider area.



Figure 12: Land ownership

Figure 12 shows the illustrative area of this alternative approach that has been considered for development (97 ha in yellow). The remaining areas in green could contribute to increase the boundaries of Trent Park (from 213 ha to 292 ha) as well as used to explore compensatory measures for green infrastructure and biodiversity net gain. Further on ground work would be needed to understand the constraints and compensatory measures. Table 1 shows some high level numbers to illustrate the site potential of the wider area.

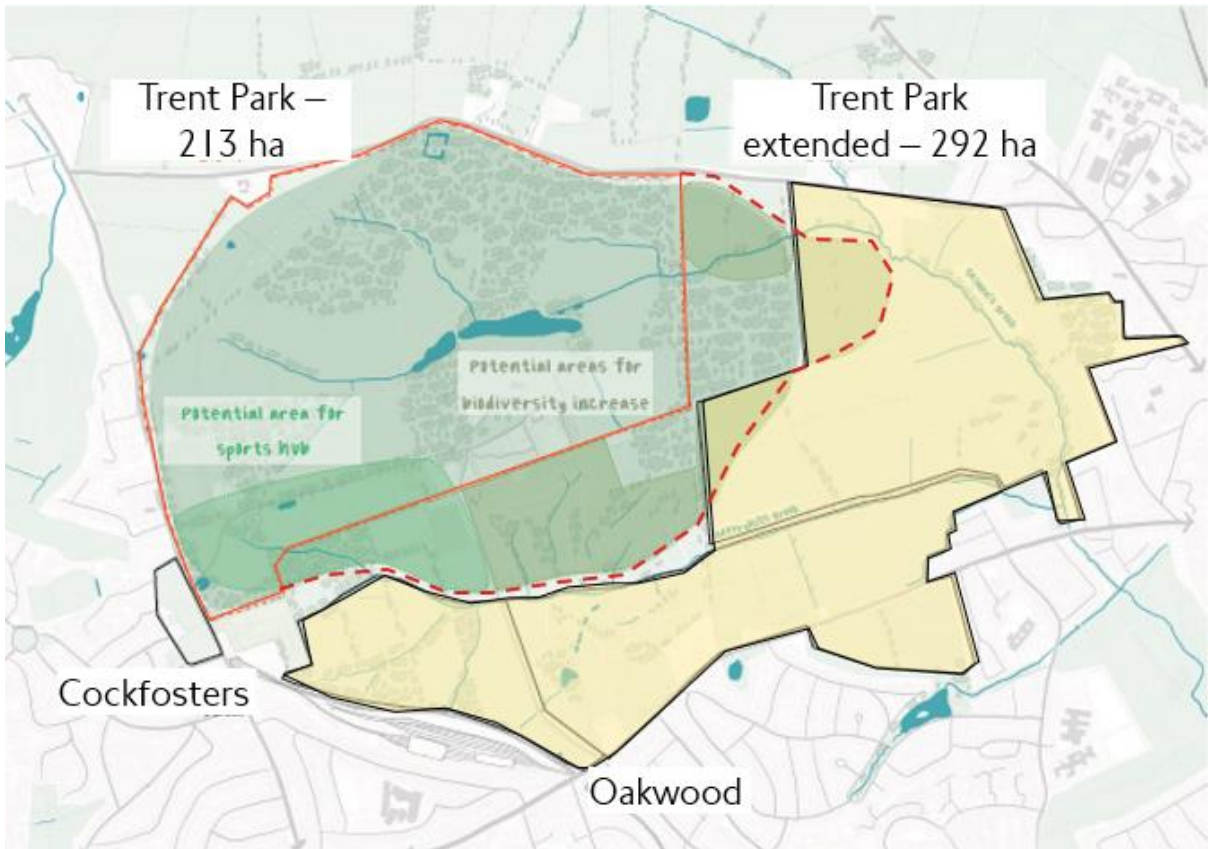


Figure 12: Potential area of Green Belt and development considering land near Oakwood and Cockfoster stations

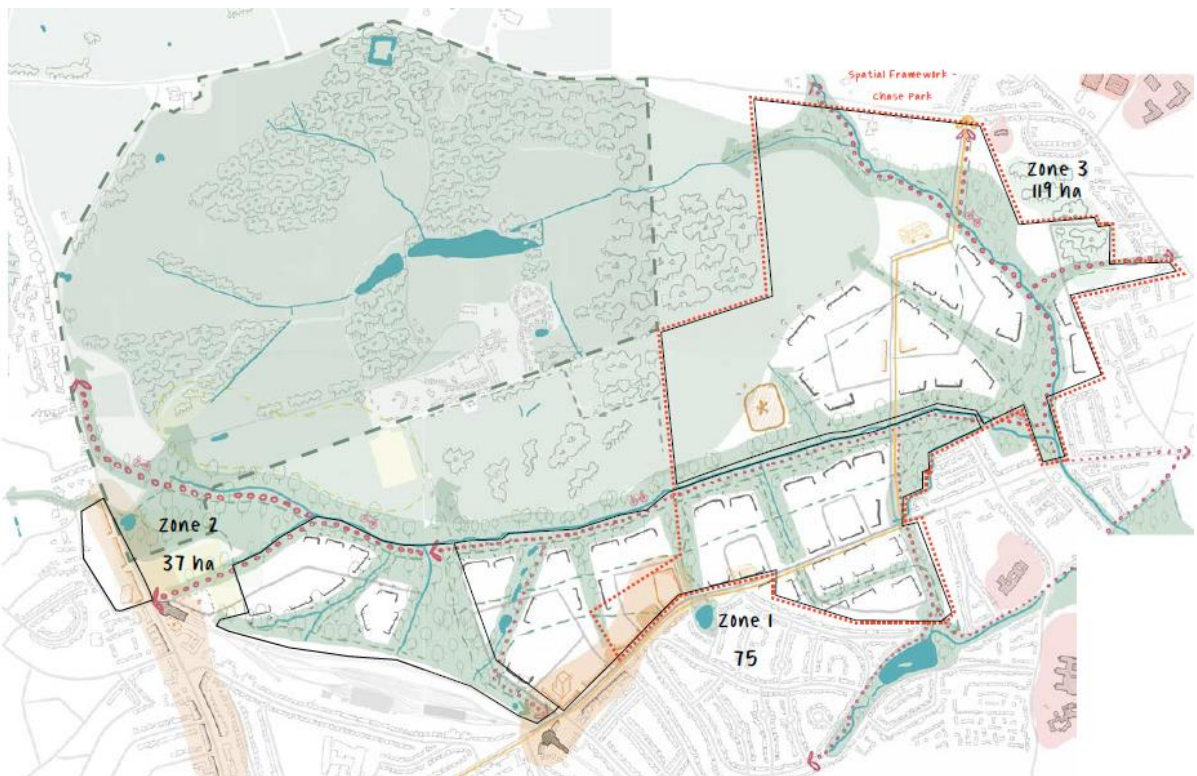


Figure 13: Indicative potential development plots

	Proposed illustrative scenario	Draft Local Plan (Chase Park only)
Total Green Belt release land area (hectares)	231	167
Developable area (hectares)	97	68
Gross Densities (du/ha)	~47	~22
Density within developable area (du/ha)	108	55.7
Total homes with ≥70% family homes	10,501 (75%)	3,765 (70%)
Total family homes	7905	2636
Accessible open space	139 ha	99ha

Table 1: Potential number of homes and family homes from the above scenario

Q4.7: Is there a quantitative need to remove land from the Green Belt to ensure that the identified need for additional industrial and warehousing floorspace can be met by 2041?

Although, there is a need established for 304,000sqm of industrial floorspace over the Plan period, including 190,000 sqm of B8 uses, it is not clear how the remaining 120,000 sqm is broken down for example, Class E uses which have the potential to be accommodated on other brownfield sites, such as town centres that are better connected.

From a TfL-specific perspective, there is a potential to consider land swaps for well connected industrial land in urban areas with the Green Belt land that is closer to M25 or has appropriate access to the strategic road network for appropriate employment uses. Such land swaps have the potential to free up well connected land in urban areas which can then be used for high density residential and commercial development where occupants and visitors can travel sustainably.

Q4.8: Overall, are there exceptional circumstances in principle to justify altering Green Belt boundaries for a) housing and b) employment development?

If new housing need figures are to be met, it is critical that the opportunity for significantly greater numbers of homes facilitated by existing and potential transport infrastructure are met and the sites are not squandered for low density development that does not facilitate the new bus route(s) and facilities needed to support sustainable development nor optimise the number of homes delivered. We do not believe exceptional circumstances exist to justify the proposals in the draft Local Plan, and that development at an appropriate scale and in appropriate locations is necessary to demonstrate exceptional circumstances that would justify its release. It is noted that the additional land take at Chase Park proposed in the alternative in Table 1 above is predominantly in the ownership of LB Enfield and therefore there would be limited barriers to its release for development. With LB Enfield as a partner, and with the support of the Mayor, MHCLG and other relevant bodies, this could be progressed within reasonable timescales to build the pipeline towards 88,000 homes per year.

In relation to Crews Hill, the poor transport (as indicated in Q4.5 and Q4.6) which can provide 'turn up and go' services should be explored first, enabling sustainable mode share and access to existing amenities and infrastructure. It is recognised that there are some previously developed sites within that area, but if the Inspector is of the view that there are exceptional circumstances to justify their release (recognising also paragraph 155 of the NPPF in relation to proposed development), these should be phased to promote better connected development to come forward first thereby facilitating additional transport infrastructure to ensure the sites are in sustainable locations and development potential can be optimised.

In relation to employment, as per Q4.7, it is not clear whether exceptional circumstances have been demonstrated as the 120,000 sqm of Core Industrial Uses may include Class E (industrial) which has the potential to be accommodated in town centres which are more sustainable locations.

Compensatory improvements

Q4.9: Is the Plan consistent with paragraph 147 of the NPPF with regard to the provision of compensatory improvements to the environmental quality and accessibility of land in the Green Belt? Are the measures identified in criterion 13 of the Policy SSI meant to deliver this objective? If so, are they viable and deliverable?

Regarding the accessibility of land in the Green Belt, please refer to answers to Q4.2, Q4.5, and 4.6 which comment on the potential alternative approaches by extending Chase Park placemaking area toward the west to be closer to Oakwood and Cockfosters Piccadilly line stations.

While Crews Hill placemaking area has a station served by Great Northern Rail, new and improved infrastructure is needed to make it adequately accessible. These substantial improvements need to be underpinned by denser development and restrained car parking. Similar points have been articulated in our Regulation 19 response, SoCG discussions and in answers to other related Matters.