



# New Enfield Local Plan 2019 – 2041 - Examination

Examination Hearing Statement – 5 - Key Diagram,  
Spatial Strategy and methodology for selecting site  
allocations

Iceni Projects Limited on behalf of  
Fairview New Homes

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# 1. INTRODUCTION

1.1 This Examination Hearing Statement (EHS) has been prepared in response by Icení on behalf of Fairview New Homes ('Fairview'). It relates to key matters identified in the Enfield Local Plan 2019–2041 Examination by the Inspector in their Main Matter, Issues and Questions and Draft Hearing Programme:

- Matter 4 of the Enfield Local Plan is Green Belt, and
- Matter 5 is Key Diagram, Spatial Strategy and methodology for selecting site allocations.

1.2 This Hearing Statement relates to Land South of Enfield Road. The Fairview's land interest is within the Chase Park South allocation (SA10.1), which is part of the larger Chase Park allocation in the Draft Local Plan Policy PL10: Chase Park. Fairview has an option on part of the Chase Park allocation and has been actively involved with the site for a number of years. They are committed to delivering the site and bringing forward development within the first five years of the plan period.

1.3 Fairview is working with the London Borough of Enfield and other principal landowners at Chase Park, including Comer Homes, Diocese of London, and Lansdown Land to realise the vision of a new extension to the Borough providing urgently needed homes and affordable family homes.

1.4 In relation to the allocation, we have a number of points and recommendations to ensure that both allocations are sound.

1.5 The word count for this document is 2,184 words.

## **The Site**

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1.6 The Site promoted by Fairview is currently undeveloped grassland which is in the designated Green Belt extending to 13 ha. It is located on the western edge of the built-up area known as World's End and is at the northeastern side of the largely residential suburb of Oakwood. It is in the North-Western quadrant of the London Borough of Enfield.

1.7 The site relates well to the built-up form of both World's End and Oakwood. It is surrounded by development on three sides, with Enfield Road (A110) providing a strong boundary to the north. The site is defined by an urbanised character with medium density residential development enclosing the triangular shaped piece of land.

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## 2. MAIN MATTER 5 - KEY DIAGRAM, SPATIAL STRATEGY AND METHODOLOGY FOR SELECTING SITE ALLOCATIONS

**Issue 5.1: Whether the vision and strategic objectives have been positively prepared and are justified and effective.**

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**Q5.1:** Are the spatial vision and strategic objectives soundly based and justified by the evidence, and is it clear how the Plan's policies will help to deliver the vision and strategic objectives over the Plan period?

- 2.1 The spatial vision and strategic objectives set out in the Local Plan are generally soundly based and justified by the evidence. The Local Plan aims to guide sustainable growth and development in Enfield, balancing the need for housing and employment with protecting the environment and enhancing quality of life.
- 2.2 The objectives of the Local Plan are clearly linked to the policies outlined within, particularly with regard to the Green Belt release. This connection is evidenced by the need for family housing, which drives the proposed changes. As highlighted in 2.19 of the Matter 4 Hearing Statement (reproduced below), the need for this form of development is strongly justified by evidence.
- 2.3 The key statistics are as follows:
- The LHNA modelling indicates the largest requirement for new homes is for three- and four-bedroom properties, accounting for over 60% of the need. This translates to a need for at least 844 family-sized affordable homes per year.
  - Recent housing completion data shows that from 2019/20 to 2021/22, nearly 75% of new homes delivered in Enfield were one- or two-bedroom properties. This stark contrast highlights the undersupply of larger family affordable homes.
  - Icen's Technical Assessment of Housing Need (Appendix A1) reiterates the acute need for family housing within the Borough. It highlights that Enfield's 2015 SHMA Update recommended that 50% of both market and social rented housing should be family-sized units (three or more bedrooms). This recommendation was based on the observation that 57% of market housing demand in Enfield was for houses rather than flats.
  - The Technical Assessment also highlights the strong market demand for houses in Enfield. It cites data showing that 60% of market housing transactions over the past five years were for houses, not flats. This further underscores the mismatch between the types of housing being delivered and the preferences of those seeking housing in Enfield.

- According to the London Datahub, Enfield has delivered 325 three or four bedroom properties between 2022/23 – 2024/25. Of these, 30 were low cost affordable/social rented and 19 intermediate tenures.
- According to the Centre for London, for one-bedroom properties, the average wait is 563 days, while for two-bedroom properties, it increases to 1,201 days. The average wait for three-bedroom properties is even longer, at 1,711 days, and for those needing four or more bedrooms, the wait extends to 2,076 days.
  - Enfield Council’s information to potential Council housing applicants states that in some cases, individuals may have to wait up to 15 years for a 3-bedroom property.
- According to MHCLG statistics, the number of families on Enfield Council's housing waiting list is 5,991 and is divided as follows in terms of need.
  - NB – this does not show all households in need, only those that are on the register; many more will not have bothered to put themselves on the register due to waiting times, meaning they would never be successfully housed.

<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>3 bed+</b>	<b>Unspecified</b>
1,229 (20%)	2,139 (36%)	2,079 (35%)	519 (9%)	25

- There are 3,410 people in temporary accommodation in Enfield, according to the Council’s Housing Strategy.
  - Enfield had the third-highest number of people in temporary accommodation in England. This situation causes distress for those affected and places a significant financial burden on the local authority, with over £66 million spent on temporary accommodation services in 2018/19.
- Citizens Advice Enfield reported a 246% increase in homelessness in the borough over the last seven years.

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- 2.4 The objectives are pragmatic and realistic, recognising that while some Green Belt land will be released, this action does not compromise the overarching goal of ensuring the protection and enhancement of Enfield's environment.

**Issue 5.2: Whether Policy SS1 establishes an appropriate spatial strategy, taking into account reasonable alternatives.**

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**Q5.2:** Is the spatial strategy for the scale and distribution of growth, set out in Policy SS1, justified and appropriate for the sustainable development of the area when considered against reasonable alternatives? What reasonable alternatives were considered by the Council, and why were these rejected?

- 2.5 The spatial strategy of maximising the use of previously developed land within the borough and promoting high densities in the most sustainable locations is considered to be sound. The approach of identifying Green Belt releases is deemed a sensible response to the insufficient supply of available land and the urgent need to deliver family market and affordable housing. It is understood that the method to identify these locations has been rigorous and has included a variety of assessments, such as landscape assessments. The approach is considered sound based on the tests of soundness within the National Planning Policy Framework (NPPF).

- 2.6 We will not repeat the points made in the Matter 4 statement (above) which is part of this document, but it is clear that a business-as-usual scenario of merely relying on brownfield land to deliver housing needs will not be sufficient to meet the quantum of housing needs in the Borough. Additionally, it will not address the specifics of this need, including the very strong unmet demand for family market and affordable housing. As previously highlighted, the affordable housing need, particularly for family homes, is critical. Many families wait for many years for properties to become available, resulting in an enormous housing waiting list within the Borough and thousands of families in temporary accommodation. This need will not be met without a significant change to housing policy, which includes the release of some Green Belt land.

**Q5.3:** Other than those specifically referred to in Policy SS1 (e.g., PL5, PL6, PL10, PL11, and New Southgate [PL7]), is it clear how the 'placemaking' areas relate to the overall spatial strategy and the purpose they serve in delivering the overall strategy?

- 2.7 Icenis has not previously commented on these matters, so we will not respond to this question.

**Issue 5.3: Whether other aspects of Policy SS1 are justified, effective, consistent with national policy, and in general conformity with the London Plan.**

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**Q5.16:** Are the overarching approaches to Town Centres, Residential Communities, and Metropolitan Open Land, as set out in criteria 7, 8, and 9 of Policy SS1, justified, effective, and consistent with national policy?

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2.8 Icenl has not previously commented on these matters, so we will not respond to this question.

**Issue 5.4: Whether the Key Diagram effectively illustrates the spatial strategy and indicates the broad locations for development proposed in the Plan.**

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**Q5.17:** Does the Key Diagram (Figure 2.4) effectively and accurately illustrate the spatial strategy?

2.9 We consider this diagram to illustrate the Council's approach of seeking to deliver higher densities in town and local centres and then deliver two new communities by removing them from the Green Belt.

**Q5.18:** Is the Key Diagram accurate with regard to the following factors:  
a) The extent of the Green Belt and Metropolitan Open Land (MOL)?  
b) The relationship between the concept of 'gentle densification' and MOL? Is it the case that the Plan allows for 'gentle densification' within areas of MOL?  
c) The relationship between the concept of 'gentle densification' and areas identified for 'intensification around transport nodes and town centres'? Are these two policy approaches compatible?

**Q5.19:** Is the relationship between concepts identified on the Key Diagram and policy clear? For example, is the Plan clear how 'gentle densification' and 'intensification around transport nodes and town centres' will be implemented?

2.10 This is a matter for the Council to respond to.

**Issue 5.5: Whether the allocations in the Plan have been selected using an appropriate methodology based on proportionate evidence.**

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**Q5.20:** Is the approach to the assessment and selection of sites, as set out in the Site Allocations Topic Paper, justified? Does the submitted evidence demonstrate that the sites have been selected on a robust, consistent, and objective basis?

2.11 The site selection process detailed in the Site Allocations Topic Paper employs a rigorous, multi-stage approach to ensure development in Enfield occurs in the most sustainable and appropriate locations. The first stage involves identifying potential sites from the Housing and Economic Land Availability Assessment and Call for Sites exercises. These sites are then filtered based on absolute constraints like policy designations and environmental constraints, as well as a size threshold. Only sites that meet these initial criteria move on to subsequent stages.



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2.12 The second stage prioritises the remaining sites based on their location and contribution to achieving sustainable development objectives. Brownfield sites within the urban area are prioritised, followed by greenfield sites within the urban area, and then previously developed land in the Green Belt. Greenfield sites within the Green Belt are considered last, with preference given to those that least impact Green Belt purposes. Strategic sites, those capable of supporting large-scale development and infrastructure improvements, are also considered at this stage. The following stages involve detailed planning assessments, sustainability appraisals, and deliverability evaluations to further refine the pool of potential sites. This approach is standard for site selection processes for semi-urban Green Belt sites such as this.

**Q5.21:** Was the criteria used in the initial sift of sites (Stage 1 of the process) justified, in particular the 'absolute constraints'?

2.13 The list of absolute constraints (below), is considered to be sensible:

- Sites within the functional floodplain (Flood Zone 3b)
- Special Areas of Conservation (SAC)
- Sites of special scientific interest (SSSI)
  
- Special Protection Area (SPA)
- Ramsar sites
- National Nature Reserves (NNR)
- Ancient Woodland
- Suitable Alternative Natural Greenspace (SANG)
- Grade 1 and 2 agricultural land

2.14 Under the new NPPF, it may have been possible to exclude Grade 1 and 2 agricultural land, but not under the 2023 version against which this Local Plan will be considered against. This is because the 2023 puts a much greater emphasis on protecting agricultural land of the highest quality,

**Q5.22:** Paragraphs 4.5 and 4.6 of the Site Selection Methodology paper refer to sites that fell within priorities 1 and 2 being generally considered suitable for development, but with some exceptions, and sites that fell within priority 7 and 8 were generally considered unsuitable but with some

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exceptions. On what basis were the 'exceptions' justified, and is it clear which sites fall into which category?

2.15 This is a matter for the Council to respond to.

**Q5.23:** Are the reasons for selecting some sites and rejecting others clearly set out and justified?

2.16 This is a matter for the Council to respond to.