



JANUARY 2025

# New Enfield Local Plan 2019 – 2041 - Examination

## Examination Hearing Statement – Matter 4

Iceni Projects Limited on behalf of  
Fairview New Homes

January 2025

ICENI PROJECTS LIMITED  
ON BEHALF OF FAIRVIEW  
NEW HOMES

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## CONTENTS

1. INTRODUCTION .....	1
2. MAIN MATTER 4 – GREEN BELT .....	2

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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 2,420.

## **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 4 – GREEN BELT

- 2.1 We have answered the questions posed by the Inspector as appropriate. Where it is clear the question is aimed at the Council we have stated this.

**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 were fully examined.**

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**Q4.1:** What is the identified capacity to meet a) housing and b) employment needs within the Plan area without requiring any alteration to Green Belt boundaries?

- 2.2 It is a matter for the Council to provide details on capacity for these indicators; however, we would highlight the dangers of relying solely on brownfield land to meet housing need. In a Borough such as Enfield, where small sites (those less than 0.25 hectares) have made up 48% of delivery, a brownfield-only policy will naturally be reliant on these smaller sites moving forward. Historically, relying on small sites has been shown to be fraught with problems.

- 2.3 The Inspectors of the adopted London Plan concluded in their report, that the small sites housing capacity had been overestimated due to overly optimistic assumptions, insufficient evidence, and unrealistic targets for local planning authorities. They highlighted the risks of relying on small sites, such as physical and policy constraints (e.g., conservation areas), market limitations for smaller developers, and potential conflicts with other objectives like protecting local character and heritage. The Inspectors cautioned that an overreliance on small sites could undermine housing delivery overall, as it is less predictable and harder to scale, making it unsuitable as a primary strategy for meeting ambitious housing targets. They recommended reducing the small sites target to ensure more realistic housing targets were provided. In short, small sites are an unreliable form of housing land supply. Smaller sites are also more challenging in terms of delivering affordable housing, not least as they are unattractive to Registered Providers.

- 2.4 It is easy to see how a continued reliance on small sites in a Borough like Enfield will cause significant issues with a) identifying the actual capacity of the Borough with any level of confidence and b) significant difficulties managing this supply of sites to deliver outcomes with certainty.

**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?

2.5 This is a matter for the local authority to expand upon, but given the nature of the Borough, which has historically been reliant on small sites (see previous answer), there are limited opportunities to deliver increased delivery drastically.

**Q4.3:** Is there any substantive evidence to indicate that relevant neighbouring local planning authorities outside the Plan area could accommodate some of the housing or employment development proposed?

2.6 The Duty to Co-operate Statements of Common Ground identify that the surrounding local authorities do not consider themselves capable of assisting Enfield in meeting its housing needs.

2.7 We understand the neighbouring authorities to be as follows:

- Waltham Forest - to the east
- Haringey - to the south
- Barnet - to the west
- Epping Forest District Council (Essex) – to the northeast.
- Broxbourne Borough Council (Hertfordshire) – to the north.
- Welwyn Hatfield (Hertfordshire) – to the northwest
- Hertsmere (Hertfordshire) – to the northwest

2.8 Of these authorities, it would not be appropriate to consider that the other London authorities could accommodate the housing growth as Enfield as they have similar constraints in terms of Green Belt and are covered by the built form of London for the most part.

2.9 For the other non-London Boroughs, we have provided the following table to understand the current position with Local Plan, Standard Method (expressed as an annualised figure) and housing targets.

<b>Local Authority</b>	<b>Previous SM Figure</b>	<b>Draft SM (July 2024)</b>	<b>Final NPPF Figure (Dec 2024)</b>	<b>Housing Target (dpa)</b>	<b>Local Plan Adoption Date</b>	<b>Emerging Local Plan Status</b>
Epping Forest	725	1299	1210	518	Mar-23	Recently adopted Local Plan
Broxbourne	634	775	735	454	Jun-20	Evidence Gathering
Welwyn Hatfield	910	848	834	760	Oct-23	Evidence Gathering
Hertsmere	731	1034	959	266	Jan-13	Reg-19 closed May 2024

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- 2.10 As you will note, these Boroughs are all facing significant increases to their housing targets from the adopted position and so their ability to incorporate additional housing will be limited by their own Green Belt constraints. It should also be noted that these Boroughs closest to London often have a dense form of development, with lots of small settlements and limited gaps between them, which makes accommodating the new higher Standard Method figures challenging without accommodating further growth from Enfield.

**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.**

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**Q4.4:** What was the Council's approach to assessing the opportunities for altering Green Belt boundaries?

- 2.11 This is a matter for the Council to respond to.

**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?

- 2.12 This is a matter for the Council to respond to.

**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?

- 2.13 This is a matter for the Council to respond to, but as the question eludes to, there are also qualitative reasons for the Green Belt for a Green Belt release. This includes need is for larger family affordable homes which should not all be delivered in high-density, high-rise schemes.

**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?

- 2.14 We have not commented on industrial and warehousing matters.

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

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- 2.15 Our response relates only to Question 2.8 a) on housing. We consider there are robust exceptional circumstances as set out in the relevant topic paper.
- 2.16 The Council asserts that insufficient land is available within the urban area or neighbouring authorities to meet these needs. This conclusion is supported by extensive Duty to Cooperate discussions, which confirmed neighbouring authorities' inability to accommodate Enfield's unmet housing requirements.
- 2.17 The need for more housing, particularly affordable and family homes, forms a key component of the exceptional circumstances case. Enfield faces a significant housing shortage, especially for larger, family-sized homes, and relies heavily on Green Belt release to address this issue. The Council emphasises its commitment to sustainable development, aiming to balance the need for housing and employment growth with protecting the environment and minimising the impact of development on Green Belt land.
- 2.18 Enfield faces a significant need for family affordable homes, with a substantial gap between need and delivery. The Enfield Local Housing Needs Assessment (LHNA) of 2020 identifies an estimated requirement of 1,407 affordable homes per year, split evenly between affordable/social rented accommodation (711 homes) and affordable home ownership or intermediate rented accommodation (696 homes). However, the delivery of affordable housing falls short of this estimated need.
- 2.19 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.
  - Icení'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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2.20 From the above, it is clear that there is an acute mismatch between the supply of market and affordable housing and demand. Continuing with the business-as-usual strategy of relying solely on brownfield land will only exacerbate the current problem and leave thousands of families in overcrowded and poor-quality dwellings or living in temporary accommodation.

**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 Policy SS1 meant to deliver this objective? If so, are they viable and deliverable?

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

**Policies Map**

**Q4.10:** Is the submitted Policies Map accurate with regard to the boundaries of the Green Belt?

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

**Q4.11:** Are the inset maps associated with Green Belt allocations in Appendix C consistent with what appears on the Policies Map?

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

**Issue 4.3: Whether other proposals in the Green Belt are justified, consistent with national policy, and in general conformity with the London Plan.**

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**Q4.12:** Other than the allocated housing and employment sites, what other allocations are identified within the Green Belt?

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

**Q4.13:** Are there any proposed changes to Green Belt boundaries resulting from these allocations?

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

**Q4.14:** In principle, are the uses proposed within these areas compatible with the Green Belt? Would any development associated with them be considered “inappropriate development in the Green Belt” by the NPPF?

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

**Q4.15:** Are the inset maps relating to other proposals in the Green Belt in Appendix C accurate?

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