

# Enfield Local Plan 2019 – 2041 Examination

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**Date** 7 January 2025  
**From** Lichfields obo Berkeley Homes (North East London) Ltd

## **Subject Matter 5: Key Diagram, Spatial Strategy and methodology for selecting site allocations**

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This Hearing Statement has been submitted by Berkeley Homes (North East London) Ltd. ('Berkeley'); promoting land interests in the Crews Hill area (Policy PL11) including the Owls Hall Estate immediately west of Crews Hill station (Policy SA11.1) as well as the Enfield Garden Centre (Policy SA11.4) on Cattlegate Road. The Crews Hill area is a proposed allocation for approximately 5,500 homes.

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

**Q5.1: Are the spatial vision and strategic objectives soundly based, 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?**

- 1.1 Yes. Berkeley supports both the spatial vision and the strategic objectives of the submitted Plan. In particular, Berkeley considers that the delivery of Crews Hill – as a constituent part of the overall spatial strategy – would support LBE in achieving its vision and objectives both within and beyond this plan period.
- 1.2 Crews Hill's delivery would, inter alia, increase the supply of new family homes (Objective 3), support LBE to tackle the climate emergency (Objective 8), and deliver significant green infrastructure enhancements enabling public access to new parks and open spaces (Objective 12).

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

**General Matters**

**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?**

- 2.1 Yes. Berkeley considers that the Spatial Strategy – detailed in Policy SS1 – is soundly based when considered against the reasonable alternatives. In particular, Berkeley supports the specific allocation of Crews Hill as a Placemaking Area for growth centred around an underutilised train station on land that is currently within the Green Belt. Its allocation would help the Council address the challenge of significantly boosting the supply of homes in an area of extremely high housing need as well as helping it respond to other needs (i.e. infrastructure) and delivery wider benefits.
- 2.2 The proposed spatial strategy has been arrived at noting (1) the amount of housing and other development needs required to be planned for and the potential options to try and meet said needs (see our Matter 2 statement for consideration of the housing needs element) and (2) the Council’s conclusion in respect of the housing needs – and other factors – that exceptional circumstances do exist to release land from what is currently the Green Belt (considered in our Matter 4 statement).
- 2.3 In summary, the Council’s approach was as follows:
- 1 As a starting point, LBE considered an assessment of its housing needs are (in accordance with NPPF Paragraph 11) across the two distinct periods within the total plan period to 2041, namely:
    - a The 10-year period to 2029 within which LBE needs to plan for the requirement set out at Table 4.1 of the London Plan (LP2021); and
    - b Beyond 2029 to 2041, LBE has considered its development needs in accordance with Paragraphs 11 and 61 of the NPPF (Dec 2023): i.e. its local housing need calculated using the standard method. This generates a need figure far higher than is currently planned for to 2029 within the LP2021 (Table 4.1)<sup>1</sup>.

LBE also considered its employment needs across the plan period (as detailed in the Employment Land Review<sup>2</sup>).
  - 2 LBE has a constrained supply for meeting said housing and employment needs (as set out in the ‘Spatial Strategy and Overall Approach’ Topic Paper [‘SSOATP’] [TOP1]<sup>3</sup>). LBE nevertheless looked at seven potential growth options in its ‘Issues and Options’ (Reg.18) consultation in 2018<sup>4</sup>.

<sup>1</sup> See Berkeley’s response to Matter 2, Q2.1 for more detailed analysis.

<sup>2</sup> EMP1

<sup>3</sup> See Paras 4.2 – 4.3, Page 13 (TOP1).

<sup>4</sup> See paras 2.23 to 2.25, Page 12-13 (SUB8).

- 3 Next, LBE issued a further Reg.18 consultation in 2021 setting the Council’s preferred approach. To inform this plan, 12 different options for growth were tested in terms of both the quantum of development and how it might be met<sup>5</sup>. This included focusing development within the urban area (including within specific urban areas of the Borough), using some Strategic Industrial Land (‘SIL’) for housing, and potentially releasing land from the Green Belt. In terms of housing, the levels of growth tested ranged from<sup>6</sup>:
  - a c.17,000 homes – i.e. applying the current Table 4.1 LP2021 annualised target for LBE to 2029 and then reverting to existing supply (c.500 dpa);
  - b c.25,000 homes – i.e. rolling forward the current Table 4.1 LP2021 annualised target for LBE across the whole plan period; or
  - c c.55,000 homes – i.e. the Table 4.1 LP2021 annualised target plus additional supply to meet the gap to provide objectively assessed needs (noting the LP housing requirement for London as a whole is below assessed housing need). Meeting this level of growth would have ensured the plan as a minimum met its needs in accordance with Paragraph 11 of the NPPF;
- 4 Next, in formulating its Reg.19 Plan, LBE followed national policy and the steps set out at Paragraph 4.1.11 of the LP2021 to determine its housing requirement beyond 2029. LBE arrived at a requirement that is ultimately capacity based against the relevant Paragraph 11 tests of the NPPF (Dec 2023). In choosing its preferred spatial option (Option 8) the Council concluded<sup>7</sup>:
  - a The urban area could deliver significant growth without the use of SIL but this would result in a mix of homes skewed towards flats and would necessitate tall buildings for which viability was worsening (i.e. a question of deliverability). This is also in the context of the Council’s constrained supply noting the Borough’s character (that may limit capacity)<sup>8</sup> and its heritage assets;
  - b There were exceptional circumstances in the Council’s view to release Green Belt for housing and employment. Following a Green Belt review, the Council had a number of options for release, and it concluded there were also exceptional circumstances for the release of specific areas of the Green Belt: the Crews Hill and Chase Farm placemaking areas; and
  - c It was then concluded that the release of both Crews Hill and Chase Farm would have cumulative benefits that could not be delivered by releasing either in isolation. Releasing both would also ameliorate the shortfall between need and supply to a greater degree than just releasing one. The delivery of both therefore formed part of the Council’s preferred spatial strategy.

2.4 The above process has resulted in a spatial strategy that has sought to meet as much of the housing and other developments needs as possible against the NPPF Paragraph 11 tests,

<sup>5</sup> See Table 2.1, Pages 14-16 (SUB8)

<sup>6</sup> See Para 2.33, Page 14 (SUB8)

<sup>7</sup> See Table 2.2, Page 17-18 (SUB8)

<sup>8</sup> As detailed in the Council’s ‘Character of Growth Locations’ study (DES1 to DES43)

and is justified by the evidence supporting the plan: in particular the IIA (SUB8) and as summarised in the SSOATP (TOP3).

- 2.5 Moreover, while the Paragraph 145 of NPPF states there is no requirement to review Green Belt boundaries, it does not prohibit it and the Council has made the choice to do so, having concluded exceptional circumstances do exist for alterations, following a full examination of all other options for meetings identified needs. This approach is in accordance with Paragraph 145 and Paragraph 11 of the NPPF (Dec 2023) (see our Matter 4 Statement for further detail).

**Q5.3: Other than those specifically referred to in Policy SS1 (ie PL5, PL6, PL10, PL11 and New Southgate (PL7)) is it clear how the ‘place making’ areas relate to the overall spatial strategy and the purpose they serve in delivering the overall strategy?**

- 2.6 No comment.

### **Strategic Approach to Minimising Flood Risk**

**Q5.4: Is the spatial strategy consistent with national policy on flood risk? Has the Plan been informed by a Strategic Flood Risk Assessment based on the most up-to-date flood risk data and climate change allowances and taking advice from the Environment Agency?**

- 2.7 No comment.

**Q5.5: Can the Council demonstrate that the Plan takes a sequential, risk-based approach to the location of development, so as to avoid where possible flood risk to people and property?**

- 2.8 This is primarily considered a question for the Council. However, it is of note that the wider Crews Hill placemaking area includes land within identified Flood Zones 2 and 3. However, built development can be avoided in these areas and it is considered that the delivery of development at Crews Hill has the potential to minimise flood risk downstream<sup>9</sup>. As per the Level 2 Flood Risk Assessment (2023) (FLD1) Crews Hill as a wider site has been assessed as potentially passing the sequential test (Site SA27) assuming development is not within the flood risk zone<sup>10</sup> – which can be achieved.

**Q5.6: Is the Plan consistent with the actions set out in paragraph 167a)-d) of the NPPF, namely applying the sequential test, safeguarding land from development that is required, or likely to be required for current or future flood management, using opportunities provided by new development to reduce the causes and impacts of flooding and demonstrating how changes to flood risk arising from climate change have been taken into account?**

- 2.9 No comment.

<sup>9</sup> See Paras 7.21 to 7.24, Page 33 (PLA1).

<sup>10</sup> See Table 4.2, Page 51 (FLD1).

**Q5.7: Further to the above, are any of the locations identified for growth in the Plan within Flood Zones 2 and 3? If so, has the exception test been carried out and are the conclusions of this justified?**

2.10 No comment.

### **Strategic Transport Issues**

**Q5.8: Have the cumulative effects on the transport network been robustly assessed?**

2.11 No comment.

**Q5.9: What strategic transport issues have been identified that would require mitigation to enable the scale of growth envisaged to be delivered?**

2.12 No comment.

**Q5.10: What transport infrastructure, or other mitigation schemes, have been identified that would address these transport issues? Has the likely effectiveness of proposed transport mitigation schemes been assessed?**

2.13 No comment.

**Q5.11: Are there any outstanding concerns on transport matters from Transport for London, National Highways or any other relevant transport authorities?**

2.14 No comment.

### **Other Matters**

**Q5.12: Is the spatial strategy and scale of growth justified and consistent with national policy in respect of the effect on air quality?**

2.15 No comment.

**Q5.13: Is the Plan effective in ensuring adequate provision of infrastructure and local services to deliver the spatial strategy, in particular those relating to education, health and green infrastructure?**

2.16 Potentially yes, subject to the further work by the Council on viability and delivery of the Crews Hill placemaking area. P11 identifies what infrastructure is required, as also identified in the Crew Hill Topic Paper (PLA1)<sup>11</sup>.

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<sup>11</sup> See Table below Para 8.8, Pages 38 to 39 (PLA1).

**Q5.14: Does the evidence on whole plan viability and infrastructure demonstrate that the spatial strategy can viably deliver the housing, employment floorspace and infrastructure required to support the growth proposed?**

2.17 Potentially yes, although this is subject to further work by the Council on viability and delivery of the Crews Hill placemaking area. The Enfield Whole Plan Viability Update concluded that the site is viable (VIA1)<sup>12</sup>.

**Q5.15: In general terms, does the Whole Plan Viability Assessment use a robust methodology and is it based on proportionate up-to-date and accurate data?**

2.18 No comment.

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

**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?**

3.1 No comment.

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

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

4.2 No comment.

**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)?**

4.3 No comment.

**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?**

4.4 No. Gentle densification areas should include land within the MOL on the Key Diagram. A suitable modification to the Key Diagram would resolve any concerns in this regard.

<sup>12</sup> See Paragraph 12.108b, Page 209 (VIA1).

**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?**

4.5 No comment.

**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?**

4.6 No comment.

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

**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?**

5.1 Yes, Berkeley considers both the overall approach to site assessment and selection, and particularly the proposed allocation of the Crews Hill Placemaking area (PL11) is justified.

5.2 In respect of Crews Hill, Table 3.1 in the Crews Hill Topic Paper (PLA1)<sup>13</sup> fully details the site selection process that led to its allocation. In summary, LBE first looked at land within the urban area<sup>14</sup> before considering land in the Green Belt. The Council has then determined that there are exceptional circumstances to release Green Belt in general (as considered in Berkeley’s Matter 4 Statement) and concluded there are specific exceptional circumstances to release the Crews Hill Placemaking area in and of itself from the Green Belt (as noted in the Site Allocation Topic Paper [TOP2]<sup>15</sup>): assessing the site to be in a sustainable location, be of a sufficient size to support essential infrastructure, and make best use of an underutilised train station.

5.3 In conclusion, the approach to assessing and then proposing the allocation of the site is justified and accords with the approach required in national policy.

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

5.4 Yes. In particular, the Council is justified in not including Green Belt as an ‘absolute constraint’. While Paragraph 145 of the NPPF states there is no requirement to review or change Green Belt boundaries – in effect, treating Green Belt akin to a ‘Stage 1 constraint’ in the Council’s site assessment – it does also allow authorities to choose to review and

<sup>13</sup> See Pages 12 to 14 (PLA1)

<sup>14</sup> As per Stage 2 of the site selection process. Para 4.10, Page 10 (TOP2).

<sup>15</sup> See Crews Hill Site Justification for Allocation in Appendix 2 to Site Allocation Topic Paper. Sites SA11.1 to SA11.6, Pages 51 to 51 (TOP2)

potentially alter the boundaries if exceptional circumstances are fully evidenced and justified.

**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 exceptions. On what basis were the ‘exceptions’ justified and is it clear which sites fall into which category?**

5.5 No comment.

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

5.6 No comment.

**Q5.24: Were constraints to development, such as transport, flooding, landscape character, heritage and mineral safeguarding appropriately taken into account as part of the selection process?**

5.7 In respect of Crew Hill, yes. These matters are fully explored within the Crews Hill Topic Paper (PLA1).

**Q5.25: Where mitigation was deemed to be required, how was this determined and have measures been subject to assessment of viability?**

5.8 No comment.

**Q5.26: Has the site selection process ensured the allocated sites are consistent with the spatial strategy, as set out in Policy SS1?**

5.9 Yes. Policy SS1 seeks to provide for sustainable growth with supporting infrastructure whilst facilitating a nature removing and improvement to green and blue spaces (and access to them) (SS1[1]). The allocation of the Crews Hill Placemaking area (PL11) is wholly consistent with this strategy.

**Q5.27: Have any additional sites been proposed to the Council since the renewed call for sites in July 2022? If so, have these been assessed using the same methodology? Is this clearly documented?**

5.10 No comment.



**6.0 Issue 5.6: Whether Policy SS2 is justified, effective, consistent with national policy and in general conformity with the London Plan**

**Q2.28: Is the threshold of 50 dwellings or 500 sqm of non-residential floorspace for the preparation of a masterplan justified and likely to be effective? Would preparation of a masterplan for a development of this scale be unduly onerous?**

6.1 No comment.

**Q2.29: Is the threshold of 100 dwellings for the submission of a planning brief justified and likely to be effective? Would preparation of a planning brief for a development of this scale be unduly onerous?**

6.2 No comment.

**Q2.30: Is the Plan clear as to when masterplans or planning briefs must be prepared and the mechanism by which they would be approved?**

6.3 In respect of the Crews Hill Placemaking Area (PL11), yes. Part 2e of Policy SS2 states that Planning Briefs for the largest proposals will need to be progressed as Supplementary Planning Documents ('SPD'). Policy PL11(2) is then clear that the preparation of the SPD will be led by the Council (in partnership with the local community, landowners, and other key stakeholders). It will then formally be adopted by the Council prior to any planning applications being granted.

**Q2.31: How would Policy SS2 be used in decision making? Are matters covered addressed in more detail in other policies in the Plan? Are there any parts of Policy SS2 that are not addressed by other policies?**

6.4 No comment.

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