



# Jesus Church Land, Enfield

## Representations to the Consultation for a New Enfield Local Plan

Iceni Projects Limited on behalf of  
Diocese of London

August 2021

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## APPENDICES

### A1. SITE LOCATION PLAN

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# 1. INTRODUCTION

- 1.1 These representations have been prepared by Icen Projects on behalf of Diocese of London (“The Diocese”), relating to the land at Jesus Church, Forty Hill. A site location plan of our client’s landholding is attached at Appendix A1.
- 1.2 The Diocese of London is the group of Church of England organisations located in North London. It comprises parishes, schools, chaplaincies, missional communities and other organisations, which are united by their common Christian faith. The Diocese covers 277 square miles of Greater London north of the Thames from Staines in the west to the Isle of Dogs in the east and as far north as Enfield. They have significant land holdings across the Diocese, including land in the Green Belt that has significant development potential, such as this site. The Diocese seeks to promote sites such as this so that they optimise the potential of their landholdings to fund their wider ecclesiastical activities.
- 1.3 The site measures approximately 16 hectares, located to the south east of the bend of Forty Hill, approximately 1.5 miles north east of Enfield town centre.
- 1.4 Our client has a very large landholding and is seeking to deliver high quality developments in line with their aims as an ecclesial organisation.
- 1.5 The site comprises grass fields to the north and woodland to the South. Forty Hill Church of England Primary School is situated to the north of the site and Jesus Church located to the west. Commercial nurseries are located to the South of the site and there are a number of temporary structures associated with the nurseries within the southern parcel of the site.
- 1.6 The western boundary of the site follows Forty Hill, wrapping round Jesus Church and its associated extension. Primary access to the site is gained via an unpaved track access off Forty Hill, to the immediate north of Jesus Church. A second access is found further south of Forty Road which leads to the southern boundary of the site.
- 1.7 The site is accessible by public transport, located an 8-minute drive from Turkey Street train station, situated on the Overground line which has regular trains travelling to London Liverpool Street.
- 1.8 Our client’s objective is to promote the site for Green Belt release. We consider that the land to the South of and surrounding Jesus Church is in a highly sustainable location as the land surrounding the site comprises a range of uses.

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- 1.9 We consider that the land to the South of and surrounding Jesus Church fundamentally does not contribute the five aims of the Green Belt set out within the National Planning Policy Framework (NPPF) and should therefore be a logical option for Green Belt release within this Plan period.
- 1.10 We propose four possible options for the site's allocation;
- residential development, including a scheme delivering more than 50% affordable housing.
  - a third aged living development to address unmet need of older people who need affordable care and accommodation.
  - deliver a new school or extend the Forty Hill Church of England Primary School.
  - a land swap with the commercial nurseries to the South.
- 1.11 In relation to the proposed Local Plan growth strategy, the key points to extract from these representations are the following:
- We consider it would be appropriate for the Council to pursue the full level of objectively assessed housing need (OAHN) in the Borough given the absence of constraints beyond Green Belt (e.g flood risk, AONB, etc). This would further address affordable housing need in the Borough.
  - Brownfield land alone will not deliver sufficient land to meet the Council's housing target. This will require the identification of suitable Green Belt land, we support the Council's approach to releasing Green Belt and optimising the delivery of affordable housing. Further releases will assist in meeting this need, these additional allocations could focus on delivering even higher levels of affordable housing.
  - The use of Green Belt can allow the delivery of more and higher quality infrastructure such as schools to accommodate the very high levels of housing growth in the Borough.
  - The Borough will need to identify locations for new third aged living developments. The London Plan sets a benchmark in this regard and the Local Plan does not have a strategy to address this need.
- 1.12 For the reasons set out above, we consider that Exceptional Circumstances can be demonstrated to justify the release of Green Belt land at Forty Hill.

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## 2. THE SITE, SURROUNDINGS AND POTENTIAL DEVELOPMENT

### **The site and its relationship with surrounding development**

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- 2.1 The site is located to the northern edge of the built-up area known as Forty Hill. It is in the North Eastern Quadrant of the London Borough of Enfield (see Site Location Plan in Appendix A1).
- 2.2 The site is designated within the Metropolitan Green Belt and within the Forty Hill Conservation Area and comprises three distinguishable parcels of undeveloped land. The eastern parcel which lies south of Forty Hill Primary School is predominantly grass, excluding the south western corner which houses plant nursery polytunnels, which we understand is leased. The eastern parcel which lies to the east of Jesus Church is also predominantly grass, with the northern area currently being used for temporary car parking.
- 2.3 The south western parcel is predominantly tree covered. Woodland surrounds the whole site with trees running along the boundary of each parcel, screening the site on all sides from surrounding development.
- 2.4 The site is situated within Flood Zone 1 which has the lowest risk of surface water flooding.
- 2.5 Access to the site is gained from two points off Forty Hill, both north and south of Jesus Church. The north western boundary of the site follows Forty Hill, wrapping round Jesus Church and its associated extension. Forty Hill provides a buffer between the built-up development to the south, and the land to the North West which has a rural character.
- 2.6 To the east of the site is the New River, beyond which is a mix of residential properties and open space. To the south is Glebe and Clock House commercial nurseries. Additionally, there are a number of large residential properties and gardens.
- 2.7 Nearby heritage assets include Maiden's Bridge to the north of the site, Walham Cottage and Sparrow Hall to the South on Forty Hill, all of which are Grade II listed buildings. Forty Hill has various is Grade I and II listed buildings located to the West of Forty Hill. The site is not considered to form part of the immediate setting of these assets.

### **Sustainability Credentials**

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- 2.8 The site is well served by public transport. While the site has a relatively low Public Transport Accessibility Level (PTAL) rating, we consider this to not be a true reflection of the sustainability of

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the site. Amenities within the locality comprise a Primary School, doctor's surgeries, commercial nurseries, pubs and convenience stores.

- 2.9 The nearest rail station is currently 0.8 miles from the site which is situated on the Overground line and provides regular services travelling to London Liverpool Street approximately every 30 minutes, rising during peak hours. The train station is also well served by a range of bus services (six an hour at peak times).
- 2.10 Alternatively, Enfield Chase Rail station is located approximately 2 miles to the South of the site. Enfield Chase provides up to 6 trains per hour to Moorgate station (Southbound) and northbound towards Hertford and Letchworth Garden City. Enfield Town station is the terminus station of the line served by London Overground and also provides services towards London Liverpool Street approximately every half an hour.
- 2.11 Vehicular access would be gained from Forty Hill. The surrounding roads provide good access to the strategic road network, including the M25 which is approximately 6 minutes drive from the site. Pedestrian and cycle access from Forty Hill is also available from the western boundary of the site providing an opportunity for more sustainable methods of transport to the site.
- 2.12 In terms of access to social infrastructure, the site is located approximately 5 minutes drive (approx. 1.3 miles) north from various shops on Lancaster Road, while the amenities and facilities of Enfield Town are located further south.

### **Potential Development of the site**

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- 2.13 We consider that the site presents an opportunity for multiple development options. These, in order of preferability, are set out below.

#### **Option 1: Residential Development**

- 2.14 We consider in principle that the use of this land for residential development is appropriate given the surrounding residential uses and the need to bring forward sensitively designed sites for new family homes where there is a real housing demand. Importantly, development would include a significant provision of affordable homes, potentially above 50%, which could be managed by either a Registered Provider or the local authority. This would be accompanied by private amenity space, green space and enhancements to the existing landscape.
- 2.15 Our understanding of Enfield is that there is a strong market for new family homes with garden spaces that is not currently being met. Land at Jesus Church is well placed to deliver accommodation of this type.

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### **Option 2: An affordable third aged living development**

- 2.16 The site is ideal in size and location for a third aged living development. This could be an extra care, independent living or care home to meet the needs of the older population. It could seek to specialise in care for which there is a significant unmet need, such as people with dementia or be delivered by an affordable housing provider.

### **Option 3: Land swap with the commercial nurseries**

- 2.17 An alternative option for the site would be the opportunity for a land swap with the commercial nurseries to the South of the site. We consider this to be an appropriate option for the site as it will achieve the council's strategy to maximise brownfield land.

### **Option 4: New school or extension to the existing school**

- 2.18 The site also has the potential to accommodate a new secondary or SEN school, depending on the boroughs need or expand the existing Primary School. The Council's current position is that the need for a secondary school places created by recent demographic changes has now been met (in part by a site at Chase Farm Hospital which has displaced housing delivery in this location). Notwithstanding this, the Local Plan envisages the delivery of 25,000 new units in the Borough and this will undoubtedly require new school facilities. As the Council considers its distribution strategy for this growth, the Diocese stand ready and willing to provide a new school on part of the land to the South of and surrounding Jesus Church.
- 2.19 Alternatively, the location of the site south of Forty Hill Primary School presents an opportunity for the school to expand on their current facilities which could include the provision of new playing fields or alternative sports facilities. This option for development is appropriate as it proposes to build upon the existing infrastructure that the school currently delivers. The provision of school facilities are often more desirable on sites that have been released from the Green Belt, as it allows a more pleasant environment for a school and the sites are less constrained.
- 2.20 As mentioned previously, the site is situated within the Forty Hill Conservation Area. Development within Conservation Areas is not uncommon, and it is not considered that the site needs to remain undeveloped to protect this heritage asset.
- 2.21 In order to overcome possible ecology constraints of this site associated with the existing woodland, any development on site ensure the protection of high-quality trees and wildlife present on site.

### **Summary**

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- 2.22 We consider that the site is located in an ideal infill position that can utilise its unique strategic position close to public transport and social and community infrastructure. Forty Hill forms a boundary and



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buffer between the built urban form to the South and east and the land which is of rural character to the north and west.

- 2.23 We consider that additional release of the Green Belt is a necessity to ensure the Council are planning proactively and responding to demand, which the emerging Local Plan does not address, such as the full level of OAHN and the needs of older people.
- 2.24 The site also presents an opportunity for a land swap with the commercial nurseries to the South which will assist with the council's strategy to maximise brownfield land for redevelopment.
- 2.25 Lastly, the site has the capacity to provide either a new school on site (either secondary or SEN or extension to existing Primary School as required), if it is evident that one is required from the increase of housing. Alternatively, the site presents available land for the expansion of the Forty Hill Primary School including the provision of new playing pitches.
- 2.26 The site is located within the Green Belt; however, we consider that it does not contribute towards the five aims of the Green Belt, most notably as it acts as an infill site around Forty Hill, and as a logical option for Green Belt release.

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### 3. POLICY CONTEXT

#### National Planning Policy Framework

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3.1 The Government's national planning policies are set out in the recently-revised NPPF published in July 2021. It contains the Government's policies for planning in England and should therefore be considered within these representations.

3.2 Paragraph 35 of the NPPF confirms that, to be sound, a plan must be:

- *Positively prepared* – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- *Justified* – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- *Effective* – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- *Consistent with national policy* – enabling the delivery of sustainable development in accordance with the policies in this Framework.

#### Sustainable Development

3.3 Paragraph 8 identifies that achieving sustainable development means that the planning system has three overarching objectives, all of which should be considered to be interdependent and therefore need to be pursued in mutually-supportive ways:

- a) 'An economic role – contributing to building a strong, responsive and competitive economy';
- b) 'A social role – supporting strong, vibrant and healthy communities'; and
- c) 'An environmental role – contributing to protecting and enhancing our natural, built and historic environment'.

3.4 Paragraph 11 states at the heart of the NPPF is a presumption in favour of sustainable development. For plan-making this means that;

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3.5 Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and

3.6 strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.

### **Green Belt**

3.7 Section 13 of the NPPF (2021) outlines policy relating to the Green Belt. Paragraph 137 introduces the Green Belt, stating that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open. Paragraph 137 also states that the essential characteristics of the Green Belt is their openness and their permanence.

3.8 Paragraph 138 sets out the five purposes of the Green Belt, which are as follows;

- To check the unrestricted sprawl of large built up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

3.9 Paragraph 140 states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. Furthermore, strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure the Plan period.

3.10 Paragraph 142 states that when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account, with Paragraph 143 stating that when defining Green Belt boundaries, plans should ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development; be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the Plan period; and define the boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

### **Education**

3.11 Chapter 8 (Promoting healthy and safe communities), Paragraph 95 states it is important that a sufficient choice of school places is available to meet the needs of existing and new communities.

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Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. It further states that local planning authorities should:

- a) Give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
- b) Work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

3.12 Chapter 9 (Promoting Sustainable Transport), Paragraph 106 states that planning policies should support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.

#### **Small/ Medium Sites**

3.13 Paragraph 69 of the NPPF outlines that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. The policy further seeks to promote this type of development, local planning authorities should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, unless it can be shown, through relevant plan policy documents, that there are strong reasons why this 10% cannot be achieved.

#### **London Plan (2021)**

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3.14 The London Plan (adopted 2021) provides the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.

3.15 The London Plan is based on a projection for 66,000 more households a year (2019-2029). Policy H1 (Increasing Housing Supply); Table 4.1 outlines the Mayor's housing target for each Borough. These targets are informed by the need of housing evidenced by the GLA's 2017 Strategic Housing Market Assessment (SHMA) and London's Housing Land Availability Assessment (SHLAA). Table 4.1 confirms that LBE are required to provide a minimum of 12,460 new homes between 2019 and 2029 with an annual monitoring target of 1,246 units. This is a significant increase from the previous figure of 789 dwellings per year.

3.16 The GLA's SHLAA on which the new London Plan is based shows that London has capacity for 649,350 homes during the 10 year period covered by the Plan's housing targets, however James Brokenshire (Ministry of Housing, Communities and Local Government) believes that the number need to be closer to 100,000 a year and future London Plans will need to reflect this. With the

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increased housing need in London, Inner Borough's are constrained and limited, therefore much of this housing need, will , in the future, need to be provided within the Outer Borough's for example in the London Borough of Enfield.

3.17 A number of further policies within the London Plan are relevant to these representations and have been identified below.

- **Policy H4 – Delivering Affordable Housing**- Affordable housing is defined as social rented, affordable rented, and intermediate housing. 50% of all new homes delivered across London should be genuinely affordable.
- **Policy H5 – Threshold Approach to Applications** - The threshold level of affordable housing on gross residential development is initially set at a minimum of 35%, 50% for public sector land where there is no portfolio agreement with the mayor; or 50% for strategic industrial locations.
- **Policy G2 – London's Green Belt** – The Green Belt should be protected from inappropriate development. Exceptional circumstances are required to justify either the extension of de-designation of the Green Belt through the preparation or review of a Local Plan.

#### Older Persons Housing (C3)

3.18 Policy H13 (Specialist Older Persons Housing) states that Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing taking account of:

- local and strategic housing needs information and the indicative benchmarks set out in Table 4.3 (and provided below for Enfield);
- the need for sites to be well-connected in terms of contributing to an inclusive neighbourhood, access to social infrastructure, health care and public transport facilities;
- the increasing need for accommodation suitable for people with dementia.

3.19 The London Plan outlines that to meet the predicted increase in demand to 2029, London identifies annual borough benchmarks for specialist older persons housing 2017-2029 across the District as 4,115 units per annum. The annual borough benchmark for Enfield is 195 units per annum. Given schemes are usually are 100-150 units, the Council needs to identify a new extra care scheme every year. This is the sixth highest benchmark out of all 33 London Boroughs.

3.20 Policy H13 also outlines that specialist older persons housing (Use C3) provision should deliver;

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- affordable housing in accordance with Policy H4 Delivering affordable housing, and Policy H5 Threshold approach to applications;
  - accessible housing in accordance with Policy D7 Accessible housing;
  - the highest standards of accessible and inclusive design in accordance with Policy D5 Inclusive design;
  - suitable levels of safe storage and charging facilities for residents' mobility scooters;
  - pick up and drop off facilities close to the principal entrance suitable for taxis (with appropriate kerbs) minibuses and ambulances.

### **Previous Local Plan Documents**

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3.21 The Diocese have been involved and engaged with the Council through the plan-making process and submitted representations to their previous Issues and Options Consultation in 2016 and Draft Local Plan in 2019.

3.22 Our representations to the Issues and Options consultation in 2016, raised a number of significant matters, including;

- The importance of making provision for the full objectively assessed development needs arising in the area for the whole of the Plan period;
- The duty to co-operate and providing sufficient land to accommodate growth from surrounding areas (including that arising from the Mayor's London Plan 2015);
- The availability and suitability of Jesus Land in sustainability terms; and
- The site does not perform or fulfil Green Belt functions, so therefore should be removed from the Green Belt.

3.23 The 2019 Representations sought to:

- Support the release of Green Belt land to meet the Council's housing needs.
- Ensure that the housing target was not reliant on brownfield land alone due to the housing outcomes this would deliver:
  - Nearly all flatted development, when the need was for family homes.
  - Failure to optimise affordable housing delivery, due to reduced viability of brownfield land.

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- Concerns about the deliverability of relying solely on brownfield land during uncertain economic periods.
  - Demonstrating the benefits of a range of forms of development on the Forty Hill site.

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## 4. EVIDENCE BASE

- 4.1 Authorities preparing Local Plans are required to assess future needs and opportunities for their area, explore and identify options for addressing these, and then set out a preferred approach underpinned by the required evidence base documents (Paragraph: 029 Reference ID: 61-029-20180913). We have reviewed a number of the documents below.

### **Housing and Economic Land Availability Assessment (HELAA)**

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- 4.2 The assessment of land availability is an important step in the preparation of Local Plans (Paragraph: 001 Reference ID: 3-001-20140306).
- 4.3 Paragraph 67 of the NPPF states that strategic policy-making authorities should have a clear understanding of the land available in their area. Planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. This includes specific, deliverable sites for years one to five of the plan period; specific, deliverable sites or broad locations for growth, for years 6-10 and; where possible, for years 11-15 of the Plan.
- 4.4 The HELAA assessment for the site is split in to three parcels (CHC11-13). The HELAA initial identifies the site as developable in the Stage 1 assessment, although we consider that the 6-10 timeline is too conservative and it could be brought forward within the 1-5 year time period.
- 4.5 The Phase 2 Study states that the site is 'potentially suitable' due to the proximity of an SINC and within a Conservation Area. A conclusion is made that the site could be considered developable, subject to confirming viability and a review of policy constraints.
- 4.6 We can confirm that our client has established that development of the site, even for a high level of affordable housing would be viable. Furthermore, our review of the site notes that a sensitive landscape-led scheme would be appropriate within the site's constraints.

### **Strategic Housing Market Assessment (SHMA)**

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- 4.7 Paragraph 61 of the NPPF requires all Local Planning Authorities to assess the development needs of different groups in the community, including:

*'those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes'*



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4.8 The SHMA appears to be broadly acceptable, but there are a number of key points to address. For example, there needs to be a clear link between the desire to deliver large affordable family homes on the urban extension released from the Green Belt and the SHMA. This is required to ensure that the Exceptional Circumstances remain robust.

4.9 In addition, the SHMA needs updating to reflect the Council's position on First Homes. It appears that the approach is that First Homes would require a 60% discount to make them affordable for Enfield residents. However, further analysis is required if this policy were to be taken forward in the Local Plan, not least on viability. Currently, the evidence base needs a more sophisticated analysis than that provided to withstand developer scrutiny.

### **Whole Plan Viability Assessment**

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4.10 The Council's emerging Local Plan contains affordable housing targets based on the London Plan target. As required by Paragraph 34 of the NPPF, plans should include setting out the levels and types of affordable housing provision required, along with other infrastructure.

4.11 The Council has commissioned a viability assessment which we welcome. The assessment is broadly sound, but requires the following updates:

- The approach to First Homes needs to be updated, as the SHMA suggests a figure of 60% discount is required, but the Viability Assessment does not support this. An alternative figure needs to be clearly recommended by the study.
- A clear link between the level of infrastructure proposed for the urban extensions and the contributions requested needs to be established as the Infrastructure Delivery Plan is evolved.

4.12 We would recommend that at least one of the urban extensions is tested to demonstrate viability and deliverability to the Inspector.

### **Green Belt Review / Study**

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4.13 Enfield carried out a Green Belt and MOL Review as part of their Local Plan evidence base. The report was produced in June 2021 and assesses the Green Belt and assesses the potential harm to the Green Belt if any land is de-designated. The Green Belt Review assesses all the Green Belt throughout the district in line with paragraph 138 of the National Planning Policy Framework. We broadly support the approach and scope taken by LBE in relation to assessing all the Green Belt land in the District as well as small individual sites which have been identified for release, but we have concerns over the conclusions for Forty Hill.

4.14 The Council's assessment is set out below:

**Table 4.1 Green Belt Review Assessment**

<b>Green Belt Aim</b>	<b>Site Assessment</b>
Purpose 1: To check the unrestricted sprawl of large built-up areas.	Strong - Land is adjacent to the large built-up area of Greater London, it is open and there is strong distinction between the parcel and the urban area.
Purpose 2: To prevent neighbouring towns merging into one another.	Weak - Land does not lie between neighbouring towns.
Purpose 3: To assist in safeguarding the countryside from encroachment.	Strong - Land is open countryside and there is strong distinction between the parcel and the urban area.
Purpose 4: To preserve the setting and special character of historic towns	Strong - The land falls within the Forty Hill Conservation Area which is partially contiguous with and adjoins the urban area of historic London. The Forty Hill Conservation Area Appraisal notes the importance of “the presence of extensive open land. This helps to preserve the individual nature of each settlement and gives the historic estates and hamlets an attractive landscape setting, particularly where it is parkland, woodland or agricultural land
Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	Strong - All Green Belt land is considered to make an equally strong contribution to this purpose.

4.15 The Green Belt and MOL review concludes that removing the Land at Jesus Church from the Green Belt would result in high harm on the Green Belt. It concludes that the parcel makes a strong contribution to Green Belt purposes 1, 3 and 4 but its release would have a minor impact on the distinction of adjacent Green Belt.

4.16

4.17 We have provided our own assessment of the the site in Green Belt terms, which we consider to be more appopriate. Further detail can also be found in our attached Masterplan of the site which considers the landscape impact of developing the site.

<b>Green Belt Aim</b>	<b>Site Assessment</b>
To check the unrestricted sprawl of large built-up areas.	The site is essentially infill development well contained within the existing road network and would not lead to urban sprawl.
To prevent neighbouring towns merging into one another.	The land does not divide separate towns.

To assist in safeguarding the countryside from encroachment.	<p>The site is enclosed by the physical barrier that is Forty Hill on the northern and western boundaries.</p> <p>It is considered that the development of this land would not present a risk to the wider Green Belt land to the north of Forty Hill due to this defensible boundary.</p>
To preserve the setting and special character of historic towns	The land does not sit within the context of a historic town. The Council's assessment assumes that all Conservation Areas should be considered as part of the historic setting of the town, but this is not the purpose of each individual conservation area and it should be assessed on a case-by-case basis. In this instance we do not consider that the site forms part of the historic context of the Green Belt and has more localised context. There would be no harm under our assessment.
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The development would not preclude the recycling of derelict and other urban land elsewhere in LBE, given that the Council is seeking to optimise the brownfield supply before releasing Green Belt land.

- 4.18 In summary, we consider that the site does not meet the Green Belt objectives in the NPPF as set out above and its release would give rise to only limited harm to the Green Belt.

### **Sustainability Appraisal (SA)**

- 4.19 The Council has produced an Integrated Assessment (IA) for the Local Plan which includes a Sustainability Appraisal (SA).
- 4.20 A SA is a systematic process that must be carried out during the preparation of a new Local Plan (Paragraph: 001 Reference ID: 11-001-20140306). The SA's role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. Also, a SA should be applied as an iterative process informing the Local Plan (Paragraph: 001 Reference ID: 11-001-20140306).
- 4.21 We consider that the SA only assesses growth of options of 25,000 dwellings, 55,000 dwellings or lower. There needs to be a medium-high assessment of around 35,000 dwellings, as 55,000 dwellings is not considered to be a reasonable alternative and produces distorted negative results.

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A more reasonable higher figure above the London Plan target which optimises delivery might arrive at similar levels of harm as the 25,000 figure.

### **Soundness Summary**

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4.22 The following changes need to be made to the various documents:

- Amend the SA impacts in line with bullet points one and two above and introduce a third assessment alternative of 35,000 dwellings. This will ensure that the Local Plan is legally compliant and represents an appropriate strategy.
- Revise the Green Belt Assessment for Forty Hill.
- Update the SHMA to address the approach on First Homes to ensure the Local Plan is based on up-to-date evidence.
- The Whole Plan Viability Assessment will need to be updated in line with our comments to ensure that policies are based on a robust evidence base.

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## 5. HOUSING TARGET AND SPATIAL STRATEGY

- 5.1 The Draft Local Plan identifies three options for growth across the plan period which are summarised below.
- Baseline Growth - accommodating 17,000 new homes with some other land uses, including limited nature recovery and green and blue infrastructure investment.
  - Medium Growth - accommodating 25,000 new homes with a full range of land uses, including extensive nature recovery and green and blue infrastructure investment.
  - High Growth - accommodating 55,000 new homes with a full range of land uses including some nature recovery and green and blue infrastructure investment.
- 5.2 Enfield has set out that they intend to adopt the spatial strategy based on 'Medium growth' with Green Belt release as the preferred spatial strategy. An identified need of around 25,000 new homes across the plan period has been set out in the Draft Plan which equates to 1,250 homes per annum. A large proportion of the Borough's future development will be provided by the four main placemaking areas of Meridian Water, Southbury, Crews Hill and Chase Park.
- 5.3 These housing numbers are an uplift compared to the previous London Plan target for Enfield of 789dpa. However, they are also a significant reduction on the higher requirement of 1,876dpa included in a previous iteration of the New London Plan as it was considered that it would be unachievable to meet the full housing needs across London due to limited land availability.
- 5.4 The Enfield Local Housing Needs Assessment determines that there are a range of possible housing need outcomes which are included below:
- 1,117 homes per annum: existing standard method minimum need figure;
  - 1,246 homes per annum: Draft London Plan Intend to Publish target, based on existing standard method;
  - 2,213 homes per annum: new standard method minimum need figure;
- 5.5 While we support Enfield pursuing a level of growth which exceeds baseline growth, there is demonstrable need for housing throughout the district. While it is acknowledged that housing numbers meet London Plan targets, there is a clear imperative to maximise the Council's housing numbers and explore the potential for meeting a higher housing target.

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- 5.6 In addition to this, the new Standard Method minimum figure is much higher than that which has been provided for in the Draft Local Plan. We therefore recommend facilitating a level of growth which exceeds the London Plan target to ensure housing will come forward at a level to meet need. We therefore recommend accommodating for the High Growth scenario of 55,000 new homes using a full range of land uses, or seeking to establish a medium-high figure below this, but above the 25,000 units target.
- 5.7 Second, the current approach to meeting the London Plan target fails to capitalise on the opportunity of delivering higher levels of affordable housing. The current target does not adequately address affordable housing need, particularly around social rented housing. Increasing the Local Plan target would allow the Council to meet this wider need and address this unmet need.
- 5.8 The Draft Local Plan also places significant reliance on Crews Hill coming forward to deliver 3,000 homes. The Local Plan indicates that Crews Hill will not provide homes in the initial ten-year period. It is important to note that the Crews Hill site is a brownfield site. While we fully support the redevelopment of brownfield sites, these sites are often associated with complications which can delay the rate of delivery.
- 5.9 In addition to this, Crews Hill does not have any existing infrastructure. There is currently 1 train an hour and would require the provision of a new track alongside the current one to significantly increase movements. Given that similar work for the Meridian Line took circa 10 years to complete, this would be a timely process. Furthermore, there is limited social infrastructure at Crews Hill such as schools, GP surgeries or retail. Provision of this is likely to result in further delays to the required housing coming forward.
- 5.10 In order to ensure the Local Plan and its housing supply can stand up to scrutiny at examination, we recommend identifying a number of smaller greenfield sites which can come forward to meet the housing needs. Not only will this provide a mix of sites to come forward for development, but it will also ensure that if there are no unforeseen delays in the major allocations coming forward and that LBE are able to maintain their 5 year housing land supply.
- 5.11 In summary, we consider that this housing figure is not representative of Enfield's actual identified need. A supply of greenfield land will need to come forward for development to accommodate the level of growth and a significant portion of this will be Green Belt land. Edge of settlement greenfield sites, such as the Land at Jesus Church are well suited to come forward and provide family homes to ensure that homes come forward to meet housing need in the short to medium term. This in turn will further help to address the affordable housing needs of the Borough.

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5.12 greenfield sites, such as the Land at Jesus Church are well suited to come forward and provide family homes to ensure that homes come forward to meet housing need in the short to medium term. This in turn will further help to address the affordable housing needs of the Borough.

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## **6. STRATEGIC POLICY SP PL8: RURAL ENFIELD – A LEADING DESTINATION IN LONDON’S NATIONAL PARK CITY**

6.1 Policy SP PL8 sets out the objectives for sustainable and highly accessible rural activities including local food production, forestry, re-wilding, eco-tourism, sporting activities, natural burial, countryside education, and recreation which will enhance the landscape and enable all to benefit from access to wildlife-rich blue-green spaces.

6.2 While we fully support the broad objectives of this policy, it is important to consider that the redevelopment in part can facilitate such objectives. Allowing the partial development of sites such as the land at Jesus Church can facilitate re-wilding, public open space and much more. We therefore recommend incorporating re-development potential of greenfield sites in order to ensure that the rural objectives are deliverable. Currently, this evidence does not stand up to scrutiny.



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## **7. STRATEGIC POLICY SP PL9: CREWS HILL**

- 7.1 Policy SP PL9 allocates Crews Hill to come forward to deliver 3,000 homes. The Local Plan indicates that Crews Hill will not provide homes in the initial ten-year period. It is important to note that the Crews Hill site is a brownfield site. While we fully support the redevelopment of brownfield sites, these sites are often associated with complications which can delay the rate of delivery. Furthermore, these sites are often better suited to provide flatted development rather than providing family homes.
- 7.2 In addition to this, Crews Hill does not have any existing infrastructure. There is currently 1 train an hour and would require the provision of a new track alongside the current one to significantly increase movements. Given that similar work for the Meridian Line took circa 10 years to complete, this would be a timely process. Furthermore, there is limited social infrastructure at Crews Hill such as schools, GP surgeries or retail. Provision of this is likely to result in further delays to the required housing coming forward.
- 7.3 In order to ensure the Local Plan and its housing supply can stand up to scrutiny at examination, we recommend identifying a number of smaller greenfield sites which can come forward to meet the housing needs. Not only will this provide a mix of sites to come forward for development, but it will also ensure that if there are any unforeseen delays in the major allocations coming forward that LBE are able to maintain their 5 year housing land supply.

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## **8. STRATEGIC POLICY SP PL10: CHASE PARK**

- 8.1 Policy SP PL10 allocates Chase Park to come forward for development to deliver 3,000 new homes. The allocation includes removing the land, which sits immediately adjacent Enfield's settlement boundaries, from the Green Belt. The policy focuses on creating distinctive landscapes which respond to the character of the surrounding environment which includes the wider Green Belt as well as low-medium density residential development which was built circa 1930s. The policy also emphasises the importance of providing green and blue infrastructure as an integral part of the scheme.
- 8.2 Evidentially, edge of settlement, greenfield and Green Belt land has been identified as suitable to come forward for development to meet the housing need. This policy provides an example of how Green Belt land can facilitate housing growth while also ensuring that green and blue infrastructure is provided for.
- 8.3 Land at Jesus Church, while constrained by the Green Belt designation, is located on the edge of the built form and would make a logical site for further residential development. We therefore recommend allocating this site to come forward for partial development.

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## 9. STRATEGIC POLICY SP H2: AFFORDABLE HOUSING

- 9.1 Policy SP H2 requires the provision of 50% affordable housing. We are generally supportive of this requirement which will contribute towards meeting the identified affordable housing need across the Borough.
- 9.2 However, the policy makes no reference to First Homes or Exception Sites. It appears that the approach is that First Homes would require a 60% discount to make them affordable for Enfield residents. However, further analysis is required if this policy were to be taken forward in the Local Plan, not least on viability. Currently, the evidence base needs a more sophisticated analysis than that provided to withstand developer scrutiny. If LBE are seeking to omit First Homes from the Draft Local Plan, this would require robust evidence in order to support this.
- 9.3 Furthermore, Exception Sites are a useful tool in delivering affordable homes on land which would otherwise not be suited to come forward for development. Exclusion of this from the Local Plan fails to adhere to the Government's commitment to allow Exception Sites in the Green Belt.
- 9.4 We therefore recommend that this policy is revisited to incorporate both First Homes and Exception Sites to align with paragraph 72 of the NPPF and meet the test of soundness in terms of compliance with national policy.

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## 10. STRATEGIC POLICY SP SC2: PROTECTING AND ENHANCING SOCIAL AND COMMUNITY INFRASTRUCTURE

### Draft Policy SI1 – Social and Community Infrastructure

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- 10.1 Draft Policy SI1 highlights that the Council intend to work with partners to ensure community facilities and services are developed and modernised to meet the changing needs of the community.
- 10.2 The Council's current position is that the need for Secondary School places created by recent demographic changes has now been met (in part by a site at Chase Farm Hospital which has displaced housing delivery in this location). The Local Plan envisages the delivery of circa. 25,000 new units in the Borough and this will undoubtedly require new school facilities. As the Council considers its distribution strategy for this growth, the Diocese stand ready and willing to provide a new school or an extension to the existing on part of the land to the South of and surrounding Jesus Church.
- 10.3 While the Council recognise that the increased housing provision will result in increasing demand on schools and other social infrastructure throughout the Borough, it fails to provide for this need in a full and demonstrable manner.
- 10.4 There is also a need for a SEND school in the Borough, however the Infrastructure Delivery Plan determines that SEND provision will be addressed through mainstream schools with universal or targeted services and the building of new specialist schools where demand exists over the course of the plan period.
- 10.5 We would like to again emphasise the opportunity for the site to provide the land needed to expand schools to meet demand if it arises from housing growth, providing much needed educational facilities through expanding on the existing infrastructure which already establishes the north of the infill site.

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## 11. SUMMARY

11.1 These representations are produced on behalf of the Diocese of London and seek to demonstrate the benefits of allocating the site, these include;

- The site is considered to be in sustainable location and scores well against the NPPF criteria for sustainability.
- The site is not considered to meet the objectives for Green Belt land set out in the NPPF and is likely to be considered a weakly performing piece of Green Belt land as part of an updated Green Belt Review.
- The site could deliver a third aged living development to meet specialist or affordable needs.
- The site has the potential to provide residential development; an opportunity for land swap with the commercial nurseries to the South and capacity to provide a new primary, secondary or SEN school or act as a school extension in order to meet any newly arising need from the level of housing growth in the Local Plan.
- The site can provide a policy compliant level of affordable housing (to be managed by a Registered Provider or the local authority).
- The site can provide a range of family homes with gardens.

11.2 We consider that the allocation of the land to the south of and surrounding Jesus Church would accord with the Council's development objectives. As set out above, housing need is unlikely to be met by brownfield land alone and it is likely that greenfield land will need to be released from the Green Belt.

11.3 In addition, we have highlighted a number of policy changes required to make the Local Plan sound.

11.4 For the reasons set out above, we consider that Exceptional Circumstances can be demonstrated to justify the release of Green Belt land in the Borough. We would welcome the opportunity to discuss the site and the options we have proposed for development in more detail with the local authority.

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## **A1. SITE LOCATION PLAN**