



# Land Opposite Jolly Farmers Public House, Enfield Road

Representations to the Consultation for a New Enfield Local Plan

Iceni Projects Limited on behalf of  
London Diocesan Fund

August 2021

ICENI PROJECTS LIMITED  
ON BEHALF OF LONDON  
DIOCESAN FUND

Iceni Projects

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REPRESENTATIONS TO THE CONSULTATION FOR A  
NEW ENFIELD LOCAL PLAN

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- A1. SITE LOCATION PLAN
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# 1. INTRODUCTION

- 1.1 These representations have been prepared by Icen Projects Ltd (“Icen”) on behalf of London Diocesan Fund (“LDF”), relating to Land Opposite the Jolly Farmers Public House, Enfield Road, EN2 7QS. 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 Land Opposite the Jolly Farmers Public House is circa 1.7 hectares and is located to the north of Enfield Road / Slades Hill (A110) within the built-up area of Worlds End, approximately 1.5 miles west of Enfield Town Centre. The site is bounded by residential development to the east and west, with Enfield Road to the south, beyond which is further residential development and the Jolly Farmers Public House. The site is currently designated as Green Belt, however due to the site being bordered by residential development on three sides, the site does not meet the five objectives for Green Belt land in the NPPF. We consider that development of the site would constitute “limited infilling”.
- 1.4 The site also benefits from being highly accessible by public transport; Enfield Chase Railway Station is located less than 1 mile (approx. 15 minute walking distance) from the site, and there are a variety of bus stops located along Enfield Road. The Infrastructure Delivery Plan 2021 (IDP) also sets out that there will be borough-wide improvements to bus services. The A110 has been identified as a key corridor which will receive more direct and frequent bus services in the short to medium term. This further supports the sustainability credentials of the site.
- 1.5 The site is also highly accessible by vehicle and is accessed via the A110 which provides direct access to the A10. The IDP includes improvements to the M25 junction widening the A10 southbound. Evidentially, the proposed improvements will ensure that the local road network can facilitate traffic in this area and should support increased traffic movements supported by emerging development.
- 1.6 As part of the masterplanning process we consider that the site is able to accommodate one of the following options;
- 60 care bed to the south of the site, with 40 residential units to the north; or

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- In the region of 60 residential units comprising mostly family homes of 2/3 bedrooms, and a small proportion of 1/2 bedroom apartments.
- 1.7 Further information relating to the design options of the development is provided in the Vision Document, available at Appendix A2. We would welcome discussions with the Council on the above two options, to deliver a high-quality design based on demand and need in the area.
- 1.8 We consider that the site should come forward for development as it is highly sustainable; does not contribute towards the five aims of the Green Belt set out within the National Planning Policy Framework (NPPF) and; the surrounding land use is residential with the site being surrounded by residential development on three sides. Also, the topography of the site is “bowl” shaped, therefore this will restrict views into and out of the site, limiting any developments impact on the wider area.
- 1.9 In relation to the proposed Local Plan growth strategy, the key points to extract from these representations are the following;
- We support the allocation of Chase Park in principle, this is a sustainable location which contains large areas of poor-quality Green Belt.
  - We consider that the Chase Park allocation needs to be altered to include Land Opposite Jolly Farmers Pub for residential development. This site is currently identified as open space, despite the fact is identified as some of the poorest quality Green Belt land within the allocation.
  - The aspiration for publicly accessible Green Infrastructure on the site will not be delivered unless some level of development is delivered on the site. The masterplan for the site identifies around the half of the site for this use, but the rest of the site needs to be developed otherwise the site will remain in its current situation.
  - 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 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.

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## 2. THE SITE, SURROUNDINGS AND POTENTIAL DEVELOPMENT

- 2.1 The site is of circa 1.7 hectares, comprising two grass fields, divided by Merryhills Brook. The site is located to the north of Enfield Road / Slades Hill (A110) within the built-up area of Worlds End, approximately 1.5 miles west of Enfield Town Centre. The site is surrounded by urban form on three sides; to the east by Salmon's Brook, beyond which is residential development; to the south by Enfield Road, beyond which is the Jolly Farmers Public House and further residential development and; to the west by allotments and residential development.
- 2.2 The site is also highly accessible by public transport. Enfield Chase Railway station is located less than 1 mile (approx. 15 minute walking distance) from the site and provides up to 6 trains per hour to Moorgate Station (southbound) and northbound towards Hertford and Letchworth Garden City. Enfield Town Railway station is located 1.3 miles (25 minute walking distance) to the east of the site and provides London Overground services towards London Liverpool approximately every half an hour. There are also a number of bus stops within 100 metres of the site which provide frequent public transport access to the town centre, as well as other areas including Barnet, Southgate and Central London.
- 2.3 Vehicular access is currently sought from the unpaved road running from Enfield Road to the west of the site, providing direct access to the strategic road network including the A10 which subsequently leads to the M25. Furthermore, to the west of the site is Public Right of Way which provides direct access to the north of the site towards Hadley Road and Trent Park.
- 2.4 Within walking distance of the site, there is a wide range of social and community infrastructure, for example primary and secondary schools, GP surgeries, supermarkets and opposite the site to the south is the Jolly Farmers Public House.
- 2.5 The Vision Document provided at Appendix A2 highlights the sites context within the surrounding area and outlines how the site is well situated within the urban form of the area and therefore does not fundamentally contribute to the Green Belt.

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

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- 2.6 LDF consider that the site could deliver one of the below options;
- 60 care bed to the south of the site, with 40 residential units to the north; or
  - In the region of 60 residential units comprising mostly family homes of 2/3 bedrooms, and a small proportion of 1/2 bedroom apartments.

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2.7 Alongside the development, the LDF consider that the site can provide a provision of affordable homes, private amenity spaces, green space, enhancements to existing landscape and an improvement overall to the currently under-utilised vacant land.

2.8 The LDF have outlined that there is currently a strong market for new family homes within Enfield. Alongside this, the LDF consider that there is a need for retirement living within a 10 minute drive of the site (the usual distance within which people relocated from their existing homes. This analysis shows that there is a qualitative and quantitative need for 700 bed spaces over the plan period.

### **Previous Representations**

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2.9 The LDF have engaged with the Council through the plan-making process. Representations to the Call for Sites in 2016 were submitted, outlining the site's development potential given the surrounding residential land use and the need to bring forward sensitively designed sites where there is a significant housing demand.

2.10 The LDF have been involved and engaged with the Council through the plan-making process and submitted representations to their previous Issues and Options Consultation in February 2016.

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

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

2.12 Pre-application discussions for the site have also previously been undertaken and the comments provided around design have been incorporated in to the masterplan proposals.

2.13 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:

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- Nearly all flatted development, when the need was for family homes.
  - Failure to optimise affordable housing delivery, due to reduced viability of brownfield land.
  - Concerns about the deliverability of relying solely on brownfield land during uncertain economic periods.
- Demonstrating the benefits of development on the Land Opposite the Jolly Farmers Pub.

## **Summary**

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- 2.14 We consider that the site is in a sustainable location, close to existing shops and services with a good range of public transport in an Enfield context. The site would deliver a range of flats and homes as well as, potentially, a care home. This diversification of supply would meet a wide range of different development needs in the Borough and allow the site to come forward in one phase. Development of this kind will assist the Council in meeting the Housing Delivery Target.
- 2.15 As demonstrated by the masterplan document appended to these representations a care home would meet qualitative and quantitative need within the local community (10 minute drive time from the site).
- 2.16 The site is also relatively small in size (1.7 hectares) and would most likely be brought forward by medium sized developers, which will further enhance the deliverability credentials of this scheme.
- 2.17 The site is identified as a Site of Important Nature Conservation, but our understanding is that the sensitive area of the site relates to the stream and the area around it which is also a flood risk and therefore would not be developed.
- 2.18 Importantly, the site does not meet the five purposes of the Green Belt set out in the NPPF and as supported by the Council's own Green Belt study. The site is surrounded on three sides by development and is viewed in the context of the adjoining suburban development. It has a negligible wider landscape value and only benefits from short-distance views against the backdrop of the surrounding development.
- 2.19 The site does not perform a role in separating development between two settlements and has a very different character to countryside around Trent Park, which performs very strongly against the NPPF Green Belt criteria.
- 2.20 Icen consider that the site is an anomaly in Green Belt terms and its release for housing would assist in meeting the Borough's growth targets while still protecting high quality Green Belt elsewhere in the Borough.



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## **Deliverability**

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- 2.21 The site is wholly within the ownership of the LDF and would be suitable to come forward for development in the short term (5 years). Furthermore, this site is suitable to come forward as a separate phase which is not reliant on the wider allocation.
- 2.22 The proposed development will bring a number of benefits the local area and the wider Borough. The proposal for a 60 care bed to the south of the site, with 40 residential units to the north will provide much needed homes for older people. The Local Housing Need Assessment Report identifies that the overall need for residential care (C2 planning use class) is projected to increase to between 737 and 75596 units by 2036 and specialist older person (C3 planning use class) by between 1,212 and 1,242 units. Evidentially, there is a growing need for such facilities in Enfield which the Land Opposite Jolly Farmer's is available to contribute towards meeting. The proposal also seeks provide 60 residential units, the majority of which will be family homes. This will contribute towards meeting housing need across the borough.
- 2.23 In addition to contributing family homes and homes for older people, the proposal seeks to provide high quality green and blue infrastructure. This will not only enhance the sensitive ecological landscape but will create an attractive and welcoming pace which can be used by the local community. The provision of walking and cycle routes will also provide sustainable and active transport links into Enfield which can connect into the walking and cycling routes which are proposed as part of the IDP and contribute towards a high active travel growth as set out in the IDP.

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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:

- 'An economic role – contributing to building a strong, responsive and competitive economy';
- 'A social role – supporting strong, vibrant and healthy communities'; and
- '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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- a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and
  - b) 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**

3.5 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.

3.6 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.

3.7 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.

3.8 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.

### **Retirement Living**

3.9 The NPPF defines older people as "People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs"

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- 3.10 Paragraph 62 of the NPPF highlights that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including those for older people.

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

- 3.11 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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- 3.12 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.
- 3.13 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.
- 3.14 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 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.
- 3.15 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.

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- **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)

3.16 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.

3.17 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 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.

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

- 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.

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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 was assessed (HIC 10). The HELAA initially 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 its allocation in the Green Belt. 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 the proposal on the site is 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.
- 4.10 The SHMA analysis should set out the '*size, type and tenure of housing needed*'. We understand that a SHMA has been commissioned and should assess the relevant needs for these different groups. Importantly, this document should be commissioned to positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (Paragraph 11). The SHMA should then provide credible information and data that can be used to inform policies and decision-making.
- 4.11 We request that the Council should provide an up-to-date SHMA to ensure the Plan is credible and transparent. It is not sufficient to rely on the London Plan and the policies within it, an Enfield-specific approach is required and needs to be backed by evidence.
- 4.12 The Council also need to deliver 195 units per annum of specialist older person housing (Policy H15). The SHMA needs to look at how this need should be delivered in terms of tenure and type of unit.
- 4.13 We also consider it is important that Enfield seeks to understand the level of need for Care Home bed spaces. This needs to happen on a quantitative and qualitative basis as many of the Council's existing care homes will need to be built to a modern standard and may not be designed suitably to meet a range of needs, such as dementia. Our analysis shows in the catchment area there is likely to be a need for around 700 bed spaces on a quantitative and qualitative basis over the plan period. The Council will need to expand out to a Borough assessment to support a sound Local Plan.

#### **Whole Plan Viability Assessment**

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- 4.14 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.
- 4.15 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.

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

### Green Belt Review / Study

4.17 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.

4.18 The Land Opposite Jolly Farmer's Pub has been assessed as part of the Green Belt and MOL Review against the five purposes of the Green Belt as set out in paragraph 138 of the NPPF. The assessment is shown 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.	Moderate - Land is adjacent to the large built-up area of Greater London and is open however, there is weak distinction between the parcel and the urban area.
Purpose 2: To prevent neighbouring towns merging into one another.	Weak/none - Land lies in a gap between two parts of Greater London, Cockfosters to the south west and Enfield to the northeast and east, although Trent Park Registered Park and Garden maintains separation. While the land is open there is weak distinction between the parcel and the urban area due to its containment on three sides by the urban edges of Enfield.
Purpose 3: To assist in safeguarding the countryside from encroachment.	Moderate - The majority of the parcel is covered by allotments which have a stronger relationship with the urban area than the open countryside, although the fields at the eastern edge are more consistent with the open countryside to the north. Furthermore, there is weak distinction between the parcel and the urban area.



Purpose 4: To preserve the setting and special character of historic towns	Weak/none - The parcel does not have a physical or visual relationship with historic London, including historic assets recorded as making a contribution to its setting and special character.
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.

- 4.19 The Green Belt and MOL review concludes that removing the Land Opposite Jolly Farmer's Pub from the Green Belt would result in low to moderate harm on the Green Belt. The assessment determines that the close proximity of the land to the urban edge and its containment limits the impact of release on the distinction of adjacent Green Belt land, which would be negligible. The parcel makes a moderate contribution to purpose 1 and the majority of the parcel makes a relatively weak contribution to purpose 3, although the fields in the eastern half have more of an association with the open countryside. The release of the parcel in its entirety would have a minor impact on the distinction of adjacent Green Belt land to the north. Therefore, overall release of the parcel is likely to result in low-moderate Green Belt harm.
- 4.20 It is important to recognise that the majority of Green Belt land in the district is considered to have moderate high to very high harm on the Green Belt if it were to be released. Removal of the Land Opposite Jolly Farmers Pub would therefore make a logical option to come forward to provide much needed homes. Furthermore, the land that has been identified to come forward for development as part of the Chase Park allocation is considered to have moderate high to very high harm on the Green Belt if removed. It would therefore seem more advantageous to focus the Green Infrastructure provision in areas that have been identified as higher value in terms of their contribution to the openness of the Green Belt.
- 4.21 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.
- 4.22 While we generally support the LBE's Green Belt Review, we have also provided our own assessment of the site below. Further detail can also be found in our attached Masterplan of the site which considers the landscape impact of developing the site.

Green Belt Aim	Site Assessment
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<p>Purpose 1: To check the unrestricted sprawl of large built-up areas.</p>	<ul style="list-style-type: none"> <li>• The site is an infill site surrounded by development on three sides. The site is enclosed so therefore will not lead to urban sprawl.</li> <li>• The Green Belt boundary dips in to include the site and appears as an anomaly. Utilising the site's northern edge as new Green Belt boundary would provide a more defensible long-term boundary.</li> </ul>
<p>Purpose 2: To prevent neighbouring towns merging into one another.</p>	<ul style="list-style-type: none"> <li>• The built up areas on either side of the site are part of the same town so therefore no neighbouring towns will be merged.</li> </ul>
<p>Purpose 3: To assist in safeguarding the countryside from encroachment.</p>	<ul style="list-style-type: none"> <li>• The site contains a border of mature trees to the north, so therefore is neatly enclosed and contained within the urban form.</li> <li>• The landscape of the site has a "bowl" shaped topography, therefore this will restrict views into and out of the site, limiting any developments impact on the wider area. The retention of the trees on site will also contribute to restricting views in and out of the site.</li> <li>• It is considered that the development would not present a risk to the wider countryside due to its defensible boundaries and character.</li> </ul>
<p>Purpose 4: To preserve the setting and special character of historic towns</p>	<ul style="list-style-type: none"> <li>• The site is not located within the context of a historic town.</li> </ul>
<p>Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</p>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>

4.23 Ultimately, we consider that when assessed against the five purposes of the Green Belt, the site's contribution to the Green Belt is overall relatively weak. We therefore fully support the site's removal from the Green Belt. We would however recommend utilising the site fully to contribute towards meeting the needs across the district and dispersing the green infrastructure provision across the higher quality Green Belt sites.

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## **Sustainability Appraisal**

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- 4.24 The Council has produced an Integrated Assessment (IA) for the Local Plan which includes a Sustainability Appraisal (SA).
- 4.25 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).
- 4.26 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. 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.

## **Chase Park Topic Paper**

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- 4.27 The Chase Park Place Making Strategy Topic Paper sets out the approach taken to the consideration of potential policy and guidance for the study area, including analysis of the local plan approach; the site context and the available evidence. It forms part of the evidence base for the new Local Plan, setting out the justification for the specific placemaking policy at Chase Park and ensuring that this large strategic site is planned holistically and on a placemaking basis.
- 4.28 The Topic Paper sets out that in the southern part of the allocation area, the bulk of the development will be located as part of a long-term phased approach which can encapsulate more than one plan period and the subject site is likely to come forward last. While we do not necessarily support this view, we do support that the Land Opposite Jolly Farmer's pub can come forward in the initial phases and emphasise that this site is suitable to come forward in the short term.
- 4.29 The Topic Paper identifies the site as part of Chase Park; however, it does not clarify how the site will come forward. The paper even states in paragraph 4.13 that "Two of these sites – HIC 6 & HIC 10 (the Land Opposite Jolly Farmer) – have been promoted as sites for extra care or older age housing, and this is to be welcomed." It is also highlighted in the Topic Paper that the site is located nearest to the Oakwood Tube Station and is therefore considered better suited to housing which is likely to attract commuters. Evidentially, the Topic Paper has identified the site as suitable for development. However, this has not been reflected in the allocation in the Draft Local Plan.

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4.30 While we support the Enfield Borough Council providing a detailed review and vision of large-scale allocations, we recommend providing greater clarity on the overall vision for the allocation. In particular, the smaller components of the allocation. The push for green and blue infrastructure is a dominant theme throughout the Topic Paper which we fully support. However, it is evident that this is an integral consideration throughout the allocation and not just at the Land Opposite Jolly Farmer's Pub.

4.31 Overall, we support the vision set out in the Topic Paper. However, it is our opinion that the Draft Local Plan should be greater aligned with the supporting evidence. While green and blue infrastructure is a key requirement of development coming forward as part of the Chase Park allocation, the Topic Paper also identifies that the subject site is well suited to both extra care provision as well as residential provision. We therefore recommend the Draft Local Plan is amended to include residential and extra care provision on the Land Opposite Jolly Farmer's Pub. This will ensure policy fully reflects its evidence base and will provide a more robust Local Plan which will stand up to scrutiny at examination.

### **Soundness Summary**

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

4.33 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.

4.34 Update the SHMA to address the approach on First Homes to ensure the Local Plan is based on up-to-date evidence.

4.35 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

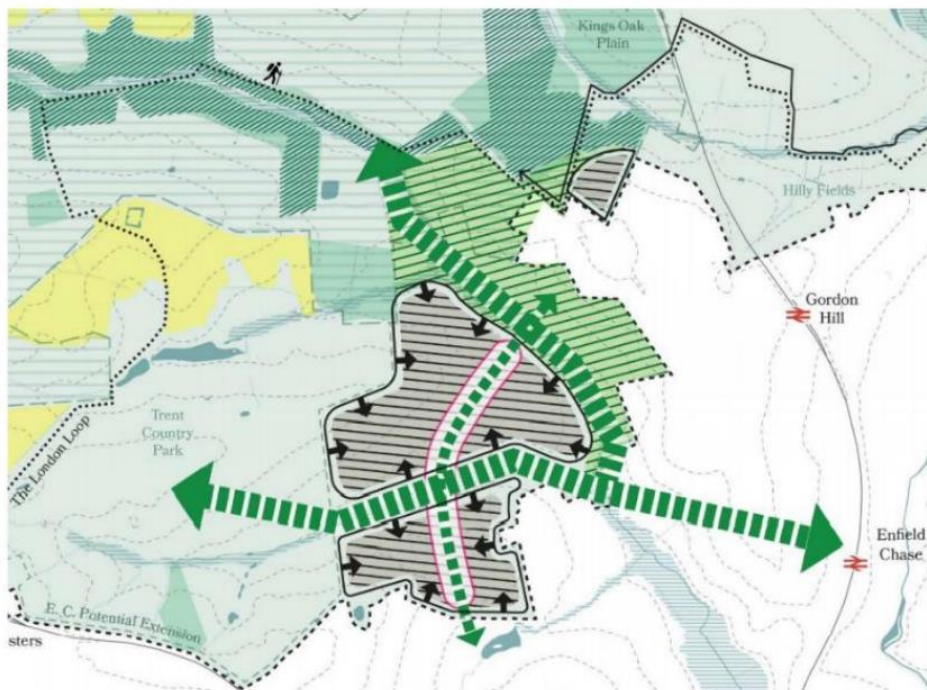
- 5.1 The Draft Local Plan identifies three options for growth across the plan period which are summarised below.
- Baseline Growth - accommodating 17,000 new homes with some other land uses, including limited nature recovery and green and blue infrastructure investment.
  - Medium Growth - accommodating 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 any unforeseen delays in the major allocations coming forward 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/ infill greenfield sites, such as the Land Opposite Jolly Farmer's Pub 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.

## 6. STRATEGIC POLICY SP PL10: CHASE PARK

- 6.1 The Land Opposite Jolly Farmer's Pub has been included as part of the Chase Park allocation. Chase Park has been allocated to provide circa 3,000 new homes on greenfield land which will be removed from the Green Belt. As it stands there are a number of requirements that have been set out in the emerging policy which are summarised below.
- 6.2 The general vision for Green Park is that it will provide an exemplar high-quality development. Design will be shaped by the brooks, woodlands and green spaces that define the area, and its relationship to the adjoining historic landscape at Trent Park. The Local Plan includes a high-level concept plan which is shown below.

### Chase Park Allocation Draft Concept Plan



Source: *Enfield Local Plan: Main Issues and Preferred Approaches (June 2021)*

- 6.3 The policy includes removing land from the Green Belt which is justified in this instance. There is a clear and well-defined approach as defined by the Calverton High Court Judgement, this states that the following procedure should be followed:

1. The acuteness/intensity of the housing need should be assessed;

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2. The constraints on the supply/availability of land suitable for development should be understood;
  3. The difficulties in achieving sustainability without impinging on the Green Belt should be reviewed;
  4. If the Council cannot accommodate growth outside of the Green Belt then potential for exporting that need to neighbouring authorities should be tested;
  5. If none of the above steps can avoid delivering housing in the Green Belt then the nature and extent of the harm to this green belt should then be assessed against how far the impacts on green belt purposes could be reduced when delivering housing on Green Belt sites.
- 6.4 Considering the above steps, it is our view that the removal of Land Opposite Jolly Farmer's from the Green Belt is justified in principle. Evidentially, Enfield's housing need cannot be met fully through land outwith the Green Belt. Furthermore, the Green Belt Review indicates that the site is of a lower value to the Green Belt when assessed against the five principles set out in paragraph 138 of the NPPF.
- 6.5 The Chase Park Place Making Strategy Topic Paper sets out the approach taken to the consideration of potential policy and guidance for the study area, including analysis of the local plan approach; the site context and the available evidence. The Topic Paper sets out that in the southern part of the allocation area, the bulk of the development will be located as part of a long-term phased approach which can encapsulate more than one plan period and the subject site is likely to come forward last.
- 6.6 The Land Opposite Jolly Farmer's Pub has been included in the Chase Park 'Place Making Area' allocation. However, it has not been included within the indicative location for housing development. The Draft Plan determines that the site contains a 'Priority Habitat Area' and sits within 250-750m from Boxer's Lake and Lonsdale Drive Woods SINC. Therefore, the development in this location is considered to place increased stress on the designated and non-designated biodiversity assets within the Borough which are already experiencing pressure from recreational use, as well as poor air quality. The illustrative masterplan produced by the Council therefore shows the site as designated Green Infrastructure.
- 6.7 While we recognise the site is identified as a Priority Habitat Area, we do not consider that this recognises the full potential of the site to contribute towards meeting the local housing need. Firstly, this site is suitable to come forward in the short to medium term. The position of the site in relation to the wider allocation means that it is suitable to come forward for development initially and does not necessarily rely on the wider scheme.



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- 6.8 Detail of the identified Priority Habitat or the proposed Green Infrastructure are not clear at this stage. However, the Draft Plan emphasises the importance of green and blue infrastructure and with regard to Chase Park, encourages the naturalisation and restoration of the river corridor along Salmons Brook through wetland creation and flood risk alleviation to enhance the ecological potential of the area. As set out above, this appears to conflict with the Topic Paper which considers the site as suitable for extra care and residential provision, largely due to the proximity to the public transport links.
- 6.9 While the Draft Local Plan fails to provide clarity on the green infrastructure provision, it also fails to recognise that prohibiting development of the whole site provides no incentive to landowners. We recognise the importance of protecting the sensitive landscape. However, this should not prohibit development of the site as whole. Furthermore, LBE fails to recognise that without partial development of the site, there will be no funding to provide high quality green and blue infrastructure which contributes towards improving the quality of the landscape.
- 6.10 While we support the inclusion of the Land Opposite Jolly Farmer's Pub in the Chase Park Placemaking Area, we recommend amending the policies map to include part of the site as suitable for development. We generally support the policy wording. However, we recommend the following adjustments.

To realise the place vision set out Figure 3.11 development in the Crews Hill area must adhere to the following place-making principles:

1. The boundary of the placemaking area includes sufficient land to deliver more development beyond 2039 to enable the creation of a new sustainable development.

Sites anticipated to come forward in the next plan period will be removed from the Green Belt as shown on the Policies Map. These sites will be protected from development other than that which is necessary in relation to the operation of existing uses, change of use to alternative open land uses or temporary uses. Any development in land beyond the site allocation must not prejudice the possibility of

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long term development in the wider placemaking area. The status of this land will only change through a review of the Local Plan.

2. To ensure that development in the Chase Park placemaking area comes forward in a strategic and comprehensive manner, planning permission on the allocated sites will only be granted following the approval by the Council of a comprehensive masterplan ~~(in the form of an SPD), for the area as a whole~~. Development in this area must be brought forward in accordance with a planned and coordinated approach for this area as set out in the approved masterplan. ~~adopted and emerging SPDs~~.

#### **Distinctiveness in the Landscape**

3. Development should front onto the Green Belt and have a positive relationship with the wider landscape, including the restored Enfield Chase and the London National Park City “north west Enfield”. The landscape setting of Chase Park should be defined by the brooks, woodland and green spaces, as shown on the Concept Framework Plan Figure 3.11.

4. Development should front onto the open space of Trent Park to the west, creating a positive and sensitive relationship with the historic landscape. Development at Chase Park will have a distinctive character, delivered at all scales of design, for example through its layout, form, range of building typologies, materials, landscape design and green infrastructure.

5. The design of new development should acknowledge the townscape of the 1930's

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residential context but make more efficient use of land with a higher density,

sustainable urban form which reflects its suburban location.

6. Development along the eastern and western edges of the development must positively

respond to the landscape and watercourses which form the edge of the site, while

development along the southern edge of the area which abuts existing residential

areas will need to carefully mediate the change in density between the existing 1930's

suburbs and the new higher density development within Chase Park itself

6. Development along the Enfield Road frontage should act as a gateway into the wider

Chase Park development, while development along the Merryhills Brook should

respond to the important blue-green function of the watercourse.

7. To the north of the main Chase Park area, higher density development close to Chase

Farm Hospital will support the delivery of a range of types and tenures of new homes

in an area which has excellent walking and cycling connections to employment

opportunities.

### **Sustainable Movement & Connectivity**

5. Development must maximise opportunities for sustainable and active travel. The

design, form and layout of transport infrastructure must create a place where walking,

cycling and use of public transport is the natural choice.

6. The development should provide new green links to facilitate movement between the

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existing and new communities, and to Trent Park as a publicly accessible landscape.

Development should close the gap in the missing link in wider routes such as

National Cycle Network route 12 and the link between the Enfield Chase landscape

and its namesake station, as shown on the Concept Framework Plan at Figure 3.11.

### **Sustainable Movement & Connectivity**

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6. The development should provide new green links to facilitate movement between the existing and new communities, and to Trent Park as a publicly accessible landscape.

Development should close the gap in the missing link in wider routes such as

National Cycle Network route 12 and the link between the Enfield Chase landscape

and its namesake station, as shown on the Concept Framework Plan at Figure 3.11.

### **Mix of People and Activity**

7. The development should create a place which provides opportunities for living, working and relaxing within the local neighbourhood, creating an inclusive community and delivering a mix of dwelling sizes, tenures and types to support people through all stages of life.

8. Provision of specialist housing for older people should be considered along the A110

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Enfield Road corridor, where improvements to existing footways along the road will be required in order to create an attractive environment for walking, cycling and other non-polluting wheeled transport.

9. The design and layout of the public realm, community spaces, buildings and facilities should create opportunities for people to interact with their neighbours.

10. Development in this location will be required to provide a school and health facilities, as well as other social infrastructure, in line with evidence of need.

**Accessibility and variety of Open Space**

11. Development should deliver a suitable mix of public and private spaces, whilst acknowledging the wider open space setting of Trent Park and the London National Park City initiative in north west Enfield, providing an abundance of opportunities to enjoy the nature and wildlife within easy reach of all homes. Development should facilitate easy access to this wider landscape setting.

12. Development should facilitate the rewilding at Enfield Chase; and the naturalisation and restoration of the river corridor along Salmons Brook in particular, through wetland creation and flood risk alleviation to enhance the ecological potential of the area.

13. Biophilic design principles should be incorporated where possible to maximise urban greening and integration with blue and green networks. The development must

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include greening elements on buildings, gardens, in streets in public open space and through the materials used. Sustainable urban drainage systems should be integrated into the public realm and designed to be multi-functional, people-focussed spaces.

14. High quality play spaces at a variety of scales and sizes should be provided, which reinforce the local character. This should be provided through a combination of designated and informal playable space. Doorstep play must be provided within individual development parcels.

**Accessibility and variety of Facilities & Services**

15. Sustainable and active travel routes should be delivered to provide easy access to existing local centres at Oakwood and Enfield Chase, the major centre at Enfield Town and the major employer at Chase Farm Hospital.

16. Social and physical infrastructure such as community centres, shops, health and education facilities to support day-to-day needs should be available within an easy walk or cycle.

17. The range of open spaces, employment opportunities, services and facilities within reach of Chase Park provides an opportunity for it to be developed as an exemplar scheme of a place that facilitates active and sustainable lifestyles.

6.98 Ultimately, we generally support Policy SP L10. However, there are a number of amendments that can be made to ensure the policy is robust and deliverable. We recommend that LBE recognise the importance of identifying the Land Opposite Jolly Farmer's Pub to come forward for development in part. Not only will this contribute towards meeting housing need in the short-term, but it will also

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ensure that part of the site can come forward to provide the green and blue infrastructure which is integral to the wider Chase Park allocation. The proposed amendments will help to provide a robust and deliverable policy that meets the NPPF's test of soundness as set out in paragraph 35.

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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 H2: AFFORDABLE HOUSING

- 8.1 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.
- 8.2 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.
- 8.3 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.
- 8.4 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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## 9. SUMMARY

- 9.1 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 can deliver a range of unit types including family housing which is much needed in the Borough.
  - The site could accommodate a 60-bed care home for which there is a significant and demonstrable need.
  - The development can bring forward new area of linear open space and footpaths to connect with the wider network.
  - The site could be developed in one phase to assist in meeting the Council's housing delivery targets.
  - The site is considered to be a poor quality area of Green Belt that is surrounded by development on three sides and viewed in a suburban context.
- 9.2 A masterplan document demonstrating how the site could be developed is included with these representations.
- 9.3 We consider that the allocation of this site would accord with the Council's development objectives fully. Brownfield that brownfield land alone will deliver sufficient homes to meet the Council's housing target. This will require the identification of suitable Green Belt land.
- 9.4 As demonstrated above, the delivery of Green Belt land is required in order to meet housing need. As set out above, Brownfield sites in the Borough will have a range of complications, and the largest ones (such as Meridian Water) have been delayed previously demonstrating that there should not be an over-reliance on these types of sites. This is particularly concerning given that brownfield sites to the east of the borough make up a significant quantum of the available land in the Borough. This land has lower values and may struggle to deliver both a policy compliant level of affordable housing and the necessary infrastructure.
- 9.5 Allocating smaller greenfield sites, such as the Land Opposite Jolly Farmer's for development will deliver significant levels of family housing to come forward in the Borough. Our analysis shows that the demand for housing in Enfield is mostly from families and seeking to accommodate them in flats will be unsatisfactory. Diversification of supply also chimes with the Government's growth and the Letwin Review which encourage a mix of units to be brought forward to speed delivery. The alternative is to rely on flatted units in Enfield to be delivered over 20 years.
- 9.6 In addition, Green Belt sites are more likely to be able to deliver policy compliant levels of affordable housing, this is particularly important given a large volume of available land is to the east of the

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borough where land values are lower (and some industrial land will be expected to achieve 50% affordable housing).

- 9.7 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.
- 9.8 We would welcome the opportunity to discuss the site in more detail with the local authority, including the need for a care home in this location.

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## **A1. SITE LOCATION PLAN**

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## **A2. MASTERPLAN PROMOTIONAL DOCUMENT**

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