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Land to the South of Enfield Road

Representations to the Consultation for a New Enfield Local Plan

Iceni Projects Limited on behalf of
Fairview New Homes

September 2021

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ON BEHALF OF FAIRVIEW
NEW HOMES

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Land to the South of Enfield Road
REPRESENTATIONS TO THE CONSULTATION FOR A
NEW ENFIELD LOCAL PLAN

CONTENTS

1.	EXECUTIVE SUMMARY.....	1
2.	INTRODUCTION.....	3
3.	THE SITE, SURROUNDINGS AND POTENTIAL DEVELOPMENT	5
4.	POLICY CONTEXT	10
5.	EVIDENCE BASE	16
6.	GROWTH STRATEGIES	ERROR! BOOKMARK NOT DEFINED.
7.	MEETING ENFIELD'S HOUSING NEEDS	ERROR! BOOKMARK NOT DEFINED.
8.	SOCIAL AND COMMUNITY INFRASTRUCTURE	32
9.	CONCLUSIONS AND RECOMMENDATIONS.....	33

APPENDICES

- A1. SITE LOCATION PLAN
- A2. MASTERPLAN VISION DOCUMENT
- A3. HOUSING NEEDS REPORT
- A4. PREVIOUS LOCAL PLAN REPRESENTATIONS

1. EXECUTIVE SUMMARY

- 1.1 **The Land at Enfield Road is accessible, sustainable and will present an immediately deliverable parcel of land to provide around 563 much needed homes for the Borough within the first 5 years of the plan including 50% affordable family homes approximately 5% of these will be accessible to those with disabilities.** We consider identifying Green Belt sites such as this is the only way to achieve both a varied mix of units including family homes with gardens and a range of tenures to support local housing need.
- 1.2 We have provided detailed evidence on the level of general market and affordable housing need in the Borough and linked our accommodation schedule to this in order to ensure that our proposals deliver the affordable and general market housing that will help address shortages within the Borough as part of the Exceptional Circumstances case for releasing the site from the Green Belt.
- 1.3 The attached masterplan also demonstrates how the site will deliver high quality green and blue infrastructure as set out in the Council's Placemaking Study and further bolster the Exceptional Circumstances case for the site.
- 1.4 The site is located on the western edge of the built up area known as World's End and is at the North Eastern side of the largely residential suburb of Oakwood. The land which is owned by the Diocese of London and under a long-term option agreement to Fairview New Homes is currently allocated as Green Belt. The site area 13.15 Hectares (32.5 acres).
- 1.5 The site is highly accessible by public transport (800 metres to Oakwood Underground Station - Piccadilly Line) with existing bus route(s) footpaths and cycle path network providing access to a wide variety of social infrastructure including: Grange Park and Merryhills schools, and Local shops – Enfield Road Parade (0.2miles) and Oakwood Parade (0.5m). Accessibility, is further enhanced by the strategic road network which is made available from the northern boundary of the site (Enfield Road - A110) with links on to Cockfosters. The site relates well to the built-up form of both World's End and Oakwood.
- 1.6 The Enfield Road provides a strong defensible boundary and marks a significant change in character with land to north. This current Green Belt site does not perform any of the 5 purposes – NPPF (2021) clause 138. This assessment is broadly supported by the Council's own study on this matter.
- 1.7 The site is able to comfortably accommodate 563 new homes, with a strong emphasis on family homes with gardens and an exceptional proportion of affordable homes (50%) including a number of larger affordable family homes, including homes suitable for those with disabilities.

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- 1.8 In relation to the proposed Local Plan growth strategy Fairview New Homes supports the Council's view that Brownfield land alone will not deliver sufficient land to meet the Council's housing target of circa. 25,000 over the plan period. Brownfield land will need to be developed and sustainable Green Belt land in close proximity to public transport nodes will also need to be released to meet the required housing numbers and national delivery test. Relying on brownfield land alone would mean that this would have to be delivered in the form of flats, which would not deliver the type of accommodation that is required by families (as shown in our previous representations Appendix A4). The opportunity here is for a high level of family affordable housing with gardens to be developed managed by a Registered Provider. This is demonstrated in the attached Housing Needs Report which has been submitted with this representation.
- 1.9 Fairview New Homes are an Enfield based SME Housebuilder who are currently producing between 850-1000 new homes per year. Fairview New Homes understand the local housing market and believe that Land South of Enfield Road has significant potential to deliver a mix of both flatted development and family homes. This diversification of housing types will help to see the site developed quickly to meet the varying types of demand for different units. Fairview New Homes consider that the site can be delivered in full, within 5 years, i.e. within the first half of the local plan, due to the limited amount of site clearance and infrastructure required to start development.
- 1.10 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. This is also supported in the Housing Need Report which was submitted along with this representation.

2. INTRODUCTION

- 2.1 These representations have been prepared by Icen Projects on behalf of Fairview New Homes (“Fairview”), relating to Land South of Enfield Road, Enfield. A site location plan of our client’s landholding is attached at Appendix A1.
- 2.2 The site is located to the south of Enfield Road, to the west of Enfield Town Centre and is in the area known as World’s End.
- 2.3 The site is bound to the north by Enfield Road (A110) and surrounded by development on three sides making it an obvious candidate for a Green Belt release. The Enfield Road provides a strong defensible boundary and marks a significant change in character with land to north.
- 2.4 The site is highly accessible by public transport (800 metres to Oakwood Underground Station) and is in close proximity to a wide variety of social infrastructure. Accessibility is further enhanced by the strategic road network which is made available from the northern boundary of the site (Enfield Road (A110) with links on to Cockfosters.
- 2.5 Fairview are based in Enfield and have a track record of delivering new homes in the Borough and across the region. They understand the local housing market and believe that the Land South of Enfield Road has significant potential to deliver a mix of both flatted development and family homes. This diversification of housing types will help to see the site developed quickly to meet the varying types of demand for different units. They consider that the site can be delivered in full, within 5 years, due to the limited amount of site clearance and infrastructure required.
- 2.6 The Land South of Enfield Road is highly sustainable in an Enfield context. The site relates well to the built-up form of both World’s End and Oakwood. As demonstrated in the Masterplan Vision Document, the site is situated in a highly sustainable location with a number of services and facilities in the immediate vicinity of the site.
- 2.7 The Land South of Enfield Road fundamentally does not contribute towards the five aims of the Green Belt set out within the National Planning Policy Framework (NPPF), and should therefore be the most logical option for early Green Belt release within this Plan period. The site is able to accommodate up to 563 units in total, including a strong proportion of family homes with garden spaces and large areas of high quality open space. This is shown in the masterplan in Appendix A2
- 2.8 In relation to the proposed Local Plan growth strategy, the key points to extract from these representations are the following;

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- 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.
 - Reliance on brownfield land alone will have significant consequences for housing delivery and in order to satisfy the Housing Delivery Test going forward (according to our analysis they are already significantly failing this test) the Council will need to identify suitable Green Belt land to diversify supply.
 - Our analysis of housing need in the Borough shows that the main driver of housing need in the Borough is for family housing and in particular affordable family homes. Relying on brownfield land alone would mean that this would have to be delivered in the form of flats, which would not deliver the type of accommodation that is required for families.
 - The release of Green Belt land can help to deliver family housing with gardens which are seldom delivered in London, but will be sought after by people moving to Enfield. This in turn can boost delivery rather than relying on nearly 35,000 flats to be delivered in Enfield to meet the housing target, which our analysis shows the housing market in Enfield is unlikely to be able to absorb.
 - 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.
 - 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 borough where land values are lower.
 - The Government has placed considerable emphasis on the need to increase delivery and it is considered that Green Belt land provides significant benefits in this regard.
 - Only through Green Belt release will the borough be able to provide the opportunity for more of its residents to aspire and achieve family homes with gardens.

2.9 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 via the local plan process.

3. THE SITE, SURROUNDINGS AND POTENTIAL DEVELOPMENT

The site and its relationship with surrounding development

- 3.1 The site is located on the western edge of the built up area known as World's End and is at the North Eastern side of the largely residential suburb of Oakwood. It is in the North-Western Quadrant of the London Borough of Enfield.
- 3.2 The site is designated within the Metropolitan Green Belt. It is currently undeveloped and comprises a total site area of 13 hectares. A mature field hedgerow runs through the middle of the site and several trees within it.
- 3.3 The site is bound to the north by Enfield Road (A110). The western edge of the site is defined by the rear gardens and parking areas of existing residential properties. The eastern edge is of similar situation with the rear gardens of existing properties on Cotswold Way defining the boundary. The topography of the site falls from the higher ground on the northern edge to the south towards Boxers Lake, which is surrounded by mature woodland and dense vegetation.
- 3.4 The site relates well to the built-up form of both World's End and Oakwood. It is surrounded by development on three sides, with Enfield Road (A110) providing a buffer between the built-up development to the south, and the land to the north which is rural in character. The site is defined by an urbanised character with reasonably high-density residential development enclosing the triangular shaped piece of land.

Sustainability Credentials

- 3.5 The site is also well served by public transport, both in terms of access to the London Underground network, but also local buses and cycle lines running past the site. The nearest tube station is currently located only 700m away at Oakwood which is situated on the Piccadilly line and provides services north and south-bound approximately every 5 minutes, rising during peak hours. In the context of Enfield this is considered to be sustainable and also an area that the New London Plan (para 4.2.5) considers to be appropriate for incremental intensification.
- 3.6 There are two train stations located approximately 1.5 miles to the east of the site in Enfield – Enfield Chase and Enfield Town. 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 provides services towards London Liverpool Street approximately every half an hour.

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- 3.7 The site is served by a number of bus services to Enfield, Barnet, Southgate and Central London. Bus route 307 (eastbound) provides services from Enfield Road at the northern edge of the site to Enfield Town Centre. There are also bus services running eastbound from Enfield Road in the direction of Barnet, and other stops within close proximity of the site provide a service towards Central London south of the Borough. These stops have an off-peak frequency of 12 buses per hour.
- 3.8 Vehicular access would be from Enfield Road. Surrounding roads from the site, provide good access to the strategic network, including Enfield Road (A110) which provides direct access to the A10, subsequently feeding onto the M25. Furthermore, pedestrian and cycle access is available from the whole of the northern boundary as well as the south-eastern corner of the site offering a more sustainable method of transport.
- 3.9 The site is also well served by social infrastructure. The site is located within walking distance (600m) of the parade of eateries and shops on Bramley Road to the west, while the amenities and facilities of Enfield Town are located further to the east (approx. 1.6 miles). Other amenities within the locality (walking distance) comprise both a Primary School (Merryhills) and Secondary School (Grange Park), doctor's surgeries, a number of small businesses, pubs and a supermarket.
- 3.10 The site is also in close proximity to two parades of shops – Enfield Road Parade (0.2 miles) and Oakwood Parade (0.5 miles).
- 3.11 Furthermore, we have carried out an assessment of the site using the Sustainable Development Scorecard. This is a free-to-use assessment of the sustainability of the site using the criteria set out in the NPPF (excluding the Green Belt). The site scored 82% and a Parity Score of 97%, showing a high degree of compliance with NPPF principles and a good balance across the three pillars of sustainable development (economic, social and environmental). This can be found in our previous representations in Appendix A4.

Existing Local Plan Designations

- 3.12 In terms of planning designations, the site is located within the Green Belt, however our analysis has shown that when assessed against the five aims of the Green Belt in accordance with the NPPF (Paragraph 138), the site performs as follows;

Green Belt Aim	Site Assessment
To check the unrestricted sprawl of large built-up areas.	This is essentially an infill site surrounded by built development on three sides. Development on the land would not lead to urban sprawl, instead it would be development constrained within the existing urban area.
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 neatly enclosed by the physical barrier that is Enfield Road on the northern boundary. This is at the apex of the natural topography and the land which slopes away to the north is of scenic value.</p> <p>It is considered that the development of this land would not present a risk of the wider countryside at Vicarage Farm, Trent Park and beyond due to the clear defensible boundaries.</p> <p>The Enfield Road marks a clear distinction between the character of the open rural countryside to the North and the enclosed field (Land South of Enfield Road) surrounded by suburban development to the south</p>
To preserve the setting and special character of historic towns	The land does not sit within the context of a historic town. The surrounding development is largely post-war suburban housing.
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. A balance is being sought to maintain delivery of homes.

- 3.13 The site does not contribute towards the five aims of the Green Belt. The Council's own Green Belt Study comes to a similar conclusions, stating the site has a 'low-medium' value in Green Belt terms and is one of the lowest value pieces of Green Belt in the Chase park allocation. The site also has no other designations in the emerging or adopted Local Plan Proposals Map.

Potential Development of the site

- 3.14 Fairview consider that the site is suitable to deliver circa 563 new homes accompanied by private amenity space, green space and enhancements tot existing landscape. Fairview has prepared amasterplan vision document to support these representations. This masterplan demonstrates that the site is suitable to facilitate 563 dwellings including 50% affordable including affordable larger family homes. These new homes would be managed by either a Registered Provide for the local authority. The precise mix of new homes has still to be agreed by the indicative layout include a strong mix of family homes with gardens balanced with some apartment blocks.
- 3.15 The proposal seeks to deliver 5% large affordable family homes which are suitable for people with disabilities. This links up well to the level of need identified in our Housing Needs Report (see Appendix A3).
- 3.16 This would deliver a density of approximately 43 dwellings per hectare and provide Shared Ownership units. We understand that there is a significant shortage of shared ownership properties in the Borough and this site would make a significant contribution towards this need.
- 3.17 Fairview's experience of developing within Enfield identifies that there is a strong market for new family homes with garden spaces that is not currently being met. This is further supported by the Housing Needs Report. We are confident that further development in this location can easily and quickly be absorbed by the market. Fairview's track record makes them an ideal development partner to ensure that the Council's housing ambitions are delivered. Land South of Enfield Road can contribute in helping to achieve this ambition.

Delivery

- 3.18 The site offers a range of different unit types which will allow it to be delivered quickly. It also has limited infrastructure and site clearance requirements. In comparison to many of the Council's brownfield sites, it is small enough to be developed quickly.
- 3.19 Importantly, Fairview are an Enfield based housebuilder with a track record of delivering these types of sites. They know the housing market and have designed an indicative scheme that they believe can be delivered quickly. The option agreement with the freeholder (Diocese of London) allows construction to begin quickly after consent and there is no need for any lengthy transactional delay.
- 3.20 We consider that the Borough will need to significantly diversify supply as shown in the Housing Needs Report in order to meet housing need. Furthermore, the report also shows that Chase Park and our scheme are crucial for delivering a substantial portion of affordable housing, given this is the basis of the exceptional circumstances case, we consider it is critical that this site is brought forward as early as possible in the Local Plan timeframe, to quickly assist those in housing need.

Summary

- 3.21 The site is located in a perfect position to deliver new homes in the first 5 years of the plan, close to public transport and social and community infrastructure and without the need for substantial new site infrastructure to make the location work. The site is surrounded by development on three sides, and Enfield Road forms a boundary and buffer between the built urban form to the south, east and west and the land which is of rural character to the north. The masterplan vision document highlights how the site can be utilised efficiently to provide circa 563 new homes of a range of unit sizes. Although the masterplan does not provide a school on site, Fairview are willing to deliver this on-site if the demand can be demonstrated.
- 3.22 LB Enfield cannot rely on brownfield sites to meet their identified housing need in the area. We consider that partial release of the Green Belt is a necessity to ensure the Council are planning proactively and responding to demand. Furthermore, there is an evident need for family homes within Enfield. The site is able to provide family housing in a range of unit types to support this demand.
- 3.23 The site is located within the Green Belt, however, we consider that it does not contribute towards the five aims of the Green Belt and therefore is the most logical option for Green Belt release. The site is also able to provide a school on-site (either primary, secondary or SEN as required), if it is evident that one is required. The residential provision which the site is capable of accommodating should be utilised and viewed in the context that LBE is a Borough that is struggling to meet the housing targets and absorb the growing population demands of London.
- 3.24 The site is immediately deliverable (once released from the Green Belt) without the need for new infrastructure or public transport improvements. As a green field site it can provide an almost unique opportunity within the Borough to provide new affordable and general market homes quickly for those in need now.

4. POLICY CONTEXT

National Planning Policy Framework

4.1 The Government's national planning policies are set out in the recently-revised NPPF published in July 2018 and subsequently updated in the July 2021. It contains the Government's policies for planning in England and should therefore be considered within these representations.

4.2 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, considering 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

4.3 Paragraph 8 identifies that achieving sustainable development means that the planning system has three overarching objectives, all of which should 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'.

4.4 Paragraph 11 states at the heart of the NPPF is 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.

Delivering a Sufficient Supply of Homes

- 4.5 Section 5 of the NPPF sets out policy relating to the supply of homes with paragraph 60 setting out the objective to objective of significantly boosting the supply of homes and the importance of a variety of land coming forward.
- 4.6 Paragraph 62 sets out the size, type and tenure of housing needed for different groups should be reflected in planning policy including affordable housing and those wishing to commission or build their own homes.

Green Belt

- 4.7 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.
- 4.8 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.
- 4.9 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.
- 4.10 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 139 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

- 4.11 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. 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.
- 4.12 Chapter 9 (Promoting Sustainable Transport), Paragraph 104 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.

London Plan (2021)

- 4.13 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.
- 4.14 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.
- 4.15 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.

4.16 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)

4.17 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.

4.18 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.

4.19 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

- 4.20 Fairview 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. Representations were made to Enfield's subsequent Issues and Options Consultation in February 2019.
- 4.21 Our representations to the Issues and Options consultation in February 2019, raised a number of significant matters, including;
- 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.
 - Reliance on brownfield land alone will have significant consequences for housing delivery
 - The release of Green Belt land can help to deliver family housing with gardens which are seldom delivered in London, but will be sought after by people moving to Enfield.
 - 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.
 - 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 borough where land values are lower (and some industrial land will be expected to achieve 50% affordable housing).

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- The Government has placed considerable emphasis on the need to increase delivery and it is considered that Green Belt land provides significant benefits in this regard.

5. EVIDENCE BASE

- 5.1 Local 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)

- 5.2 The assessment of land availability is an important step in the preparation of Local Plans (Paragraph: 001 Reference ID: 3-001-20140306).
- 5.3 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.
- 5.4 The site has been assessed in the HELAA (site reference: HIC9) and has been identified as developable in Stage 1 of the assessment. However, the 11-15 year timeline is considered too conservative and it could be brought forward in the first 5 years of the plan.
- 5.5 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.
- 5.6 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.
- 5.7 We are not aware of any major infrastructure requirements that would limit the delivery of this site and as a self-contained site which has previously undertaken broadly successful pre-app discussions with the local authority (with a school on 50% of the site in 2015) we would not expect any significant delays in bringing it forward.

Strategic Housing Market Assessment (SHMA)

- 5.8 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'

- 5.9 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. Our Housing Needs Report provides further information which paints the picture of a severe affordable housing needs problem in the Borough.
- 5.10 This allows a clear link from the type of housing to be provided on the urban extensions and that which is required to address need for the exceptional circumstances test.
- 5.11 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.
- 5.12 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.
- 5.13 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.
- 5.14 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.
- 5.15 Furthermore, the site is suitable to provide self-build homes which has been identified in the SHMA. It is important to note that the provision of self-build homes is less likely on brownfield sites and further promotes the suitability and necessity of greenfield sites, such as the Land South of Enfield Roads, to come forward and help meet housing need.

Whole Plan Viability Assessment

- 5.16 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.
- 5.17 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.
- 5.18 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

- 5.19 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.
- 5.20 The Land South of Enfield Road 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 included below.

Table 5.1 Green Belt Review Assessment of the Land South of Enfield Road (LP263)

Green Belt Aim	Site Assessment
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.

- 5.21 The Green Belt and MOL review concludes that removing the Land South of Enfield Road from the Green Belt would result in low to moderate harm on the Green Belt. The assessment concludes that the parcel makes a moderate contribution to purposes 1 and 3 and its release would have a minor impact on adjacent Green Belt land to the north. Therefore, overall release of the parcel is likely to result in low-moderate Green Belt harm.
- 5.22 The Green Belt and MOL review also assesses the wider Chase Park allocation and concludes that it determines that the removal of the whole site from the Green Belt will result in Very High level of harm on the Green Belt. It goes on to determine that the variations in Green Belt harm identified within the area highlight the spatial opportunities to minimise Green Belt harm within the area. It even goes on to determine that confining the release of the Green Belt to lower value land, including the land South of Enfield Road, would limit the harm.
- 5.23 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 South of Enfield Road 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 can be mitigated by focussing on the lowest value Green Belt elements

within the allocation (which appears to be the approach). 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.

5.24 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.

5.25 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.

Table 5.2 Fairview's Green Belt Assessment

Green Belt Aim	Site Assessment
To check the unrestricted sprawl of large built-up areas.	This is essentially an infill site surrounded by built development on three sides. Development on the land would not lead to urban sprawl, instead it would be development constrained within the existing urban area.
To prevent neighbouring towns merging into one another.	The land does not divide separate towns.

<p>To assist in safeguarding the countryside from encroachment.</p>	<p>The site is neatly enclosed by the physical barrier that is Enfield Road on the northern boundary. This is at the apex of the natural topography and the land which slopes away to the north is of scenic value.</p> <p>It is considered that the development of this land would not present a risk of the wider countryside at Vicarage Farm, Trent Park and beyond due to the clear defensible boundaries.</p> <p>The Enfield Road marks a clear distinction between the character of the open rural countryside to the North and the enclosed field (Land South of Enfield Road) surrounded by suburban development to the south</p>
<p>To preserve the setting and special character of historic towns</p>	<p>The land does not sit within the context of a historic town. The surrounding development is largely post-war suburban housing.</p>
<p>To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</p>	<p>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. A balance is being sought to maintain delivery of homes.</p>

5.26 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 Land South of Enfield Road site fully to contribute towards meeting the needs across the district and dispersing the green infrastructure provision across the higher quality Green Belt sites.

Sustainability Appraisal (SA)

- 5.27 The Council has produced an Integrated Assessment (IA) for the Local Plan which includes a Sustainability Appraisal (SA).
- 5.28 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).
- 5.29 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.
- 5.30 This is line with the recommendations of our Housing Needs Report, to at least consider the potential of exceeding the London Plan target rather than treating it as a cap.

Chase Park Topic Paper

- 5.31 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.
- 5.32 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. We consider that this approach is unsound as demonstrated by our Housing Needs Report trajectory the vast majority of affordable housing delivery is scheduled to take place in the later stages of the plan period. The support the exceptional circumstances case that the urban extensions can help address the current chronic affordable housing shortages, the site needs to be brought forward as early as possible.
- 5.33 Furthermore, having two or even three developers bringing their elements of the allocation forward at the same time, will bolster overall housing delivery, rather than requiring one developer to finish their element of the allocation, before another one gets started. Not only will this lead to the slower delivery of houses, but it will also leave the Council overly reliant on one developer.

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- 5.34 As the sites are delivering 50% affordable housing, then housing associations can be brought in as delivery partners to bring forward the affordable element earlier in the process. It therefore, would not be sensible to delay this early delivery through the current phasing process.
- 5.35 Finally, Land South of Enfield Road can be brought forward with minimal infrastructure provision, in contrast to the rest of the allocation. We do not consider it sensible to delay the most deliverable element of the allocation to the post-plan period, when delays to the rest of the allocation can undermine the Council's housing strategy.
- 5.36 The Land South of Enfield Road is suitable to come forward in the first 5 years of the Local Plan and would make a logical Phase 1 of the Chase Park development especially given the minimal level of infrastructure required to facilitate the development.

Soundness Summary

- 5.37 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.
 - 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.
 - Updating the Placemaking Strategy to move Land South of Enfield Road forward to the first phase of the allocation to be delivered. This is required to ensure that exceptional circumstances are robust and the Local Plan accords with national policy.

6. HOUSING TARGET AND SPATIAL STRATEGIES

- 6.1 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.
- 6.2 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. This figure is inline with the London Plan 2021. 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.
- 6.3 As demonstrated in the attached Housing Needs Assessment, the Government's standard method (using the latest data) shows a need for delivery of 85,500 homes per year (rounded) across London. For Enfield it shows a need of 2,355 homes per year.
- 6.4 This is clearly a complex area, with a degree of conflict between issues of 'general conformity' with the London Plan and the need for the Plan to be consistent with national policies in the NPPF so as to be sound.
- 6.5 The Council's proposed approach in Policy H1 in the emerging Plan is the Option 2 scenario of rolling forward the London Plan requirement of 25,000 homes over the plan period. Whilst we recognise the benefits of consistency of this with the London Plan, this level of housing provision meets just 53% of the assessed minimum LHN for the Borough, leaving a substantial shortfall of over 22,000 dwellings.
- 6.6 This level of provision would not even meet the demographic needs of the Borough, at 2314 dpa. It would fall short of this by over 21,300 households over the plan period. In the absence of supply elsewhere in London, household formation would be constrained and there would be potential

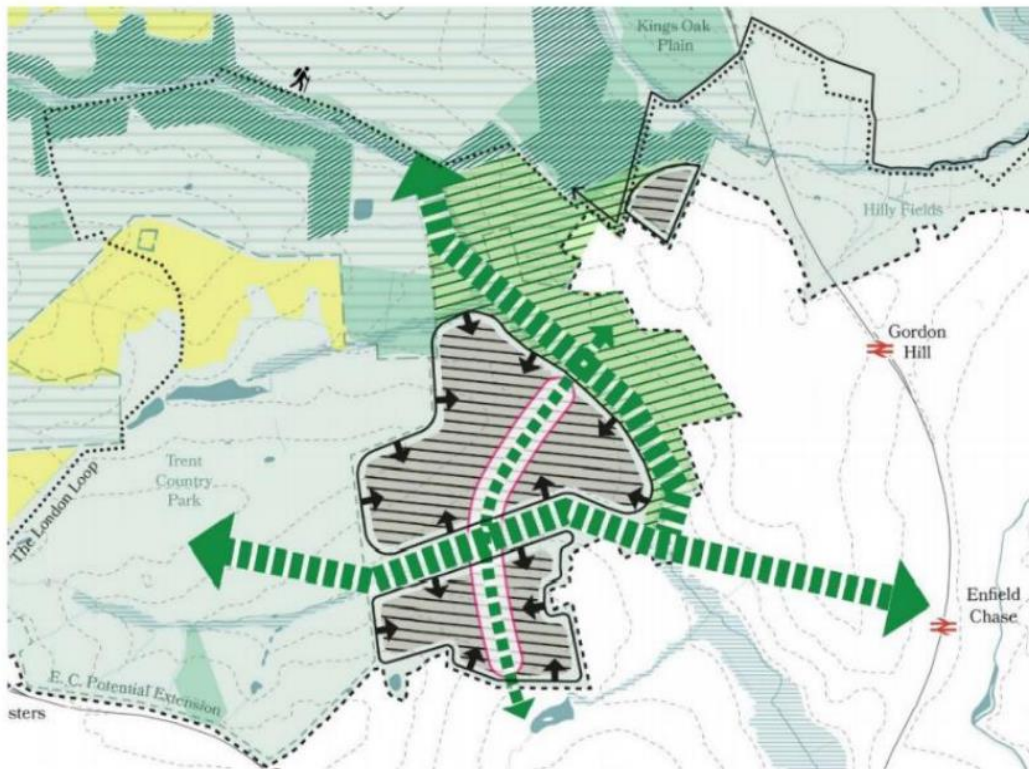
displacement effects of households from the Borough to areas beyond London, such as into Hertfordshire/ Essex.

6.7 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 exploring a medium-high figure below the 55,000 unit figure, but above the 25,000 units target. Further detail is provided in our Housing Needs Report.

7. STRATEGIC POLICY SP PL10: CHASE PARK

- 7.1 The Land South of Enfield Road has been included as part of the Chase Park allocation. Chase Park has been allocated to provide circa 3,000 new homes during the plan period 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 and accommodated within our revised masterplan (appended to this document).
- 7.2 The general vision for 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.

Figure 1.0 Chase Park Allocation Draft Concept Plan



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

- 7.3 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.

7.4 Considering the above steps, it is our view that the removal of Land South of Enfield Road's removal from the Green Belt is justified in principle. Evidentially, Enfield's housing need cannot be met fully through land without 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. Further detail is provided in our Housing Needs Study.

7.5 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. We consider that the site should come forward as an initial phase for the following reasons:

- The site is self-contained and requires limited infrastructure, it is not logical to phase it after the largest site that has unclear infrastructure requirements, when Land South of Enfield Road could be brought forward quickly and easily and begin delivering general and affordable housing.
- As demonstrated by the Housing Needs Report, the vast majority of affordable housing is provided by the urban extensions to come forward at the end of the plan period. Given the acute nature of the affordable housing issues in Enfield the Council needs to bring forward the elements of the urban extensions that can come forward affordable housing as early as possible. The land to the north of the allocation and Crews Hill has an uncertain timeframe given the infrastructure requirements, but Land South of Enfield Road can come forward early and quickly address needs. This goes to the heart of the soundness of the plan due to the link to the exceptional circumstances case.

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- By having more than one developer bringing forward their site forward at one time within the allocation increases the delivery rates and the amount of affordable housing being brought forward.
 - The Council is highly reliant on urban extensions to deliver its five year housing land supply and although a trajectory has not been produced, it appears unlikely that given the infrastructure requirements on Crews Hill in particular, that pushing Land South of Enfield Road in to a later plan period will be an appropriate strategy, given that it can come forward earlier than all other elements of the allocation.

7.6 Considering the above steps, it is our view that the removal of Land South of Enfield Road from the Green Belt is justified in principle. Evidentially, Enfield's housing need cannot be met fully through land outwith the Green Belt as demonstrated in the Housing Needs Report. 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.

7.7 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.

To realise the place vision set out Figure 3.11 development in the Chase Park 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 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 or SPD**. 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 or SPD**.

- 7.8 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 South of Enfield Road to come forward for development in the initial phases of development. Not only will this contribute towards meeting housing need in the short-term, but it will also 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.

8. STRATEGIC POLICY SP PL9: CREWS HILL

- 8.1 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.
- 8.2 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.
- 8.3 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 and bringing Land South of Enfield Road forward in to this plan period. 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.

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.

10. STRATEGIC POLICY SP SC2: SOCIAL AND COMMUNITY INFRASTRUCTURE

- 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, details of school requirements, needs to be set out and sites identified.
- 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 (as we did in previous reps) 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.
- 10.6 If a school is not required in this location, then we propose the site is delivered in line with the Masterplan scheme submitted with these representations.

11. CONCLUSIONS AND RECOMMENDATIONS

- 11.1 Fairview New Homes is one of a number of parties which is promoting development of land at Chase Park, Enfield through the Local Plan process. As the land falls within the Green Belt, it is therefore necessary to demonstrate 'exceptional circumstances' for the alternation of the Green Belt boundaries through the plan-making process. These exceptional circumstances can be made up of an accumulation of factors including the scale of need, inherent constraints to delivery, and the need for particular types of housing.
- 11.2 There is a clear quantitative case for Green Belt development both across London and in Enfield. The Secretary of State has identified the housing need as acute. There is a substantial shortfall of over 33,000 homes a year across London; and the London Plan Inspector's Report specifically identifies that considering Green Belt development is a logical step to close the gap. In Enfield the urban capacity falls well short of meeting overall housing needs, with in particular a very limited land supply post 2033.
- 11.3 The proposed development at the Land South of Enfield Road will bring a number of benefits to Enfield, these include:
- The site is considered to be in sustainable location (800m from a station/with good bus connections) and scores very 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 considered relatively weak performing piece of Green Belt land as part of the updated Green Belt Review.
 - The site can provide 50% affordable housing (to be managed by a Registered Provider or the local authority). The majority of these homes will be family homes including a number of desperately needed fully accessible family homes.
 - The site is suitable to provide self-build homes in line with the NPPF.
 - The overall level of affordable housing provision matches the broad requirements of the Borough as explained in the masterplan and Housing Needs Report.
 - The site can provide a range of family homes with gardens which cannot be met solely through land outside of the Green Belt.
 - The diverse range of unit types proposed for the site and unconstrained nature of the site means it can be developed quickly and start making a contribution to meeting the Council's housing target in the early phases of the Local Plan.

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- 11.4 A masterplan document demonstrating how the site could be developed is included with these representations.
- 11.5 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.
- 11.6 Some further changes to the Local Plan are required to make it sound, including:
- Moving Land South of Enfield Road up to the current plan period to bring forward affordable housing as early as possible and to demonstrate a five year housing land supply.
 - Exploring the potential for delivering above the 25,000 homes figure for the plan period, which is currently proposed.
 - Clarifying the position on First Homes.
- 11.7 We would welcome the opportunity to discuss our representations in more detail with the Council.