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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 Homes

February 2019

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ON BEHALF OF FAIRVIEW
HOMES

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

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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 650 much needed homes for the Borough within the first 5 years of the plan.** Concentrating development around transport hubs 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. The release of sustainable Green Belt land would also allow other social infrastructure to be developed including potentially a special needs school, sheltered and extra care accommodation. Green Belt release in tandem with brownfield development is the only way Enfield will achieve the provision of a minimum of 35,000 homes over the plan period. (1800 homes per annum)
- 1.2 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 is currently allocated as Green Belt. The site area 13.15 Hectares (32.5 acres).
- 1.3 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.
- 1.4 The site is, therefore, is both highly accessible and sustainable. ICENI have further assessed the site against the NPPF's criteria for sustainability using the Sustainable Development Scorecard. The site scored 82% prior to optimisation (which is considered to be very good) 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)
- 1.5 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 Council did not previously assess the site through its partial Green Belt Review as part of the evidence gathering for the Adopted Local Plan. A full, robust Green Belt Review will be required as part of the emerging Local Plan in order to understand the sites in the Borough that are the most poorly performing and can be considered for released.

1.6 The Enfield Road provides a strong defensible boundary and marks a significant change in character with land to north being open and having a more rural countryside feel. This current Green Belt site does not perform any of the 5 purposes – NPPF (2018) clause 134. These can be summarised as follows:

Green Belt Aim	Site Assessment
To check the unrestricted sprawl of large built-up areas.	The site is 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

1.7 The site has been assessed and has only limited ecology value

1.8 The site is able to accommodate +/- 650 new homes, with a strong emphasis on family homes with gardens and an exceptional proportion of affordable homes (40% +) The site also has the potential to deliver a school on-site (this could be primary, secondary or SEN) if the Council consider that the level of housing growth and distribution justifies a school in this location. Given the Borough's emerging need for sheltered accommodation the site can also support sheltered and care housing.

1.9 In relation to the proposed Local Plan growth strategy Fairview supports the Council's view that Brownfield land alone will not deliver sufficient land to meet the Council's housing target of circa. 35,000 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 desired by families. The opportunity here is for a high level of family affordable housing with gardens to be developed managed by a Registered Provider.

- 1.10 Delivery of new homes is now critical and whilst brownfield land is a clear priority all recent experience in the Borough and adjacent Boroughs is that large scale urban regeneration projects are taking too much time to yield new homes.
- 1.11 Fairview are an Enfield based SME Housebuilder who are currently producing between 850-1000 new homes per year. Fairview 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 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.
- 1.12 Identifying and assisting in bringing forward sites forward as quickly as possible is of utmost importance for the Borough, given that they are currently failing the Housing Delivery Test and need to produce an Action Plan to identify how they will remedy this. We consider that this strategy should involve identifying easily deliverable sites such as Land South of Enfield Road should be allocated in the Local Plan.
- 1.13 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.

2. INTRODUCTION

- 2.1 These representations have been prepared by Icen Projects on behalf of Fairview 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 being open and having a more rural countryside feel.
- 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 as well as the nature of the option agreement.
- 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. We have also assessed the site against the NPPF’s criteria for sustainability using the Sustainable Development Scorecard. The site also scored 82% (which is considered to be very good) 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)
- 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 Green Belt release within this Plan period. The site is able to accommodate up to 650 units in total, including a strong proportion of family homes with garden spaces and large areas of high quality open space. The site also has the potential to deliver a school on site (this could

be primary, secondary or SEN) if the Council consider that the level of housing growth and distribution justifies a school in this location.

2.8 In relation to the proposed Local Plan growth strategy, the key points to extract from these representations are the following;

- 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 (Appendix A4) shows that the main driver of housing need in the Borough is for family housing. 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 desired by 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 (and some industrial land will be expected to achieve 50% affordable housing).
- 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.

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).
- 3.12 A full explanation of the principles of the scorecard use and a breakdown of the site's scoring is contained in Appendix A3.

Existing Local Plan Designations

- 3.13 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 134), 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.

- 3.14 The site does not contribute towards the five aims of the Green Belt. The site also has no other designations in the emerging or adopted Local Plan Proposals Map.

Potential Development of the site

Fairview consider that the site could deliver circ 650 new homes and family homes, accompanied by private amenity space, green space and enhancements to existing landscape. They are proposing that the scheme would deliver more than 40% of units as affordable housing, dependant on whether a scheme and other uses are also required on the site. These new homes could be managed by either a Registered Provide or 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 This would deliver a density of 45-50 dwellings per hectare and provide an NPPF compliant level of Shared Ownership units of more than 10%. 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.
- 3.16 The site could also accommodate a school (as previously proposed) this could be a primary, secondary or SEN school depending on need. This would clearly deliver a lower number of residential units on the site, as previously presented to the Council at pre-application discussions in 2015. We also consider the site has the potential to deliver Extra Care Housing, for which Enfield has benchmark target of delivering 195 units per annum.
- 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. They 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 New Homes 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.

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- 3.20 We consider that the Borough will need to significantly diversify supply as our analysis (Appendix A4) shows the Council is well behind its Housing Delivery Target (as confirmed by the Government's own figures) and will not to alter its strategy to achieve these targets.

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 provided at Appendix A2 highlights how the site can be utilised efficiently to provide circ 650 new homes of and a range of unit sizes (including Extra Care Housing). Although the masterplan does not provide a school on site, Fairview are happy to provide 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 Our Sustainable Scorecard analysis has highlighted the site has having a Sustainability Score of 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). Therefore, the site would deliver a highly sustainable form of development in the LBE and make a significant contribution to housing need.
- 3.24 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 from the increase of housing. 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.
- 3.25 The site is immediately deliverable now as soon as 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 homes quickly, but also to plan for the new schools and specialist housing which comes with having to provide an emerging housing target of over 1800 homes per annum.

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. 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.

Green Belt

4.5 Section 13 of the NPPF (2018) outlines policy relating to the Green Belt. Paragraph 133 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 133 also states that the essential characteristics of the Green Belt is their openness and their permanence.

4.6 Paragraph 134 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.

4.7 Paragraph 136 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.

4.8 Paragraph 138 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

4.9 Chapter 8 (Promoting healthy and safe communities), Paragraph 94 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.

4.10 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 (2016)

4.11 The London Plan (adopted 2016) 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.

4.12 The London Plan is based on a projection for 40,000 more households a year (2011-2036). Policy 3.3 (Increasing Housing Supply); Table 3.1 outlines the Mayor's housing target for each Borough. These targets are informed by the need of housing evidenced by the GLA's 2013 Strategic Housing Market Assessment (SHMA) and London's Housing Land Availability Assessment (SHLAA). Table 3.1 confirms that LBE are required to provide a minimum of **7,976 new homes between 2015 and 2025** with an **annual monitoring target of 798 units**.

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

- **Policy 3.7 - Large Residential Developments** - Proposals for large residential developments including complementary non-residential uses are encouraged in areas of high public transport accessibility.
- **Policy 3.10 - Affordable Housing** - Affordable housing is defined as social rented, affordable rented, and intermediate housing.
- **Policy 3.18 – Educational Facilities** - Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing or change of use to educational purposes. Those which address the current and projected shortage of primary school places and the projected shortage of secondary school places will be particularly

encouraged. In particular, proposals for new schools, including free schools should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the appropriate use of planning conditions or obligations.

- **Policy 7.16 - Green Belt:** *Strategic-* The Mayor supports the current extent of London's Green Belt, its extension in appropriate circumstances and its protection from inappropriate development. *Planning Decisions-* The strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance.
- **Policy 7.17 - Metropolitan Open Land:** *Strategic -* The Mayor supports the current extent of Metropolitan Open Land (MOL), its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of MOL. *Planning Decisions-* The strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL.

Draft London Plan (2017)

- 4.14 Whilst the current 2016 London Plan (The London Plan consolidated with alliterations since 2011) still forms part of the Development Plan, the draft London Plan is a material consideration in planning decisions.
- 4.15 The draft Plan was published by the Mayor of London for consultation in December 2017-March 2018. In accordance with Section 338 (3) of the GLA Act, the Secretary of State has appointed a Panel to conduct an Examination-in-Public (EiP) of the London. The EiP began on 15 January 2019 and runs till May 2019. Given that the draft Plan is at a reasonably advanced stage of the Plan process, it should be afforded weight in the consideration of Development Plan's located within London.
- 4.16 Within the draft Plan, the Mayor of London reveals that London is required to be build **66,000 new homes every year** to meet its growing need (up from 40,000 in the adopted London Plan). 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 numbers need to be closer to **100,000 a year**. With the increased housing need in London, Inner Boroughs are constrained and limited, therefore many of this housing need, is required to be provided within the Outer Borough's for example in the London Borough of Enfield.

4.17 The New London Plan makes a great play of incremental intensification of areas within 800 metres of a station in the Outer London Boroughs.

4.18 Table 4.1 of the draft Plan outlines that Enfield has a ten-year housing target of 18,760 new homes, with an annualised average of 1,876 new homes. This is a + 135% increase from the housing targets set out within the current London Plan. The significant change in the annualised housing target can be seen below. This is also likely to increase if the overall housing targets increase to 100,000 new homes per year across London.

Borough	Current London Plan Annual Target	Draft London Plan Annual Target	Net Change	Percentage Change
Enfield	798	1,876	+ 1,078	+ 135%

4.19 The New London Plan also requires local authorities to work with operators of older person care and accommodation to deliver 195 units per annum. The level of delivery in the Borough of market Extra Care Housing has been zero in recent years.

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.

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

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

5. EVIDENCE BASE

5.1 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).

5.2 The Council are still at a relatively early stage of the Local Plan production process and so a number of documents still need to be produced. We have set out the following key documents that will be required;

- Sustainability Appraisal;
- Strategic Housing Land Availability Assessment (SHLAA);
- Strategic Housing Market Assessment (SHMA);
- Affordable Housing Viability Assessment; and
- Green Belt Review / Assessment.

5.3 We have provided our comments on issues the Council will want to consider when setting the methodology for these documents.

Sustainability Appraisal (SA)

5.4 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).

5.5 The Council have not yet produced an up-to-date SA to accompany their Local Plan document and as such have not followed Planning Practice Guidance. Due to the absence of the SA at this stage of the Local Plan process, the Council do not have the evidence required to ensure sustainable sites are selected correctly, and that reasonable alternatives are fully tested (as required by the PPG). We would refer the Council to London Plan standard of seeking to allocate sites that are 800 metres from a station and with good access to public transport such as bus services. Land South of Enfield Road is one such site.

5.6 We request that the Council must inform their Local Plan going forward by completing a full SA (with interim version produced at the various stages), as required by National and European legislation and national planning policy. Without such evidence, the sites that will be allocated within the next round of the Local Plan, will therefore not be justified and the Council will be under further scrutiny from involved parties as to why such sites have been selected over alternatives. If this is not provided, the Council will be required to return to the earlier stages of the plan-making process and therefore ensure the soundness of the Plan.

5.7 We further request that when the Council come to produce a SA, they should set out a clear set of parameters to assess sites effectively and on an individual basis to provide a robust analysis to underpin the Local Plan going forward.

Strategic Housing Land Availability Assessment (SHLAA)

5.8 The assessment of land availability is an important step in the preparation of Local Plans (Paragraph: 001 Reference ID: 3-001-20140306).

5.9 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.

5.10 The Council refers to the London SHLAA (2017), which provides useful background for development opportunities on large sites, however we consider that this can't be used as a substitute for a Borough wide call for sites that draws down on Green Belt release and understands the capacity for brownfield sites in developing housing. We consider a thorough approach to site selection is required and will be crucial to the development of the Local Plan.

5.11 We understand that a Call for Sites is to be run alongside the Local Plan consultation. We request that a SHLAA must be produced to allow a fair, transparent and objective methodology in selecting the most suitable and deliverable sites. The filter for selecting site must not include subjective assessments and focus on environmental constraints only, not existing policy constraints (such as Green Belt).

5.12 If this is not provided, we consider that the Council will have to return to the earlier stages of the plan making process to ensure justification is provided over the sites selected.

Strategic Housing Market Assessment (SHMA)

- 5.13 The NPPF requires all Local Planning Authorities to prepare a SHMA to assess people's housing needs within an area, based on statistical evidence. The NPPF states that plans should 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.
- 5.14 We request that the Council should provide an up-to-date SHMA to ensure the Plan is credible and transparent. Furthermore, we request that the SHMA should provide statistical evidence needed to justify certain draft Plan policies for example housing mix and the level of need for older person housing. Without the evidence base documents, the Local Plan would therefore not be sound and not in accordance with national policy.
- 5.15 It is notable that our analysis (Appendix A4) shows a strong demand for family housing in the Borough.

Affordable Housing Viability Assessment

- 5.16 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. We consider that a viability assessment is crucial in understanding the viability and therefore deliverability of the identified sites. Without a viability assessment this undermines the deliverability of the sites that will be likely be provided in the next round of the Local Plan consultation, and therefore undermine the Plan as a whole. This is unsound and contrary to national policy.
- 5.17 The Council have failed to provide a viability assessment to support the requirements set out within the draft Local Plan. We request that the Council provide an up-to-date viability assessment to understand whether such site allocations are viable and therefore deliverable within the Plan period, and to also understand whether the possible infrastructure that is likely to be needed giving the increase of housing, is viable and deliverable.
- 5.18 This will need to take account of the tripling of Mayoral CIL rates in April 2019, for all residential development which is likely to put disproportionate pressure on brownfield sites in the East of the Borough which are expected to deliver the highest quantum of housing. These sites may struggle to incorporate policy compliant levels of affordable housing and thus there may be significant delays with their delivery.
- 5.19 We do not consider that it is sufficient to rely upon the London Plan and its evidence base. This document is strategic in nature and does not test the individual viability considerations of the Borough. Furthermore, the Council should be tested the strategic sites in the Local Plan to

understand if these can come forward while delivering a policy compliant level of affordable housing. Failure to do so could see large sites mired in viability discussions at the application and the Council unable to ascertain if these sites can deliver the requisite level of infrastructure.

- 5.20 Fairview have already carried out an initial viability of their site and consider that it can deliver 40% affordable housing (managed by either a Registered Provider or the local authority). This is one of the key benefits of Green Belt sites where existing land values are lower. It also highlights the need to test in this study whether a reliance on brownfield land will make achieving the 50% target feasible and how much Green Belt land might be required to be identified in the Local Plan.

Green Belt Review / Study

- 5.21 The Council have not yet conducted a Green Belt Assessment as part of their draft Plan evidence base documents. We consider that the Council are unable to rely on brownfield sites alone in order to meet their high housing target (as set out in Appendix A4), therefore the release of Green Belt within the Borough is a necessity. In order to fully assess the quality of the Green Belt, and therefore release the most appropriate, sustainable, and deliverable sites, a Green Belt Review is required.
- 5.22 The Council produced a Green Belt Boundary Review during the Core Strategy and Development Management Document (DMD) process in 2012. Within the Green Belt Boundary Review (2012), the scope of the review and how the Green Belt was assessed included the following;
- The current strength of the Green Belt boundary;
 - Proposed discrete adjustments to the Green Belt boundary in order to “strengthen” and improve its defensibility and resilience; and
 - Ensuring Green Belt boundaries are digitised and cartographically consistent with OS Mapping (follow rational lines etc).
- 5.23 The Green Belt Review outlined only minor changes to the Green Belt, with many due to cartographical errors or the Council aligning their boundaries. Very little Green Belt release within the Green Belt Review (2012) was to provide housing on site. This, however, was in the context of a much lower housing target.
- 5.24 A full review of all potential development sites submitted through the SHLAA call for sites process is required this time around, rather than the partial review to ad hoc small pieces of land carried out last time. We also consider it to be appropriate to outline how each site performs against the five tests of the Green Belt (as outlined in the NPPF), to therefore ensure that the lowest quality Green Belt sites are released.
- 5.25 An important consideration of an updated Green Belt Review is ensuring that permanent boundaries are provided after development and that there is a clear boundary as to where this would be. This

approach was not properly tested in the previous Green Belt Review with back gardens being considered to provide a defensible boundary. We do not consider this approach to be sound and more obvious and linear boundaries such as roads and railway lines need to be used in future assessments for it to be considered robust.

5.26 Fairview submitted representations to the Green Belt Review requesting the de-designation of the Enfield Road site, however, the site was rejected from release as there was “*no justification on the grounds of housing supply to warrant the release of parcels of land from Green Belt designation.*”

5.27 This justification no longer stands in the context of the higher housing target and we consider that the site does not meet the Green Belt objectives in the NPPF as set out below.

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

5.28 We consider that consultation on the Green Belt Review methodology should also be undertaken to reduce the scope for disagreement at the Examination in Public. In particular, how views and

landscape character will be considered and whether the Council will consider historic context of a Green Belt setting.

Soundness Summary

- 5.29 We consider that an updated Green Belt Study is required which takes as its starting point that the Green Belt will need to be altered to accommodate housing growth. A robust and credible methodology which reviews all potential sites should take in to account a wide range of principles, but particularly the need to deliver defensible Green Belt boundaries for the foreseeable future.

6. GROWTH STRATEGIES

- 6.1 Chapter 2 highlights the growth options for Enfield, with addressing the shortage of housing in Enfield as a priority. The draft new London Plan (2017) is proposing that Enfield should deliver 1,876 additional dwellings each year between April 2019 and March 2029 which equates to 18,760 homes over the next 10 years. This could be further increased if an immediate review of the London Plan takes place to seek to deliver 100,000 homes per year in London as required by the NPPF Standardised methodology and requested by MHCLG.
- 6.2 Paragraph 2.1.3 of the draft Plan highlights that “*addressing the shortage of housing in Enfield is a priority*”. With the draft London Plan increasing the housing target to 18,760 homes over the next 10 years, and the lack of delivery of key sites (such as Meridian Water) since the adoption of the previous Core Strategy, the Council are under pressure to deliver to drastically increase their housing delivery. In February 2019, it has been announced that the Council will need to prepare an Action Plan to seek to address the recent under delivery of their housing target. This will require the Council to take a renewed focus on housing delivery in the Local Plan.
- 6.3 We support development on brownfield sites, however, we consider that in isolation they will not be sufficient to deliver the challenging housing target placed on the Borough over the plan period. We also consider that brownfield sites often slower delivery timeframes which will further compound the Council’s Housing Delivery Test underperformance. In addition, they are usually not able to provide social and community infrastructure on-site such as schools with open space.
- 6.4 The Council will therefore need to consider areas of the Borough that are located in the Green Belt but are worthy of release due to them being located in sustainable locations (800 metres from a station and with a range of existing public transport options such as buses, cycle lanes and which score well against the Sustainable Development Scorecard criteria), sites that are suitable and deliverable and also not contributing to the Green Belt. We consider that Land South of Enfield Road is able to provide this, and therefore help contribute towards meeting Enfield’s significantly increased housing target.
- 6.5 In the following sections, we have sought to provide comments on each elements of the Council’s potential Local Plan strategy.

Town Centres and areas around stations

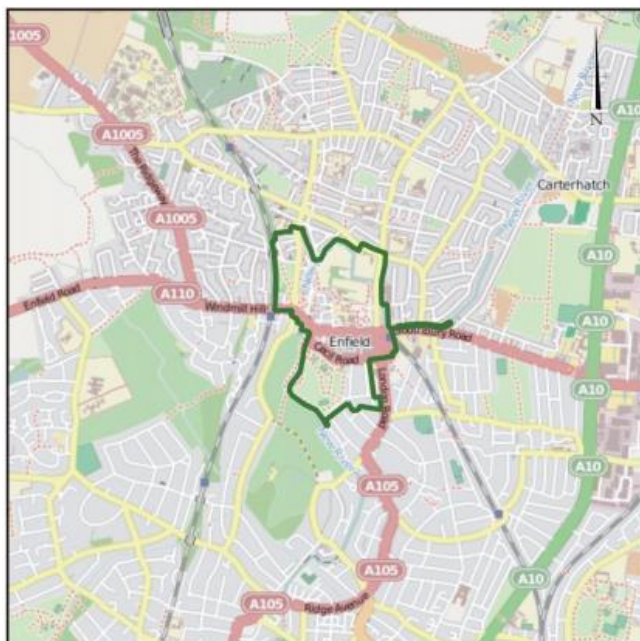
- 6.6 LBE state that in the emerging Local Plan that new development opportunities should be directed towards areas with high levels of public transport accessibility, where higher densities are will be expected. The Borough’s town centres are therefore considered sustainable locations for mixed use

development and the amount of housing, jobs, community facilities and commercial activities should be utilised in these locations.

- 6.7 We support, in principle, this growth option in light of national and London Plan policy which encourages and promotes patterns of growth in locations that are highly sustainable, through limiting the need to travel and offering a genuine choice of transport modes (Paragraph 103 of the NPPF). We also agree that delivering growth within the existing urban area and in close proximity to town centres and tube and rail stations has a wide variety of benefits and is highly sustainable, however we consider that this is a finite resource and there is only so much intensification that can be sustainably achieved.
- 6.8 Within the draft Plan, the Council have highlighted two opportunity areas (Upper Lea Valley and Southgate). We support, in principle, the Council intensifying development in these OA's, however both are located along the Crossrail 2 line. For these OA's to be successful, this is heavily reliant on Crossrail 2 being implemented to provide the infrastructure needed in the area. Enfield Lock (located in Upper Lea Valley OA) has significant potential for redevelopment however is currently hampered by relatively poor transport links, including slow journey times and frequent delays, so is heavily reliant on Crossrail 2 to come forward to increase the number of trains in the area, and therefore encourage development.
- 6.9 Crossrail 1 has already seen significant delays. The Elizabeth line underground link was set to open in December 2018, and was then delayed to Autumn 2019 and has now been delayed "indefinitely", with increasing pressures on funding (estimated to be in the region of £1.7bn). It is understood that this overspend has eaten in to the budget for Crossrail 2.
- 6.10 The final plans for Crossrail 2 are not anticipated to be submitted to Parliament until 2021/2022, with construction anticipated shortly afterwards. If all goes to plan, it is anticipated for completion in the 2030s. It is evident with the delays that Crossrail 1 has experienced, that delays with Crossrail 2 timescales could also occur, leaving sites earmarked for intensification without the infrastructure required for long periods. We consider that in order for Enfield to meet their housing targets within this Local Plan timescale, the Council need to consider sites that are deliverable in the short term, and not reliant on infrastructure that is not yet fully committed.
- 6.11 With this in mind, the Council are already limited in their options for development that is located within town centres and urban areas outside of these OA's and although we support Crossrail 2 coming forward to unlock potential sites, we consider that they are not able to rely on this option alone. We consider that alongside the need for sustainable developments close to transport hubs, other options need to be considered which must include Green Belt release in sustainable locations such as Land South of Enfield Road.

6.12 Secondly, although we appreciate that planning policies should promote an effective use of land in meeting the need for homes (in accordance with Chapter 11 of the NPPF), this should not be done at the cost of impacting on the environment and setting for example on heritage assets or on townscape. Enfield has a total of 22 Conservation Areas and increasing densities in these locations (although close to transport hubs), we consider is not always appropriate.

6.13 One example is Enfield Town Conservation Area which boundary covers the whole of the town centre (as shown below), with Enfield Town train station located in the centre. As outlined in the Area Appraisal (2015), the town centre is also the only location protected by an Article 4(1) direction, and the remaining of the Conservation Area is relatively low density.



6.14 We request that the Council ensure they fully assess the impact of such growth option, specifically the increase of density, on the Conservation Areas and other heritage assets around the town centres and urban areas, and to ensure that these 22 conservation areas are still preserved and enhanced.

6.15 It is also notable that the Council has previously produced an Area Action Plan for Enfield Town Centre which will have sought to significantly intensify existing sites and reduce the number of available sites. Furthermore, it highlights that in order to increase the density of town centre sites with heritage constraints, it requires additional policy documents that take time to come forward. Green Belt sites, do not suffer from similar constraints and can be brought forward quickly.

6.16 Development around town centres will also deliver significant levels of flatted development, whereas our analysis (Appendix A4) shows that the demand for family housing. An overconcentration of this type of development site as the expense of Green Belt land will not deliver the type of housing that Enfield needs.

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- 6.17 We would also state that there are a number of Green Belt sites which are located in equally sustainable locations (800 metres from a station, with a range of public transport options such as buses and which score well against the Sustainable Development Scorecard criteria) and can deliver a similar pattern of sustainable development. We consider that Land South of Enfield Road is one such option.

Capacity and Improvements to rail links

- 6.18 We are yet to see any compelling evidence that town centres outside of the Opportunity Areas and Intensification Areas can deliver significant numbers. A number of sites have been proposed where there is no clear indication of a willingness of the owner to bring the site forward and whether the densities proposed are feasible. If the Council believe that these areas can deliver significant intensification of development this will need to be carefully masterplanned and the feasibility of each site assessed. The infrastructure requirements, including public transport availability will need to be examined.
- 6.19 Locations such as Southbury and Edmonton Green are likely to have limited capacity to accommodate additional growth because the train line that serves them runs only two trains per hour. Significant upgrades to this line are unlikely for two reasons. First, TfL is unlikely to be able to fund these improvements due to budgetary constraints following Crossrail 1 overspends and Crossrail 2 shortfalls. Second, dual-tracking of the line would be highly problematic as it runs through urban areas that would require very large amounts land to be compulsorily purchased and demolished.
- 6.20 Highly complex engineering solutions would also be required for areas of raised tracks running through urban areas and over existing busy roads. The cost would be prohibitively expensive compared to the returns in terms of increase of frequency of trains.
- 6.21 Our view is that the numbers that these locations can deliver will not be sufficient to make such infrastructure improvements viable and in any case they are already some of the lowest sales value areas in the Borough and London as a whole. They differ from the Opportunity and Intensification Areas in that redevelopment of areas like Meridian Water are unconstrained and thus can deliver much higher numbers of units. The wholesale redevelopment can also deliver place making activities which drive higher sales values.

Summary

- 6.22 We consider that the Council's option of intensifying development within existing urban areas and near to town centres and transport hubs is sound in principle. We support this policy generally, however; this option alone, is unlikely to deliver sufficient numbers needed to meet the Council's housing target. Many areas within Enfield's town centres are already being allocated for Crossrail 2 Intensification and Opportunity Areas. We consider that this does not leave an abundance of locations to provide additional housing elsewhere. There are a total of 22 conservation areas within

Enfield (many of which lie within town centres for example Enfield Town), so targeting significant increase of density is not always appropriate within town centres, due to the impact it will have on heritage and townscape.

- 6.23 We consider that the Council must look to Green Belt release alongside development in urban areas to ensure the housing target is met. Land South of Enfield Road offers an excellent opportunity due to it being located near to a wide variety of sustainable transport methods and our view that it performs weakly against the five objectives of the Green Belt set out in the NPPF.

Transport Corridors

- 6.24 LBE consider that The Great Cambridge Road (A10) and North Circular Road (1406) corridors have potential areas that could bring forward a significant scale of development opportunity. We consider that potential areas that are located in close proximity to sufficient public transport should be fully maximised, however there are also many potential areas that would most likely require a car to travel. Paragraph 103 of the NPPF states that development should be focused on locations which are sustainable through offering genuine choice of transport modes, which will help reduce congestion and emissions, and therefore improve air quality.

- 6.25 Paragraph 2.9.5 of the Plan recognises that not all the available sites along the transport corridors are in close proximity to existing facilities and public transport (more than 800 metres from a station and without a good range of other public transport options such as buses), so therefore many of the sites are not sustainable as they will increase the reliance of car, increase capacity on the main roads and in turn have a negative impact on the air quality of Enfield and public health. Due to this, these potential development sites may be considered for mixed use developments to try and reduce these issues, however this will mean compromising the number of homes built on site, and therefore impact on Enfield's housing target.

Summary

- 6.26 We consider that this option is not the most sustainable, and also cannot be relied upon in isolation. We consider that there are a variety of Green Belt sites (for example Land South of Enfield Road) that are more sustainable than available sites located along the transport corridors. The Council should ensure that any sites selected are highly sustainable and near to services and public transport.

Estate Renewal

- 6.27 As an additional source of growth, the Council is already driving a programme of estate renewal which is set to deliver 3,000 new homes in New Southgate, Ponders End and Edmonton, and further homes in the Meridian Water Development. We consider that estate renewal is acceptable in

principle and should be utilised as a source of growth, however there are limited opportunities in Enfield for this type of growth.

- 6.28 Furthermore, estate renewal requires people to relocate from their communities, whilst their area is demolished and rebuilt. In some cases, many people are unable to move back as they cannot afford the new market rates which leads to permanent displacement of people from their communities.
- 6.29 In addition to this, estate renewal often takes time due to land ownership being transferred, and in some cases (such as Alma Estate), a public inquiry into the compulsory purchase of property and land is required. In the case of Alma Estate, the Council started compulsory purchase proceedings in 2014, and in December 2016, only 85 home owners (out of 170 home owners) had come to an agreement with the Council. Many landowners refused to sell their land, therefore the CPO went to a planning inquiry. Although construction at Alma Estate is now underway, the process of estate renewal can cause delay in delivery and therefore can impact the housing target within the plan period.
- 6.30 Furthermore, not all estates may be located in sustainable locations (800 metres or less from a station and without a good range of public transport options such as buses) and so may not be suitable for intensification. These types of estates should not be prioritised over more sustainable sites, such Land South of Enfield Road.

Summary

- 6.31 We consider that although estate renewal is a good source of growth, it is not the quickest way to deliver, and can sometimes take years for completion. Furthermore, there are limited opportunities for this type of growth, so therefore the Council will need to look for other sources of growth, for example, Green Belt release. These sites can be developed quickly in line with the Government's delivery agenda and can make a significant contribution to the Council's challenging housing target in a short space of time.

The Eastern Corridor and industrial areas

- 6.32 Paragraph 2.11.2 of the draft Plan states that due to the location of the Crossrail 2 route, the Council must consider whether the low density industrial areas to the east are making the best use of land. There are two designated Strategic Industrial Locations (SIL's) in Enfield as outlined within the draft London Plan which currently occupies 326 ha of industrial land in Enfield (out of 400 ha overall); Brimsdown and Freezywater / Innova Park, both located in the market area of Lee Valley.
- 6.33 The Council recognise the need to utilise industrial land, in accordance with Policy E7 of the draft new London Plan, and highlight the potential to provide mixed use proposals of high quality design within these areas, for example, industrial land on the ground floor, with residential on the upper

floors. The draft new London Plan suggests that co-locating can be achieved given that no industrial land is lost; the industrial activities are not compromised in terms of their continued efficient function; the industrial uses should be completed and operational in advance of any residential component being occupied; and an appropriate design mitigation is provided.

6.34 This growth strategy has rarely been tested in London Boroughs, so there is uncertainty on whether this form of development is achievable on a large scale, deliverable and viable. Although we support in principle the idea of utilising industrial land to provide housing, it can cause a wide variety of issues for example;

- whether all industrial sites can practically accommodate residential on top;
- where businesses are decanted to whilst the development is happening;
- viability issues;
- difficulties in combining residential with industrial in design terms; and
- whether there is an overall market demand for this type of development.

6.35 Furthermore, it is expected that industrial sites will need to meet 50% threshold for affordable housing. This is also compounded by the tripling of Mayoral CIL for residential development in these lower value areas. This can cause a variety of viability issues for developers. Industrial land is often located in the poorest parts of the Borough where viability is the most challenging, however the need to provide 50% affordable housing, could discourage or delay development within the area.

Summary

6.36 We consider that this growth strategy is untested and risky in terms of providing Enfield with the required housing numbers needed and within an appropriate timescale. We consider that Green Belt release is more reliable and is tested to be deliverable and viable.

Strategic plan-led approach to Green Belt

6.37 The Council consider that there is a possibility within their Green Belt to provide an accessible and sustainable option or options to help meet their growth challenge. This is particularly the case where such development is well connected to the borough's public transport network. In Paragraph 2.12.2 the Council also recognise that there are strong sustainability arguments in favour of developing some Green Belt land.

6.38 We recognise the need to await the "Call for Sites" submissions before determining the quantum of development accommodated in the Green Belt, however, we are strongly in support of this growth option within the draft Plan. The release of Green Belt in sustainable locations (800 metres from a station, without a good range of public transport options such as buses and which score well against

the Sustainable Development Scorecard criteria – such as Land South of Enfield Road). Clearly any release from the Green Belt will have to consider against the 5 objectives set out in the NPPF (para 134). Enfield Road has been assessed and does not perform any of the five tests of Green Belt and is therefore a strong candidate to be released from the Green Belt. There is, therefore, a good opportunity to utilise the land efficiently and provide much needed housing numbers for the area.

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

6.39 There are a wide variety of benefits derived from developing on sites that have been released from the Green Belt. We consider that smaller sites (such as Land South of Enfield Road) can be delivered quickly, and they also offer opportunities to deliver more infrastructure such as schools, which brownfield land can struggle to deliver.

6.40 Developing on sites that have not previously been developed, also offers opportunities to deliver a range of unit types including family homes and flats, which Fairview have outlined as being in demand

in Enfield. This is strongly supported by our analysis (Appendix A4) shows that the demand for family housing is growing in the Borough whereas the demand for flats is declining.

- 6.41 Family housing with gardens is rarely delivered on new developments in London and the release of Green Belt land could allow this to happen. We consider this is important as many people moving to Enfield will be seeking this type of accommodation. The alternative is to deliver nearly 35,000 flatted units over a 20 year period and we consider that this approach is likely to slow delivery of housing. As per the Government's delivery agenda, a mixture of the type of dwellings being brought forward will speed the rate at which they are built out. Our analysis (Appendix A4) shows that the Council is currently failing the Housing Delivery Test and will need to change its strategy of relying solely on brownfield land.
- 6.42 We consider that there are a number of weakly performing Green Belt sites located in Enfield, that are also sustainable for example Land South of Enfield Road. The masterplan provided at Appendix A2 highlights how the site can accommodate a high-quality development, with a range of unit types/sizes and also open space with good access throughout. Although not shown within the masterplan at Appendix A2, the site also has capacity to provide a school on site (either primary, secondary or SEN, as required) if it is demonstrated that there is demand for one. Sites such as Land South of Enfield Road, are perfectly placed in accommodating a school, as they often have the nice, open space needed to provide the best facilities (for example playing fields and sports pitches). They are often more desirable on sites that have been released from the Green Belt, as it allows a more pleasant environment for a school.
- 6.43 We note the reference to bringing forward Crews Hill in the emerging Local Plan, we consider that more Green Belt land will be required than the area around the station. Furthermore, the area requires significant additional infrastructure to bring forward a new settlement, this will mean it is likely to take around 5-10 years to come forward, whereas Land South of Enfield Road can be brought forward immediately.
- 6.44 We consider that there are many Green Belt sites that are also highly sustainable. Our Sustainable Scorecard analysis has highlighted the site has having a Sustainability Score of 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). It is also worth noting that the Scorecard analysis does not use Green Belt as a consideration in sustainability terms. The full Scorecard analysis is provided in Appendix A3. Therefore, we consider that this could deliver a highly sustainable form of development in the LBE and make a contribution to housing need.

Summary

- 6.45 We agree with the approach taken by the Council to taking a strategic plan-led approach to Green Belt, and we consider that Land South of Enfield Road provides a perfect opportunity for the Council

to fulfil their ambition. When tested against the five tests of Green Belt, we consider that the site performs poorly against the five objectives of Green Belt land in paragraph 134 of the NPPF. We request that Land South of Enfield Road should be removed from the Green Belt, so it is able to provide a high-quality development and help contribute towards Enfield's challenging housing target.

Future Crossrail 2 Growth Corridors

- 6.46 As discussed previously in relation to intensifying development in and around town centres, we support the Council in identifying areas that are linked to Crossrail stations however we consider that this cannot be relied upon in isolation. There is limited delivery potential associated with these sites in the short term, as the existing public transport connections in these areas is sometimes limited and in-frequent. Given Crossrail 2 timescales are scheduled for completion in the 2030's, this would leave many areas insufficiently served by public transport for the density proposed for over a decade, if Crossrail 2 is delivered on time (Crossrail 1 has been delayed by at least 1.5 years).
- 6.47 We consider that the Council must look to more short term options for example Green Belt release, which does not rely on public transport improvements to come forward ahead of delivery.
- 6.48 Land South of Enfield Road is available, suitable and deliverable within five years, and can help contribute towards housing numbers within this plan period, therefore we consider that this should be released from Green Belt designation. Identifying sites such as this will ensure that housing delivery in the Borough is relatively smooth and large chunks of the housing provision is not linked to uncommitted infrastructure.

Opportunity Areas

- 6.49 We support, in principle, the need for the Council to work alongside the Mayor to bring forward both Opportunity Areas in the Borough, however experience on previous OA's has shown that they have often been very slow to come forward (e.g. Meridian Water). Furthermore, as discussed previously, the basis of the delivery of these OA's is Crossrail 2. Without this infrastructure improvement, public transport may be patchy in places and may not support the very high densities proposed in the short term.
- 6.50 One example is Meridian Water which forms part of the Upper Lee Valley OA. The Upper Lee Valley OA was originally adopted in July 2013, with works beginning at Meridian Water in 2017. Ahead of any development, the land had to be de-contaminated of oil and other non-aqueous chemicals. Development partners are now being selected for the site and delivery could take some time.
- 6.51 In order to support the slow delivery of OA's and the uncertainty sometimes associated with them coming forward, we consider that Green Belt release is needed. We consider this is a more reliable growth strategy that is not reliant on infrastructure improvements ahead of delivery.

6.52 As with all of the brownfield options, this approach is likely to deliver an overwhelming proportion of flats, whereas our analysis shows a significant need for family homes in the Borough (Appendix A4). We consider this underlines the importance of not relying on brownfield sites and seeking to allocate Green Belt land, such as Land South of Enfield Road which can deliver the types of homes that Enfield needs.

Summary

6.53 We consider that although Opportunity Areas should be maximised for their potential in providing homes, there is, however; uncertainty over whether these can be delivered within this Plan period, due to the reliance on infrastructure improvements including Crossrail 2. They would also deliver overwhelmingly flatted developments when the demand in the Borough is for a significant level of family housing.

7. MEETING ENFIELD'S HOUSING NEEDS

7.1 Within the draft Plan, the Mayor of London reveals that London is required to be build **66,000 new homes every year** to meet its growing need (up from 40,000 in the adopted London Plan). The GLA's SHLAA on which the new London Plan is based on, 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 numbers need to be closer to **100,000 a year**. With the increased housing need in London, Inner Boroughs are constrained and limited, therefore many of this housing need, is required to be provided within the Outer Borough's for example in the London Borough of Enfield.

7.2 Table 4.1 of the draft Plan outlines that Enfield has a ten-year housing target of 18,760 new homes, with an annualised average of 1,876 new homes. This is a + 135% increase from the housing targets set out within the current London Plan. The significant change in the annualised housing target can be seen below. This is also likely to increase if the overall housing targets increase to 100,000 new homes per year across London.

Borough	Current London Plan Annual Target	Draft London Plan Annual Target	Net Change	Percentage Change
Enfield	798	1,876	+ 1,078	+ 135%

7.3 Over the past 10 years, Enfield has seen 633 gross and 512 net average completions per year, which is a third of the new target. We consider that Enfield face a significant challenge if they are to achieve the required housing numbers and must increase their housing delivery drastically. We consider that Green Belt release is a necessity to fulfilling the housing growth required in the area. In comparison to brownfield sites, Green Belt sites are considered more deliverable in the short term, rarely have problems with contamination, can provide infrastructure on site if needed, and can also provide high quality, landscaped environments. Enfield is also fortunate to have area of the Green Belt next to transport nodes such as Oakwood, Cockfosters and Crew Hill and the Borough should take advantage of this almost unique opportunity in London for early delivery of sustainable housing growth.

7.4 Fairview have a successful past record on delivering sites within the Borough, and are able to provide a high quality masterplan design at Land South of Enfield Road. They are able to mobilise work quickly, once planning permission is secured, so the site can contribute to housing numbers in the short term. By kick starting delivery, this will ensure that Enfield are on track to their ever increasing housing targets.

Draft Policy H1: Housing growth and quality

7.5 We support the Council, in principle, and its aim to bring forward enough homes to meet the identified need and also to seek to deliver at least 1,876 homes per year from 2018-2036. We consider that 1,876 homes should be considered as the absolute minimum, given that SOAN suggests a much higher target is required across London.

7.6 We consider that in order to meet just the current target, the Council must go further than identifying brownfield sites and should seek to release certain sites for development that are currently located in the Green Belt, for example Land South of Enfield Road. If the Council miss this opportunity to properly plan to meet their housing target, by developing brownfield land only, we consider that they will significantly undershoot the 1,876 dpa target with drastic implications for housing affordability in the already stretched Borough.

Draft Policy H1a/b

7.7 We consider that the Council needs to firm up its approach to Green Belt development as the absence of considering this form of development in the Borough, could have significant detrimental consequences for housing targets across the Borough. This is further shown in the Housing Delivery Test analysis contained within Appendix A4 of these representations.

Draft Policy H1c

7.8 We support the draft policy in stating the Council wish to make the most efficient use of land, by taking into account local character and existing and planned infrastructure capacity, however we request that the Council highlight how the necessary infrastructure for these developments can be accommodated. We consider that the only way to make this feasible and possible, is with Green Belt releases which can provide sufficient spaces for associated infrastructure such as a school.

7.9 We request that the Council inform us of what infrastructure is needed through an Infrastructure Delivery Plan or Needs Assessment to be published alongside the draft Local Plan. As outlined with previous discussions with the Council, Land South of Enfield Road is able to provide a school on site if it is evident that one is required in the local area (either primary, secondary or SEN, as required). We consider that if the Council do not move towards Green Belt release, this may compromise the ability of infrastructure to be provided, and therefore potentially impact on the housing numbers overall.

Draft Policy H1d/e

7.10 Draft Policy H1d outlines that development should address the needs of a variety of different types of homes in the Borough. We consider that Green Belt land allows the delivery of more family homes for example Land South of Enfield Road which is able to provide 270 family homes, as shown in the masterplan provided in Appendix A3.

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- 7.11 Our analysis (Appendix A4) shows that the overwhelming need is for family homes in the Borough and a reliance on brownfield land will deliver mostly flatted units. If the Council release Green Belt land, this will allow the required family homes to come forward, rather delivering accommodation that does not meet the needs of the population.
- 7.12 Furthermore, the alternative would be to deliver approximately 35,000 flats over 20 years, which is likely to have significant delivery issues for an outer London Borough. Provision of houses with gardens (alongside flats) would chime with the Government's agenda (and the Letwin Review) of providing a greater variety of unit types to facilitate faster delivery.
- 7.13 Draft Policy H1e also outlines that the Council are to provide associated community and open space of high quality standard. Land South of Enfield Road is able to provide a high quality design with open space. We consider that this is a strong benefit of it releasing it from the Green Belt, as this style of development may not be able to be provided on brownfield sites alone.

Draft Policy H2: Affordable housing

- 7.14 Draft Policy H2 outlines that Enfield have set a strategic target that 50% additional housing delivering across the borough between 2018 and 2036 should be affordable. This is a strategic target in Enfield, rather than site specific, and we wish to understand how the Council are aiming to make up the shortfall of affordable housing from the site specific target of 35% (without grant).
- 7.15 Furthermore, as required by Paragraph 34 of the NPPF, we consider that a viability assessment is crucial in understanding the viability and therefore deliverability of identified sites. We request that the Council provide a viability assessment to support the requirement of 50% affordable, as set out in draft Policy H2.
- 7.16 This required for several reasons, first of all a very large number of units are expected to come forward from smaller sites where affordable housing will be limited. Secondly, larger schemes need to be tested for deliverability against the affordable housing target to make sure the biggest sources of houses in the Borough also can deliver a policy compliant level of affordable housing and the necessary infrastructure. It is not sufficient to rely on the London Plan alone and failure to properly understand the Borough-specific implications of this policy would provide an unacceptable level of uncertainty over affordable housing.
- 7.17 For example, the majority of brownfield land is in the East of the Borough where values are lower and the affordable housing requirement may be higher due to the London Plan policy of delivering 50% on former industrial sites.

7.18 We consider that this underlines the importance of seeking to release Green Belt land in the Borough, which, due to lower existing use values, is more likely to be able to fund both a policy compliant quantum of affordable housing and the necessary level of infrastructure (Land South of Enfield Road is one such example).

Draft Policy H3 – Small Sites

7.19 While we support the Council's commitment to delivering small sites, we also share their scepticism about the levels of housing this can deliver. We agree that it cannot deliver all of the Boroughs housing need.

7.20 We also consider that the reliance on such a large number of small sites (983 dpa in the London Plan) makes it more important that Green Belt sites are allocated. Reliance on this many small sites has very significant issues that need to be addressed:

- Small sites (of less than 10 units) cannot be expected to deliver affordable housing. If nearly half of the Council's supply comes from small sites it makes it extremely challenging to meet their 50% strategic target across all development in the Borough. Green Belt sites are much more likely to deliver a policy compliant level of affordable housing.
- The level of infrastructure that small sites can deliver will be limited. Virtually none can be provided on sites and pooling infrastructure contributions is notoriously inefficient and makes it harder to predict when funding for key projects can be secured. Green Belt sites offer certainty over when the necessary infrastructure can be provided.
- The delivery of small sites is unreliable and unpredictable. Relying on half of your housing target to be met through small sites is likely to have significant implications for meeting the Housing Delivery Test. Phasing of Green Belt sites can be used to ensure that they come forward quickly to deliver housing at the appropriate time.

7.21 In summary, while we support the diversification of supply to smaller sites, this emphasises the need to have a reliable supply of larger site that can be brought forward quickly, such as Green Belt sites.

Draft Policy H4 - Housing Mix

7.22 Draft Policy H4 outlines that the Council seek to ensure a choice of homes to address the Borough's needs. They make reference to their latest SHMA, published in 2015, however we consider that a more up-do-date SHMA is needed to provide robust analysis and to support the housing mix stated within draft Policy H4.

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- 7.23 Draft Policy H4d outlines that market housing should be “flexibly designed to respond to residents’ changing needs over time” and Policy H4e states that housing should “be designed to be appropriate for the accommodation of families”. Fairview have highlighted that there is a need for family housing within Enfield, and Land South of Enfield Road is able to provide this on site. Furthermore, we consider that through providing an up-to-date SHMA, this will provide the justification and support for this housing mix. We also consider that Enfield is in a unique position to deliver family homes within an outer borough of London, rather than flats, therefore the Council should be seeking to provide family homes whenever possible and suitable.
- 7.24 We consider that in order to deliver more family homes, the Council will need to look into releasing the Green Belt. Green Belt land provides more outdoor space, so therefore can be utilised for family homes more effectively and viably. Land South of Enfield Road is able to provide family homes, with gardens and high quality open space. We consider that this form of development, cannot always be provided on brownfield sites, therefore due to demand in family homes, the Council should look towards Green Belt release.

Policy H7 – Supported and Specialist Housing

- 7.25 While we support the principle of a specialist and supported housing policy, we do not consider it goes far enough as currently drafted. The New London Plan specifically requires local authorities to work with operators of Extra Care to identify sufficient sites to deliver 195 units of Extra Care Housing per annum. This policy makes no reference to this approach and will need to remedy this in the allocation stage of the next version of this Local Plan. Land South of Enfield Road could be a good location to deliver this form of housing and Fairview is open to discussions with the local authority about accommodating this (or other types of older person care and accommodation) within any future allocation.
- 7.26 We consider that allocating sites in the Local Plan is essential to ensure that this target can be met. Traditional Extra Care Housing struggles to compete with market housing for sites due to the longer-term nature of returns through an element of care and the additional common areas that this type of development seeks to deliver. This will be compounded by the emerging London Plan policy of requiring affordable housing from Extra Care schemes, which will make it even harder for them to compete for sites.
- 7.27 The need to allocate sites is underlined by the very low levels of delivery in the Borough in previous years. We understand no market Extra Care Housing has been brought forward in Enfield in recent years.

8. SOCIAL AND COMMUNITY INFRASTRUCTURE

Draft Policy SI1 – Social and Community Infrastructure

- 8.1 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.
- 8.2 We consider that in order for the Council to identify its current need for infrastructure, an up-to-date Infrastructure Delivery Plan (IDP) is required to be produced alongside the Local Plan to outline appropriate provision, ensuring development is supported by physical and community facilities to meet local needs, and to identify any deficiencies where infrastructure is required.
- 8.3 Land South of Enfield Road is able to provide a school to meet demand if it arises from housing growth. As stated in earlier sections, a broad design for a new secondary school and housing was deemed broadly acceptable for the site as part of pre-application discussions. Depending on the level and type of need, the masterplan can be altered to deliver a primary or SEN school too.
- 8.4 The Council's current position is that the need for a secondary school created by 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 nearly 40,000 new units in the Borough and this will undoubtedly require new school facilities. As the Council considers its distribution strategy for this growth, Fairview stand ready and willing to provide a new school on part of the Land South of Enfield Road site.
- 8.5 There is also a need for a SEN school in the Borough, but it is unclear where this might be best located within Enfield. The nature of growth from students with special needs is not as predictable as the wider projections for school places, but the Council has reported a specific, but unquantified need for high performing children with ASD.
- 8.6 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.

9. CONCLUSIONS AND RECOMMENDATIONS

9.1 These representations are produced on behalf of Fairview New Homes and seek to demonstrate the benefits of allocating the site, 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 using the assessment under the Sustainable Development Scorecard (see Appendix A3).
- The site is not considered to meet the objectives for Green Belt land set out in the NPPF and is likely to be considered a weakly performing piece of Green Belt land as part of an updated Green Belt Review.
- The site can provide a primary, secondary or SEN school to meet any newly arising need from the level of housing growth in the Local Plan.
- The site can provide 40% affordable housing (to be managed by a Registered Provider or the local authority).
- The site can provide a range of family homes with gardens.
- The site is capable of providing supported and specialist housing for older people for which there is very significant unmet need in the Borough.
- 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.

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 and the delivery of more Green Belt land would accord with the Council's development objectives for the following reasons:

- We consider it unlikely 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.
- The delivery of Green Belt land is required to ensure the Council can meet the Housing Delivery Test going forward (our analysis in Appendix A4 shows they are significantly underperforming in this regard). This has been confirmed by Central Government in February 2019 and the Council must devise an Action Plan to boost delivery levels in the Borough.

Brownfield sites in the Borough will have a range of complications, and the largest ones (such as Meridian Water) have been delayed previously (see analysis in Appendix A4). We consider there needs to be focus on the sites that can be delivered quickest as part of the Council's Action Plan

- The allocation of Green Belt land 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 around 35,000 flatted units in Enfield to be delivered over 20 years.
- 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.
- 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.
- There is significant reliance on small sites within the Council's housing target set by the London Plan. Sites of 10 or less are not required to make any contribution to affordable housing and thus the Council's very challenging 50% strategic affordable housing target becomes even more difficult to achieve. This requires Green Belt sites to come forward which are far more likely to deliver policy compliant levels of affordable housing.
- 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). This is pertinent due to the tripling of Mayoral CIL rates in the Borough which will put further pressure on brownfield sites to deliver policy compliant levels of affordable housing.

9.4 For the reasons set out above, we consider that Exceptional Circumstances can be demonstrated to justify the release of Green Belt land in the Borough.

9.5 We would welcome the opportunity to discuss the site in more detail with the local authority, including the need for a school in this location.

A1. SITE LOCATION PLAN

A2. MASTERPLAN OF SITE

A3. SUSTAINABLE DEVELOPMENT SCORECARD

A4. HOUSING DELIVERY TEST ANALYSIS