

Enfield Local Plan Examination January 2025
Written Statement Matter 5
Key Diagram, Spatial Strategy and methodology for selecting site allocations

Savills on behalf of Comer Homes

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

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

Q5.18: Is the key diagram accurate with regard to the following factors:

- a) the extent of the Green Belt and Metropolitan Open Land (MOL)?
- b) the relationship between the concept of 'gentle densification' and MOL? Is it the case that the Plan allows for 'gentle densification' within areas of MOL?
- c) the relationship between the concept of 'gentle densification' and areas identified for 'intensification around transport nodes and town centres'? Are these two policy approaches compatible?

Q5.19: Is the relationship between concepts identified on the Key Diagram and policy clear? For example, is the Plan clear how 'gentle densification' and 'intensification around transport nodes and town centres' will be implemented?

Response

We have some concerns about some of the draft designations currently shown on the draft proposals map and illustrative framework plan.

One of the main concerns raised in our representations in respect of Policy PL10 is designation of Vicarage Farm (to the north of the Chase Farm allocation) as public open space, and partially as proposed woodland, as shown on Figure 3.2 in the draft plan. Vicarage Farm is a working farm and equestrian centre. The fields need to accommodate crops and/or livestock and cannot be safely open to the public or become woodland.

Draft Policy PL10 13e states that the development should create a range of new open spaces including a hilltop view park at the highest part of the placemaking area. We fully support the objectives the Council is trying to achieve, however, we are concerned about how this will work in practice. Vicarage Farm is one of the highest parts of the placemaking area. Vicarage Farm is a working farm and equestrian centre and it is therefore not practical for it to be formally designated as open space as currently shown on Figure 3.2 (Illustrative Framework Plan). The fields need to accommodate crops and/or livestock and cannot be safely open to the public. The open space designation is not shown on the draft proposals map and should be removed from the illustrative plan.

It could be possible to provide public access across the land through rural style footpaths (a conventional arrangement on farms of course). We could establish a modest area of public open space but it would affect the viability of the farm.

There is more than sufficient public open space designated across the remainder of the Chase Farm allocation. The total open space in and surrounding the southern part of the Chase Farm allocation amounts to some 45 ha. This is predominately the land around the north, the western portion and the land along the brook. This does not include private gardens (which will be additional open space) or ancillary open space within the developed areas.

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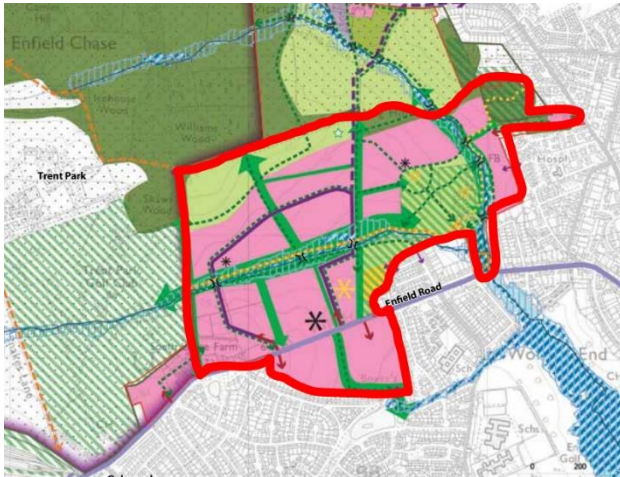


Figure 1 – the southern part of the Chase Farm allocation (within the red line) includes 45 ha of open space

That would amount to over 120 sq m of open space per household (excluding private gardens). By any measure this a very generous open space provision for the proposed development. Therefore there is no need to include the land to the north (Vicarage Farm) as public open space.

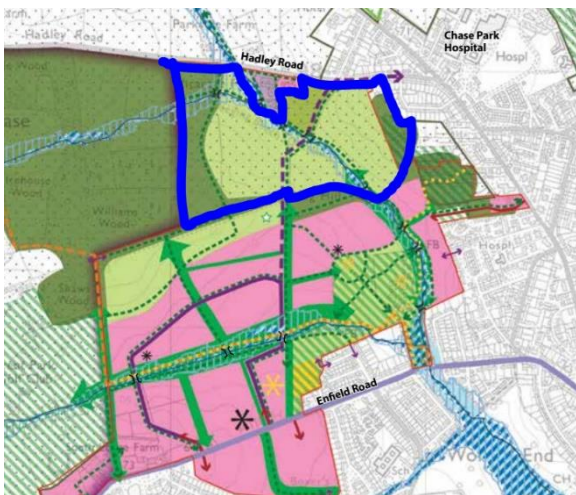


Figure 2 – the north part of the Chase Farm allocation should not be identified as open space

The draft proposals map appears to show all of the Comer Homes site as falling within the Ancient Woodland designation. This needs to be reviewed as this is not the case and could create problems for future applications.



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Therefore we propose the following changes:

- Open space designation removed from north part of Chase Farm allocation
- Alternatively, a footnote added to Figure 3.12 stating “this is an illustrative interpretation of how Policy PL10 could be implemented and does not constitute the Local Plan Proposals Map.” The sentence “and in broad accordance with the illustrative Framework Plan (Figure 3.2)” should accordingly be deleted from PL10 paragraph 4.
- Ancient woodland designation removed from Proposals Map (or at least more carefully defined)