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Strategic Planning and Design  
Enfield Council  
FREEPOST  
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EN1 3BR

Sent via Email: [localplan@enfield.gov.uk](mailto:localplan@enfield.gov.uk)

Dear Sir or Madam,

## DRAFT LOCAL PLAN

### REPRESENTATIONS TO ENFIELD COUNCIL

#### LAND ON THE WEST SIDE OF GREAT CAMBRIDGE ROAD, ENFIELD, EN1 4DS

On behalf of our client, David Pask of Forty Leisure Limited and Jubilee Church, we have been instructed to prepare and submit this letter to Enfield Council as part of the Enfield Local Plan: Main issues and preferred approaches (June 2021) consultation.

The representations are in respect of the land described in the draft Local Plan as proposed **site allocation SA44: Land opposite Enfield Crematorium (known as "The Dell"), Great Cambridge Road, EN1 4DS (the site)**. Our client holds the leasehold interest in the site.

Earlier representations were submitted on behalf of our client in connection with this land as part of the 2020 and 2021 Call for sites.

Our client **strongly supports** the proposed allocation of the site for mixed use development and promotes its release from the Green Belt and local open space designation.

These representations first provide a summary of the site and introduction to Jubilee Church, before providing representations on:

- Policy SP SS1 (Spatial strategy);
- Policy SP H1 (Housing development sites) and proposed site allocation SA44;
- Policy SP SC2 (Protecting and enhancing social and community infrastructure); and
- Release of the land at SA44 from the Green Belt and the local open space designation.

#### Site Context

The site, which covers approximately 4.11 hectares (10.16 acres) in area and is shown on the attached site location plan, is located to the west of Enfield Crematorium on the western side of the A10 (Great Cambridge Road). The entire site is located within the Green Belt and open space designation.

The site is currently undeveloped and is vacant scrubland with overgrown weeds and shrubs covering the majority of the site. The planning history of the site indicates consent has previously been granted for a pet cemetery, a garden of remembrance and a temporary use as a vehicle access to a site



compound. We have been advised by our client that the site was also previously in use as a gravel pit. The site comprises of unsightly and underused land. It has experienced two serious fly tipping incidents in recent years, resulting in costs to our client associated with clearing the site. Photographs of the site are provided at **Appendix 1**.

Residential development along Severn Drive adjoins the site to the south, and to the north is Turkey Brook. To the east of the site beyond the A10 (Great Cambridge Road) is Enfield Crematorium. To the west is New River and an area of open space with a primary school and garden nursery further west. Access to the site for vehicles and pedestrians is via an existing entrance from the A10 / Great Cambridge Road.

The site's PTAL score is 1b. Although, the closest rail station, Turkey Street, is only a 12-minute walk from the site. Turkey Street is served by the Transport for London Overground line. There are also currently four bus routes that serve the adjoining A10 and a bus stop is located directly outside the site boundary. Enfield town centre is located 2km south west of the site, and the closest local centre is 1km east of the site.

### **Jubilee Church**

Jubilee Church is a local Enfield church that has grown significantly over the last 25 years to have a congregation which gathers over 2,000 Enfield people each Sunday to worship services, and is now one of the largest congregations in north London.

Jubilee Church has in recent years utilised the Enfield Cineworld to bring together its congregation. Whilst this has served the church well, and enabled them to grow, it has never been a permanent home for the church and they have only ever had short term arrangements in place, meaning that there is no security for them that the arrangement would not be terminated at short notice. Jubilee Church require a permanent base to enable the church to stay in the borough.

During the pandemic the church held online services and events, when it was not possible to meet in person. The church continued to grow during the pandemic. Following the easing of the COVID-19 pandemic restrictions, the church has been able to return to Cineworld, albeit as explained above, this is not a permanent base.

The diverse church's congregation brings together people from different nationalities and age groups. Jubilee Church also undertake an extensive range of community work, including the Enfield Foodbank, Enfield Debt Centre and crisis support. This community work is also undertaken from temporary bases. A purpose built building to serve the church would enable Jubilee Church to undertake all of its community work, as well as its worship services on a single site. It is important that Jubilee Church can remain in the borough to ensure that it is able to continue the current extensive community work it provides in the borough.

Further information on the church's role in the borough is detailed at **Appendix 2**, in the letter prepared by the Executive Pastor of Jubilee Church, David Pask.

Jubilee Church consider that the subject site is a suitable and sustainable location for their church because it is well positioned in the borough of Enfield; it is a site considered suitable for development; it provides suitable land to enable a purpose built and sustainably designed church and community hub to be built; it has good road access; and it is accessible to local residents on foot, via Turkey Rail station and by bus with opportunities to enhance the bus links to the site.

The important role that Jubilee Church plays in the borough and the importance of retaining the place of worship in the borough for its 2,000 strong congregation needs to be taken into full consideration by Enfield Council in their assessment and allocation of the site for a mixed use development.

Our client intends to develop the site to provide:

- a purpose built and high quality church, together with associated community facilities to provide a permanent home for Jubilee Church and all the projects and initiatives that it runs, to deliver a community hub which can be used flexibly by a range of community organisations and initiatives. This offers the opportunity to be an exemplar community initiative. With the spaces provided available to be used for a range of purposes. It also offers the opportunity for an exemplar and sustainable community building that blends appropriately into its surrounding environment with a sympathetic design that respects the wider Green Belt land. Undercroft or basement car parking will be used to provide the cycle and vehicle parking required to support the use. The delivery of a church building on the site is key to provide long term security for the church and the role it plays in Enfield. This element of the development is expected to utilise circa 2.5 acres, which will include outside amenity space to support outdoor community events.
- publicly accessible open space which seeks to enhance biodiversity and wildlife, that provides active leisure opportunities, community growing initiatives/ allotments and provides new pedestrian and cycle links to create the potential to connect the site to the Green Belt land to the west. Currently the site is not accessible to the public and therefore cannot be enjoyed by the public and it creates a block with no accessible routes through the site. It is envisaged that part of the north and west of the site will be re-designated as local open space and will be delivered to much better meet the objectives of this designation than the land in its current state; and
- new high quality homes, including terrace townhouses and flats, which will include affordable housing and a high proportion of family homes in an area of acute housing need.

Paul Henry Architects has been appointed to undertake master planning work on behalf of Forty Leisure Limited and Jubilee Church. Our client would like to work with the council to explore the optimum development on the site, which meets the identified needs of Jubilee Church but also helps to deliver housing in a sustainable location and publicly accessible open space on the site.

### **Policy SP SS1 (Spatial strategy)**

The delivery of the site will support the objectives of draft policy SP SS1 as it will:

- Provide sustainable growth through the delivery of a mixed use development providing new homes, community facilities and public open space;
- Provide much needed new homes to support the target of at least 23,000 new homes;
- The design of the development as it is progressed will ensure that it is designed to enhance urban greening and to offer innovative design solutions;
- Support employment through the expansion of the existing community projects run by Jubilee Church and new community initiatives; and

- Removal of the site from the Green Belt will facilitate the longer term protection of retained Green Belt land that better serves the functions of the Green Belt.

The objectives of draft policy SP SS1 are supported and the proposed allocation of the site is considered to help support these.

#### **Policy SP H1 (Housing development sites) and draft site allocation: SA44**

The proposed option based on 'medium growth' with Green Belt release is identified in the draft Local Plan as the preferred spatial strategy. This decision is supported by our client.

Policy SP H1 (Housing development sites) identifies the site as one of two sites classed as *"Other proposed site allocations outside of the place making areas (outside urban areas)"*. The site is identified at the supporting table 8.1 that forms part of draft Local Plan (Policy SP H11) as suitable for mixed use development, with a housing capacity of 270 units. The allocation of the land is supported and it is considered that the site can deliver this number of homes.

The supporting proforma for the site allocation, at appendix C of the draft plan, identifies under the land use requirement that the site should provide new homes. Whilst this is supported, it is considered that the proforma at appendix C should refer to the site's land use requirement as being mixed use development, including housing and community uses. This is to reflect our client's proposal to build a permanent home for Jubilee Church and the other community projects it is involved with on the site, as well as housing. This description would also align with the summary table 8.1 that forms part of draft Policy SP H1 that describes the proposed use as 'mixed use'.

The explanatory text to draft Policy SP H1 advises that *"Outside of the urban placemaking areas, the Council is also allocating a number of smaller brownfield sites which will make a valuable contribution towards meeting the identified need for housing."*

Table 8.2 sets out the *"Housing supply – sources of supply over the plan period up to 2039 (net number of homes)"*. It shows provision for approximately 30,000 new dwellings over the plan period up to 2039. 23,566 new dwellings towards meeting this target will be made by sites allocated for housing in the urban area and a small number of Green Belt sites to accommodate new dwellings. The inclusion of the subject site makes an important contribution to this figure.

Currently there is very little new build homes under construction in this area. As outlined in the Local Plan, Enfield needs to significantly increase the supply of new homes to meet both future demand and the backlog of existing need. Targets are not currently being met due to the lack of suitable or available land. To meet the current adopted London Plan housing target in Enfield, it is understood that the borough will be required to more than triple current housebuilding rates. Enfield also remains an expensive place to live as house prices are among the highest in England.

There is an urgent need to build more homes, including affordable housing and family-based housing in this area to meet future demand and widen the choice of homes (as identified in the Enfield Local Housing Needs Assessment). The adopted North East Area Action Plan identifies a specific localised affordable housing need in this area.

The site is considered to be make an important contribution to the mix of proposed allocated sites in the borough as it provides land that:



- supports the delivery of housing in the borough with a mix of housing types, including townhouses and flat, to provide choice and to meet demand in line with the Local Plan and London Plan. The site is likely to be better suited to the delivery of townhouses, with affordable homes to support families, than smaller and more constrained urban sites where flatted development is more likely to come forward;
- provides the opportunity to deliver accessible and public open space to serve the new homes and local communities, utilising the large site area s to provide ample open spaces to suit all age groups, with features to encourage active lifestyles and community growing initiatives. The site also offers the opportunity to deliver allotments within part of the site, which lies within an area of deficiency in allotment provision (as identified in the adopted North East Area Action Plan). Urban sites are less likely to be able to offer these features on such a large scale, or if they are, it will likely be more constrained. The masterplan will enable part of the site to be delivered as open local space, this land will be able to de designated for this use, to ensure its long term protection for this purpose;
- provides the opportunity to create green links, for pedestrians and cyclists, as the site is currently inaccessible and creates a blockage to east west connectivity and south north connectivity from the urban area to the south, to the land to the north, allocated as a site of Metropolitan Importance for Nature Conservation. There is an existing public footpath immediately to the north of the site that connects Forty Hill and the A10. There is an opportunity to connect into this existing pedestrian link and to create a further east west connection for pedestrians and cyclists;
- due to its size, the site provides the opportunity to provide extensive biodiversity enhancement, creating a new area of parkland with native planting to attract wildlife. Extensive greening along the northern and western site boundaries will ensure that the visual and functional boundary between the site and the Green Belt to the west and the designated Metropolitan Importance for Nature Conservation to the north are clearly defined. This will also create separation between the built development and designated land to the north and west;
- offers the opportunity to deliver highly sustainable new build homes, set in a very green and open location with sustainability initiatives delivered into the community through the design approach, such as the potential to utilise Passivhaus principles; streetscape incorporating shared communal areas and safe spaces for children to play; buildings orientated to provide sunny, light-filled homes with suitable shading; low fuel bills through sustainable community heating systems; and community growing initiatives and collaboration. The large site size provides the opportunity to deliver an exemplar new mixed use and sustainable community;
- provides future residents of this new community, and those existing residents in the local area, with direct access to a new build church and associated community facilities with the opportunity for it to foster new community initiatives and projects. The site will deliver a brand new high quality building with a range of community groups operating from it. It will have a food bank and it will have facilities for young children. There is the potential for community food growing projects to come forward creating collaboration between residents, the food bank and existing initiatives in the wider area (e.g. Forty Hall);

- is identified in the Housing and Economic Land Availability Assessment (2021) that informed the draft Local Plan - referred to CHC5 in the table (Appendix E: Full assessment of potential sites), with following points in this assessment noted:
- **development constraints:** The assessment refers to trees being a potential constraint on the site. The vast majority of vegetation across the site are weeds and scrubs that have self-sowed over the years and as a result of the site not being used. Other than at the rear of the site, and site boundaries there are no established trees, as far as we are aware. The existing vegetation on the site should not act as a constraint to development. Development on the site, which would include extensive landscaping, offers the opportunity to provide native tree planting and native landscaping that attracts wildlife and insects and enhances biodiversity.
- **deliverability:** We agree with the assessment's conclusion that the site is available and deliverable.
- **suitability:** The site is identified in the assessment as suitable for development, as a result of its location outside of a flood risk area and with no conservation/ heritage constraints. With the only potential constraint being the current Green Belt and local open space allocation. As discussed later in this letter, the site is considered suitable for release from the Green Belt and local open space designation (albeit as part of the delivery of the site it is expected that part of the site will be re-delivered as local open space). The removal of the site from these allocations would further ensure the site's suitability for development.

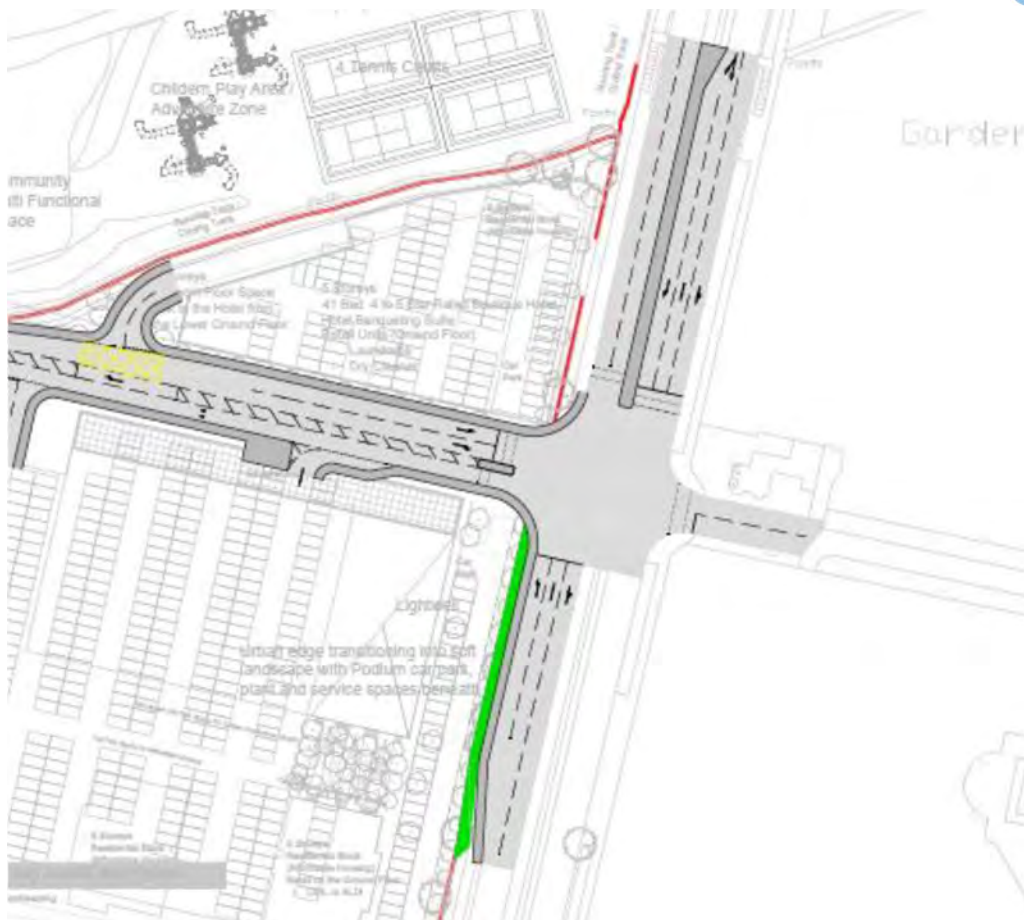
The assessment classes the land as agricultural grade 3 land. We do not agree with this classification. Given the site's position on the very edge of the urban area and because there are no crops grown on the land, there is no grazing on the land and the land is overgrown scrubland, it cannot be considered to be grade 3 agricultural land. Furthermore, the planning history of the site indicates consent has previously been granted for a pet cemetery, a garden of remembrance and a temporary use as a vehicle access to a site compound. We have been advised by our client that the site was also previously in use as a gravel pit.

- **achievability:** The assessment considers cost factor dependencies, including infrastructure costs for developing road and utilities. Our client has appointed Nick Bond, Director at Caneparo transport consultants to advise them on the road upgrade works to facilitate access.

Nick has provided initial advice, but further discussion and engagement will be required with Enfield's highways officers on the works required to the road to facilitate access.

There is an existing vehicle access from the A10 to the site. The existing access to the site is left in-left out only and a central reserve blocks access to the southbound side of the A10 Great Cambridge Road carriageway. There are also no adjacent turning facilities such as roundabouts that would allow vehicles to access the southbound carriageway nearby.

The plan below show's Caneparo's initial suggestion of the proposed highways works that could take place to facilitate access and exit in both directions.



*Image: Caneparo's initial draft proposed highways works to the A10.*

The site does not currently have utilities connections, however as a result of its proximity to the existing urban area to the south and position adjacent to the A10, it is expected to be feasible to provide all necessary utilities to the site.

The site is very close to a number of existing primary schools, with the two closest being Forty Hill and Worcesters Primary School, both located just to the west of New River. The closest existing secondary school is St Ignatius College, located on Turkey Street. As part of the discussions with the Council to develop the masterplan, consideration of the existing capacity of nearby schools and health facilities will be considered, to identify the necessary financial contributions that the development can make to enhance these facilities. For example, a children's nursery could possibly occupy part of the proposed flexible community/ church space that is proposed to be delivered.

The assessment advises that the site may be considered developable subject to confirming viability. It is not considered that the infrastructure and utilities requirements will impede the viability of development on the site. A mixed use development providing housing, including affordable housing and open space is considered suitable on this site. The scheme viability will impact upon the quantum of affordable housing that the site delivers. Further work will be undertaken on the viability, as the masterplan is progressed.

- **Capacity:** The assessment assumes that 80% of site is developable for residential due to need for access and open space to be provided as part of the comprehensive redevelopment of the

site. A density of 85 dwellings per hectare is assumed with a building typology of terrace townhouses. It is expected that the site will deliver a mix of both terrace townhouses, for families, and flats. Delivering a mix of housing types, as opposed to only townhouses is considered to be more suitable and will ensure a mixed community to meet different housing needs.

Our client would welcome the opportunity to further discuss the capacity of the site and an initial masterplan for the site with the council. As part of the development, as well as housing and open space our client intends to deliver a church on the site, to provide a permanent home for Jubilee Church, together with the other community facilities run and organised by Jubilee Church, such as a permanent home for the foodbank.

The delivery of a church/ community building(s) would only require circa 2.5 acres of land (circa 25% of the site). This would include the land to provide the church/ community buildings, vehicle and cycle parking to serve the church/ community use and open space to serve the church/ community use and to facilitate outdoor community initiatives. Undercroft or basement car parking, as opposed to surface level parking, will be used to reduce the footprint of this use. Further consideration will be given to innovative design to ensure that the design of the church/ community building is sympathetic to the character of the surrounding area.

The assessment has assumed that 20% of the land will be required for access and open space. There is no mention of the church use in the assessment. Therefore, when the land for the church use is included in this assumption, the percentage is likely to be higher than this. There will still however be several acres available to deliver housing and through the comprehensive delivery of a masterplan for the site, the uses will be able to co-exist. It is considered that the proposed 270 units can be delivered on the site, as well as the church/ community use through the use of innovative design and the delivery of a mix of both terrace townhouses and flats on the site, as opposed to solely townhouses, which is what the Council has currently assumed.

- **Delivery timescales:** The assessment suggests that the site would be available for housing in 11- 15 years. Our client would welcome the opportunity to discuss the most suitable phasing with the council. It is envisaged that the Phasing could come forward as:

Phase 1: 1 – 5 Years

- Delivery of the highways works to upgrade the access into the site.
- Delivery of the church and community facilities; and

Phase 2: 6- 10 years

- Delivery of an initial phase of housing to help fund the delivery of the landscaping/ public park;
- Delivery of part of site landscaping and public park; and
- Delivery of the pedestrian and cycle links through the site.

Phase 3: 11- 15 years

- Delivery of remainder of housing; and
- Delivery of the remainder of the landscaping and public park.

The site is in single freehold ownership. The freehold interest is held by the London Borough of Haringey. Our client, Forty Leisure Limited, is the sole leaseholder of the site. Tom Mulligan Land has been appointed by our client, to engage with Haringey on the freehold acquisition of the land. Discussions are ongoing with Haringey, who are considering the proposal. An update on these discussions is provided in the letter prepared by Tom Mulligan Land, which is attached at **Appendix 3**.

### **Policy SP SC2: Protecting and enhancing social and community infrastructure**

Policy SC2 of the draft plan promotes new and enhanced community infrastructure. The proposed delivery of Jubilee Church and the associated community facilities on the site is considered to address the draft policy SC2 - part 2 requirements.

Bullet point a) of draft Policy SC2 (part 2) supports the delivery of planned clusters and hubs of community facilities. This draft policy is supported and the site offers the opportunity for an exemplar community hub to be delivered.

Bullet point e) also encourages that spaces can operate as a multifunctional space offering fair and affordable access to the public (including protected groups) and sufficient capacity/flexibility to meet a range of needs (e.g. shared spaces or co-located uses), especially outside of core hours. This draft policy is supported and the delivery of a purpose built community facility on the site will ensure that it can be designed from the outset, as a flexible space, that can meet a wide range of groups needs to ensure that the space is actively used.

Our client who holds the leasehold interest in the site, have identified it as a suitable location to provide a permanent base for Jubilee Church, together with other community facilities. Jubilee Church has been actively looking for an alternative and permanent base for some time. They have appointed Tom Mulligan Land to assist them with this search. Despite an extensive search, they have been unable to secure a suitable relocation site. Details of this search are provided at **Appendix 4**, in a letter provided by Tom Mulligan land, who has been appointed to assist the church in finding a relocation site.

If Jubilee Church is unable to secure a suitable relocation site in the borough, it is likely that they will need to move outside of the borough. This is not something that the church wishes to do; they have built up and established important connections in the borough over the last 25 years. However, they cannot continue to operate unless a permanent location is secured.

The allocation of the site for a mixed use development, which can include the delivery of a purpose built church and community building is therefore welcomed by our client.

### **Green Belt and Open Space Release**

Enfield's Growth Topic Paper (May 2021) considers the exceptional circumstances that warrant the release of a small and carefully considered quantum of land from the Green Belt. This topic paper confirms that some Green Belt land will be required to be released for development and for the borough to meet its growth objectives, including accommodating the identified need for housing and employment. We support this approach and consider that the site represents a suitable site for Green Belt release to support the council's growth objectives.

The Green Belt and MOL Assessment - Final Report 2021 and appendices undertakes an assessment of the site, in the context of its potential Green Belt release. The site falls within the area identified in the report as EN31. EN31 is 6.85 ha and the site is approximately 4.11 ha of this area. It comprises of all the land within EN31 other than the northern section, which includes the Turkey Brook, which is designated as land of Metropolitan Importance for Nature Conservation.

The report recognises that the land *“is isolated, adjacent to inset urban area and has clear readily recognisable woodland and road boundaries”* and therefore concludes that the harm of releasing the land from the Green Belt is moderate (Table 8.10: Green Belt and MOL harm assessment summary table). We consider that the harm of the release of this land is less than this, and this is discussed further below.

The appendices to the report set out a more detailed assessment. It considers and assesses the site in the context of its contribution to the Green Belt and the potential harm of its release. The table below provides a summary of this assessment, together with DWD’s further comments:

Contribution to GB purpose	Summary by LB of Enfield	LB of Enfield conclusion	DWD comments
Purpose 1 - Check the unrestricted sprawl of large built-up areas	Land is adjacent to the large built-up area of Greater London, it is open and there is moderate distinction between the parcel and the urban area.	Relatively strong	<p>Whilst the site itself is undeveloped, it is positioned immediately to the north, east and west of urban development (housing, garden nursery, school, Enfield Cemetery).</p> <p>Great Cambridge Road (A10) provides a clear distinction between the Green Belt to be retained to the east (Enfield Crematorium) and the site, which we consider should be released from the Green Belt. New River and Turkey Brook and the wooded boundary also provide clear distinctions between the site and neighbouring land.</p> <p>Whilst the site is undeveloped it is scrubland, covered in weeds and not accessible or pleasant to look at a result of it being very overgrown (as shown on the photographs attached at <b>Appendix 1</b>)</p>
Purpose 2 - Prevent neighbouring towns merging into one another	Land does not lie between neighbouring towns	Weak/ no contribution	<p>We agree with this conclusion.</p> <p>As identified by the assessment, the site serves no contribution in preventing neighbouring towns from merging. The release of the site from the Green Belt would not result in</p>

			neighbouring towns merging, it would instead provide a natural extension to the urban development immediately to the south.
Purpose 3 - Assist in safeguarding the countryside from encroachment	Land is open countryside and there is moderate distinction between the parcel and the urban area.	Relatively strong	<p>The site cannot be considered to provide open countryside as it is currently overgrown scrubland with weeds and has been used for fly tipping as a result of this. It also has urban development to the south, east and west.</p> <p>Photographs of the site at <b>Appendix 1</b> show that views beyond the site are urban in character, looking towards houses and roads. The site is contained by the existing built development and roads that boarder the site. The site is considered to be in an urban environment as opposed to open countryside. The existing built development that borders the site creates a perception of encroachment on to the site.</p> <p>The site is considered to be unsightly and its appearance does not have a positive impact on the neighbouring Green Belt land to the west. The site is also not currently accessible.</p> <p>The terrace properties on Severn Drive and their rear gardens back directly on to the site. The extension of development to the north provides a natural extension to the urban area.</p> <p>The land to the north of the site, where Turkey Brook is located and which is designated as land of Metropolitan Importance for Nature Conservation should be protected. The inclusion of open space on the northern part of the site, in the future masterplan will mitigate the impact on this designated land and ensure that this land to the north is</p>



			<p>protected and enhanced by the development.</p> <p>We therefore question the conclusion that the site serves Purpose 3 'Relatively strongly'.</p>
<p>Purpose 4 - Preserve the setting and special character of historic towns</p>	<p>The parcel does not have a physical or visual relationship with historic London, including historic assets recorded as making a contribution to its setting and special character.</p>	<p>Weak/ no contribution</p>	<p>We agree with this conclusion.</p>
<p>Purpose 5 - Assist in urban regeneration, by encouraging the recycling of derelict and other urban land</p>	<p>All Green Belt land is considered to make an equally strong contribution to this purpose.</p>	<p>Strong</p>	<p>It has been identified as necessary to release land from the Green Belt in Enfield. Furthermore, where land no longer functions as Green Belt, it should be released to ease pressure on urban land and the densities of development required to meet housing and other economic targets, and to enable a range of housing types to be delivered.</p> <p>The site offers a location for well planned development that offers the opportunity to provide open space as part of the development proposals, which will be open space that is better quality and more accessible than is currently the case.</p>
<p><b>Harm of Release</b></p>	<p><b>Summary by LB of Enfield</b></p>	<p><b>LB of Enfield conclusion</b></p>	<p><b>DWD comments</b></p>
<p>Impact on distinction of adjacent Green Belt land</p>	<p>The expansion of the existing urban edge of Greater London into the parcel would require the release of the Green Belt land to the east, as this area would become cut off from the wider Green Belt, and the Green Belt land to the north as this area would become significantly contained and</p>	<p>No/Negligible</p>	<p>We agree with this conclusion. The site could be released, providing a logical but limited extension to the urban area to the south, whilst not compromising the Green Belt to the west, continuing to serve its purpose.</p>

	<p>almost cut off from the wider Green Belt to the west. Release of this parcel in conjunction with the land to the east and north would have a negligible impact on the distinction of adjacent Green Belt to the west due to its containment and the regularity of the partially raised and wooded western boundary following the New River. Therefore, overall, release of the area to the east of the New River would have a negligible impact on the distinction of the adjacent Green Belt land to the west.</p>		
Harm	<p>The parcel makes a relatively strong contribution to Green Belt purposes 1 and 3 but its release would have a negligible impact on the distinction of the adjacent Green Belt land to the west. Therefore, overall, release of the parcel is likely to result in moderate Green Belt harm.</p>	Moderate	<p>As set out above, we question the conclusions with regard to how well the site serves purposes 1 and 3 of the Green Belt and also the overall conclusion that the Harm is 'Moderate'.</p> <p>Other land parcels surrounding the site's potential release is designated as 'Low-Moderate' (EN36) and 'Low' (EN33, EN34, EN35). When looking at these parcels and the Council's assessment of them, we consider that the subject site's scoring should align with these parcels. We consider that the site's removal from the Green Belt would cause 'Low' harm.</p>

Paragraph 8.41 of the Topic Paper advises that:

*“The ELP aims to mitigate the loss of Green Belt by ensuring schemes maintain any physical boundaries that provide visual and functional separation from the Green Belt and enhance these where possible. This ensures clear delineation between the built form of new development and the openness of the Green Belt. Schemes will be expected to incorporate effective landscaping schemes and buffers, where required, to create appropriate transitions.”*

The development on the site will not have a visual impact on the wider Green Belt, because it is proposed that as part of the masterplan and site's delivery extensive greening along the northern and western site boundaries will be delivered to provide a landscaped buffer. This will ensure that the visual and functional boundary between the site and the Green Belt and the designated Metropolitan Importance for Nature Conservation are clearly defined. This will also create separation between the built development and designated land to the north and west.

Paragraph 8.42 of the topic paper advises that: publicly

*“The location of the sites adjacent to existing built up areas also ensures existing services and facilities are more accessible, which encourages the use of sustainable modes of transport such as walking and cycling. All new development is expected to promote walking and cycling by improving accessibility existing public rights of way, footpaths and cycling routes.”*

The site currently acts as a barrier to movement, with no access through it. The delivery of the site offers the opportunity to create new pedestrian and cycle links within the site. It also provides the opportunity to improve east to west connectivity from the A10 to Forty Hill and connectivity to the north by connecting into the existing pedestrian pathway immediately to the north of the site and providing a further east west cycle/ pedestrian pathway.

To encourage sustainable transport by those travelling to and from the new homes and church/ community facilities, it is expected that a new bus stop at the site will be provided and enhancements to existing bus routes introduced (or possibly new bus routes introduced), to help improve sustainable accessibility.

The development of the site will also make a contribution towards the creation of the Green Loop (as identified in the recently adopted Enfield Blue and Green Strategy) along Turkey Brook to connect the development to the wider strategic green grid network, especially local landmarks such as Forty Hall, Enfield Chase and Lee Valley Regional Park. The development will support the policy initiatives of draft policy BG1 (Enfield's blue and green infrastructure network), which seeks to ensure that proposals contribute to the creation of a more integrated, multifunctional and accessible blue and green infrastructure network.

The release of Green Belt land will also enable this site to be made more accessible and useable by the public. Paragraph 8.48 of the topic paper states that:

*“Access to public open space will also be enhanced through the on-site provision of open space on sites proposed to be released from the Green Belt. This may include Local Equipped Areas of Play (LEAPs), outdoor gyms and other facilities to encourage and active lifestyles in areas that were previously inaccessible.”*

Currently the land is not accessible or used by the public. The release of the land from the Green Belt and allocation for mixed use development will enable part of the site to be delivered as a publicly accessible open space, which can include equipment to encourage active lifestyles and opportunities for community growing and allotments, as well as features to enhance wildlife and vegetation. The publicly accessible open space is expected to be located in the northern and western parts of the site.

The area of open amenity land to the north of the site has been defined as of “low quality but high value” in the Blue and Green Infrastructure Audit (Figure 7.11 of the Audit) and would clearly benefit from enhancement. There are also large areas of open space deficiency in the residential areas to the

south and east of the site. The site is also identified as having low natural amenity value. The development of the site also provides an opportunity to address play provision deficiencies in the area (the existing facilities in the Turkey Street ward performs poorly against quality and value benchmarks).

It is considered that the land should be removed from the Green Belt designation. A further assessment of why the site is not considered to perform the functions of the Green Belt, as set out in the NPPF was included in the February 2021 Call for sites submission, that we submitted on behalf of our client. An extract from this letter is provided at **Appendix 5**, which justifies the release.

The site is also currently designated as local open space. For the same reasons as the site is identified to not meet the purposes of the Green Belt and also because the land is not accessible to the public or able to be enjoyed by the public. It is also considered that the current local open space designation is not appropriate. It is considered that the local open space designation should be removed from the entire site but that as part of the future development of the site, that part of the land will be re-delivered as local open space. This is expected to be land on the north and west of the site. The land to be redesignated as local open space will be established as part of the masterplan for the site.

The development will also make an important contribution to the vision and principles of the National Park City, acting as an important gateway into the borough from the north east along the main arterial road into London from the M25 (A10). It will provide significant environmental net gains in the form of new publicly accessible open space; ecological enhancements to the existing wildlife corridor along Turkey Brook; urban greening; tree-lined roads/avenues; allotment or community garden space in association with the existing food bank; expansion of the Green Loop and landscape buffers along its edge. The Green Loop will provide improved access to the Lee Valley Regional Park and open countryside to both existing and new residents, especially east to west links, which is identified as a strategic priority in the adopted Blue and Green Strategy and emerging draft Local Plan. The development also provides an opportunity to make more of the attractive blue and green assets in this area, such as the new River, The Dell and Turkey Brook.

### Initial Masterplan

It is considered by our client that the site offers the potential for the comprehensive delivery of a viable mixed use development, with housing, a church and community space and publicly accessible open spaces.

A high level indicative masterplan has been prepared by Paul Henry Architects and are attached at **Appendix 6** to inform further engagement with the council.

The illustrative masterplan proposes to deliver a mixed use community that will include:

- A Community building on the eastern part of the site which will provide a permanent home for Jubilee Church and a community hub, which will provide a base for a range of new and existing community initiatives including Enfield Food Bank. Outside spaces will be provided to support this use and to facilitate outdoor community initiatives and projects. Vehicle and cycle parking to serve this use will be delivered as undercroft or basement parking, so that it is not visible and to reduce the footprint of this element of the development.
- Residential development of at least 270 new homes in the centre of the site and along the southern boundary providing an extension to the existing residential development to the south. This will include both terraced townhouses and flats. Vehicle and cycle parking to serve

this use will be delivered as undercroft or basement parking, so that it is not visible and to reduce the footprint of this element of the development. Shared amenity and private amenity spaces to support these uses will also be delivered.

- All built development will be designed to meet low carbon and sustainability objectives and be innovatively designed to ensure that the built development sits appropriately in the site's context and is in keeping with the character of the local area.
- Pedestrian and cycle links across the site will be provided to create connectivity within the site and to Turkey Brook to the north and to Forty Hills to the west.
- The masterplan seeks to promote sustainable transport, introducing a new bus stop on the site to serve the residential and church/ community uses and to limit reliance on the car. Whilst vehicle parking will be required on the site, this will be undercroft and basement car parking to reduce its visibility and positioned to limit the parts of the site where cars can travel to, to instead enhance pedestrian and cycle movements.
- Public open space of which a significant proportion of this land is expected to be designated as local open space. The layout and design of this element of the development will be progressed as the masterplan is development. It is expected that the land will provide pedestrian and cycle pathways; equipment to encourage active lifestyles; children's play equipment; community growing and allotments; and features to enhance biodiversity and wildlife.
- The proposed delivery of greening/ public open space along the northern and western site boundaries in the masterplan will provide a landscaped buffer to the neighbouring land. This will ensure that the visual and functional boundary between the site and the Green Belt to the west and the designated Metropolitan Importance for Nature Conservation to the north are clearly defined. This will also create separation between the built development and designated land. It is expected that this land will be re-designated as local open space, to ensure the long term protection of the land for this use.

The current masterplan is illustrative and will be progressed further forward by the project architect. Our client would welcome the opportunity to engage with the council on the masterplan and its phasing, to enable the illustrative masterplan to be refined.

### **Conclusion**

Overall, the site is considered to represent a suitable, available and viable housing-led mixed-use development site and should continue to be allocated in the next version of the draft Enfield Local Plan for mixed-use development.

The allocation of the site will facilitate the opportunity to bring forward housing, including family homes, affordable homes and accessible public open space. It will also facilitate the provision of a much needed community hub offering co-location opportunities (e.g. shared spaces) to a range of local organisations in a largely urbanised area, which suffers from acute levels of social and economic deprivation relative to other parts of London. There is an urgent need to improve access to community facilities and open spaces within this area due to the ongoing pressures from Enfield's expanding population and physical severance, such as surrounding road and rail routes. New or additional community facilities are required to support additional homes in this area and meet future needs (as set out in the adopted North East Area Action Plan).

The existing church has a relatively young and multi-cultural congregation and very much reflects the ethnic diversity of the borough. However, there are no other suitable locations in the borough which are available and offer sufficient space to meet the needs of the church and its congregation, despite an extensive land and property search.

Combining housing with active social and community uses offers the opportunity to create a truly sustainable community in the heart of Enfield in a prominent and highly accessible location on the edge of the urban area.

It will transform an area of vacant and underused scrubland, which is unsightly and provides no tangible benefit to the community. It is not considered to serve the purposes of the Green Belt or local open space designation. We consider that these allocations should be removed in the next version of the draft Enfield Local Plan. As part of the development of the site, part of the land will be able to be re-delivered as local open space which much better meets the needs of locals and serves the purposes of the designation, than the land in its current state.

The initial discussions that have taken place with Enfield have been constructive and the draft Local Plan confirms the council's support for mixed use development to come forward on this site.

Our client is committed to the delivery of this site. Our client would welcome the opportunity to discuss the site further with officers at the council. Key matters that we would like to discuss with officers, to inform work developing the masterplan for the site, include:

- the site's capacity for housing and the mix and type of housing, including affordable housing;
- infrastructure requirements, both on and off site, including education and healthcare facilities;
- highways works strategy;
- the layout of the site including the position of the church, housing and publicly accessible open space; and
- phasing strategy.

If the relevant officer is able to make contact with me, once you have had the opportunity to review the attached, we would welcome the opportunity to arrange a convenient time to further discuss the site and the draft masterplan, together with my client and the project architect.

We would also like to work with you to prepare a statement of common ground to agree on the key infrastructure and delivery requirements of the site through the Local Plan process, prior to its submission to the secretary of state.

Should you have any questions in the meantime or if you require further information as part of this submission, please do not hesitate to contact me.

Yours faithfully,



## Appendix 1 – Photographs of the site



Photographs of the site













**Appendix 2 –Letter prepared by David Pask, Executive Pastor at Jubilee Church**





22 February 2021

To whom it may concern

My name is David Pask and I am the Executive Pastor of Jubilee Church. This letter provides some headline information on Jubilee Church and also details some of the existing community projects that the church is already undertaking in Enfield.

### **JUBILEE CHURCH**

Jubilee Church is a local Enfield church that was planted in 1994 with a handful of members and now has grown significantly to gather 2,000 Enfield people each Sunday to worship services for encouraging and uplifting messages and times of community together. The church is a very diverse church by way of nationality (over 100 different nationalities) and by way of age. The church has many young adults and young families.

Above all, Jubilee Church is a community church and places great value on serving the wider community of Enfield, especially those who are most vulnerable and in need.

Community Projects that the church currently undertakes and plans to continue to undertake although we would need a permanent base in the borough to ensure this, would include:

### **THE ENFIELD FOODBANK**

Jubilee Church has been running the Enfield Foodbank for the past 10 years.

In 2020 alone, 165,000 meals were given away to Enfield people.

The church pays for the staff and provides the premises.

The foodbank works with 200 Foodbank volunteers as well as social workers, the council, schools and over 180 front line agencies in Enfield



### **ENFIELD DEBT CENTRE**

Established in early 2020, the Enfield Debt Centre provides support and pathway out of the pain of debt. The Debt Centre is run by Jubilee Church, including a paid member of staff and has 10 trained Debt Advisors and is in the process of increasing the number to 20. The service is provided both online and at the church premises. The service is available to any Enfield resident in the borough and is free of charge.

### **M6:8 DOMESTIC ABUSE CRISIS SUPPORT**

The domestic abuse initiative helps any victim of domestic abuse in Enfield.

In the past year 60 families have been rehoused, 345 people have been helped and supported. Jubilee Church pays for the staff and supports the volunteers

### **ENFIELD SCHOOL UNIFORM PROJECT**

This scheme run by Jubilee Church provides new school uniforms free of charge to those children who cannot afford a uniform.

We work with 10 Enfield schools and the scheme allows for 170 children to be provided for each academic year

### **EMPLOYMENT SUPPORT COURSE – RE:WORK**

This course was set up during the pandemic and has proved to be very helpful for people by way of helping with cv writing/ interview skills and general support. It is free of charge and open to the whole community and promoted at job centres etc. It requires a paid member of staff who is paid for by the church.

### **FUEL BANK (GAS AND ELECTRICITY)**

The Fuel Bank provides support to Enfield people who find themselves in fuel poverty. Referrals are received from local Enfield partners such as CAB, GP's, Social Workers etc. The team then provide vouchers for electricity or gas





## **YOUTH**

In addition to the community projects above, the church carries out a lot of work with the Youth in Enfield. A positive and encouraging environment is provided throughout the year and regular projects take place such as mentoring in schools, counselling, advice on knife crime, apprenticeships with employers etc

Sincerely

David Pask  
Executive Pastor  
Jubilee Church

**Appendix 3 – Letter prepared by Tom Mulligan regarding Land Acquisition**



**TOM  
MULLIGAN  
LAND**

The Pill Box (Suite 206)  
115 Coventry Road  
Bethnal Green  
London E2 6GG

t: 020 7438 2011  
e: land@tmland.co.uk  
w: tmland.co.uk

Emma Penson  
D.W.D  
6 New Bridge Street  
London  
EC4V 6AB

9<sup>th</sup> September 2021

Dear Emma

## **LAND ON THE WEST SIDE OF GREAT CAMBRIDGE ROAD, ENFIELD, EN1 4DS**

TM Land has been appointed by Jubilee Church and Forty Leisure Limited to engage with Haringey Council on the freehold acquisition of the land. Forty Leisure Limited currently has a leasehold interest in the land that has an unexpired term of 9 years. The shares of the Forty Leisure Limited are 100% owned by Jubilee Church London Ltd.

### **1. Jubilee Church London Ltd**

Jubilee Central  
2 Lumina Way  
Enfield  
EN1 1FS  
Company number **08864205**

### **2. Forty Leisure Limited**

Jubilee Central  
2 Lumina Way  
Enfield  
EN1 1FS  
Company number **02824450**

In our discussions with Haringey, they have advised that they will consider a sale of the freehold to our client, if the land is included in the Draft Local Plan, following the call for sites.

After several conversations with Nick Papapavlou MRICS of Strategic Property Haringey Council, we received the attached email.

Nick confirmed Haringey are seriously considering our client's proposed purchase of the freehold as a special case.

Special Specific Reasons for Haringey to proceed with sale to the current tenant of the land include:

1. **Its not within the boundary of the Borough of Haringey**, so its not political nor against any land sale policies. This could be a constraint on the sale if the land was actually within the borough of Haringey itself.
2. **One off opportunity for a large receipt now for Haringey**. Without planning the site has nominal value, as the current rent is very low, and when the current lease ends in 9 years' time, the planning position may be different or there may not be an exceptional circumstance/ need at that time to warrant the release from the Green Belt. Therefore, there is currently considered to be a window of opportunity for the sale of the land. If it is not sold to the church, a significant financial receipt to Haringey could be lost forever. They don't want that.

We are scheduling a meeting with L B Haringey in October 2021 are confident that we will be able to reach a positive outcome with Haringey. Our client is committed to the land acquisition, or if they prefer an alternative joint venture deal solution that works for them.

TM Land will be continuing to engage with Haringey over the coming weeks and months to seek to agree the land acquisition. If the London Borough of Enfield would like to further speak with us in connection with our progress on the land acquisition in the coming weeks and months, we would be very pleased to engage. Please contact me on 07738 185313

**From:** Papapavlou Nick <[Nicholas.Papapavlou@haringey.gov.uk](mailto:Nicholas.Papapavlou@haringey.gov.uk)>

**Date:** Monday, 9 November 2020 at 11:25

**To:** TM LAND <[tom@tmland.co.uk](mailto:tom@tmland.co.uk)>

**Subject:** RE: The Land West of the Great Cambridge Rd, within the L B Enfield.

Morning Tom and apologies for the late reply

Thanks for the attached, which is very useful

Whilst this is being considered internally, this will be very much dependent on the outcome of the call for sites

How about we sched a quick catch up late in the week, say Fri ?

Best

Nick Papapavlou MRICS

for

Strategic Property

Haringey Council

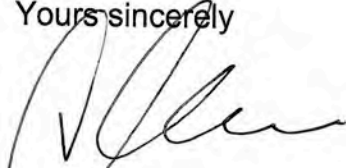
River Park House

225 High Rd

London  
N22 8HQ

Tel 020 8489 2193"

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Mulligan', written over a faint circular stamp or watermark.

Tom Mulligan  
Director

**Appendix 4 – Letter prepared by Tom Mulligan Land regarding site Search**





**TOM  
MULLIGAN  
LAND**

The Pill Box (Suite 206)  
115 Coventry Road  
Bethnal Green  
London E2 6GG

t: 020 7438 2011  
e: [land@tmland.co.uk](mailto:land@tmland.co.uk)  
w: [tmland.co.uk](http://tmland.co.uk)

Emma Penson  
DWD  
6 New Bridge Street  
London  
EC4V 6AB

Dear Emma

22 February 2021

TMLand have been retained to act for The Jubilee Church to find a location for the church to occupy within the London Borough of Enfield. We understand that the church has also previously retained agents to acquire properties for them.

### **Summary**

TMLand have carried out an extensive search utilising various approaches to sourcing a new facility for the church. We have spoken with the agents, landlords and developers. We have also sent out request on our mailing lists.

Despite a significant search to date TMLand have not been able to find any suitable, viable available buildings. Primarily this is due to planning challenges of strategic industrial areas and a lack of suitable opportunities outside of these protected areas. We are continuing our search however it has become clear there are limited options within the borough.

### **Requirement**

TMLand have been instructed to source a suitable building that is either a freehold purchase or a rental property. The property would need to accommodate the church which typically has around 2000 people attend regularly every Sunday. It has been established that in order to accommodate this capacity the building would need to be circa 40,000-50,000 sq.ft. with an F1 use class (Place of Worship). The majority of the accommodation would also need to be over one floor. Additionally, the property would need good access links to transport and to have parking available, preferably onsite or in close proximity.

### **TMLand Experience**

TMLand and its team are highly experienced land agents who have carried out over 100 acquisitions with Development values totalling in excess of £1.5m across London. More information can be found on our website [www.tmland.co.uk](http://www.tmland.co.uk)



## TMLand Search

The search has targeted both existing buildings as well as sites that could be suitable through a change of use or redevelopment. As part of the search, we have directly approached landowners, spoken with local active commercial agents and advertised the requirement to our mailing lists of landlords, agents and developers.


The majority of properties that naturally fit the above requirements are industrial buildings. Enfield in nature has number of industrial buildings and industrial estates that are clustered together. Having considered a number of these it became apparent that it would be against planning policy to change the use of these sites to F1. This is because the majority of industrial buildings are located in Strategic Industrial areas and are therefore protected by planning policy. Once we removed Strategic industrial Areas from our search it greatly reduced the number of available properties that we could approach.

Focusing on buildings outside the Strategic industrial Area provided limited options which fit the churches requirements. The number of these properties that are vacant or available are limited even further.

Subsequently we have also targeted Event spaces within Enfield which have a similar use and amenities, for a purchase or letting. However, the rental levels needed to take the space on a Sunday (one of their busiest days) is not viable, we were quoted a rental price of £1,200,000 per annum to rent a 45,000 sq.ft. space for one day a week.

We are continuing to search however the number of suitable buildings which are available are limited within Enfield.

Kind Regards



Richard Parkin-Mason

TMLand

[Richard@tmland.co.uk](mailto:Richard@tmland.co.uk)

020 7438 2011

## Appendix 5 – Green Belt Assessment

**Extract below taken from DWD letter of representation submitted on behalf of our client in February 2021, as part of the Call for sites submission. Note: Paragraph references in the NPPF therefore relate to the former 2019 NPPF as opposed to the 2021 version.**

The purpose of the Green Belt is set out in the NPPF and the allocation of the Green Belt is implemented via the Local Plan and the local planning authority. Section 13 of the NPPF sets out the policies for protecting Green Belt land. Paragraph 133 of the NPPF defines that the fundamental aim of the Green Belt land is *‘to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence’*.

The NPPF at paragraph 134 outlines that the *‘Green Belt serves five purposes:*

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

Paragraph 138 states that *‘Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.’*

Paragraph 139 states that *‘When defining Green Belt boundaries, plans should:*

- a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*
- b) not include land which it is unnecessary to keep permanently open;*
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.’*

Section 5 of the National Planning Policy Framework 2019 (NPPF) sets out the Government’s objective to significantly boosting the supply of housing. Specifically, paragraph 67 states that *‘planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.’*

Paragraph 92, Section 8 of the NPPF, confirms that local planning authorities should plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places,

sports venues, open space, cultural buildings, public houses and places of worship) and other local services.

### Assessment of Green Belt designation

The openness of Green Belt land is identified in the NPPF as one of its essential characteristics. In this respect, the release of the Green Belt designation and potential development of the site needs to be assessed against the effect on the openness of the Green Belt. As noted above, the site is immediately bordered by residential development to the south, and sites to the east and west both contain built development such as a primary school, plant nursery and Crematorium. In this respect, the extension of built development onto the site is unlikely to detract from the open characteristic in this location which already contains substantial built development.

Paragraph 134 of the NPPF sets out the five purposes that Green Belt land should serve. We have assessed the land in relation to these five purposes below:

*a) To check the unrestricted sprawl of large built-up areas;*

An alteration to the Green Belt boundary to include the site would not result in the unrestricted sprawl of a large built up area. It would create a natural extension to the existing built development to the south. The unrestricted sprawl would be precluded by the existing recognisable landscape and built features comprising of New River to the west, Turkey Brook to the north and the A10 to the east. For this reason, the proposed amended Green Belt boundary would result in a suitable measure against unrestricted sprawl.

*b) To prevent neighbouring towns merging into one another;*

The existing built up areas of Enfield, Chase Side and Freezywater are already connected by built development. The release of this Green Belt site would not result in any new or additional merging of neighbouring towns.

*c) To assist in safeguarding the countryside from encroachment;*

The land to the west of the site and beyond Forty Hill comprises of undeveloped fields and open farmland. This land is considered to serve the purposes of the Green Belt. The subject site, however, is separate to this and is proximate to development comprising of residential houses, schools, plant nursery and Enfield Crematorium. As a result of the land uses immediately surrounding the site, its separation from the open and undeveloped Green Belt land to the west and due to the existing recognisable landscape and built features that surround the site (identified above), we consider that the de-designation of Green Belt land at the site would not result in any encroachment of development into the countryside.

*d) To preserve the setting and special character of historic towns; and*

Green Belt land also serves the function of preserving the setting and special character of historic towns. The site is located outside of the town centre and Enfield is not a historic town. The removal of the site from the Green Belt designation will not adversely impact on this as a result of its location.

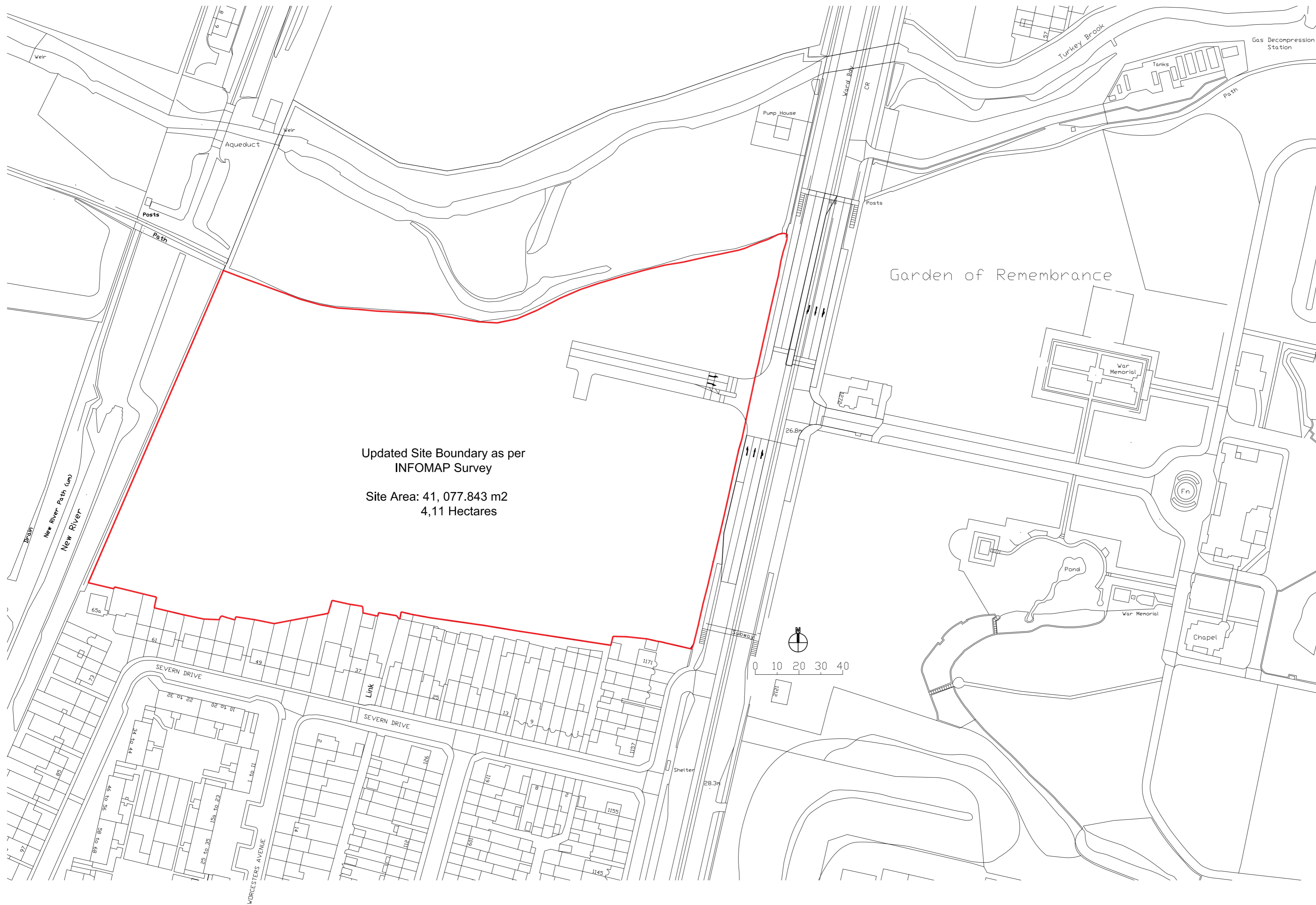
*e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'*

Whilst the site is located in the Green Belt, it has been previously been used as a gravel pit, planning permission has been granted for other uses on the site in the past and on two separate occasions in recent years there has been fly tipping on the site. The site does not therefore comprise of fields or beneficial open land, the designation and allocation of the site would help encourage the recycling of a derelict site.

The above assessment highlights why we consider that the site is no longer performing the functions of Green Belt land as set out in the NPPF, regional and local policy, and why it should be released from the Green Belt designation.

**Appendix 6 – Illustrative Masterplans prepared by Paul Henry Architects**





Updated Site Boundary as per  
INFOMAP Survey  
Site Area: 41, 077.843 m2  
4,11 Hectares

**RIBA Plan of Work  
Stage 0 and 1**

•	Issued For Discussion	13.09.21	PHA
•	Issued For Discussion	08.09.21	PHA
Rev	Description	Date	Chkd



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Client  
Jubilee Church London

Job Title  
Proposed Master Plan Development at  
A10 Great Cambridge Road, Enfield, EN1 4DS

Drawing Title  
OS Map (Location Plan)

Scale 1:1250	Sheet A2
Date 29.08.2021	Drawn by ALM
	Check by PH
Dwg No. 2000-000	Rev -



**Note:** Masterplan for publicly accessible open space to be progressed to provide equipment to encourage active lifestyle, Childrens play equipment, community growing + allotments, features to enhance biodiversity + wildlife

**KEY**

	Publicly Accessible Open Space
	Shared Amenity / Private Garden to Support Housing (Not Accessible to the Public)
	Illustrative Tree Planting / Landscaping
	Proposed Pedestrian Path / Cycle Path
	Internal Road
	Development Zones

High Level Illustrative Master Plan  
Development For Discussion with All Project Stakeholders

RIBA Plan of Work  
Stage 0 and 1

A	Issued For Discussion	13.09.21	PHA
-	Issued For Discussion	08.09.21	PHA
Rev	Description	Date	Chkd



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Client  
Jubilee Church London

Job Title  
Proposed Master Plan Development at  
A10 Great Cambridge Road, Enfield, EN1 4DS

Drawing Title  
Proposed Site Plan \_ Massing Study - Sheet 02

Scale 1:500	Sheet A1
Date 29.08.2020	Drawn by ALM
Drg No. 2000-001A	Check by PH
	Rev A





**Note:** Masterplan for publicly accessible open space to be progressed to provide equipment to encourage active lifestyle, Childrens play equipment, community growing + allotments, features to enhance biodiversity + wildlife

**KEY**

	Publicly Accessible Open Space
	Shared Amenity / Private Garden to Support Housing (Not Accessible to the Public)
	Illustrative Tree Planting / Landscaping
	Proposed Pedestrian Path / Cycle Path
	Internal Road
	Development Zones

High Level Illustrative Master Plan  
Development For Discussion with All Project Stakeholders

RIBA Plan of Work  
Stage 0 and 1

A	Issued For Discussion	13.09.21	PHA
-	Issued For Discussion	08.09.21	PHA
Rev	Description	Date	Chkd



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Client  
Jubilee Church London

Job Title  
Proposed Master Plan Development at  
A10 Great Cambridge Road, Enfield, EN1 4DS

Drawing Title  
Proposed Site Plan \_ Massing Study - Sheet 01

Scale 1:500	Sheet A1	Drawn by ALM	Check by PH
Date 29.08.2020			
Drg No. 2000-001			Rev A







2 Reference Image - 02  
Scale: NTS @ A1



3 Reference Image - 03  
Scale: NTS @ A1



1 Reference Image - 01  
Scale: NTS @ A1



4 Reference Image - 04  
Scale: NTS @ A1

High Level Illustrative Master Plan  
Development For Discussion with All Project  
Stakeholders

RIBA Plan of Work  
Stage 0 and 1

Rev	Description	Date	Chkd
-	Issued For Discussion	13.09.21	PH
-	Issued For Discussion	08.09.21	PH



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Client  
Jubilee Church London

Job Title  
Jubilee Church  
A10 Great Cambridge Road, Enfield, EN1 4DS

Drawing Title  
Proposed Project Precedence Images -  
Sheet 01

Scale	Sheet		
NTS	A1		
Date	Drawn by	Check by	
29.08.2021	ALM	PH	
Drg No.	Rev		
2000-003	-		





2 Reference Image - 02  
Scale: NTS @ A1



3 Reference Image - 03  
Scale: NTS @ A1



1 Reference Image - 01  
Scale: NTS @ A1



4 Reference Image - 04  
Scale: NTS @ A1

High Level Illustrative Master Plan  
Development For Discussion with All Project  
Stakeholders

RIBA Plan of Work  
Stage 0 and 1

-	Issued For Discussion	13.09.21	PH
-	Issued For Discussion	08.09.21	PH
Rev	Description	Date	Chkd



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Client  
Jubilee Church London

Job Title  
Jubilee Church  
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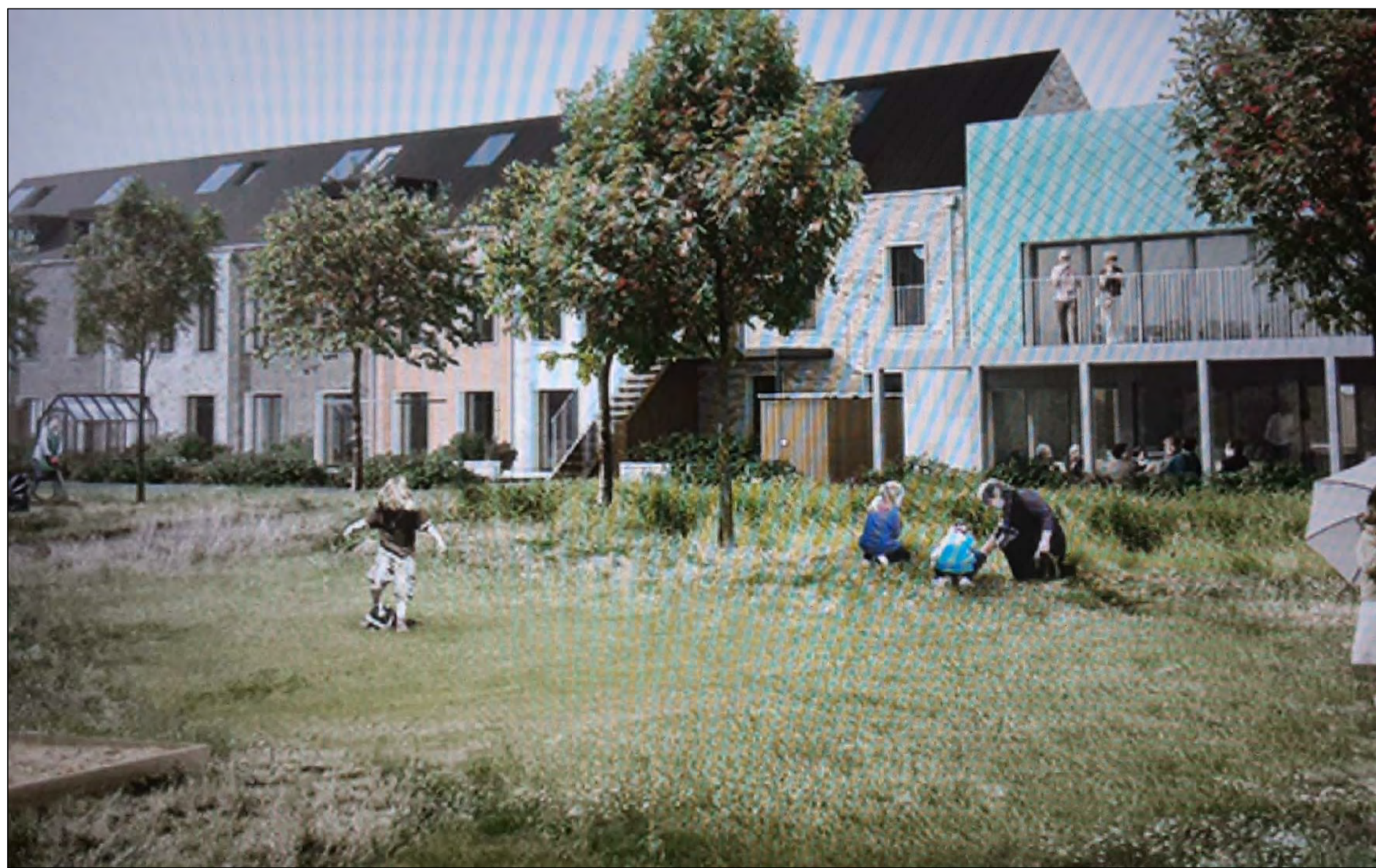
Drawing Title  
Proposed Project Precedence Images -  
Sheet 02

Scale NTS	Sheet A1	
Date 29.08.2021	Drawn by ALM	Check by PH
Drg No. 2000-004		Rev -





2 Reference Image - 02  
Scale: NTS @ A1



1 Reference Image - 01  
Scale: NTS @ A1



3 Reference Image - 03  
Scale: NTS @ A1

High Level Illustrative Master Plan  
Development For Discussion with All Project  
Stakeholders

RIBA Plan of Work  
Stage 0 and 1

Rev	Description	Date	Chkd
-	Issued For Discussion	13.09.21	PHA
-	Issued For Discussion	08.09.21	PHA
-	Issued For Discussion	23.02.21	PHA



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Drawing Title  
Proposed Project Precedence Images -  
Sheet 03

Scale	Sheet		
NTS	A1		
Date	Drawn by	Check by	
18.02.2021	ALM	PH	
Drg No.			Rev
2000-005			-