

Strategic Planning and Design,
Enfield council,
Freepost,
EN1 3BR

10 September 2021

Dear Sir/Madam,

REPRESENTATIONS TO DRAFT ENFIELD LOCAL PLAN 2019 – 2039 (AUGUST 2021)

This submission is made by Carter Jonas on behalf of London City Mission (our client) in respect of the Regulation 18 Consultation of Enfield Council's Draft Local Plan 2019-2039.

Carter Jonas are currently promoting sites within the ownership of the London City Mission for residential led mixed use development and this submission is consistent with an earlier Call for Sites representation submitted to the Council in October 2019 which supported the allocation of a proposed development site on Elsing Road for mixed residential and community uses.

Introduction

London City Mission (LCM) works alongside churches across London to share the love of God and the good news of Jesus Christ with the least reached people in the city – people living in some of London's most deprived areas, or on the very margins of society. For example, they work with:

- Those living or working on the streets;
- Families struggling to make ends meet;
- Older people who are lonely and isolated in their homes;
- Young people who lack self-esteem, live in fear of knife and gun crime, or suffer from mental ill-health.

LCM is committed to providing practical, relational and spiritual support, making the most of every opportunity to share the good news of Jesus in both their words and actions. This is as true now, as when they were founded in 1835.

London City Mission: How They Work

London City Mission welcomes people from all faiths, cultures and backgrounds into their projects, as they seek to build friendships, help out practically, pray and share the hope of Jesus. By way of example, they do this by:

- Working with people who are homeless – in their day centre at Waterloo, in hostels, on the streets, at church drop-ins in Kings Cross and Camden, through their support of the church winter night shelters, and through their supported tenancy programmes;
- Providing free toddler groups – on some of the city's most deprived estates and communities;
- Providing mentoring programmes – for young people who are at risk of being involved in gang culture and violence;

- Visiting and befriending people – who may be in their later years of life and are often housebound, lonely and isolated;
- Hosting community events – from weekly drop-in lunches, termly poetry nights, free English classes and sewing groups.

Many of the communities in which LCM works are made up of people from a range of cultures and nationalities. Social cohesion is an important issue in London and LCM addresses this by working to cross boundaries and bring communities together. Other key issues that LCM addresses through their work are:

- Homelessness & housing;
- Families and young people;
- Loneliness.

With around a third of the city – c.2.5m people – living on the margins, LCM helps to equip churches to do this kind of work too, so that more people can be reached.

London City Mission: Property Development Programme

London City Mission has a diverse property portfolio which is managed to run ministry projects, generate income which is ploughed back into ministry, and to house LCM's missionaries and retired staff.

London City Mission property development programme across the city will:

- Create more homes, including affordable homes;
- Improve community space;
- Help sustain the work of the Mission across London for the long-term.

Site Background

The Site is approximately 0.12ha in size, located on the corner of Elsing Road and Turkey Street and currently comprises one single storey building. The Site is well-connected to existing public transport links with the Greater Cambridge Road (A10) to west and a number of railway stations and bus stops in close proximity. Local amenity and public open space can be found at Elsing Park, a local park and garden, which sits 300m north of the Site.

The Site is currently owned in its entirety by the London City Mission and operates as a day nursery. The currently underutilised site represents a sustainable brownfield development opportunity to provide a residential led mixed use development. This type of site should be prioritised by Local Authorities for redevelopment.

The NPPF at page 66 advises that in order for sites to be considered deliverable, it should:

- a) Be available now – *it is*;
- b) Offer suitable location for housing development – *it is a brownfield Site with close proximity to local facilities and would therefore be a suitable location for development*;
- c) Be achievable with a realistic prospect that housing will be delivered within five years – *it is available now*; and
- d) Be viable for development – *initial feasibility studies undertaken for development of the Site indicate that the Site is viable for development*.

On the basis the Site at Elsing Road passes all of these tests, we consider that the Council should consider the Site for inclusion within the draft Local Plan.

Carter Jonas considers that the Site could come forward for development within the next 5 years, and therefore if allocated could form part of LB Enfield 5 Year Housing Land Supply.

Draft Local Plan Representations

The Council has invited comments on the Draft Local Plan 2019 - 2039, and our response is provided below.

The decision to bring forward a new Local Plan is supported. The importance of creating a Plan-led approach to planning for development cannot be understated. Enfield Council's adopted Core Strategy pre-dates the National Planning Policy Framework (NPPF) and therefore, a new Local Plan is required to ensure the future needs of residents and businesses in the Borough can be met through the sustainable development of sites.

We are supportive, in principle, of the Spatial Strategy Approach on page 22 in that it seeks to deliver 25,000 new homes across the Plan Period (2019 - 2039) through the delivery of the four main placemaking areas of Meridian Water, Southbury, Crews Hill and Chase Park. Table 4.1 of the London Plan (2021) sets a housing target of 12,460 for LB Enfield, over a 10 year period, which is consistent with the proposed housing targets contained within the draft Local Plan. Policy H1 of the London Plan provides a clear direction for boroughs to maximise the supply of housing by taking into account local context and character and optimising urban sites. The principles of Policy SP SS1 (Spatial Strategy) are supported in order to help meet the needs of the Borough beyond 2039 and ensure there are broad locations for growth in accordance with the NPPF. However, we consider that development opportunities outside of these areas should also be embraced to help meet and exceed the proposed housing targets. Furthermore, given the significant undersupply of housing within London, it is suggested the Council is not maximising the opportunity to deliver housing in sustainable locations. The Site at Elsing Road is in single ownership and is deliverable. The opportunity to maximise housing delivery on brownfield sites that are sustainably located with good access to services should be prioritised.

Chapter 3 of the draft Local Plan proposes ten 'placemaking' areas connected to growth, development and regeneration across the Borough. We are supportive, in principle, of this approach however we consider that the Council should allow alternative development sites to come forward outside of the designated 'placemaking' areas. This in turn, will help meet and exceed the proposed housing targets across a range of diverse sites.

We are supportive, in principle, of Policy SP SC2 (Protecting and Enhancing Social and Community Infrastructure), however we suggest that the criteria for development involving the loss or release of a community building should be expanded to include provision for whether there are alternative sites available within the local area to allow consolidation of facilities where appropriate.

Policy DM H4 concerns 'Small Sites and Small Housing Developments.' Part (2) of this Policy states small sites should be located in areas with 'good public transport accessibility (PTAL 3-6)'. We agree that small sites should be located in well-connected locations, with good access to services and facilities. However, we contend that sites outside of this PTAL range should not be discounted, especially if a suitable opportunity is presented to bring a sustainable brownfield site forward.

Carter Jonas in principle supports the preferred option for Policy SP H1 (Housing Development Sites), however, we consider that there should be an opportunity for sites not allocated, but in sustainable locations to have in principle support from the Council for development. This should be made clear in the wording of the draft policy.

We suggest our Site at Elsing Road should be included as part of Enfield's Site Allocations Document, thereby increasing the number of dwellings per annum in order to meet the Local Plan housing requirements. This would ensure the Local Plan is effective, positively prepared and consistent with national policy by ensuring the delivery of sustainable development.

Summary and Conclusion

Carter Jonas considers that there is an opportunity to bring forward more sites as part of Policy SP H1. The Site at Elsing Road is deliverable since it is in single ownership and available now, offers a suitable location for development now, and has a realistic prospect that housing will be delivered within five years. This would assist the Council in maximising the delivery of all types of housing as part of sustainable development – a key theme of the NPPF.

We would be grateful if you could confirm receipt of these representations and keep us informed on the progress of the production of the Local Plan. We confirm that we wish to participate in the examination of the Local Plan.

Please do not hesitate to contact me should you require any additional information.

Yours sincerely

Planner