

Strategic Planning and Design  
 Enfield Council  
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13 September 2021

*By Email*

Dear Sir/Madam

## **ENFIELD COUNCIL DRAFT LOCAL PLAN: 2019-2039 (JUNE 2021) MAIN ISSUES AND PREFERRED APPROACHES REGULATION 18 CONSULTATION**

### **REPRESENTATIONS ON BEHALF OF THE DUCHY OF LANCASTER**

CBRE Planning ('CBRE') is instructed by the Duchy of Lancaster to make representations to the Enfield Draft Local Plan Regulation 18 consultation. The Duchy of Lancaster own a 11.05ha site located between Camlet Way and Crescent West in Hadley Wood, to the northwest of the borough. These representations are submitted in respect of this site at Camlet Way ('the site') and have been informed by the following suite of technical evidence base, addressing key considerations for the site:

- Landscape and Visual Matters Due Diligence Report (prepared by Landscape Visual Ltd);
- Built Heritage Assessment (prepared by RPS);
- Ecological Assessment (prepared by Ecology Solutions Ltd); and
- Transport Appraisal (prepared by i-Transport LLP).

Full copies of the technical assessments can be shared with the Council upon request.

The National Planning Policy Framework 2021 (NPPF) sets out that to be considered 'developable', a site should be in a suitable location for housing development with a reasonable prospect that it will be available and could be viably developed at the point envisaged. The below representations seek to demonstrate that the site at Camlet Way and Crescent West is not only developable, but also should be considered deliverable within five years and should remain allocated for housing in the Local Plan.

### **Duchy of Lancaster**

The Duchy of Lancaster is the private estate of the sovereign and consists of a unique portfolio of land, property and assets that are held in a trust. The Duchy of Lancaster aims to deliver sustainable and long-term growth from its portfolio. The Duchy of Lancaster is the freehold owner of the site identified as site SA45 within the draft Local Plan Regulation 18 consultation.

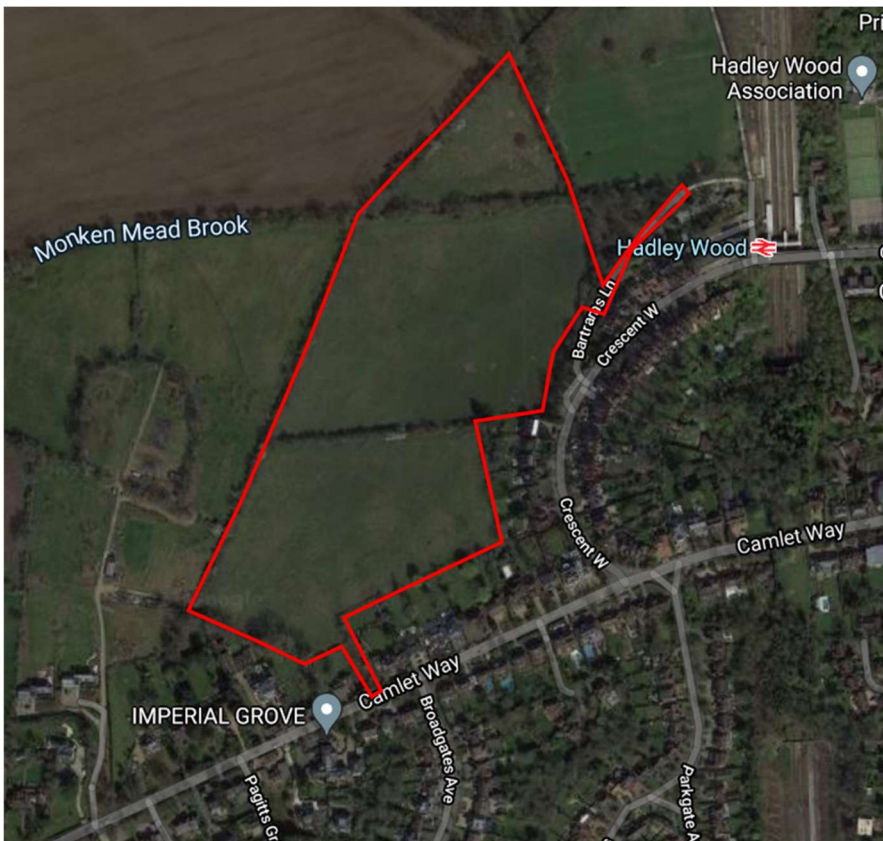
## Site Description

The site is located to the northwest of Camlet Way and Crescent West approximately 100m to the west of Hadley Wood Station. The site consists of 11.05ha of pasture/grazing land, including a brook, which runs east-west through the northern portion of the site.

The site is located adjacent to the existing neighbourhood of Hadley Wood, to the rear of the predominately large, detached properties along Camlet Way and Crescent West. There is a strong tree line to the north east boundary of the site, separating the site from the Bartrams Lane. Further to the south, the site directly adjoins the rear gardens of the residential properties along Crescent West and Camlet Way.

The site is currently accessed to the south, in between properties 83 and 79 Camlet Way, and to the north, from Bartrams Lane and a pedestrian footpath which runs adjacent to Crescent West. There are both pedestrian and vehicular access to the site.

The site plan below shows the general site extent and location.



The site is subject to the following planning policy designations:

- The site is within an Area of Special Character.
- The site is within the Green Belt.
- Parts of the north and northwest of the site are within 'APA2: Enfield Chase and Camlet Moat' Archaeological Priority Area.
- The majority of the site is within Flood Zone 1, and a small portion to the north is within Flood Zone 3.
- The northern part of the site is situated within a Site of Borough Importance for Nature Conservation (SINC).

The site is located immediately adjacent to Hadley Wood Conservation Area, which extends to the east of the site to cover Crescent West and East. There are three Grade II listed buildings to the north of the site along Camlet Way (83 Camlet Way and Attached Wall, 87 Camlet Way and Attached Wall and Pegasus, 81 and 91 Camlet Way). There are also a number of other heritage assets within the wider surrounding area including Wrotham Park Registered Park and Garden and the Battle of Barnet Registered Battlefield. The Monken Hadley Conservation Area, which is within the London Borough of Barnet, abuts the western boundary of the site.

The site is approximately 100m to the west of Hadley Wood Station. The village of Hadley Wood is identified within the adopted Local Plan to have a Local Shopping Parade. Hadley Wood Primary School is approximately 300m to the east of the site.

### Representations to the Draft Local Plan: Appendix C: Site Allocation SA45 (Land Between Camlet Way and Crescent Way)

The site is identified within Enfield’s Draft Local Plan as Site Allocation SA45 (Land Between Camlet Way and Crescent Way). The allocation identifies the site for residential development, with a capacity estimate of 160 dwellings. Timescales for delivery in the draft allocation are identified as 10+ years. The Duchy of Lancaster support the draft allocation in principle. However, these representations will demonstrate that the site is available now, can accommodate and mitigate identified constraints/considerations and is capable of being delivered within the next five years.

An assessment has been provided below, drawing on the supporting technical evidence base, which justifies the release of the site from the Green Belt and its continued allocation for housing development.

### Housing Need

The Enfield Draft Local Plan will provide for at least 24,920 new dwellings in the plan period up to 2039, equating to 1,246 homes per year. This is in line with the London Plan (2021) 10-year housing target for net housing completions of 12,460 for Enfield.

The Enfield Local Housing Needs Assessment (November 2020) sets out the objectively assessed need requirement for the draft plan at 1,744 dwellings per annum. This would equate to an overall need of 34,880 homes over a 20-year plan period. Therefore, there is a significant need for new homes in Enfield over the 20-year plan period, which will not be met by the draft Local Plan target.

In terms of housing supply, the Enfield Strategic Housing Land Availability Assessment (2020) (SHLAA) identifies 329 sites as either ‘developable’ or ‘deliverable’ with a potential capacity of 13,813 dwellings. An additional unidentified capacity of 1,100 windfall dwellings brings the total SHLAA capacity to 14,913 dwellings. In addition to the deliverable and developable sites, there are 160 sites categorised as ‘potentially developable.’ The ‘potentially developable’ sites account for 24,180 dwellings. The availability of these sites is unknown and many are likely to be subject to other viability and policy constraints (summary table below).

Table 15: Potential SHLAA site capacity in 5-year periods

	0-5 years	6-10 years	11-15 years	15+ years <sup>16</sup>	Total Plan period
Deliverable	4,915	0	0	0	4,915
Developable	0	5,751	3,147	631	9,350
Potentially developable	0	6,969	9,935	7,276	24,180
<b>TOTAL</b>	<b>4,915</b>	<b>12,720</b>	<b>13,082</b>	<b>7,907</b>	<b>38,628</b>

Therefore, although Enfield can currently demonstrate a 5-year housing supply, Enfield has a significant housing need over the 20-year plan period. The majority of the 'potentially developable' sites identified within the SHLAA are required to come forwards in order for Enfield to meet the Council's housing targets. The 'medium growth' option identified as the preferred option within the draft Local Plan, is not sufficient to meet the identified needs of the borough and a higher growth option should be pursued. This will inevitably require greater intensification of brownfield land and existing urban areas, as well as additional Green Belt release than is currently proposed.

Site SA45 will therefore be a critical component of meeting the development needs of the borough over the plan period and, therefore, the Duchy is promoting the site for allocation for residential development and its release from the Green Belt.

## **Green Belt Release**

The NPPF provides the overarching national policy for the protection of Green Belt land. Provisions are made within the NPPF at Section 13 for the review and appropriate release of Green Belt land in exceptional circumstances, identified through the preparation or updating of local plans. It is well established that the land requirements to meet development need, such as housing need identified in a local plan, can form such an exceptional circumstance.

The Council has acknowledged that some Green Belt release will be required to meet development needs in the draft Local Plan, through its preferred option 2 for 'medium growth'. This level of growth is insufficient to meet the identified housing need.

As part of the evidence base supporting the emerging Local Plan, the Council has undertaken a Green Belt and MOL Assessment (2021), to review the contribution that identified parcels of land make towards the five purposes of including land within the Green Belt, as set out at paragraph 138 of the NPPF.

Site SA45 sits within a larger parcel of land, which forms part of the Green Belt and MOL Assessment, identified as parcel EN3. The harm of releasing parcel EN3 as a whole is identified by the Assessment as being 'high'. In its assessment of a smaller parcel cognisant with site SA45 and the land ownership of the Duchy, the Assessment concludes the harm of its release to be 'moderate'. The Assessment recognises the limited containment that the properties along the south east boundary of the site make and also acknowledges the clear and readily recognisable field boundaries of the site.

Paragraph 143 of the NPPF sets out the criteria plans should recognise when defining Green Belt boundaries. Part (f) of Paragraph 143 sets out that plans should "*define boundaries clearly, using physical features that are readily recognisable and likely to be permanent*". The Council's Green Belt Assessment notes that there is a regular and consistent boundary to the west of the site, and so release of the site would only result in a minor impact on the distinction of the adjacent Green Belt. This boundary provides a well-established screen of vegetation and release of the site would continue the existing urban boundary northwards. As such, the site would seem appropriately located for release with a clear defensible boundary that would minimise impact on the adjacent green belt land.

The Green Belt Assessment states that restricting release within the site to the southern field would help to maintain most of the views of the open country to the northwest from the Hadley Wood Conservation Area and minimise containment of the open Green Belt land to the north, reducing impact on the distinction of adjacent Green Belt land. The Assessment also suggests that the area to the north east of the site, outside of the allocation boundary, would be suitable for release in combination with the southern-most third of the southern field within the allocated site.

Although it is recognised that focusing development to the south of the allocation would limit impact on the Green Belt land to the north and maintain views from the Conservation Area, the technical assessments informing this representation demonstrate that impacts could be addressed through a strong landscape strategy.

The Heritage Report prepared by RPS notes that impacts to the significance of the adjacent conservation areas would be limited and could be mitigated by the provision of appropriate landscape buffers and the detailed design of development proposals. As such, it is not necessary to limit development to the southern-most field. The whole allocation is considered suitable for housing development.

Furthermore, consideration would be given to the area of SINC land and presence of Flood Zone 3 surrounding the brook to the north of the site, extending beyond the northern boundary of the site. It is likely that development will need to be located away from this specific location, leaving an area of open space within the site to adjoin the land to the northeast of the allocation, which is designated as Local Open Space. This would present opportunities to retain openness to the area of land to the northeast, resulting in minimal impact to its distinction. It is therefore considered that the impact of the piece of adjacent Green Belt land to the northeast would be minimal.

This would also help to maintain views out from Crescent West over an open area of site, although it is noted that the Built Heritage Assessment concludes that the key view from Crescent West is now far more restricted and glimpsed in nature, owing to the maturing of planting which now marks the edge of Crescent West. Whilst there would be some impact to the settings of the adjacent conservation areas, the supporting technical assessments have concluded that this would be limited and could be mitigated by provision of appropriate landscape buffers and the detailed design of development proposals.

The Council's Green Belt Assessment acknowledges the reduced harm that might arise from release of site SA45, as well as identifying potential mitigation measures. These are reinforced and further considered by the technical appraisals informing these representations and it is concluded that the site is suitable for Green Belt release with minimal harm, which can be appropriately mitigated.

## **Site Suitability**

### **Sustainability**

The site is located adjacent to the urban area of Hadley Wood, near Hadley Wood Station. There is a Primary School 300m to the east of the site, with a nursery and a number of other services within the immediate vicinity of Hadley Wood. Bus and train connections to High Barnet allow for access to a range of supermarkets, convenience stores, shops and services. The site's close proximity to a station, and easy access to a range of shops and services, mean it is well located to accommodate housing development and represents a sustainable location. The sustainability of the site is also confirmed by the Transport Appraisal informing these representations, discussed further below.

### **Landscape and Visual Impact**

The site is currently used as pasture/grazing land. These representations are supported by a Landscape and Visual Matters Due Diligence Report, which assesses the landscape/townscape and visual impact considerations in developing the site.

Although the Report acknowledges that the landscape of the site is potentially visually sensitive to development, it states that development of the site could still be undertaken in a way that is consistent with the wider townscape pattern. This would ensure that development of the site would be consistent with the wider townscape, and would be sensitive to the townscape within the adjacent Hadley Wood Conservation Area.

As the northern part of the site is a SINC, there may be opportunities for this area to be retained as wilder or informal open space. Given the adjacency to the local open space and SINC land to the north of the allocation, this would help to maintain the openness of the area of Green Belt land to the north-east of the site. It would also help to maintain views out from the rear of the houses along Crescent West and the Hadley Wood conservation area across this part of the site.

Therefore, although the Landscape Visual Assessment identifies some sensitives, it is clear that the proposed development could be designed in a way which would be consistent with the surrounding townscape.

### Transport and Access

The connectivity and sustainability of the site is good in terms of its proximity to public transport. The two existing vehicular access points are identified above from Camlet Way and Crescent West.

A Transport Appraisal has been prepared by i-Transport which concludes that the site is very well located to meet the key transport tests identified by paragraph 110 of the NPPF:

- The site is well located to local facilities and services, with Hadley Wood rail station available within a very short walking distance and providing frequent rail services to central London and Welwyn Garden City. Higher order facilities, including Barnet High Street, are located within a 2km walking distance.
- Safe and suitable site access is readily achievable from Camlet Way and/or Crescent West, which has been tested by the Transport Appraisal.

The Appraisal notes that traffic impacts would be modest and would quickly disperse across this area of the Borough that is not particularly constrained in highways terms. The Transport Appraisal notes that movements associated with development of the site would load the network in a location where there are few highway constraints, therefore limiting impacts.

The Transport Appraisal identifies the following opportunities that development of the site could deliver:

- It can deliver a new connection between Camlet Way and Crescent West as sought by the emerging Neighbourhood Plan.
- It can be delivered early within the life of the local plan – there are no transport constraints, particularly traffic impact, to prevent early delivery of this site in a readily accessible location.
- It can be delivered at greater scale, assisting the Council with housing numbers. The site is in a very good location for housing and there are no access or traffic capacity reasons to limit the quantum of development to 160 new homes.

The Transport Appraisal demonstrates that the site has suitable access to support development of the site, including beyond the identified development yield. There are opportunities for enhanced connectivity and the transport impacts are estimated to be minimal. There are therefore not considered to be any transport or access constraints limiting the site from being brought forward for development. This supports the continued allocation of the site for residential development in the emerging Local Plan.

### Ecology

A Habitat Survey, Desk Study and Ecological Assessment have been prepared by Ecology Solutions. The site is currently pasture/grazing land, and there is an area to the north of the site which is identified as a SINC, Broadgate Pastures. This stretches further to the north of the site around the railway lines to the northeast.

The Ecological Assessment confirms this SINC land hasn't been appropriately managed and therefore the value of this grassland will likely continue to decline, with rough grasses and brambles. This presents an opportunity for any future development on the site to enhance this area of SINC, which help to retain the open character of the site.

The initial site survey found no evidence of protected species or badgers and no bat roosts were recorded. The presence of trees containing features with potential to support roosting bats was recorded. In themselves, these trees would not preclude development coming forward on the site. There is the potential for birds, dormice and reptiles within the site and its hedgerows. These also would not preclude development from coming forwards on the site if appropriately managed and mitigated.

Therefore, based on the Ecological Assessment, there is no evidence to suggest any ecological constraints that would preclude development from coming forwards on this site. In fact, the development of the site could bring opportunities to further enhance the current ecological value of the site, in particular the area of SINC land to the north. This evidence supports the continued allocation of the site for residential development within the emerging Local Plan.

### **Heritage/Townscape**

The site is near several listed buildings and is adjacent to the Hadley Wood and Monken Hadley Conservation Areas.

The Council's Green Belt Assessment considers the site against the five national Green Belt purposes as set out within the NPPF, purpose 4 of which is to 'preserve the setting and special character of historic towns'. The Council has identified this site as having a 'strong' impact on this purpose due to its potential impact on the Hadley Wood Conservation Area. The Conservation Area Appraisal notes that there are *"attractive breaks in the street frontage to the north side of Crescent West, where houses give way to open country with views out to the northwest of hills and woods"*.

There is therefore some degree of heritage sensitivity to be considered as part of the promotion of this site, which would require a range of mitigation measures to be included as part of any future development proposals. RPS note in their Built Heritage Assessment that the open fields within the site make a modest contribution to the setting of the Hadley Wood Conservation Area, being the way in which they provide insight into the historic rural context of the local area. However, whilst the conservation area appraisal identifies this outward view from Crescent West as a key view, this view is now far more restricted and glimpsed in nature, owing to the maturing of planting which now marks the edge of Crescent West.

There are three listed buildings located to the south of the site. The Heritage Report concludes that the wider modern built environment along Camlet Way now blurs an appreciation of the listed buildings' historic context as an isolated group and makes no contribution to their setting or significance. Views from the rear gardens into the site make a modestly positive contribution to their setting and significance. The descending nature of the topography and hedgerows within the Site limit wider ranging views across the Site as a whole.

The site is located to the immediate east of the Monken Hadley Conservation Area boundary. There is minimal inter-visibility between the two areas, due to the density of hedgerow planting. The Heritage Report concludes that the Site only contributes to the setting of this part of the conservation area for the way in which it forms part of the rural countryside.

The Heritage Report concludes that development within the Site has the potential to impact upon the significance of the Hadley Wood Conservation Area and the Monken Hadley Conservation Area through the introduction of built form within their settings where there was previously none. It states that any such impacts to the significance of these heritage assets would be limited and could be mitigated by the provision of appropriate landscape buffers and the detailed design of the proposed development

Therefore, an appropriately and sensitively designed development could be brought forward on the site, suitably mitigating any potential impacts to heritage assets. The heritage considerations associated with the site are therefore not limiting and should not affect its continued allocation within the emerging Local Plan.

### **Flooding**

The site is predominately located within Flood Zone 1. Parts of the site to the north around the Brook are within Flood Zone 3. The part of the site in Flood Zone 3 is contained to a small area, and residential development could be located away from the areas at risk of flooding. As such, flood risk is not considered a site constraint that should prevent the site coming forwards for housing development.

## Site Availability

The current draft allocation sets out that the estimated timeframe for delivery is 10+ years. The Duchy of Lancaster reiterate that the site is available now and could be brought forward within the next five years.

## Representations to the Draft Local Plan: Policies

### Strategic Policy SS2

We do not consider that the preferred option 'medium growth' sufficiently addresses the identified development needs of the borough, particularly that of housing need. This is a pressing need as a result of a national housing crisis, which is particularly prevalent in the South East and London. Therefore, a higher growth strategy is more appropriate and the allocation of site SA45 would form an important part in meeting the identified housing need.

### Policy H1 Housing Development Sites

The Duchy support the identification of their site at Camlet Way as a site allocated for housing. The site is available now and is suitable for development with no constraints to the site coming forward. It is also likely the site could accommodate in excess of the 160 dwellings currently estimated by the draft allocation. Whilst the majority of new housing development is to be focused in urban areas, we would emphasise that amendments to Green Belt boundaries in sustainable locations are important for meeting the Borough's housing needs, as recognised by the 'medium growth' preferred option. Notwithstanding this, it is considered that this option is insufficient to meet the identified housing need for the borough and site SA45 is critical in meeting the development needs, alongside additional Green Belt land release.

### Policy DE9 Shopfronts and Advertisement

The site at Camlet Way is identified on the Draft Policies Map as within an 'Area of Special Character'. Although the policies map refers to Policy DE9, there does not seem to be a specific definition or policy requirement for this within the Draft Local Plan. We would like to ensure that should a housing development come forwards on this site, the policy requirements remain flexible enough to allow for this. The features and characteristics of any housing development on this site would be sympathetic and compatible with surrounding area.

## Summary

The Duchy of Lancaster welcomes the opportunity for engagement with Enfield Council with regards to the policies and site allocation discussed above.

The Borough has a significant housing need throughout the next plan period. The Duchy's site at Camlet Way is an important component to meeting the development needs of the borough over the plan period, and the Duchy continues to promote the site for residential development allocation and its release from the Green Belt.

Technical assessments have been prepared and inform this representation in order to understand the landscape visual, transport, heritage and ecology implications of developing the site for housing. Although there are some identified sensitivities related to the potential loss of views from the adjacent conservation area, it is considered that this could be addressed through a robust landscape strategy and development that is consistent with the wider townscape. The Heritage Report prepared by RPS concludes that effects on the significance of the adjacent conservation areas would be limited, as views from Crescent West into the site are currently minimal due to the dense boundary vegetation.

The Transport Assessment confirms that the site is well-located to deliver housing in excess of the 160 units. The site is well located to local facilities and services, with Hadley Wood rail station available within a very short walking distance. Safe and suitable site access is readily achievable from Camlet Way and/or Crescent West.



Traffic impacts would be modest and would quickly disperse. Thus, the site is not materially constrained in terms of highways.

There are no ecology constraints identified on the site that would prevent future development. In fact, development on the site would provide a good opportunity to improve the site's biodiversity, in particular enhancements to the small area of SINC to the north.

In light of the analysis and conclusions, the Duchy continues to promote the site for residential development allocation and its release from the Green Belt. The site and its surrounding area could accommodate housing development in excess of 160 dwellings, and development could present a good opportunity to enhance the local landscape and ecology features.

I trust that the above is helpful and would request that we be informed on the draft Local Plan process and milestones, including changes made to the document as a result of this consultation. The Duchy of Lancaster reserves the right for a representative to attend the eventual Local Plan Examination in Public.

Yours sincerely,