



13 September 2021

Dear Sir/Madam,

**DRAFT ENFIELD LOCAL PLAN - MAIN ISSUES AND PREFERRED APPROACHES (REGULATION 18)  
REPRESENTATIONS ON BEHALF OF UNITED LIVING NEW HOMES  
BRIMSDOWN SPORTS GROUND (SITE ALLOCATION SA40)**

On behalf of our client, United Living New Homes (hereafter 'ULNH'), we are writing to submit representations on the Enfield Draft Local Plan - Main Issues and Preferred Approaches (Regulation 18 version) as published on 21 June 2021 (hereafter 'the draft Plan').

**Background**

ULNH is the specialist residential development arm of the United Living Group and has a strong track record of delivering new homes which make a positive contribution to the communities in which they are located. ULNH works collaboratively to provide high quality, energy efficient, sustainable homes for housing associations, local authorities, institutional investors and private developers, with projects including mixed tenure, low, medium and high-rise multifamily apartment schemes as well as traditional single-family homes. Working nationally, ULNH operates in urban, city centre and rural locations with a focus on bespoke, high-quality design and placemaking.

ULNH intends to purchase Brimsdown Sports Ground, allocated as a Housing Development Site in the draft Plan (Site Allocation Reference SA40). The freehold interest is held by the London Borough of Enfield (hereafter 'the Council'), with a lease currently held by Goldsdown and Brimsdown Sports Limited. Whilst the site is designated as a Local Open Space in the existing and emerging Local Plans, it is fenced off from public access and is in a dangerous, derelict and unsightly condition. The land contains multiple fly tipping sites, areas of severely overgrown vegetation, dangerous structures and – having previously been used for industrial landfill – is heavily contaminated. The site poses a serious risk to public safety and is a liability to the Council as freeholder.



ULNH has secured an option to acquire the lease to Brimsdown Sports Ground and is engaging with the freeholder and leaseholder with a view to acquiring the site, remediating the land contamination and developing the site for a comprehensive mixed-use scheme involving residential, sports and community uses, along with enhanced public open space. ULNH is committed to working in partnership with the Council and the community to create a new neighbourhood which directly responds to local needs and will deliver a lasting legacy for the people of Enfield.

ULNH welcomes the publication of the new Local Plan and strongly supports the Plan's key objectives to increase the supply of housing of different types and tenures, improve access to open space, and enhance the connectivity, liveability and visual appearance of the public realm. In particular, we welcome the importance attached to design quality, placemaking and taking a masterplan approach to larger sites. These principles are central to the ethos of ULNH and would be thoroughly embedded into our proposals for Brimsdown.

At this stage, our client wishes to make a select number of general representations in relation to the overall spatial strategy options as set out in the draft Plan, and in respect of Site Allocation SA40. We reserve the opportunity to make comments on other specific policies and compliance with legal requirements during the latter stages of plan preparation.

### **Overall spatial strategy and housing delivery (Chapters 2 and 8)**

The draft Plan seeks to provide for at least 24,920 new dwellings up to 2039, equating to 1,246 homes per year. The Plan's overarching spatial strategy is to direct a large proportion of those homes to four key placemaking areas (Meridian Water, Southbury, Crews Hill and Chase Park). The latter two of these designations involve the release of Green Belt Land to provide approximately 6,000 homes. Outside of the main placemaking areas but within urban locations, further development that '*enhances urban greening*' is encouraged, with particular focus on town centres and transport nodes. The remainder of the borough (excluding the retained Green Belt) is denoted as being suitable for '*incremental sustainable densification*'.

As per para. 35 of the National Planning Policy Framework 2021 (hereafter 'the NPPF'), plans are sound where they are positively prepared, justified, effective and consistent with national policy. In the London context, development plan documents must also be in general conformity with the London Plan 2021. Both the NPPF and the London Plan contain a strong presumption against development in the Green Belt, with para. 140 of the NPPF and Policy G2 of the London Plan making it clear that Green Belt boundaries should only be altered where there are exceptional circumstances. Para. 141 of the NPPF provides that before concluding that these exceptional circumstances exist, the plan-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need including, *inter alia*, optimising density and making as much use as possible of underutilised land.

Our client does not object in principle to Green Belt release and appreciates the difficulties faced by Enfield in delivering upon the challenging housing targets set by the London Plan,



particularly when considered against a legacy of historic under-delivery. There is clearly a delicate balance to be struck between the densification of urban areas and developing on rural Green Belt land. However, in our view, the Plan does not fully optimise the opportunities offered by the existing built-up areas of Enfield before considering large-scale development in the Green Belt, and we argue that there could be far more emphasis on densifying specific, underutilised sites within the urban area, in line with the NPPF and London Plan.

It is noted that Option 3 (as set out in Table 2.2) – which achieves a medium level of growth but accommodated within the urban area – has been discounted. However, the reasoning for doing so makes a number of assumptions which are not fully justified, such as that urban development would be less viable, or that *'most housing units will be small and many in tall buildings'*. It is somewhat assumed that releasing Green Belt land is the only method of providing high-quality homes and that the alternative will result in skyscrapers or overdeveloped sites. However, high density does not necessitate high-rise, particularly where a design-led approach is taken (as advocated by the ambitious placemaking policies elsewhere in the draft Plan, which are strongly supported). Additionally, Option 3 has been discounted partially because it relies on the release of Strategic Industrial Land (SIL) when there are significant sites within the urban area – including Brimsdown Sports Ground – that can be developed without the need to release any SIL.

Furthermore, the draft Plan does not appear to have adequately considered the role of the Lee Valley Opportunity Area (hereafter 'the OA') in the overall spatial strategy, as required by Policy SD1 of the London Plan. The draft Plan indicates that Opportunity Areas have been identified as locations to focus development and the Enfield Growth Topic Paper states, in para. 6.2.3, that *'land will be optimised and densities significantly increased in opportunity areas'* (our emphasis). However, this is not appropriately reflected in the designation of most of the OA being identified as land suitable for *'incremental sustainable densification'*. Option 6 – which involves accommodating the majority of development to the east of the A10 (and therefore almost entirely within the OA) – is discounted on the basis that it would result in high-density development. Given that the London Plan identifies Opportunity Areas as being key locations for growth, the Lee Valley OA should – at the very least – be reflected on the Key Diagram as an area which is suitable for densification which is more than 'incremental'.

To conclude on this point, within the context as set by national and London-wide policy, we would urge the local planning authority to consider whether it has first fully explored all options for optimising capacity within the urban area, particularly within the Lee Valley Opportunity Area, for the supply of new homes. Within that context, we now address the specific site ULNH hopes to take forward for comprehensive redevelopment, the Brimsdown Sports Ground.

### **Policy H1 and site allocation for Brimsdown Sports Ground (SA40)**

Brimsdown Sports Ground is allocated for mixed use development as SA40 within the draft Plan for *'renewed community uses alongside a limited amount of other enabling uses'*. Table 8.1 refers to an estimated capacity of 50 homes, thus it is assumed that these 50 homes are the enabling uses referred to. The site allocation further states that *'any net loss of open space*



would need to be supported by a masterplan approach'. Further commentary in relation to the site is provided in the Housing Topic Paper (2021), as follows:

*"Site is located within the urban area. Part of the site can be considered previously developed land. Despite the open space designations, there is potential for this site to contribute towards housing need whilst also improving the quality of and access to the open space, whilst providing housing that also has potential to act as enabling development for renewed community uses."*

ULNH strongly supports the recognition within the draft Plan that:

- part of the site can be considered as previously developed land;
- the site is suitable for residential development;
- a net loss of open space may result from the need to meet wider policy objectives on the site;
- residential development is required to overcome the considerable viability challenges posed by site-specific characteristics (as outlined below); and
- a masterplan approach would be welcomed on the site.

However, we suggest that the estimated capacity of 50 units severely constrains the site's potential and will fail to deliver the other benefits that we understand the Council wishes to see on this site (such as affordable housing, a 'legacy' sports facility, community uses and enhanced public open space).

The NPPF states that planning policies should promote the effective use of land in urban areas, making 'as much use as possible' of previously developed sites. Of particular relevance here is para. 120, which requires local planning authorities to give substantial weight to the value of using previously developed land within existing settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. Policy D3 of the London Plan provides that all development must make the best use of land by following a design-led approach that optimises the capacity of sites, having regard to the site's context, capacity for growth, and existing and planned infrastructure capacity.

Brimsdown Sports Ground lies within the Lee Valley Opportunity Area and within an area identified for 'intensification around transport nodes and town centres' on the Key Diagram (Fig. 2.1). Whilst the site currently has a PTAL rating of 1b – 2 (denoting a relatively low level of transport access), it is only a few minutes' walk from Brimsdown Station, situated on the West Anglia Mainline on a section of the track which is identified to benefit from four-tracking and from Crossrail 2 investment. Whilst the site is designated as Local Open Space (which is being fully considered in ULNH's plans for the site), the site is otherwise unencumbered by policy restrictions and is not in close proximity to any heritage assets. It is currently doing nothing for the local community, being largely closed off from public access, uneven underfoot, contaminated and lacking any form of natural surveillance. It represents the perfect opportunity to transform a neglected and underused site into one which delivers a number of



benefits for the people of Enfield and, in accordance with the NPPF and London Plan, should be optimised to its full potential.

It is not clear from the evidence base documents how decisions on indicative capacity have been reached, or what options for mixed use on the site have been explored. It is assumed that in the absence of any indication that a comprehensive scheme can or will be delivered, this figure was considered to be a high-level estimate of the number of homes required to fund replacement of the sports pitches and community uses which formerly existed on the site. In our view, the new homes should not be viewed purely as enabling the delivery of replacement sports facilities. In the context of Enfield's limited land supply, sites like Brimsdown can make a substantial contribution to housing need and deliver on wider objectives highlighted throughout the Plan, such as ensuring that more people can access good quality homes, promoting active lifestyles through design, improving the public realm and enhancing urban greening. Achieving these objectives requires a more holistic approach to development than a simple cross-subsidy model.

As part of our preliminary discussions in relation to its purchase of Brimsdown, ULNH has commissioned an architect to prepare a capacity study and indicative masterplan which demonstrates that the 8.08-hectare site is able to deliver, spatially:

- New sports facilities, including a replacement football pitch and a new leisure and/or community centre;
- A substantial number of new homes of various typologies, including an on-site contribution to affordable housing (the exact quantum being subject to viability);
- A significant proportion site area as publicly accessible open space, including a central square, linear parks, pocket parks and allotments; and
- A package of local infrastructure contributions and site access enhancements, including new pedestrian and cycling routes.

To realise these benefits, a higher number of homes would be required, developed at a medium density (between 60 and 130 units per hectare). These homes would be located in buildings ranging from 2 storeys on the perimeter of the site to 6 storeys towards the centre of the site. Any such scheme would not visually impact on any of the surrounding streets, with additional massing being imperceptible from surrounding neighbourhoods. All homes would comply with adopted amenity standards, with little or no impact on the amenity of existing residents. There would, as the site allocation acknowledges, likely be a net loss of open space, but any replacement open space would be of a far higher quality than that which currently exists (noting also that the site has not been *truly* publicly accessible since 2017).

Lastly, we would like to highlight the very specific viability challenges associated with developing this site (as has been recognised during the Site Selection process). The site was previously used as a landfill site by Johnson Matthey between 1913 and 1958. A contamination report submitted alongside a planning application for new sports pitches in 2016 (Ref: 16/05432/FUL) stated that the site would be classified as Category 1 (land that is clearly problematic) or Category 2 (contaminated land requiring remedial action). A more recent



desktop study has been commissioned by ULNH, which suggests that expected ground conditions comprise significant depths of historic wastes, with sources of contamination identified across the site. Additionally, the filled ground is likely to pose geotechnical and engineering development constraints. The likely costs of remediation would likely prohibit a developer coming forward with a scheme for 50 units, having regard to the fact that they would also likely be required by other policies in the draft Plan to provide replacement community uses and high-quality public realm within the site.

## **Summary**

ULNH supports the broad policy objectives of the Plan but considers that further consideration should be given to using underutilised sites in urban areas, and particularly within the Lee Valley Opportunity Area, to reduce some of the pressure on the Green Belt and other designated land.

In the specific case of Brimsdown Sports Ground, the site is part previously developed land, is located in an Opportunity Area and area for intensification in the draft Plan and – subject to the appropriate infrastructure enhancements – is eminently suitable for residential development, as recognised by the site allocation. However, the requirement to re-provide new sports facilities and/or community uses (as desired by the Council as landowner and required by Local Plan policy), coupled with the need to remediate the land contamination, means that redevelopment of the site is unlikely to be viable without a substantial number of homes being delivered.

ULNH's ambition is to deliver high-quality, sustainable development which is more transformative than merely building homes to cross-subsidise the refurbishment of the existing sports pitches. In light of this - and in light of the Council's overarching housing need – we would urge the local planning authority to consider allocating Brimsdown Sports Ground for a much higher number of homes as part of a comprehensive masterplan involving community and recreational uses.

ULNH would welcome the opportunity to be closely involved in the Local Plan preparation process from this point forward and, when we are able to do so, share our preliminary work in order to demonstrate that the ULNH masterplan is capable of being delivered.

Yours faithfully

**DP9 Ltd.**