



Strategic Planning and Design
Enfield Council
FREEPOST
NW5036
EN1 3BR

By email: localplan@enfield.gov.uk

13th September 2021

Dear Sir / Madam

**REPRESENTATIONS ON NEW ENFIELD LOCAL PLAN (MAIN ISSUES AND PREFERRED APPROACHES)
JUNE 2021
“PARKVIEW PLACE” – LAND AT PARKVIEW NURSERY, THEOBALDS PARK ROAD, CREWS HILL**

On behalf of Landvest Crews Hill Limited, we write to make representations in respect of the Enfield Local Plan 2019 – 2039 (“Main issues and preferred approaches”) (Regulation 18) and specifically in relation to the site at Parkview Nursery, Theobalds Park Road, Crews Hill, EN2 9BQ, hereafter referred to as ‘Parkview Place’. A Site Plan is enclosed as **Enclosure 1**.

These representations relate specifically to the draft Proposals Map and ‘Strategic Policy PL9: Crews Hill’ contained within the Enfield Local Plan (“Main issues and preferred approaches”, June 2021).

Background

Site Location

The site is located on Theobalds Park Road, within walking distance (10–15-minute walk) of Crews Hill station. The site is covered almost entirely in substantial high bay buildings, including greenhouses, used for the storage and display of large numbers of potted plants, shrub and trees, for wholesale trade sales and distribution and extensive areas of hard standing for vehicle parking and loading areas, as shown in the aerial photos within the Supporting Document at **Enclosure 2**. The site is served by four existing vehicular access points; three off Theobalds Park Road and one off Tingles Top Lane. The existing built form, scale and massing of the site is significant, particularly in an area designated as Green Belt. The existing development is a significant intervention into the Green Belt, therefore, which has already an adverse impact on the openness of the Green Belt. To the north of the site is a residential enclave on Rosewood Drive and beyond the site boundary to the south is a primary school and nursery, although the site is contained and well screened, particularly in views from the south.

Context

Landvest are the site promoters for ‘Parkview Place’, a 7-hectare previously developed site in single ownership within the identified Crews Hill Growth Area. Landvest are committed to continue building their relationship with the London Borough of Enfield and are supportive of the overarching placemaking vision and objectives for Crews Hill set out in Policy SP PL9 in recognition of its significant potential to deliver new housing (Ref: SA27 - Crews Hill for 3,000

homes) that the borough needs in a sustainable manner. With the substantial housing need that the Borough faces (as set out below) a 'step change' in housing delivery is required, which justifies alterations to the Borough's Green Belt boundaries in the forthcoming new Local Plan in the context of NPPF ('the Framework') paragraph 40 ("*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans*"). Furthermore, under the terms of the Framework (paragraph 142), where it has been concluded that it is necessary to release Green Belt land for development, "first consideration" should be land which has been "previously developed", such as the Parkview Place site. This approach and promotion of Crews Hill as a Growth Area is fully endorsed by Landvest and is in accordance with national planning policy and guidance.

However, as currently drawn, the draft Proposals Map designates a significant portion of the Parkview Place site as a new east-west green corridor, thus severing one of the largest sites in single ownership in the designated Growth Area. To put this into perspective, approximately 4 hectares of the 7-hectare site is proposed to be outside of the 'housing-led areas in Green Belt' designation. The size of the corridor being envisaged is of concern and the proposed allocation as it stands would unduly restrain the redevelopment potential and delivery of much-needed housing on the site that is assessed¹ as being "low harm" in terms of its potential release from Green Belt due to its weak and limited contribution to the Green Belt. Landvest consider that the severance of the site and exclusion of this substantial part of the site is a significant missed opportunity for the Council in achieving its vision for the Crews Hill Growth Area. Accordingly, these representations set out **key changes required to the draft Local Plan and Proposals Map in order to realise the full potential of the Parkview Place site and its vital contribution to the Crews Hill placemaking area and soundness of the draft Plan.**

Landvest has brought together an experienced professional design team (as detailed within the attached Supporting Document) to present the opportunity for the strategic redevelopment of Parkview Place in Crews Hill.

Prior to this, formal representations have been made to the London Borough of Enfield Local Plan (Call for Sites) in February 2019 and March 2020 and to the Green Belt and MOL Methodology Review in May 2020. Following subsequent discussions with Senior Regeneration, Planning and Policy Officers at LB Enfield, a "Vision Document" for the site was also prepared to inform the future Masterplan for a community-focussed and sustainable residential-led redevelopment of the site.

Enfield's Housing Need

The adopted new London Plan (2021) sets an annual housing target for LB Enfield of 1,246 new dwellings per annum, which represents a **56% increase in the Borough's housing requirement** compared with the 2016 London Plan.

The Government's projections (OAN) increase this further still, to 4,373 new dwellings per annum without the 'London cap' and 2,355 with the 'London cap'.

Draft Strategic Policy SP H1: 'Housing development sites' within the emerging Enfield Local Plan sets out a target of at least 24,920 new dwellings that the Local Plan will deliver over the plan period up to 2039, equating to 1,246 homes per year in line with the London Plan. The list of sites to be allocated (in Table 8.1) include Land at Crews Hill (Site Ref: SA27) which has an estimated residential capacity of 3,000 new dwellings. Landvest strongly supports the inclusion of Crews Hill as an allocated site in recognition of the major potential that it has to deliver the housing that the Borough needs in line with its 'Growth Area' status.

LB Enfield has been delivering around 500 new homes per annum on average in recent years. To deliver the required number of new houses across the Borough in the next plan period a step-change in approach is needed. Enfield

¹ Within the LUC evidence-based document titled Green Belt and Metropolitan Open Land Study 'Final Report' dated June 2021



Council needs to plan and deliver for more homes and unlocking Green Belt land is one of the innovative and necessary requirements to achieve this step-change.

These are unprecedented requirements amounting to ‘*exceptional circumstances*’ in the context of paragraph 140 of the Framework requiring an unparalleled response, which in this case justifies the alteration of Green Belt boundaries.

The redevelopment of Parkview Nursery site can directly support and deliver this objective through a plan-led Masterplan approach in the new Enfield Local Plan.

Parkview Place: A Deliverable Site

Parkview Place represents a major opportunity to deliver substantial numbers of much needed housing, including affordable housing, in a sustainable form, as an allocated housing site released from the Green Belt in the new Enfield Local Plan.

Within the definitions of the Framework, a “deliverable” site for housing is one which should *be “available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years”*.

With reference to this definition, the site is demonstrably “deliverable” and meets the “available, suitable and achievable” criteria:

- **Available:** the 7-hectare is in single ownership and being promoted by developer, Landvest, an independent and experienced housing developer with a successful track record of delivering high quality homes in London and the South East.
- **Suitable:** whilst designated as Green Belt, the site is almost entirely previously developed land occupied by substantial urbanising forms of development including high bay warehouse-type buildings; greenhouses, used for the storage and display of large numbers of plants, shrubs and trees for wholesale trade sales and distribution, in addition to extensive areas of hard standing used for parking. This is illustrated clearly in the aerial views and site photos within the Supporting Document. The site therefore makes a weak/limited contribution to the relevance, openness and purposes of Green Belt, as set out and supported in the LUC evidence-based Green Belt and Metropolitan Open Land Study (June 2021 - Site CH8 within which Parkview Place is located). It is also notable that the LUC Green Belt Study assessed the site’s potential harm of release from the Green Belt as “low risk” due to its weak/limited contribution to all of the Green Belt purposes and its minor impact on the distinction of adjacent Green Belt land. Furthermore, other than the Green Belt designation, there are no major physical constraints which would restrict the residential-led redevelopment of the site.
- **Achievable:** initial capacity studies for the site prepared by Patel Taylor demonstrate that the site is capable of delivering a substantial number (550-650 homes) of high quality, sustainable dwellings, including affordable homes, alongside commercial uses and supporting infrastructure sought by Enfield Council, including a new publicly accessible east-west green corridor and open space.

Response to Strategic Policy SP PL9: Crews Hill

As noted above, Landvest supports Enfield Council’s overarching placemaking vision for Crews Hill to become an *“important gateway to north Enfield’s part of the ‘London National Park City’... facilitating connections to the rest of the Borough and wider region along an east-west green corridor following the route of the London Loop”*. However,

the strategic location, size and proportion of this open space corridor in relation to the Parkview Place site requires further consideration, as outlined in more detail below.

It is not disputed that Crews Hill is strategically positioned to become a key link in joining up the north of the Borough, yet still has a sense of separation from the built form of the rest of the Enfield and therefore should look to retain some of this character. Nor is it disputed that there is an opportunity to improve east-west connectivity from Hadley Wood to Whitewebbs and beyond through the use of green links out into the wider landscape. The principle of a multi-functional corridor which extends habitats, improves access to open space, particularly close to homes and workplaces, and provides a sustainable travel route is a positive aspect within the draft Local Plan.

In particular, Landvest welcome the inclusion of the Parkview Place site within the proposed Crews Hill placemaking area boundary (as indicated on the draft Proposals Map) in recognition of its significant potential to deliver new housing growth (including much-needed affordable housing) in the Borough, directly responding to the Government's drive to optimise housing delivery and densities on all available, suitable and achievable sites.

However, there are a number of concerns arising from the current approach which are set out in turn below:

- a. **Flexibility** – the proposed allocation identifies developable land north and south of an open space space/corridor that runs east-west both through the site and beyond. The approach currently put forward is intended to be very prescriptive of the land to be used for development, and the land (excluded from development) to be used for the green corridor. This approach is inflexible and has the potential to limit the amount of housing delivered from the Parkview Place site. Landvest contend that a more appropriate solution to provide flexibility to both the Developer and the Council would be to allocate the entire Parkview Place site for redevelopment (ref: Proposed Amendment to the Draft Proposals Map), whilst identifying in the supporting text reference to the requirement that a corridor of suitable width and purpose is provided east to west through the allocated site. This would allow the Council to maintain the delivery of a sustainable east-west route, as identified in the Crews Hill evidence-base Topic Paper, whilst ensuring it is in the right location to provide linkage with the existing 'London Loop' cycle network and providing greater flexibility for both parties should technical constraints emerge through the planning and wider Crews Hill SPD Masterplan process that prevent or limit the maximum development potential, as would be the case with the significant severance of the Parkview Place site as currently identified on the Proposals Map. Alternatively, a single point of access could be decided to be the best approach, and therefore logical to locate the access in the centre of the site, with the east-west green corridor located either north or south of this access point. The current draft allocation is too rigid to allow for such design development, which could result in unintended consequences, such as restricting innovative and sustainable design, principles which are at the very heart of the national planning agenda and draft Policy SP PL9.
- b. **East-west Corridor Width** – the Crews Hill concept plan at Figure 3.10 (and the corresponding Proposals Map) illustrates a c 270m wide green corridor through the centre of the Parkview Place site, which is considered excessive given that 82% of the existing site is occupied by buildings or hard-standing and constitutes previously developed land. Furthermore, the area identified for a potential corridor/open space is disproportionate to the land remaining for housing within this site. The reality is that this would severely impede the developable area and thus development potential of the site to deliver new homes (it is noted that there is no key accompanying the diagram at Figure 3.10, but clarification was sought during the consultation period from LB Enfield planning policy officers). From the information available, it is unclear as to why a route of this size and in this location is considered necessary or indeed achievable. As per (a) above, it is considered that the inclusion of the whole of the Parkview Place site for housing-led development is required, but with a clear requirement for an east-west corridor of a suitable width and purpose to be provided as part of the redevelopment proposals for Parkview Place.

- c. **Onward Connections** – Landvest has engaged highways and transport consultant, Ardent Consulting Engineers, to consider the impacts of the draft designation on the ability to deliver sustainable connections within the site and to the surrounding public footway and cycleway network, but also on the delivery of suitable vehicular and public transport access to the Parkview Place site itself. On review of the corridor location, it appears to connect to an existing surface level crossing (uncontrolled) of the railway line, with onward connectivity to the land occupied by the golf course on the western side of the railway. There is, however, a key cycle route (National Cycle Network Route 12) to the south of the Parkview Place site which runs along Strayfield Road, connecting to the path that leads to the golf course land as well as Strayfield Road, providing onward connections to the east via Flash Lane (and then to Whitewebbs Park). The route along Strayfield Road also leads to the south-west to Chase Farm Hospital. There is, therefore, an alternative green corridor that could also be explored, which would align more clearly with this Cycle Route.

Way Forward

As noted above, Landvest is willing, in principle, to incorporate a public route/east-west connection through the site, but this should co-exist in harmony with new housing-led regeneration, amenity areas and landscape and must be balanced with the aims of optimising the site's potential to deliver the housing that the Borough needs in a viable and sustainable way.

An east-west corridor should respect the intentions behind green infrastructure, consider appropriate housing densities for the site and provide successful amenity and ecological benefits as well as sustainable travel requirements. The width shown at present risks unintended consequences of separating homes and workplaces from each other and not encouraging a sense of community within this part of Crews Hill.

In response, Landvest's design team has prepared an alternative indicative layout for the site (see Proposed Masterplan 'Green link option 1' within the Supporting Document at **Enclosure 2**) demonstrating how a new east-west green corridor/open space could be accommodated alongside a substantial quantum of housing-led development, in order to optimise the potential of the site, whilst facilitating connections and fostering permeability principles within Crews Hill and its hinterland, in accordance with national planning policy objectives.

The alternative layout shown on the illustrative Masterplan retains the indicative location of the east-west corridor ('green link') as shown within the draft Local Plan but its width is reduced to facilitate two evenly balanced housing-led parcels on either side with direct relationships onto the 'central' green corridor.

The final page of the Supporting Document contains several examples of where green corridors have been successfully incorporated into housing-led regeneration masterplans demonstrating how the landscape can co-exist and have a strong relationship with homes, workplaces and community uses.

The alternative layout put forward is purely indicative at this stage and through further exploration, the east-west connection could be incorporated in a more organic form with varying widths which respond to different typologies of homes. However, to facilitate this, a substantial reduction in the current indicative width shown in conjunction with possible relocation is required to successfully deliver the placemaking objectives of the Local Plan alongside new housing.

We therefore request that both figure 3.10 in the draft Local Plan and the corresponding draft Proposals Map are amended to reflect the alternative Masterplan layout for the Parkview Place site shown within the Supporting Document. In order to assist the Council in preparing the next stage of the Local Plan, Patel Taylor has produced an indicative extract and a suggested amendment to the Proposals Map for the Parkview Place site, enclosed at **Enclosure 3**. This clearly shows the amendments sought by Landvest, namely an extension of the hatched 'housing-



led areas in Green belt' allocation for the **whole** of the Parkview Place site and an indicative alignment of the required east-west 'green link' through the Parkview Place site. An overlay of the existing site plan and Proposals Map as currently shown is also included for completeness.

Conclusion

Landvest fully endorses the London Borough of Enfield's decision to designate Crews Hill as a key Growth Area for the Borough in the forthcoming plan period, as well as the Council's overarching placemaking vision for Crews Hill, including creating sustainable connections to the rest of the Borough and wider region along an east-west green corridor to connect with the route of the London Loop. Landvest are keen to continue to work collaboratively with the London Borough of Enfield to deliver significantly enhanced connections (bus travel, cycle and footway connectivity and green space) both for potential residents or occupiers of the Parkview Place site as well as existing residents and businesses in the vicinity of Crews Hill. However, it is fundamental that the **whole** of the Parkview Place site is allocated to maximise the delivery of housing and the proposed new east-west routes and connections to the north to Crews Hill station and south to Chase Farm Hospital are sustainable and viable if the full potential of the Growth Area is to be realised and the new housing that the Borough needs is to be delivered. In this regard, the strategic location, size and proportion of the open space corridor in relation to the Parkview Place site requires further consideration and amendments as outlined in the text above and in the accompanying plans.

Policy 'SP PL9: Crews Hill' and the Proposals Map as currently drafted/drawn are overly prescriptive and therefore undermine the true development potential of the Parkview Place site in terms of the quantum of new housing and associated supporting infrastructure that it could deliver and therefore considered unsound as currently proposed. From a transport, access and sustainability perspective, the approach to maintain as much flexibility and opportunity for change as policy and transport patterns develop throughout the Plan period should be considered, and the amendments proposed within these representations would help to facilitate this.

Parkview Place is a demonstrably deliverable site with no major physical, ownership or legal constraints. It has the scope through masterplanning to be both self-sufficient, as well as also fully capable of integrating, complementing the existing community and enhancing local facilities and services in the Crews Hill area and its hinterlands.

Landvest's Vision is for Parkview Place to be allocated for a high-quality residential-led development of new homes creating a new community with a landscape-led design. Providing a strategic housing opportunity for the London Borough of Enfield, Parkview Place would directly and positively respond to Enfield Council's own vision for Crews Hill Growth Area, reflecting its good accessibility and opportunities for delivering sustainable, energy efficient, and high-quality and affordable new homes, alongside community, landscape, biodiversity and well-being benefits.

Please do not hesitate to contact us regarding the contents of this submission. We look forward to further engagement with the London Borough of Enfield as the emerging Local Plan advances through the plan making process.

Yours faithfully

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