



Response to Draft Local Plan

10th September 2021

Introduction

This document has been produced by Lansdown to support the submission of the land at 135 Theobalds Park Road, Crews Hill, Enfield for a mixed-use development of industrial units and a retail food store in response to the publication of Enfield’s Draft Local Plan (2021-2039). This submission follows the Call for Sites submission package and will provide specific feedback on the draft policies and support its subsequent employment use allocation (SA48) in the Draft Plan. The site has been located in the map (Figure 1) by the red boundary.

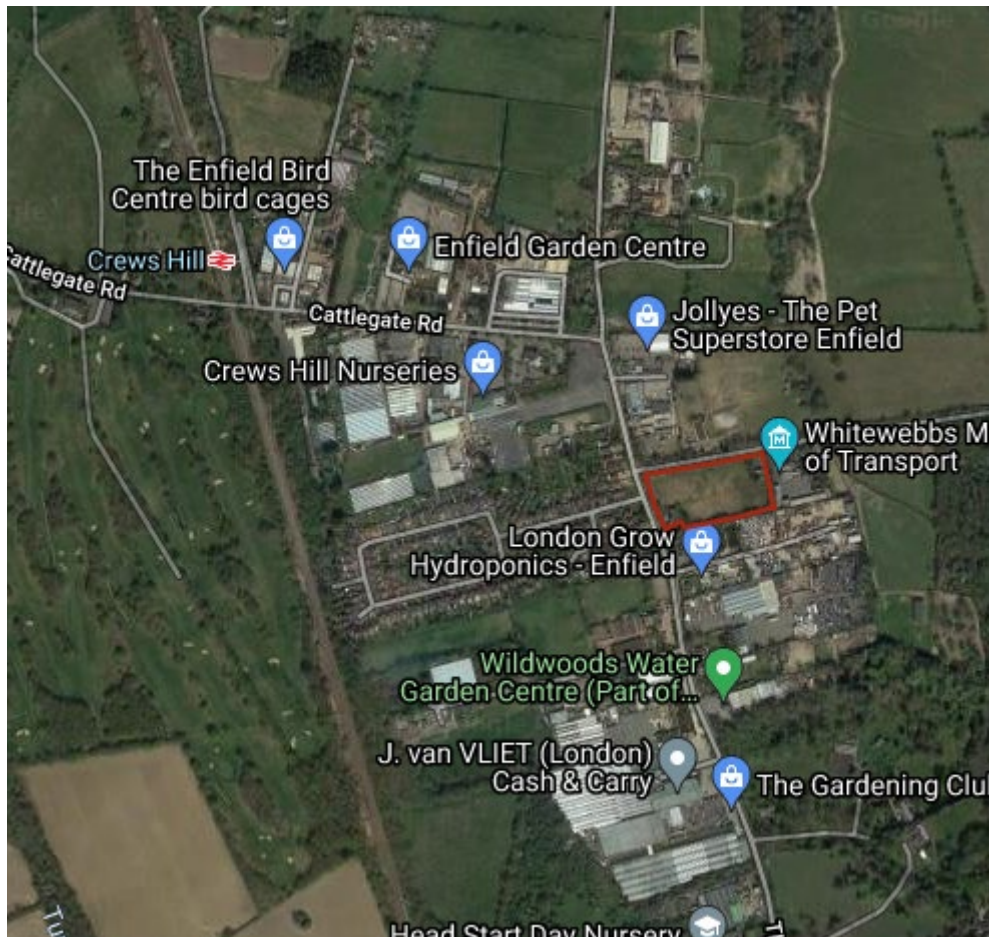


Figure 1: Draft Policies Map of Crews Hill Placemaking Area

Overall, we support the Draft Local Plan published by Enfield Council given that it will provide a strong foundation in helping the Borough meet its future development needs in a sustainable manner that will make efficient use of the land made available. Following the release of the Draft Local Plan, the site has been included within the Crews Hill Placemaking Area detailed in Strategic Policy SP PL9. As depicted by the pink shaded area in Figure 2, the site represents a central point within the Placemaking Area. It is considered that this proposal would be key in helping Enfield Council create a sustainable and well-balanced community at Crews Hill that would deliver a variety of facilities and services suitable for the scale of the new community.

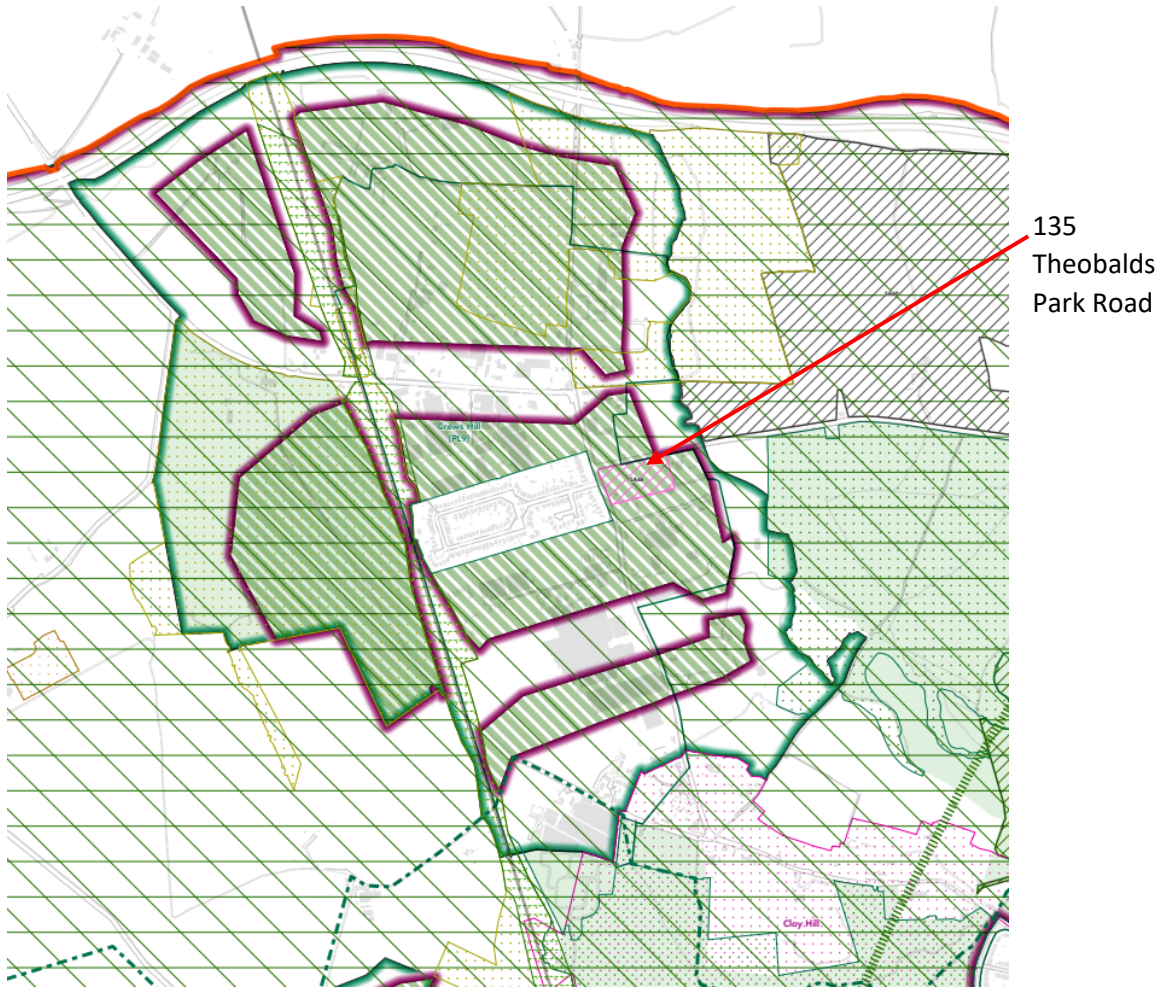


Figure 2: Draft Policies Map of Crews Hill Placemaking Area

Chapter 2 Spatial Strategy

Strategic Policy SP SS1: Spatial Strategy

We strongly support the spatial strategy option (2) selected by the council within Strategic Policy SP SS1 which states that a provision will be made for at least 25,000 new homes over the plan period, with a focus on four ‘main placemaking areas’ of Meridian Water, Southbury, Crews Hill and Chase Park. Although this may appear to be an ambitious target, it is evident that meeting this target is crucial in achieving a number of key strategic objectives outlined by the Council with regard to numbers and affordability:

- Increase the supply of housing to ensure that more people can access good quality homes.
- To protect family housing and support the delivery of new family homes to help ensure that people who grew up in the Borough will have the opportunity to remain.
- To provide a variety of housing options to meet the needs of everyone, regardless of income, age and ability (including securing 50% of all new homes to be genuinely affordable).
- To deliver wheelchair accessible and supported housing, and support developments that seek to meet the needs of specific communities, including older people, disabled and vulnerable people, students, and Gypsies and Travellers.

With regard to the population structure of Enfield, the birth rate is currently more than double the death rate (which the Council have confirmed within their own evidence base). There is also a higher proportion of 0-19 year-olds compared to London and the rest of the England according to the Enfield Local Housing Needs Assessment 2020 (LHNA) which is further driving the need for deliverable family housing within the Borough.

In terms of the current affordable housing need (both affordable home ownership and intermediate housing), the LHNA estimates that there is a need of 1,407 affordable homes per annum over the plan period. This figure exceeds the overall standard method figure of 1,117, and the London Plan (2020) target of 1,246. It is unrealistic to expect that this need can ever be met in full, but it does expose the scale of the overall need in the Borough.

It is evident that Enfield Borough is facing a housing crisis that needs to be tackled immediately. Therefore, we support the Draft Plan’s ‘Medium Growth’ strategy which will largely focus new housing delivery within Enfield’s urban areas. However, in order to meet the Borough’s total housing requirement, some Green Belt release will have to take place. Without any Green Belt release the Council have estimated that only approximately 17,000 homes could be delivered up to 2039 which would not be enough to address the present housing crisis in terms of numbers and affordability.

This issue has also been recently recognised at a national scale in the latest 2020 Housing Delivery Test results (released 19th January 2021), with 55 councils failing to deliver at least 75% of homes estimated by the government to be needed in their area over the past three years. Enfield is one of these authorities facing a presumption in favour of sustainable development (NPPF paragraph 11) with a HDT score of 56%, generating less than 500 new

homes a year at present. They must also apply a 20% buffer to the HLS and also must produce a Housing Action Plan.

As a consequence of this, there may be a risk of unplanned, speculative Green Belt proposals within Enfield that would put increasing pressure on existing services and facilities. Many of these developments could take place without fully understanding of the needs and requirements of these local communities, since the extensive masterplanning process that is proposed in the draft Local Plan would not take place. Therefore, providing a minimum of deliverable 25,000 new homes (preferred option) will help guard against speculative Green Belt proposals. With this approach, the Council will ensure to make the best use of land within the Borough, ensuring development is planned and implemented in the most appropriate way and in the areas of best potential.

In addition to accommodating the Council's growth requirements, the preferred spatial option will reduce reliance on higher density developments and tall buildings that often offer units below the nationally described space standard. The COVID-19 pandemic has highlighted the importance for residents to have adequate private amenity space and access to local open space, with people spending more time than ever before in their homes over the last 18 months. This is especially important for family housing and ensuring adequate space for families will drastically improve the quality of life for Enfield's residents. In order to achieve this, it is evident that pockets of identified Green Belt land will have to be released as part of a strategic plan-led approach. This will help provide the conditions required to build new communities that deliver a wider mix of housing including family homes with gardens and easy access to local green spaces.

One of the four placemaking areas that have been identified within the Enfield Draft Local Plan as part of the carefully planned Green Belt release includes Crews Hill. Plans for to develop the area have been described within Draft Policy SP SS1:

"Crews Hill will be regenerated and extended to form a sustainable rural gateway settlement providing access to countryside activities and the surrounding mosaic of green and blue spaces and networks. Delivery of the Crews Hill gateway settlement will extend beyond this plan period."

Strategic Policy SP SS2: Making Good Places

We support the principle in policy SP SS2, that major development should contribute to the vision of the placemaking area it is located within. We consider that the employment proposal for 135 Theobalds Park Road would make a significant positive contribution to the Crews Hill Placemaking Area in creating a sustainable, well balanced community which will support the needs of future residents.

We also support the creation of Masterplan SPDs which will help create more meaningful boundaries that will better reflect existing ownership boundaries and the Call for Sites proposals for each land parcel. Creating a forum for owners, stakeholder groups and developers to help produce a broad concept for Crews Hill will help achieve the policy's aim of making the *"best use of land, integrating a mix of uses where appropriate."* This strategy

will also ensure that the Council's strategic development proposals are being designed in the most effective way possible that will contribute to the aims and principles set out in the plan. In our support for the draft policy, we are keen to work with other key landowners involved in the wider allocation and also the Council to ensure the placemaking area is masterplanned to ensure the highest levels of sustainability and quality are present in the design of the development.

Chapter 3 Place

Strategic Policy SP PL9: Crews Hill

As mentioned previously we support the principle of the Crews Hill Placemaking Area and the overall vision Policy SP PL9 sets out for the area. We believe that the overall vision for Crews Hill is appropriate and reflects the wider spatial strategy for Enfield as described in Policy SP SS1.

Crews Hill sits in an elevated position in the rural north of the Borough. It is largely characterised by its economic function as a home to many garden centres and plant nurseries, although in recent years it has begun a transition into non-horticultural based activities with the establishment of urban fringe activities such as waste recycling, scrap metal companies and builders merchants. It is considered that these uses can be supported and thrive in the placemaking area. Much of the area therefore consists of previously developed land (PDL) and so the impact of development on the Green Belt will be less harmful. Additionally, development will likely facilitate improved physical and visual links to the Enfield Chase landscape to the west and the National Park City to the northwest.

Crews Hill provides one of the best opportunities in Enfield to accommodate growth whilst also delivering environmental benefits such as flood water management, biodiversity net gain and improving public access. Although located within a rural area, Crews Hill is quite well connected to the urban area of Enfield and the Hertfordshire countryside to the north. It has an existing train station (providing direct links to central London and Hertfordshire), frequent bus services passing through and the National Cycle Route 12 which provides a sustainable link to the east of the Borough. This represents a good level of existing infrastructure that would be upgraded to create a sustainable public transport system to support a new community. The Council have also stated that investment would also be provided to improve the street environment to encourage walking and cycling amongst new residents and visitors. Therefore, Crews Hill has the potential to become a community that is embedded within sustainable travel principles and not reliant on private vehicle modes.

The placemaking area provides a unique opportunity to create relationships between built form and surrounding landscape which contrast around the topography which is Crews Hill. The Crews Hill Topic Paper has identified an approach to development that would respect this topography with taller, higher densities located on the "flatter valley floor" and the more sparsely distributed development located on the sloping and higher ground. This will help minimise the overall Green Belt impact of development by preserving the wider landscape

continuity between the north of Enfield and the surrounding countryside to the north of London.

As stated in the Topic Paper, natural flood management features (e.g., ponds and wetlands) at locations such as Salmons Brook will build on Enfield's River and wetland restoration programme, restoring and renaturalising urban rivers. The naturalisation and restoration of the local river corridors will contribute to the improvement of blue infrastructure networks, delivery of strategic flood mitigation and create Sustainable Drainage Systems (SuDS), trees and rewilding routes/areas.

With regard to deliverability, the Crews Hill area comprises a limited number of ownerships and vast swathes of the area and surrounding land is owned by the Council which will help facilitate the development more efficiently.

Given the above, it is clear that the placemaking area proposal at Crews Hill provides a unique opportunity for the Borough to deliver a significant portion of its housing need whilst creating a sustainable rural community that will be of benefit to both the existing and future residents of the area.

It is considered that our hybrid proposal for industrial units and a retail food store at 135 Theobalds Park Road (which is subject to an employment use allocation in the draft plan) would help support the new community of the Crews Hill Placemaking Area. A variety of available sites that have come forward suggest that a mix of building types and function can be integrated with the residential element of the wider area. Placemaking principle 11 of policy SP PL9 states that *"development should create a mixed and inclusive community, by providing a diversity of employment opportunities."* Principle 15 expands on this by emphasizing that:

"Development at Crews Hill should deliver a variety of facilities and services suitable to the scale of new community to meet the day to day needs of its residents. Facilities and services should be located so as prioritise active and sustainable travel to them from all parts of the development."

The proposal would clearly support these placemaking principles given the diverse range of employment uses that are proposed for the site which include both industrial and retail uses. This would add to the existing provision of industries that are prominent in Crews Hill such as horticulture, land sciences and food production and help create a significant number of alternative employment opportunities for local residents.

The proposal provides an excellent opportunity to capitalise on the rising demand for employment floorspace in the Borough, specifically for logistics and manufacturing which has been established within this statement. The local foodstore element of the proposal would also help contribute to the everyday needs of the new community at Crews Hill and it is clear that to sustain the increased population, a range of retail options should be on offer. Such facilities will be crucial to creating a well-balanced and mixed-use community.

Importantly, the sustainability of the site makes it an ideal location to provide such employment and retail uses. The site's proximity to public transport links such as Crews Hill

station and local bus stops means that private vehicle travel would be minimised. Additionally, the site is linked to surrounding areas by paved footpaths which will encourage active travel to and from the site. Its central location within the Crews Hill Placemaking Area would make it a prominent and sustainable hub for both employment and retail activity.

Given the above, we give our full support to the draft employment allocation at 135 Theobalds Park Road which will offer a diversity of employment opportunities and facilities close to home that will reduce the need to travel beyond Crews Hill for residents' day-to-day needs. The proposal presents a good opportunity to make use of an underutilised site and make a positive contribution to the Crews Hill Placemaking Area. The site is readily available and could be delivered in the short term and be masterplanned to ensure that it is well connected to the wider Crews Hill Placemaking Area and surrounding areas. With the positive and proactive cooperation proposed by the Council, that we are happy to engage with, the Crews Hill Placemaking Area should make a meaningful and well-planned contribution towards the wider spatial strategy.

Chapter 5 Addressing equality and improving health and wellbeing

Strategic Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities

We support the measures listed in Strategic Policy SP SC1 which focuses on how development can contribute to the healthy and active lifestyles of residents. This has become ever more important following the outbreak of COVID-19, where people have been spending more time within the close proximity of their homes. Therefore, we give our support to the Council in its objective in ensuring that development contributes towards creating healthier places to live and reducing inequalities across the Borough.

It is considered that the employment and retail proposal at 135 Theobalds Park Road would encourage the use of active travel modes, given that the site is located centrally within the proposed placemaking area and so will be accessible to the entirety of the Placemaking Area by foot and cycle. The site benefits from direct access to National Cycle Route 12 and dedicated footways along Theobalds Park Road.

Overall, we believe that the proposal will contribute towards creating a healthier place through supporting greater physical movement for future residents of the placemaking area.

Chapter 6 Blue and green Enfield

Strategic Policy SP BG4: Green Belt and Metropolitan Open Land

We support the general position of this policy that states that Enfield's Green Belt and Metropolitan Open land should be protected from inappropriate development that would have a detrimental impact on openness and character of its surroundings.

However, Green Belt boundaries, in accordance with Paragraph 139 of the NPPF, can be altered through the preparation or updating of plans where exceptional circumstances are clearly evidenced and justified. The evidence provided in the following section of this report confirms that the release of appropriate Green Belt sites is required to address the current shortfall in the supply of employment land in Enfield. Further to this, Enfield has entered a housing crisis and is facing a significant shortfall in the provision of housing for its residents as shown by the evidence provided earlier in this statement. This has increased pressure on the ability of the Council to meet the development need has been reflected by the Council in its objective of delivering a minimum of 25,000 new homes over the plan period and employment land target (as specified in the previous section). As part of this provision the Council has committed to safely releasing Green Belt sites without compromising the long-term future of the Green Belt nor compromising its five objectives.

With an established need to consider Green Belt release to meet both the housing and employment demand for the plan period, it is important that sites are only released where wider impacts are minimised and sustainable development is promoted. As has already been established in this statement, the land at 135 Theobalds Park Road has received a draft employment allocation and is set to be released from the Green Belt, representing a central location within the Crews Hill Placemaking Area.

The site falls within Crews Hill Cluster 4 (CHC4) within the Council’s 2021 Green Belt Assessment, with a specific site reference of CFS132, as shown by the map below (Figure 3).



Figure 3: Extract from Enfield’s 2021 Green Belt Assessment sites map

The table below summarises the Council’s assessment of the contribution of the site (CFS132) to the first four purposes of Green Belt as set out by Paragraph 138 of the NPPF.

Green Belt Purpose	Contribution	Explanation
1. Check the unrestricted sprawl of large built-up areas	Relatively Weak	The land does not lie in close proximity to the large built-up area of Greater London; however, it is close enough to have some relevance to Purpose 1. There is minor distinction between them and the inset urban area.
2. Prevent neighbouring towns merging into one another	Weak/No contribution	Land does not lie between neighbouring towns.
3. Assist in safeguarding the countryside from encroachment	Relatively Weak	The site is largely contained by development. Consequently, it is influenced by urbanising development.
4. Preserve the setting and special character of historic towns	Weak/No contribution	The area 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.

In terms of the harm caused by releasing the site from the Green Belt the Council’s assessment states that there would be a “negligible impact” on the distinction of the adjacent Green Belt land to the south and east due to the presence of existing development in both of these directions. The land north of the site would become more contained as a result of it being released. The site is currently well screened by the treeline along Whitewebbs Road, which minimises the inward and outward views. Additionally, the existing development located to the north of Whitewebbs Road already influences the distinction of the open land in this direction. Overall, the release of the wider CHC4 area in conjunction with the sites, would have a negligible impact on adjacent Green Belt to the west due to the presence of the treelined railway line. Therefore, it was concluded that the implication of releasing the site from the Green Belt is considered to be “minor”.

With regard to the proposed development, the buildings will integrate with surrounding washed over urbanising development of Crews Hill and have a minimal impact on the wider Green Belt and the openness of the wider Green Belt.

All of these factors combine to demonstrate that, if the allocation for the site was to be confirmed and subsequently released from the Green Belt for the proposed development, it would result in low Green Belt harm.

Chapter 9 Economy

Strategic Policy SP E1: Employment and growth

We support the Council's proactive stance regarding providing sufficient employment and office space over the course of the plan period. As part of Enfield Council's long-term vision and strategy for growth, Draft Strategic Policy SP E1 sets a target for a minimum of 251,500 sqm of net additional industrial and logistics floorspace and 37,000 sqm for net additional office floorspace to be delivered over the plan period. This follows evidence published in Enfield's Employment Topic Paper (2021) that summarised their Employment Land Review (2018). The inclusion of a clear and accountable target is vitally important to ensuring the Local Plan has a clear aim that can be provided over the coming years.

In terms of supply the Council have confirmed that there is not currently enough available brownfield land to help meet this need, with a shortfall of under half (48%) the floorspace needed for industry and logistics. Therefore, the development of sustainable Green Belt sites, alongside urban supply, have the potential to meet almost all industrial and logistics needs in the Borough up to 2039.

Given the above evidence, the Council has pursued Policy Option B and so the draft policy has allocated new locations for employment-led development in appropriate parts of the Green Belt, which includes the land at 135 Theobalds Park Road (SA48). This would help accommodate future business growth in the Borough and secure thousands of local jobs in the process. The inclusion of specific employment allocations is vitally important to securing the required employment floorspace across Enfield. Therefore, we strongly support the policy and the specific site allocations contained therein, in particular the site at 135 Theobalds Park Road.

As specified in the Draft Plan, the site at 135 Theobalds Park Road has an estimated additional capacity of 3,250 sqm which would make a significant contribution towards the additional employment floorspace target set by the Council. Furthermore, the proposal is unique given that it is being put forward for a mix of industrial and retail uses unlike all other Green Belt employment allocations in the Draft Local Plan which are for solely industrial and logistics purposes. Due to the more diverse employment activities proposed, the site has a greater potential to make more efficient use of the land and to meet the new population and local business needs.

Strategic Policy SP E2: Promoting jobs and inclusive business growth

We particularly support the parts of this policy which seek to promote a growing and diversifying economy, and also the creation of jobs for local residents. The site at 135 Theobalds Park Road would provide an ideal blend of employment opportunities, which will be generated by both the industrial and retail elements of the scheme. This will help to support the new Crews Hill population that will be inhabiting the immediate locale in line with the Placemaking Area. The hybrid scheme would have significant benefits for the local economy and will help to support the sustainable and vibrant community visions that are essential part of the placemaking area's strategy. Therefore, the policy is positively worded

and we would stress the merits of our site in relation to the criteria and requirements set out within the draft policy.

Chapter 13 Movement and connectivity

Chapter 13 includes important policies relating to sustainable transport, connections and active travel that underpin the Draft Local Plan's focus on achieving sustainable development. We support the policies and the aims they promote within the Local Plan, and therefore agree with the wording and approaches as a whole. With the ever-growing pressure to combat climate change, promoting sustainable and active lifestyles is vitally important for all aspects of the Local Plan.

Strategic Policy SP T1: Promoting sustainable transport

Draft Strategic Policy SP T1 supports new development that promotes sustainable modes of travel, reduce traffic, improve safety and environmental quality and support business. New development is also expected to be car-free (or offer a low level of parking provision) and support complementary measures. We feel this is crucial for the Local Plan to promote sustainable development and new housing and employment land should only be developed in sustainable locations. Therefore, this policy seems positively worded and seeks to achieve key aims of the Local Plan.

Policy DM T2: Making active travel the natural choice

Draft Policy DM T2 will be expected to reflect the 'healthy streets approach' (set out in the Transport for London's healthy streets toolkit). Development should be prioritised that encourages active modes of transports and an increase in cycling and walking for shorter journeys (under 2km). Proposals under this policy are expected to promote road safety and safer cycling and pedestrian movement which can be achieved through improved sustainable access and routes to local services. There will be a significant opportunity to contribute towards improving the active transport networks around the Borough through the various placemaking areas identified in the Local Plan. It is important that a strategic and holistic view is taken to ensure that the improvements made are well-designed and provide meaningful benefits for residents.

Turning to sustainability and the Crews Hill Placemaking Area, the Accessibility and variety of Facilities & Services place-making principles outlined in SP PL10 indicates that "*development at Crews Hill should deliver a variety of facilities and services suitable to the scale of the new community to meet the day to day needs of its residents*" and that "*Facilities and services should be located so as to prioritise active and sustainable travel to them from all parts of the development.*"

The site at 135 Theobalds Park Road is in an ideal location to contribute towards both the Chapter 13 policies and the key sustainability principles set out in SP PL9. It is located in central Crews Hill and so will be accessible to the entirety of the Placemaking Area by foot and cycle, thereby providing the key retail service within a sustainable location. This will help

to promote active transport to meet some of the day-to-day needs of the future community, and therefore will make a significant contribution to the overall sustainability of the new community. We believe this benefit should be positively viewed and held as important in the wider masterplanning of the placemaking area.

The proposal will also seek to improve the pedestrian crossing opportunities across Theobalds Park Road, thereby improving the east-west connectivity across Crews Hill. This will be a meaningful contribution to a key principle set out for the area, and will help to ensure that the new development is well connected, sustainable and positively designed.

Overall, we support the policies in Chapter 13 because they promote sustainable development and design that will promote active transport modes over private vehicular usage. Furthermore, we believe the development proposal at 135 Theobalds Park Road is ideally located to demonstrate and promote these principles within the wider Crews Hill Placemaking Area, making a substantial contribution to the provision of facilities and services that will promote the sustainability of the new community.

Conclusion

This statement forms part of our response to the Draft Enfield Local Plan (2021-2039) consultation with reference to the relevant policies in relation to the proposal for a mixed-use development of industrial units and a retail food store at 135 Theobalds Park Road, Crews Hill. Overall, we give our support to the Draft Plan and its allocation (SA48) of the site to deliver both employment and retail floorspace within the boundary of the Crews Hill Placemaking Area, a new sustainable rural gateway settlement that will be delivered over the plan period.

This statement has established that the creation of the Crews Hill Placemaking Area will provide a unique opportunity for the Borough to deliver a significant portion of its housing and employment floorspace need whilst creating a sustainable rural community that will be of overall benefit to both the existing and future residents of the area.

The potential for Crews Hill to become a new Placemaking Area, means the services and facilities required to support such a settlement would also need to be provided. Developing a retail food store and key employment land within the centre of the settlement would further promote transport other than private vehicular modes since key services will be within walking distance of much of the settlement. The proposal would also offer a significant number of diverse employment opportunities for local residents. Therefore, it is evident that the proposal would make a clear positive contribution in supporting a mixed and balanced community at Crews Hill.

Enfield Council's latest Green Belt Study 2021 concluded that the implication of releasing the site from the Green Belt is considered to be "minor", given its weak to no contribution to the first four Green Belt Purposes as specified in Paragraph 138 of the NPPF. Therefore, if the draft allocation for the site were to be taken forward and subsequently released from the Green Belt for the proposed development, it would result in low Green Belt harm.

As specified in the Draft Plan, the site at 135 Theobalds Park Road has an estimated additional capacity of 3,250 sqm which would make a significant contribution towards the additional employment floorspace target of 251,505sqm set by the Council. There is not currently enough available brownfield land to help meet this need, with a shortfall of under half (48%) the floorspace needed for industry and logistics. Therefore, the development of sustainable greenfield sites such as 135 Theobalds Park Road, will be crucial in meeting almost all industrial and logistics needs in the Borough up to 2039.

The site benefits from good accessibility to Crews Hill station and bus routes leading into Enfield. This means the area has considerable potential to be a hub for new, sustainable development that utilises key public transport networks to their full opportunity.

The proposed development, in principle, would demonstrably be a meaningful addition to the new Crews Hill Placemaking Area, helping make a significant contribution to an established need of employment floorspace space in the Borough. Therefore, we give our full support to the draft allocation of the site and its formal inclusion within the emerging Local Plan.



Lansdown