



# PLANNING REPORT

In respect of

**Southbury Leisure Park, Enfield**

On behalf of

**Royal London Mutual Insurance Society Limited**

JCG25060/DS  
Final  
13 September 2021

## REPORT

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### Document status

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Prepared for:

**Royal London Mutual Insurance Society Limited**

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# 1 INTRODUCTION

- 1.1 This planning report is submitted in support of a representation upon the new draft Enfield Local Plan – Main Issues and Approaches. The representation site is the Southbury Leisure Park, Southbury Road, Enfield, which is subject of an allocation in the draft Plan, Site SA11. The representation is made on behalf of Royal London Mutual Insurance Society Limited (Royal London), the owners of the Leisure Park.
- 1.2 The Leisure Park site is a potential redevelopment site, with the ability to accommodate a significant amount of new housing. Accordingly, the site is promoted as a residential led mixed use development site.
- 1.3 Royal London are broadly in support of the new draft Plan, in terms of its housing strategy, its policies for Southbury and its allocation of the Southbury Leisure Park site (Site SA11). The reasons are set out within this statement.

## 2 SITE AND SURROUNDING AREA

- 2.1 The representation site is the Southbury Leisure Park. The Park comprises a Cineworld, 15 screen cinema complex, plus three restaurant buildings. The restaurants are occupied by Pizza Hut, Wagamama, Five Guys and TGI Fridays. The site also accommodates approximately 542 car parking spaces. Immediately to the north of the Leisure Park, but sharing the car park, is the Southbury leisure centre. This is not part of the representation site.
- 2.2 The Leisure Park site is located at the junction of Great Cambridge Road (A10) and Southbury Road (A110). Access to the site is from Southbury Road. The site is approximately 750m from Enfield town centre, further west along Southbury Road. The site falls within an area of mixed character. To the east, on the opposite side of Great Cambridge Road, is a mixture of large retail development and car showroom / industrial units. The retail development includes a large Morrison's store and the Colosseum Retail Park. Significantly, the Colosseum Retail Park site is the subject of a large redevelopment scheme. The area to the north, south and west of the Leisure Park comprises in the main, residential properties ranging between two – four storeys. Plus immediately to the north of the site is Kingsmead School.

### 3 POLICY BACKGROUND AND STRATEGY

- 3.1 Royal London recognise the challenging role of LB Enfield to meet housing targets, in accordance with advice in the National Planning Policy Framework (NPPF) and the recently adopted London Plan.
- 3.2 The NPPF, originally issued in July 2018, has been updated in July 2021. As explained in the NPPF, the purpose of the planning system is to contribute to the achievement of sustainable development. A key element of sustainable development is ensuring that sufficient land is available in the right places to support growth, most notably for new housing. Indeed, throughout the NPPF there is an emphasis on delivering a wide choice of homes and to making the most effective use of land. With regard to plan making and relevant to this representation, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- 3.3 The London Plan is up to date, having been approved in March 2021. In general terms, the Plan seeks to deliver the homes that Londoners need by making the best use of land. Notably Policy GG2 of the Plan promotes higher density development on brownfield land. Policy H1 sets ten year targets for net housing completions which each local planning authority should plan for. Importantly, Boroughs must include these targets in their development plan documents. Significantly, the London Plan sets a target for 12,460 new homes in LB Enfield during the period up to 2028/29. The representation site is able to bring forward a meaningful amount of housing, so as to assist in LB Enfield in meeting this target.
- 3.4 It is noted that the new Local Plan aims to meet the Borough's land development requirements up to the year 2039. It is clear that in order to meet housing requirements and to meet the needs of its growing population that there is a need to plan positively for housing growth. Accordingly, Royal London are supportive of the draft Plan's principle of medium growth, whereby 25,000 new homes are planned during the Plan period. In order to meet this challenging requirement it is necessary to make the best use of previously developed land (or brownfield sites), such as the representation site.
- 3.5 The draft Plan's strategy for housing growth includes a focus on particular areas of the borough and the identification of placemaking areas. Royal London support this strategy. Notably, Southbury is a placemaking area and is identified as a key gateway to the Lee Valley, Ponders End and Enfield Town, where new residential led mixed use development will be introduced, including some taller buildings. The requirements for Southbury are set out in draft Strategic Policy SP2. Amongst other things, draft Policy SP2 encourages high density development of exemplary quality. Royal London are supportive of the principles set out in draft Policy SP2 and the objective to bring forward redevelopment in the area.
- 3.6 The Southbury placemaking area contains five site allocations, including Southbury Leisure Park. For each of the site allocations, the draft Plan (in paragraph 3.2.9) recognises that there will be a considerable increase in the number of tall buildings, which the draft Plan defines as anything above 15 storeys. Royal London agrees that high density development in accessible areas, such as Southbury, is required to meet housing requirements.

## 4 MERITS OF REPRESENTATION SITE

- 4.1 The representation site is ideally suited to accommodate high density residential development, in accordance with the objectives of the draft Local Plan for the following reasons:
- The site represents previously developed land (brownfield site)
  - The site is accessible, being within 750m of Enfield town centre and well served by public transport. The site has a PTAL rating of 4, with both Southbury and Enfield Town overground stations being within approximately 750m
  - The site is currently underutilised, accommodating approximately 10,000 sqm of floorspace and providing for 542 car parking spaces, despite being approximately 3ha in size
  - The site is in one ownership and will become available for development in the next five to ten years
  - The site already accommodates a large building, with the cinema building being equivalent to seven storeys in height
  - The site falls within an area of mixed character, with other residential development being to the north, south and west
  - The site is large enough to bring forward a substantial amount of new houses, including affordable housing
  - In addition to housing, the site can deliver commercial floorspace, allowing for a mixed use development
- 4.2 The suitability of this kind of site for a high density residential led development is well illustrated by the Council's approval of the redevelopment of the Colosseum Retail Park, on the opposite side of the Great Cambridge Road. Like the representation site, this was a low density retail / leisure park with a large amount of surface level car parking. The proposals providing for building heights ranging between 6 – 29 storeys and bringing forward approximately 1,600 new residential units and 7,000 sqm of commercial floorspace. In that case, the Council accepted that redevelopment of the site was acceptable in policy terms and tall buildings was appropriate for the site. The proposals were considered in the context of a pressing need for more housing in the Borough, including affordable housing.
- 4.3 By virtue of the Colosseum proposals, this area adjoining the Great Cambridge Road has become established as a location for a high density residential led scheme. Many of the issues relating to the Colosseum redevelopment apply to the Southbury Leisure Park redevelopment site. Albeit, it is accepted that each individual site will have its own set of constraints and opportunities, which will dictate the precise scale and nature of development.
- 4.4 Relevant to the consideration of proposals for a high density residential led development is the housing position in LB Enfield. In accordance with the 2020 housing delivery test results, LB Enfield delivered 1,314 new homes against the 2,328 required during the last three years, equating to 56% of the target. Under the housing delivery test, the presumption in favour of sustainable development therefore now applies to LB Enfield, as with all authorities falling below the 75% target. In light of that position, the possibility of development on the Southbury Leisure Park has even greater merit.

## 5 SITE ALLOCATION

- 5.1 The future of the existing tenants on the Southbury Leisure Park is in doubt, with leases expiring during the next four to five years. The uncertainty has only increased as a result of the pandemic and its impact upon the leisure industry. If required, it may well be possible to accommodate the current occupiers or indeed similar uses within a redevelopment scheme. Nevertheless, it has now become clear that the site will be available for redevelopment, certainly during the lifespan of the new Local Plan. Indeed, the site is likely to be available for redevelopment during the next five years. In this connection, the site provides an outstanding opportunity to bring forward much needed housing, on a brownfield site in an accessible location.
- 5.2 The draft Local Plan includes the representation site as a site allocation, Site SA11. The site allocation proposal is for 'new homes and non residential floorspace.' The allocation includes an indicative capacity estimate of 450 homes and non residential floorspace. The allocation also predicts that the timeframe for delivery will be within 5 – 10 years. The site clearly is suitable for a residential mixed use development providing new homes and non residential floorspace.
- 5.3 Royal London notes the indicative capacity figure of 450 homes. It is considered that this figure may well be an under estimate of the site's potential. Work undertaken by Royal London to date, by way of massing and capacity studies, suggest that the site could deliver in the order of 750 residential units. This is based on development blocks of up to 20 storeys in height, which of course will be in accordance with the recognition in the draft Plan that the Southbury placemaking area can bring forward tall buildings, as is illustrated by the recently permitted Colosseum redevelopment.
- 5.4 Royal London support the SA11 site allocation for the Southbury Leisure Park, albeit the site's indicative capacity needs to be reviewed against the wider objectives for the Southbury placemaking area and the characteristics of the site.



## 6 SUMMARY AND CONCLUSION

- 6.1 The representation site is the Southbury Leisure Park, located at the junction of Great Cambridge Road / Southbury Road. The site comprises a 15 screen cinema and four restaurants. The Leisure Park is owned by Royal London Mutual Insurance Society Limited. The site is a potential redevelopment site, likely to be available during the next five years. As part of this draft Local Plan representation, the Leisure Park site is promoted for a high density residential led development.
- 6.2 As a result of the recently approved London Plan, LB Enfield need to allocate sites to meet the ten year target of 12,460 new homes up to the year 2026. The representation site is able to bring forward a meaningful amount of housing, so as to assist LB Enfield in meeting this target. The representation site is ideally suited to accommodate residential development. Notably, it represents previously developed land, it is accessible being well served by public transport, is in one ownership and is potentially available during the next five to ten years. Plus it is large enough to bring forward a significant amount of new housing, including affordable housing.
- 6.3 Royal London supports the draft Plan's principle of medium growth, so as to meet housing targets. Nevertheless, this strategy is reliant upon making the best use of brownfield sites such as the representation site. Royal London also support the designation of Southbury as a placemaking area, where redevelopment is encouraged and for example, where the principle of tall buildings is recognised. Finally Royal London support the inclusion of Southbury Leisure Park as a site allocation (Site SA11), designated as a site for redevelopment to provide new homes and non residential floorspace. Albeit, Royal London are of the opinion that the site has potential to deliver a greater quantum of residential units than the capacity estimate of 450. Work to date suggests that a more realistic figure is closer to 750 residential units.