

Date: 13 September 2021

Strategic Planning and Design  
London Borough of Enfield  
Civic Offices  
EN1 3BR

Dear Sir / Madam,

**ENFIELD LOCAL PLAN – MAIN ISSUES AND PREFERRED APPROACHES (JUNE 2021)  
REPRESENTATION BY GERAS ESTATES LIMITED AND HEBE DEVELOPMENTS LIMITED  
ARNOLD HOUSE, ENFIELD (SITE SA29)**

I am instructed by Geras Estates Limited and Hebe Developments Limited (“Geras and Hebe”) to make representations upon the new draft Enfield Local Plan – Main Issues and Approaches. Geras Estates Limited and Hebe Developments Limited have a contractual interest in the site at Arnold House, Enfield, which is subject of an allocation in the draft Plan, Site SA29.

The Arnold House can logically be split into two, as indeed is indicated by the Site SA29 location plan. The eastern part of the site is a brownfield site in the existing defined built up area and is known as Site 1, in which Geras Estates Limited has a contractual interest. The western part of the site is undeveloped and is currently in the Green Belt and is known as Site 2 in which Hebe Developments Limited has a contractual interest. The dividing red line on the Site SA29 location plan correctly shows the boundary between Sites 1 and 2.

Both Geras and Hebe are broadly in support of the new Draft Plan, both in terms of its proposed housing strategy and its allocation of the Arnold House site (Site SA29) for development. The reasons are set out below.

**Local Plan Strategy**

Geras and Hebe fully recognise the challenging role of LB Enfield to meet housing targets, in accordance with advice in the National Planning Policy Framework (NPPF) and within the recently adopted London Plan. For example, the NPPF advises local planning authorities to ensure that sufficient land is available in the right places to support housing growth and to deliver a wide choice of homes. With regard to plan making, the NPPF also advises that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. The London Plan sets a target of 12,460 new homes in LB Enfield during the period 2028/29.

It is noted the new Local Plan aims to meet the Borough’s requirements up to the year 2039. It is clear that in order to meet housing requirements and meet the needs of its growing population that there is a need to plan positively for housing growth. Accordingly, Geras and Hebe are supportive of the draft Plan’s principle of medium growth, whereby 25,000 new homes are planned during the Plan period. However, as fully recognised by the draft Plan, there is not enough brownfield sites available in order to achieve this growth figure and therefore it is necessary to release suitable sites from the Green Belt.

Notwithstanding the need to accommodate housing growth, Geras and Hebe also stress that it is necessary for the draft Plan to recognise the need to provide both living and care accommodation for the elderly. In this connection, there is both a pressing national and local need to provide for more care homes. For example, it is known from local studies that there is a shortfall of in the order of 1,000 bed spaces within LB Enfield.

## **Site 1**

The site contains Arnold House, a former residential care home. The building has been vacant for over a year. Arnold House, along with ancillary buildings and hardstanding takes up the majority of Site 1, which is 0.56 ha (1.39 acres). The site is accessed from The Ridgeway. The site is surrounded by residential development on three sides and properly falls within the built up area. Accordingly, the site constitutes previously developed land (or a brownfield site) within the built up area.

The site is in an accessible location. Regular bus services are available from The Ridgeway, whilst Gordon Hill overground train station is a short walk to the east. Enfield town centre is approximately 2km to the south. The site is also close to a number of local services, including Enfield Hospital.

The site's redevelopment potential has been recognised in the past. In November 2006 outline planning permission was granted for 15 residential units, with a reserved matters approval in August 2009.

The draft Local Plan reaffirms the site's position within the defined built up area and the fact that the site constitutes previously developed land. The draft Plan allocates the site for housing, with an indicative capacity for 36 homes.

Geras Estates Limited accept that the site could theoretically accommodate housing, owing to the nature of the area and as illustrated by the November 2006 permission. However, the site accommodates a care home building, albeit vacant. Accordingly, the lawful use of the site is as a care home. Geras Estates Limited intend to redevelop Site A for a care home / extra care homes scheme. This is in response to both local demand and local need, as clearly demonstrated by local studies. Provisional work has indicated that for example, the site could accommodate a 80 bed care home and approximately 10-15 extra care/residential units.

In light of the care home proposals, the site is unlikely to be available for a conventional housing scheme, albeit there is likely to be an opportunity to bring forward residential accommodation for the elderly. For this reason, it is requested that the SA29 allocation for Site 1 be amended to 'care home / extra care units.' The benefit being to assist in meeting Local Plan requirements to provide for elderly accommodation and a specialist form of housing.

## **Site 2**

Site 2 lies to the west of Arnold House. The site is largely undeveloped, comprising former grassed terrace gardens, a disused tennis court and wooded areas. The site is now largely overgrown. It is 0.76 ha (1.89 acres). For the same reasons as Site 1, the site is an accessible location.

Site 2 is currently in the Metropolitan Green Belt. However, the site is well related to the built up area, with Site 1 and the former care home being immediately to the east and the residential roads of Woodridge Close and Crofton Way being to the north and south respectively. Logically, Site 2 now forms a natural part of the built up area. Indeed, development can be accommodated on the site without causing harm to the purposes of the Green Belt.

Like Site 1, the development potential of Site 2 has been recognised previously. A permission for a 20 bed care home was granted on appeal in October 2008. In granting permission, the Secretary of State accepted that there were very special circumstances to outweigh the harm to the Green Belt, which included the need for the care home and significantly, only slight loss of openness.

The development potential of Site 2 is recognised by the draft Plan. The site is proposed to be removed from the Green Belt, to be included within the defined built up area and allocated for housing. The SA29 allocation has an indicative capacity for approximately 62 homes on the site.

Hebe Developments Limited fully support the removal of the site from the Green Belt and its allocation as a housing site. As explained previously, it is necessary for the Council to release sites from the Green Belt, so

as to meet housing requirements. Site 2 is ideally suited for residential development and no longer performs the function of a Green Belt site. Notably, the site is surrounded on three sides by built development and is in an accessible location, well served by public transport. Accordingly, the site represents a logical extension to the built up area and its allocation for development will create a stronger and more defensible Green Belt boundary. Provisional work undertaken by Hebe Developments Limited indicate that the site has the capacity to bring forward in the order of 62 units. The site is available for development and Hebe Developments Limited are of the opinion that the site is suitable and for the level of residential development proposed by the draft Plan.

## **Summary**

Geras and Hebe are broadly supportive of the approach adopted by the draft Enfield Local Plan. They support the principle of the medium growth housing option. However, Geras and Hebe recognise that this option requires the release of some Green Belt sites. Geras Estates Limited and Hebe Developments Limited have a legal interest in the Arnold House site comprising of Site 1 and Site 2 respectively, subject of the SA29 allocation. Both Sites 1 and 2 are available for development. Geras Estates Limited are of the opinion that Site 1 should be allocated as a care home / extra care units. Hebe Developments Limited fully support the removal of Site 2 from the Green Belt and its allocation for residential development.

I look forward to discussing the Arnold House sites with you further. In the meantime, I look forward to being updated on the progress of the Local Plan.

Yours faithfully,