



Response to Draft Local Plan

10th September 2021

Introduction

This document has been produced by Lansdown to support the submission of Anglo Aquatic Plant Co, Strayfield Road, Enfield for 65 dwellings (subject to masterplanning) 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 further detail with regard to the proposed residential redevelopment of the brownfield site. The site has been located in the map (Figure 1) below by the red placemark.

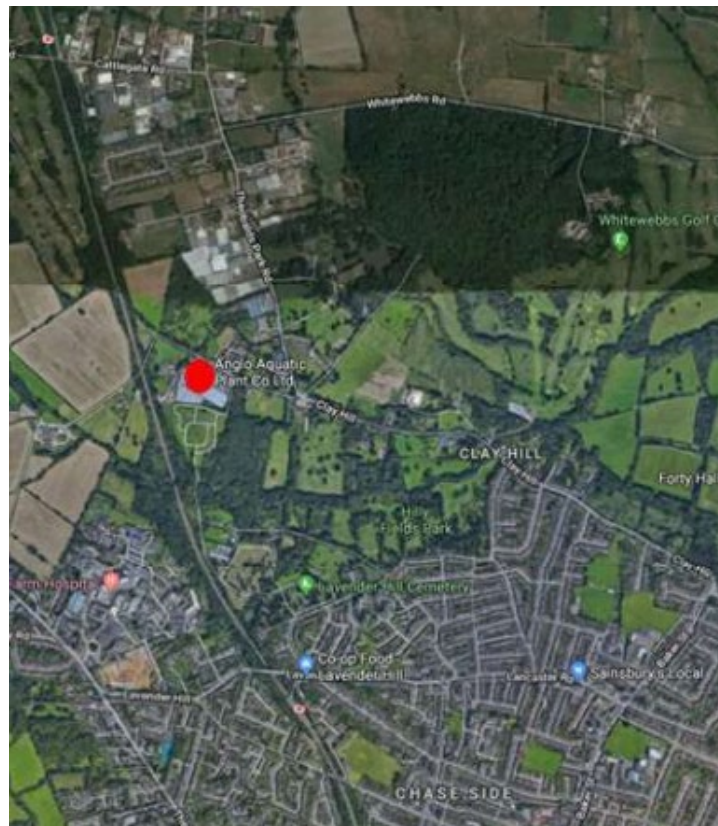


Figure 1: Location of Anglo Aquatic

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. However, despite our residential proposal for the site, it currently falls outside of the ‘Indicative location for housing-led areas in Green Belt’ as depicted by Figure 2 below. One of the key purposes of this statement is therefore to propose an adjustment to this boundary to include Anglo Aquatic as an indicative location for housing-led development and further present the suitability of the site. It is considered that this deliverable housing proposal would be key in helping Enfield Council achieve its target of 25,000 new homes over the plan period up to 2039.

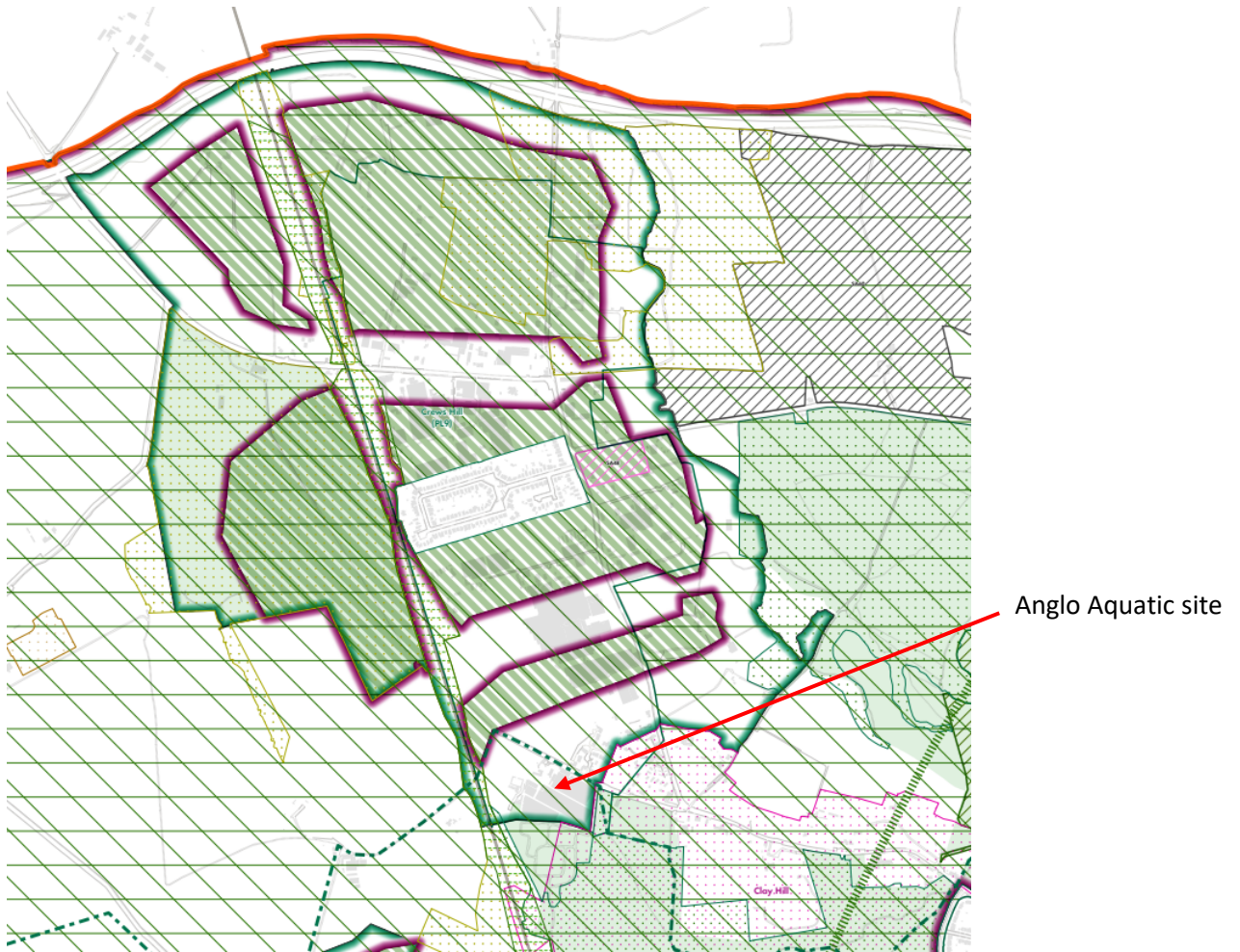


Figure 2: Draft Policies Map of Crews Hill Placemaking Area

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 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. This clearly sets out 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, the Draft Local Plan has made this issue a top priority and adopted a ‘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 placemaking areas that have been identified within the Enfield Draft Local Plan as part of the carefully planned Green Belt release includes Crews Hill which we also give our full support to. Plans for the Crews Hill Placemaking Area has 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. The sustainable residential proposal for Anglo Aquatic would make a significant contribution to 3000 dwelling provision of the Crews Hill Placemaking Area and would support the Council in meeting its growth needs.

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 to the improvement of blue infrastructure networks, delivery of strategic flood mitigation and create Sustainable Drainage Systems (SuDS), trees and rewilding routes/areas.

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.

However, in order to adequately deliver the 3000 dwellings set out in the vision, we believe the 'Indicative location for housing-led areas' should better reflect the land that has been made actively available through the Local Plan process. The indicative housing led area that has been drawn up for Crews Hill cuts through existing ownership boundaries. These factors may threaten the deliverability of housing for Crews Hill and so sustainable sites such as Anglo Aquatic, that has been promoted for residential use should be included within the indicative housing led area. Making this proposed change will help make best use of the land available in the Crews Hill Area and deliver the aspirations set out in the vision of Policy SP PL9.

It is also considered that the surrounding area of Anglo Aquatic and landscape will be better complemented (as shown in Figure 3) by the high-quality residential proposal than the existing development which is characterised by existing blocky glasshouses, warehouse buildings and other structures. Therefore, a positive contribution to the character and nature of the local area would be achieved as a result of the development.



Figure 3: Indicative layout for the site within the context of the surrounding 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. Therefore, our key proposed change to Policy SP PL9 would be to amend the Indicative location for housing-led areas to include the available and deliverable Anglo Aquatic site. 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. 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. We therefore, support 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 residential proposal at Anglo Aquatic would encourage the use of active travel modes, given that the site benefits from direct access to National Cycle Route 12 and a public footpath from Cattlegate Road to Strayfield Road as illustrated in map below (Figure 4). New development at Anglo Aquatic will enable a new relationship with the

surrounding landscapes to emerge and create a new framework of green infrastructure that would encourage physical activity.

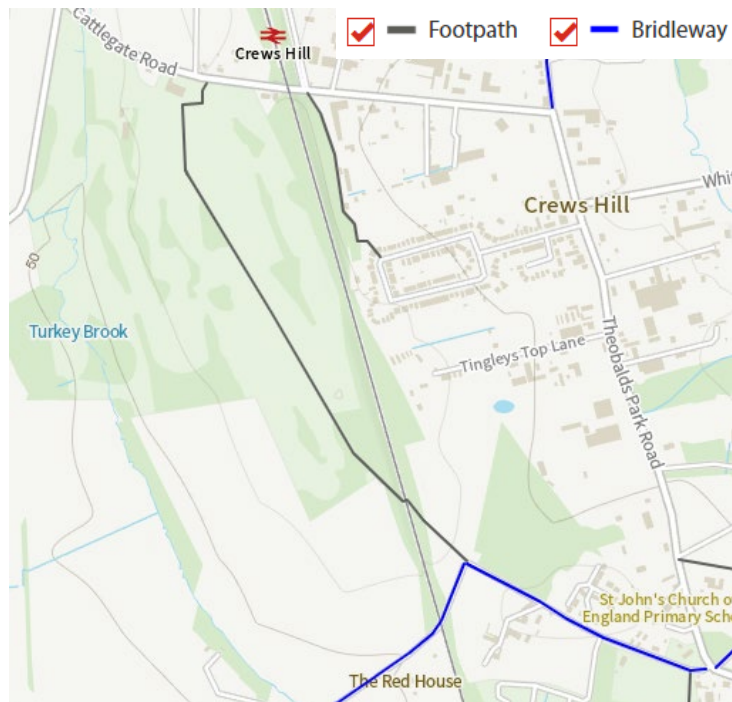


Figure 4: Enfield Public rights of way map.

Due to fact that the site falls within the Crews Hill Placemaking Area, access to a wide range of local facilities and services would be provided. Access to local healthy food opportunities, allotments and food growing spaces would be abundant in this location given that Crews Hill is a hub for food growing and horticultural activity. The Placemaking Plan for Crews Hill sets out that the new community will support this.

Overall, we consider that the proposal at Anglo Aquatic will support these healthy and active lifestyle principles and has the potential to address any adverse health impacts and contribute to improving the health and wellbeing of the Borough.

Chapter 6 Blue and green Enfield

Strategic Policy SP BG1: Blue and green infrastructure network

We support the objectives set out in Policy BG1 which prioritises development that will contribute to the creation of a “more integrated, multi-functional and accessible green and blue infrastructure networks”. This is consistent with the vision set out in Policies SP BG1-BG9. For example, Placemaking Principle 14 of Policy SP PL9 states that development at Crews Hill should incorporate “green links to the surrounding designated landscapes, for example Enfield Chase, and the National Cycle Network route 12”.

Anglo Aquatic falls within close proximity to key blue and green infrastructure networks, such as Enfield Chase which connects Crews Hill and Trent Park. The proposal site will benefit from restoration of this area as detailed in the Crews Hill Topic Paper, which will comprise a publicly

accessible woodland, open space, sustainable movement routes and extensive rewilding. Therefore, we believe that effective masterplanning of the Crews Hill Placemaking Area as supported in Policy SP SS2 has the potential to protect and enhance these green and blue infrastructure networks.

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.

A Landscape and Visual Overview and Green Belt Assessment was undertaken by CSA Environmental which describes the existing landscape character and quality of the site at Anglo Aquatic and the surrounding area. This report was submitted to the Council on the 6th April 2021 as evidence to support the residential proposal for the site. The report then also examines the suitability of the site to accommodate the development proposal, and the potential landscape and visual effects on the wider area. The analysis considers the effect of developing the site on the Green Belt purposes, as set out in paragraph 138 of the NPPF.

The report makes the following key conclusions:

- The site is not covered by any statutory or non-statutory designations for landscape character or quality.
- The site is assessed as being of low landscape and townscape quality, value and sensitivity. This is because the glasshouses at the site are not seen in conjunction with the other horticultural businesses further north, they appear visually separate and do not appear wholly compatible with the neighbouring residential area which is visible from vantage points in the south.
- The proposal will constitute an improvement to the character of views where the existing plant nursery is visible due to the replacement of the existing blocky and reflective glasshouses, warehouse buildings and other structures with high quality and well-designed new residential development, and augmentation of the site's boundaries with new native tree planting.
- The site will only be visible from vantage points where the existing buildings are currently visible, i.e., no greater visual envelope. Views into the site are generally restricted to the immediate vicinity and only offer medium and longer distance views of the existing buildings from vantage points south and southwest of the site.
- Given the site's location and PDL nature, it is capable of being removed from the Green Belt and allocated for development, without compromising the objectives and purposes of the Green Belt or adversely impacting on the wider landscape character of the area.
- The site's performance against the first four Green Belt purposes is summarised in the table below:

Purpose 1: To check the unrestricted sprawl of large built-up areas	Relatively Weak Contribution
Purpose 2: To prevent neighbouring towns merging into one another	No Contribution
Purpose 3: To assist in safeguarding the countryside from encroachment	Relatively Weak Contribution
Purpose 4: Preserve the setting and special character of historic towns	Relatively Weak Contribution

Should residential development come forward at the site there are various design principles that would be incorporated in order to reduce the impacts on Green Belt openness. For example, the proposed houses are laid out to allow for a substantial tree planting belt around the entire site to reduce impact on the Green Belt. Backing onto this perimeter belt are the larger houses, mainly 'link-detached', all with generous gardens. An indicative site layout is provided in Figure 5 below, showing our vision for the site.



Figure 5: Indicative layout of the site

Further design principles (that will help minimise harm to Green Belt land) will be illustrated at later date when more detailed plans of the site and a wider masterplan of the Crews Hill Area are produced.

Local Plans should consider and allocate the most suitable sites for development. Where development pressures are so great as to require the release of Green Belt land (such is the case in Enfield), it is important to ensure sites allocated for development are the most appropriate. This is specifically addressed in Paragraph 142 of the NPPF: *“Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed”*. The Draft Local Plan for Enfield has established the exceptional circumstances to justify the release of Green Belt land to meet the development needs of the Borough and as a “starting point” aims to make the most efficient use of PDL sites in the delivery of new housing to meet local needs.

The above conclusions and evidence provided within the LVIA prove that given the site’s weak contribution to the NPPFs Green Belt purposes and sensitive design of the proposal, it should be considered as one of the most suitable sites within the Crews Hill Placemaking Area for residential development. The redevelopment of Anglo Aquatic, a PDL site, provides a spatial opportunity to minimise Green Belt harm within the area and supports the case for including the site within the housing-led area with the land immediately north.

Chapter 8 Homes for all

Strategic Policy SP H1: Housing Development sites

We support the Council’s starting point in delivering and allocating new housing, which aims to make most efficient use of PDL. This is something we considered when deciding to promote the mixed-use PDL site at Anglo Aquatic.

The previous discussion also highlighted the exceptional circumstances that justify Green Belt release. In this sense, we support the Green Belt allocations proposed in this policy and support the placemaking areas as the most appropriate method to release Green Belt land to meet the evidenced housing need without compromising the wider strength and quality of the Enfield Green Belt as a whole.

Strategic Policy SP H2: Affordable housing

We support the aim of Policy SP H2 which aims to secure 50% of all new homes as affordable. This would help make a significant contribution to the LHNA’s estimated need of 1,407 affordable homes per annum in Enfield. The proposal at Anglo Aquatic would be delivered in line with this Policy and aim to meet the guideline mix of affordable housing provided within the policy. The development would achieve the same high-quality standards as the private housing element of the scheme.

Policy DM H3: Housing mix and type

As mentioned in the previous section of this statement, there is also an urgent need to deliver family housing within Enfield Borough. We therefore support Policy DM H3, which lists both 3 and 4+ bedroom market properties are listed as “high priority”. This reflects the most up to date evidence as set out in Enfield’s Local Housing Needs Assessment 2020 (LHNA) which indicates a clear long-term vision and strategy for Enfield to deliver on market family housing over the plan period.

Table 8.5 from the LHNA (below) shows that recent housing delivery is not reflecting the projected demographic need to deliver larger dwellings across all types of tenures. There is a variance of 14.8% for 3-bedroom properties and a 2.3% variance in 4+ bedroom properties in the Borough.

No. bedrooms	Market (%)			Affordable (%)			All Tenures (%)		
	Past Delivery	Future need	Variance	Past Delivery	Future need	Variance	Past Delivery	Future need	Variance
1	36.5	6.4	-30.1	31.6	14.7	-16.9	35.2	14.4	-20.8
2	36.0	22.0	-14.0	42.9	35.3	-7.6	37.8	41.5	3.7
3	18.7	42.0	23.3	18.4	42.3	23.9	18.7	33.5	14.8
4 or more	8.8	29.6	20.8	7.1	7.7	0.6	8.3	10.6	2.3
TOTAL	100.0	100.0		100.0	100.0		100.0	100.0	

The significant unmet need for family housing within Enfield has meant many families residing in the Borough have been forced to migrate outwards towards areas such as Hertfordshire in order to secure larger and more affordable housing.

This issue has been previously identified within Enfield’s Housing Strategy 2012-2027 prioritised in Aim 2 that they will increase housing supply to meet the needs of local people by:

“Increasing the number and mix of homes of all tenures including affordable and family-sized homes.”

This aim has been reflected in the Draft Local Plan by Strategic Objective 3, which seeks to:

“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.”

The policy commentary for DM H3 states that the Council will rely on lower density greenfield to deliver more family housing, given the majority of urban developments will comprise flatted developments.

The proposal at Anglo Aquatic offers a great opportunity to help address the shortfall of family housing and deliver family-sized dwellings, which will make a significant contribution to the proposed housing target. The site offers sufficient space to build larger-sized family housing with private outdoor amenity space, which has become more desirable following the outbreak of the COVID-19 pandemic.

The site's location within the new Crews Hill Placemaking Area makes it suitable for family housing. The development would benefit from the improved functionality and connectivity of the east-west green corridors across the north of the Borough and improved access to a range of local amenities and services.

Providing a diversity of housing sizes, types and tenures is emphasised in place-making principle 11 for Crews Hill within Draft Strategic Policy SP PL9. As such, the provision of family-sized dwellings in this location is in complete accordance with the spatial development and housing delivery policies of the Draft Local Plan and would make a significant contribution to the housing need of the Borough.

Chapter 11 Rural Enfield

We strongly agree with the Chapter 11's support for a greater diversity in rural areas of Enfield, encouraging a broader range of activities and infrastructure in a manner that is sensitive to the character of the Green Belt and open countryside. In pursuing this strategy, Enfield will be able to deliver the homes it needs, in terms of numbers, type and affordability.

Policy DM RE2: Improving access to the countryside and green corridors

We also strongly support the above policy which requires new development to "protect, maintain and improve" access to vast network of walking and cycling routes in the Borough. This will encourage active travel routes for new residents and increase the use of green infrastructure networks as previously discussed. In accordance with the draft policy, the proposal at Anglo Aquatic will provide direct links to public footpath and bridleway routes that extend through Enfield Chase.

Chapter 13 Movement and connectivity

We support general transport principles that have been outlined in Chapter 13 and agree with the draft approaches set out in T1 and T2. 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.

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 transport 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.

The Sustainability Movement and Connectivity place-making principles outlined in Draft Strategic Policy SP PL9 are consistent with the policies in Chapter 13 and indicate that "Development at Crews Hill should improve the functionality and connectivity of the east-

west green corridors across the north of the Borough in order to minimise the reliance of the development on vehicular access.”

A Transport Note was prepared by Paul Basham Associates which reviews the highway and transport issues related to the proposed development with regards to the existing conditions and accessibility of the site, the proposed site access, and the traffic impact of the proposal. This report was previously submitted to the Council on 6th April 2021.

A summary of the report has been produced below.

Transport Note Summary

The site affords a relatively good level of accessibility to local services and amenities, such as a bus stop, a nursery, primary school and hospital as outlined in the table below:

Service/Facility	Distance from site (m/km)	Walking Time (minutes)	Cycling Time (Minutes)
Public Transport			
Bus Stop	300m	4	1
Railway Station (Crews Hill)	2.1km	26	9
Railway Station (Enfield Town)	3.6km	45	15
Leisure			
Cricket Club (North Enfield Cricket Club)	130m	2	<1
Park (Hilly Fields Park)	1.1km	14	5
Golf Course (Whitewebbs Park Golf Course)	1.2km	15	5
Riding School (Gillian’s Riding School)	1.4km	18	6
Schools			
Primary School (Saint John’s Church of England Primary School)	450m	6	2
Nursery (Head Start Day Nursery)	600m	8	3
Secondary School (Enfield County Lower School)	2.2km	28	9
Health			
Hospital (Chase Farm Hospital)	2.1km	26	9
Pharmacy (Chase Farm Pharmacy)	2.1km	26	9
Food and Drink			
Public House (The Rose and Crown, Clay Hill)	1.1km	14	5
Café (Fields)	1.5km	19	6
Convenience Store (Co-op)	2.4km	30	10
Misc.			
Church (Saint John the Baptist)	350m	4	1
Community Centre (Brigadier Hall)	2.0km	25	8
Petrol Station (Shell)	2.0km	25	8

It should also be noted that the National Cycle Network (NCN) Route 12 is situated adjacent to the site and runs along the site frontage further encouraging use of sustainable transport modes from the site. The map (Figure 6) below illustrates how the National Cycle Route 12 will form a sustainable transport corridor between the southwest of the Crews Hill Placemaking Area and the north east of the Chase Park Placemaking Area, increasing connectivity and green routes for residents.

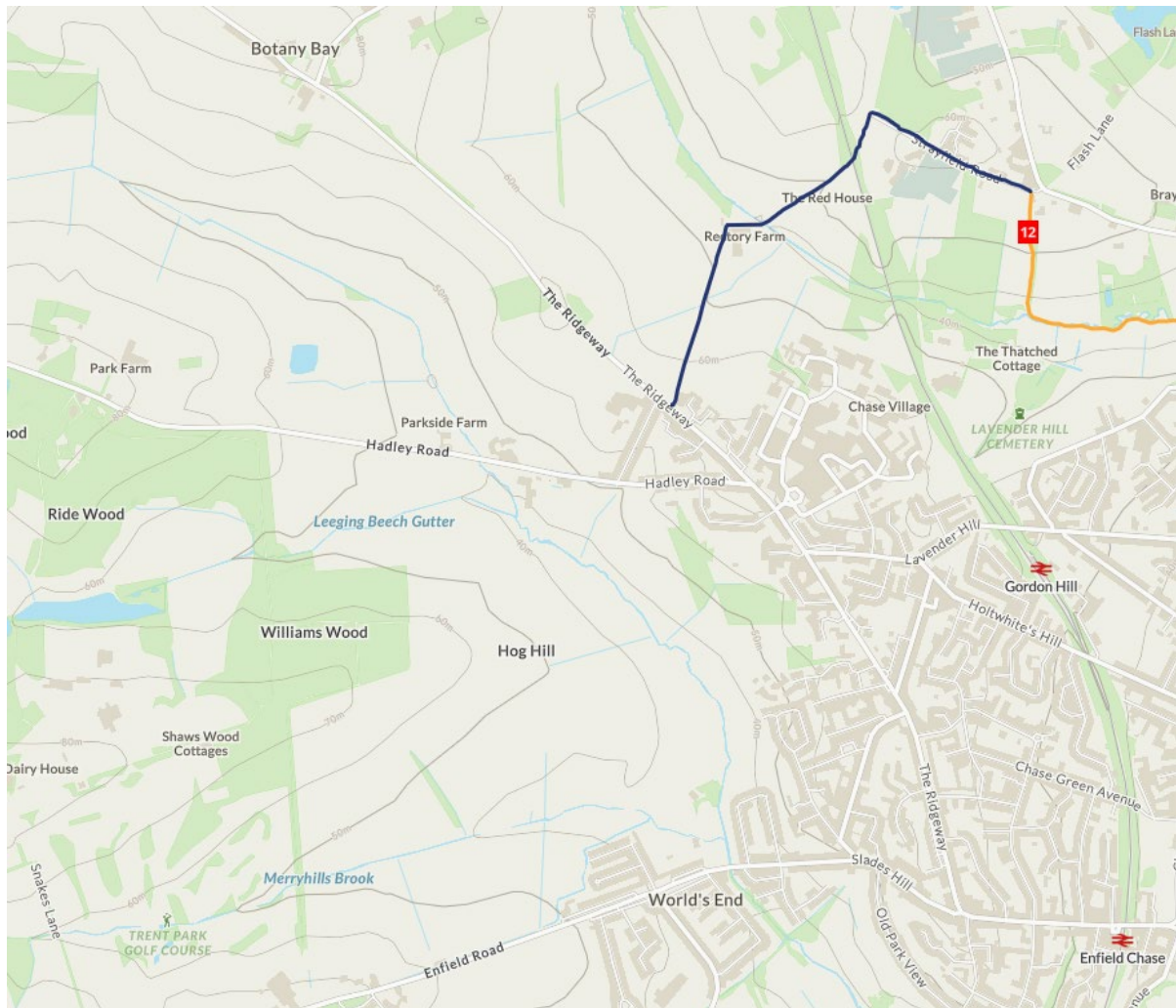


Figure 6: OS Map illustrating the National Cycle Route 12

Proposed vehicular access which will be gained from Strayfield Road, would achieve appropriate visibility in line with Manual for Streets (MfS) standards for a 30mph road. The gated access would be upgraded to provide a bellmouth arrangement measuring approximately 5.5m in width with 6m radii. It was confirmed that a footway along the site frontage could also be provided, ensuring safe pedestrian access in and out of the site. Given that Strayfield Road has varying widths of approximately 5-10m, the transport assessment found there to be sufficient space to provide a 1.5-2m footway that would connect potential site users as well as any pedestrians using Strayfield Road to the existing footways on Clay Hill and Theobalds Park Road. It is therefore considered that safe and suitable access can be provided to the site, as per the requirements of paragraph 110 of the NPPF.

The results of a trip generation assessment concluded that a proposed scheme for 65 dwellings is expected to generate up to 294 daily (12 hours) trips. This represents an estimated increase of 202 daily vehicle trips and equates to the addition of one trip every four minutes onto the local road network on average over the day. It should be noted that the report specified that the 92 two-way vehicle movements associated with the existing site is an estimation and does not necessarily reflect all of the trips associated with the existing site.

Additionally, as a result of the proposed development there would be a significant decrease in the number of lorries frequenting the site, given the residential nature of the scheme. The disruption and nuisance caused by the larger vehicles on Strayfield Road would be reduced too, increasing highway safety. As such, it was concluded that the proposed development is therefore not anticipated to have a significant adverse impact on the operation or safety of the local road network.

The Draft Local Plan already indicates the Council intends to further upgrade and improve local facilities, services and public and active transport infrastructure in Crews Hill in order to facilitate the development of the placemaking area. Therefore, the sustainability of the site (with consideration of the improved future sustainability), makes it an appropriate location for a formal residential allocation in the Emerging Local Plan.

It is evident from the assessment within the associated Transport Note that safe vehicular and pedestrian access can be achieved at the site with no harmful impact on highway safety. The sustainably located proposal falls in accordance with the draft policies within Chapter 13 with particular regard to the 'Sustainable Movement and Connectivity' place-making principles for Crews Hill.

Conclusion

This statement forms part of our response to the Draft Enfield Local Plan (2021-2039) consultation with reference to relevant policies in relation to the proposal for 65 dwellings (of which 61 will be family homes) at Anglo Aquatic Plant Co, Strayfield Road, Enfield. Overall, we give our support to the Draft Plan which includes the site within the boundary of the Crews Hill Placemaking Area. However, we do propose that the indicative housing led area is adjusted to include Anglo Aquatic based on a number of factors that include the availability of the site, its sustainability and impact on the surrounding landscape.

Given the current housing crisis faced by Enfield and evidenced housing need, we support the Council in its decision to deliver in the region of 25,000 new homes over the plan period and the delivery of the placemaking areas.

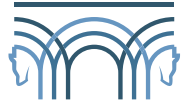
This statement has established that the creation of the Crews Hill Placemaking Area will provide a unique opportunity for the Borough to deliver a significant portion of its housing need whilst creating a sustainable rural community that will be of benefit to both the existing and future residents of the area. The proposal will respect the topography of the exiting landscape and deliver environmental benefits such as flood water management, biodiversity net gain and improving public access.

Evidence provided within the associated LVIA prove that given the site's weak contribution to the NPPFs Green Belt purposes, it should be considered as one of the most suitable sites within the Crews Hill Placemaking Area for residential development. The redevelopment of Anglo Aquatic, a PDL site provides a spatial opportunity to minimise Green Belt harm within the area and supports the case for including the site within the housing-led area with the land immediately north.

The proposal would make a significant contribution to the 25,000 net additional homes to be delivered across the Borough and the 3000 dwelling target given to Crews Hill as specified in the Draft Local Plan. The scheme, which prioritises family housing would reflect the evidenced housing type and mix that is needed in the Borough as detailed in the Draft Plan that makes market 3 and 4+ bedroom dwellings a 'high priority'. Development would be deliverable in the 0-5 year period and so would be able to address any the immediate shortfall in family housing.

The assessment undertaken within the associated Transport Note confirms that safe vehicular and pedestrian access can be achieved at the site with no harmful impact on highway safety. The sustainably located proposal falls in accordance with the relevant Draft Local Plan policies, contributing to their aims and principles.

The proposed development, in principle, would demonstrably be a meaningful addition to the new Crews Hill Placemaking Area, helping make a significant contribution to established need of family housing in the Borough. Therefore, it is considered that the site should be included within the indicative housing led area and subsequently allocated in the emerging Local Plan.



Lansdown