

# Representation Statement.

**Land East of Junction 24, M25, Enfield**

London Borough of Enfield

Draft Local Plan (Regulation 18) Publication Consultation

**Prepared on behalf of The Mayor and Burgesses of the  
London Borough of Enfield**

**13 September 2021**

**Public**

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NA

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<b>Date</b>	<b>Originator</b>	<b>Approved</b>
13 September 2021	Name:	Name
	Position    Planner	Position    Partner

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## 1. Introduction

- 1.1 This Representation Statement has been prepared by Knight Frank on behalf of The Mayor and Burgesses of the London Borough of Enfield, the landowners of Land at New Cottage Farm / East of Junction 24 M25, EN6 5QS (referred to hereafter as “the site”).
- 1.2 This Statement has been submitted to the Regulation 18 Local Plan consultation currently being undertaken by the London Borough of Enfield (“the Council” / “the Borough”/ “LBE”).
- 1.3 This Statement builds on the site information submitted to the LBE Call for Sites in early 2021. As outlined in the latest Housing and Economic Land Availability Assessment (2021), the site source reference is **CFS155**.
- 1.4 In summary, we support the preparation of the new Local Plan and agree with the overall development strategy.
- 1.5 We support the allocation of the site at New Cottage Farm / East of Junction 24 M25 as a key logistics hub under draft Policy SA54, and consider the site can make a significant contribution towards achieving the Council's vision and strategic objectives.
- 1.6 We support all policies within the plan and we provide a range of comments and recommendations in this Statement with the intention to help strengthen the Local Plan so that it is found sound at Examination. Our comments are based on guidance set out in the National Planning Policy Framework (‘NPPF’) which was updated in July 2021 as well as our experience working on strategic development projects.
- 1.7 We propose that the site is bought forward for employment-led development and that exceptional circumstances exist for its release from the Green Belt. The site would achieve sustainable patterns of development and address local development needs.
- 1.8 Our recommendations to the Council generally seek further clarification on important matters which we would expect to be resolved within the Regulation 19 Local Plan. As a part of this process, we suggest that the site offers the potential to provide additional development beyond that envisaged in the draft Local Plan.
- 1.9 Notably, approximately half of the whole site is located in Hertsmere Borough Council (‘HBC’), and we consider the whole site should be allocated for employment uses. We have engaged with HBC on this matter over the last 18 months.
- 1.10 Moving forward, we would welcome the opportunity to further engage with the Council and plan-makers to help bring forward the site for future development.
- 1.11 This Statement is structured as follows:
- Section 2 – sets out the background to the site, including site description and planning history;
  - Section 3 – considers the proposed draft Local Plan, including our responses to relevant policies;
  - Section 4 – provides the case for development at the site, including a summary of the proposals and exceptional circumstances; and
  - Section 5 – outlines key findings and suggested next steps.

## 2. Site Background

- 2.1 This section provides a summary of the site. It provides a description of the site and the surrounding area, summarises relevant planning designations, provides an overview of planning history and outlines proposals for future development.

### Site Description

#### The Site

- 2.2 The site address is Land at New Cottage Farm / East of Junction 24 M25, EN6 5QS. It is located in the north west part of the Borough, and approximately half of the site is located in Hertsmere.
- 2.3 The site is approximately c. 11 hectares (27 acres) in size with 4.7 hectares (11.6 acres) falling within LBE.
- 2.4 The site is bounded by the M25 (Junction 24) to the north; The Ridgeway (A1005) to the south; a private, single-track road to the east and Potters Bar Interchange to the west. New Cottage Farm, a two-storey detached dwelling, is also located to the south east corner of the site, however we understand this to fall outside the site ownership.
- 2.5 The site currently comprises undeveloped agricultural land, and is in single ownership (LBE). Access to the site is currently from The Ridgeway (A1005) to the south.
- 2.6 The topography of the site is generally flat and is screened from The Ridgeway and the M25 by large trees and bushes that border the site on all sides.

#### Surroundings

- 2.7 In terms of wider surroundings, to the south of the site beyond The Ridgeway (A1005) is a small employment site consisting of light industrial and commercial uses. Also, to the south of the site are a number of large detached dwellings with access to these directly off The Ridgeway (A1005). To the east of the site is St Johns Preparatory School with agricultural land surrounding the site beyond this to the south and east. To the north of the site, beyond the M25, is Potters Bar (within Hertsmere Borough Council).
- 2.8 Potters Bar is located c.600m to the north of the site, on the northern side of the M25. This settlement offers a range of services and facilities including a train station. The closest bus stop, situated on The Ridgeway (A1005), is located within 100m of the site. Direct services are provided towards Potters Bars three to four times per hour. This service also provides access to Chingford Railway Station and Enfield Town in the opposite direction.

### Planning & Environmental Designations

#### Existing Designations

- 2.9 The site is within the Metropolitan Green Belt, and located outside an existing settlement boundary. It is also located within Flood Zone 1 and therefore at lowest risk of fluvial flooding. The site is not located within a Conservation Area, and there are no listed buildings on-site or in close proximity to the site. There are no other designations impacting the site.

## Proposed Designations

2.10 The draft Local Plan proposes to release the site from the Green Belt, under draft Policy SA54 (Land East of Junction 24). The site also falls within the London National Park City covered by draft Policy PL8.

## Planning History

2.11 There is no planning history related to the site itself, however there are a number of planning applications in close proximity to the site. These are outlined in **Table 2.1** below.

**Table 2.1 – Planning History**

Application Reference	Address	Proposal	Decision
21/0109/FUL	Mandevyll, The Ridgeway, Potters Bar EN6 5QS (Located to the south of The Ridgeway)	Demolition of existing dwelling and erection of new two storey building to provide 6 x flats (4 x 2 bed and 2 x 3 bed).	Submitted 18 January 2021. Awaiting decision.
19/1391/PD56A	Hadley On The Hill Agricultural Building On Land Behind Staggs Ridge Flats, Staggs Hill, Potters Bar (Located to the north of Staggs Hill)	Change of use of agricultural barn to 3 x 2-bedroom self-contained dwellings (C3).	Refused 8 October 2021.
18/03396/FUL	New Cottage Farm, The Ridgeway Enfield EN6 5QT (Outside the site boundary)	Conversion of dwelling house to 4 x self-contained flats (2 x 2-bed and 2 x 3-bed).	Granted 22 January 2019.
17/1247/FUL	Mandevyll, The Ridgeway, Potters Bar EN6 5QS (Located to the south of The Ridgeway)	Demolition of existing dwelling and outbuildings and erection of 8 (eight) 2-storey dwellings (2 x 3 bed & 6 x 4 bed) in a U shaped formation around a landscaped courtyard with associated car parking, bin/cycle store and amenity space.	Refuse 13 October 2017.

2.12 There are no relevant applications in the wider setting of the site.

2.13 The site was also submitted to the LBE's Call for Sites exercise in early 2021 (Reference: CFS43). This submission stated that the site should come forward for employment-led development.

2.14 Since the start of 2021, we have been discussing the site opportunity with HBC. A submission was made to the HBC Call for Employment sites in early 2021 and follow-on meetings have been undertaken with planning officers.

2.15 Hertsmere draft Local Plan (Regulation 18) is being considered at Full Council meeting on 30 September 2021, with consultation anticipated to commence on 11 October 2021. Currently, the site is not proposed to be allocated for development as part of the draft Local Plan.

## Proposed Development

2.16 The site is 11 hectares in size (with 4.7 hectares falling in LBE). It is a strategic development site that we consider is capable of providing employment-led development. In terms of employment development, the following information on the development opportunity was submitted to HBC:

- **Site Coverage:** Low estimate of potential site coverage to be 50%. However, in reality, potential site coverage is considerably higher than this.
- **Land Use:** The site is most suited to logistics use (Use Class B8) given its proximity to the M25. The site could also potentially accommodate the relocated Hertsmere Bus Depot site (subject to further discussions with Officers).
- **Floorspace Quantum:** Based on a site coverage of 50%, we anticipate the site could accommodate 400,00sq.ft of employment floorspace. Further detailed engagement and agreement with the LBE may allow the site could accommodate 700,000-800,000 sq.ft of employment floorspace.
- **Jobs:** Based on the above floorspace quantum, we would expect the development to make provision for approximately 500 – 1,000 jobs. In addition, there would be a large number of indirect jobs created.
- **Phasing:** The site is able to come forward within the first 5 years of the plan period. In our experience, the market is strong and there are a lack of available sites like this and therefore developer and occupier interest would be high.

2.17 We consider the site is able to deliver up to 75,000 sqm employment floorspace in total.

2.18 Finally, as part of discussions with HBC it is worth noting that, Hertsmere planner asked whether the site might be able to accommodate the bus depot (to potentially be relocated from Potters Bar). Currently, no decision on this matter has been made.

### 3. Regulation 18 Local Plan

3.1 This section provides our comments on relevant draft Local Plan policies – and associated questions – set out in the Regulation 18 consultation document.

#### National Policy Context

3.2 As a starting point, Para. 35 of the National Planning Policy Framework (“NPPF”) updated in July 2021 requires that any Local Plan submitted to the Secretary of State for examination must be capable of being found both legally compliant and sound. This places various duties on the Council including, but not limited to, ensuring the Plan is:

- **Positively prepared** – Providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and,
- **Consistent with national policy** – Enabling the delivery of sustainable development in accordance with the policies in this Framework.

3.3 If the Local Plan fails to accord with each of the above requirements, it is incapable of complying with the NPPF.

3.4 Overall, we support the preparation of a draft Local Plan and the Council’s overall spatial strategy and vision. However, we have various comments (including points of clarification and suggested recommendations) on the draft Local Plan. Our aim is that our comments will help make the plan sound and therefore we recommend that all of our comments are addressed within the Regulation 19 Local Plan. The Council should ensure that policies are fully evidenced and justified to ensure a sound Local Plan is prepared for Examination.

3.5 Our comments are set out as follows, in response to the draft Local Plan chapters.

#### Chapter 2 – Good Growth in Enfield

3.6 Chapter Two of the draft Local Plan sets out the overall key spatial issues; vision, objectives and spatial strategy.

3.7 Overall, we support the Vision (Pg. 18) and Objectives (Table 2.1). We also support Policy SS1 (Spatial Strategy) and Policy SS2 (Making Good Places).

3.8 We support the approach to providing employment development however we suggest that an overall target is set out in Policy SS1 (similarly to the housing target) to provide the draft Local Plan with a clear objective to achieve.



**Q1. Do you consider the Council has selected the right spatial strategy option as its preferred option?**

- 3.9 Yes. We support the proposed spatial strategy option (Medium Growth 1) which proposes at least 25,000 new homes, development to meet employment needs, some Green Belt release and the creation of the National Park City.
- 3.10 We also consider that the correct procedure is being followed to select the preferred spatial strategy option, and that it will be important that the Regulation 19 Local Plan is supported by a robust evidence base, in line with the NPPF.
- 3.11 As outlined in the Growth Topic Paper (2021), it is clear that the Council have considered all strategy options to attempt to meet their housing and employment requirements in full. The Council have explored a “urban/brownfield first” approach, however through the work prepared as part of the Housing and Employment Land Availability Assessment (2021), they established that there is not sufficient land or capacity to meet the Borough’s housing and employment requirements within its policy unconstrained urban areas (Para 4.17, Growth Topic Paper 2021). Following this, the Council also approached other Local Planning Authorities (‘LPAs’) to see if they could assist in meeting the Borough’s unmet needs through the Duty to Co-operate, and also assessed whether any release of Strategic Industrial Land (‘SIL’) or Local Strategic Industrial Sites (‘LSIS’) could be possible. Neither approaches were successful therefore the Council concluded that it would need to release land from the Green Belt to meet its development needs (Para 4.18 – 4.23, Growth Topic Paper 2021).
- 3.12 In accordance with Para 32 of the NPPF, the chosen spatial strategy is also supported by Enfield’s Integrated Impact Assessment (‘IIA’), published in 2021, which states:
- “It is clear that every effort is being made in the Enfield Local Plan to avoid and minimise such adverse effects through the definition of a robust and diverse range of place-making and development management policy approaches.”*
- 3.13 The draft Local Plan period is 20 years, and the Council should ensure that the approach is in accordance with Para 22 of the NPPF which states that “*strategic policies should look ahead over a minimum of 15 year period from adoption*” with larger scale developments such as new settlements or significant extensions to existing villages and towns looking further ahead to at least 30 years.

**Q2. Are there any changes you would suggest to the proposed key diagram?**

- 3.14 We support the key diagram and the allocation of Land East of Junction 24 as a proposed release from the Green Belt.

**Q3. Are there any changes you would suggest to the proposed Spatial Strategy policy wording?**

- 3.15 We support Policy SS1, notably Point 9 which states “*Employment needs will be met through the intensification of existing industrial areas, and new sites in urban and rural locations. A new logistics hub close to Junction 24 of the M25 will provide for a significant amount of the Borough’s employment needs in the plan period. Cross boundary expansion of the hub may provide for additional employment needs beyond 2039*”.
- 3.16 We recommend that an overall employment target is set out in Policy SS1 (similarly to the housing target) to provide the draft Local Plan with a clear objective to achieve.

**Q4. Has the Council missed any other spatial strategy options?**

- 3.17 We support the approach set out by the Council, but we suggest it might be worthwhile to consider a Medium / High growth option which seeks to deliver between 25,000 new dwellings and 55,000 new dwellings. We suggest that such a growth option would meet all local needs and could also be deliverable. If an increased housing target was set out it would be useful to understand the impact on employment needs and employment targets.

### Chapter 3 – Places

- 3.18 Chapter 3 of the draft Local Plan sets out the ten identified placemaking areas, including Policy LP8 (Rural Enfield).

**Q. Have we included all appropriate placemaking areas in the urban area to accommodate growth?**

- 3.19 We support the identified placemaking areas and consider a mix of urban and rural placemaking areas will ensure a wide range of homes, employment and infrastructure is provided within the plan period.

#### Policy PL8 – Rural Enfield

**Q1. Do you support the designation of Rural Enfield as a leading transformative destination within London National Park City?**

- 3.20 We support the vision for Rural Enfield and Policy PL8 in creating this area of the Borough as a National Park City. However, we request the Council clarifies what status the National Park City would have in planning terms as a future designation. It would also be useful to clarify the timescales for delivery of the blue / green infrastructure proposed in Policy PL8. These are important considerations in light of the level of future development and other land uses that are proposed across Rural Enfield.

**Q2. Do you feel the policy covers the right area of the Borough? If not, what changes would you make?**

- 3.21 Yes. We agree that Policy PL8 covers the right area of the Borough, however we consider there are sites contained within the National Park City that might have potential (either within this plan period or beyond) for development within the Green Belt. We recommend that further information relating to the planning status of the National Park City is provided.

**Q3. Do you feel the policy could be improved?**

- 3.22 As stated above we recommend that further information relating to the planning status of the National Park City is provided. This would provide increased clarity for landowners.
- 3.23 The Green / Blue Infrastructure Strategy (Page 6) refers to an Action Plan being brought forward which will set out “*how parks, open spaces, watercourses and other elements of the blue and green network will be protected and enhanced*”. However, it is not clear from Policy PL8, the explanatory text of Policy PL8, or the Green / Blue Infrastructure Study whether this Action Plan is directly related to the National Park City Designation or whether the Council will prepare a further evidence base document covering this matter in further detail.

**Q4. Do the vision or policy miss any significant matters?**

- 3.24 No. We consider all significant matters are addressed in respect of the site.

## **Chapter 4 – Sustainable Enfield**

- 3.25 We support the following policies contained within Chapter 4 of the draft Local Plan which relate to sustainability:
- SE1: Responding to the Climate Emergency;
  - SE2: Sustainable Design and Construction;
  - SE3: Whole-life Carbon and Circular Economy;
  - SE4: Reducing Energy Demand;
  - SE5: Greenhouse Gas Emissions and Low Carbon Development;
  - SE6: Renewable Energy Development; and
  - SE7: Climate Change Adaptation and Managing Heat Risk.
- 3.26 We support the objective for Enfield Council to become a carbon neutral Borough by 2040, and the ambitions of the Climate Action Plan. Any development at Land East of Junction 24 would contribute towards achieving these targets and policies.

## **Chapter 5 - Addressing equality and improving health and wellbeing**

- 3.27 We support both Policy SC1 (Improving health and wellbeing of Enfield's diverse communities) and Policy SC2 (Protecting and enhancing social and community infrastructure) contained within Chapter 5 of the draft Local Plan.

## **Chapter 6 – Blue and Green Enfield**

- 3.28 Chapter 6 outlines the policies associated with the “green” (e.g. parks, open spaces, woodland, street trees and footpaths) and “blue” (e.g. reservoirs, lakes and waterways) elements in the Borough.
- 3.29 We support Policies BG1 to BG11 and consider that the site could offer potential to provide landscaping and biodiversity benefits to the Borough, including biodiversity net gain. We consider this could be achieved through carefully planned development.

## **Chapter 8 – Homes for all**

- 3.30 Chapter 8 (Homes for all) provides the detailed policies for the proposed housing within the Borough. We support the minimum housing target of 25,000 new dwellings over the plan period however we suggest (as set out in separate Representation Statements for other sites) that additional housing could come forward. If an increased housing target was set out it would be useful to understand the impact on employment needs and employment targets.
- 3.31 In response to the plan period, we recommend that the Council confirms that this length of time is in years. We assume it is 20 years. We also consider that an early plan review should be considered to reflect any changes in evidence, particularly evidence relating to the capacity of the Borough and the need to address significant shortfalls in housing and employment supply in London.

## Chapter 9 – Economy

- 3.32 We support the Council’s approach to meeting the identified employment need within the Borough, and support policies E1 to E10 of the draft Local Plan.

### Policy E1 – Employment and Growth

- 3.33 We support the level of employment growth proposed in Policy E1. We agree that the Borough needs to provide for a minimum of 251,000 sqm of additional industrial and logistics floorspace; and 37,000 sqm of net additional office floorspace within the Plan period (i.e. a total of 288,000 sqm of employment floorspace). This is also mirrored in the Employment Topic Paper (2021).
- 3.34 Table 9.1 of the draft Local Plan sets out the allocated sites for “employment related uses” Across the 14 allocated sites, this equates to only 208,847 sqm of employment floorspace. As such, there is a significant shortfall of c.79,153 sqm of employment floorspace allocated across the Borough over the plan period.
- 3.35 In line with London Plan (2021) requirements, and NPPF, LPAs should aim to meet their development needs in full. As a result, we suggest that the Council seeks to optimise the current allocations to ensure their need is met.

### SA54: Land East of Junction 24

- 3.36 We support the site allocation of Land East of Junction 24 (Reference SA54). The draft Local Plan states that the site has an indicative capacity of 30,550 sqm of employment floorspace. We suggest that the site could be further intensified, as we consider the site in total could accommodate up to 75,000 sqm of employment floorspace.
- 3.37 Hertsmere draft Local Plan (Regulation 18) is being considered at Full Council meeting on 30 September 2021, with consultation anticipated to commence on 11 October 2021. Currently, the site is not proposed to be allocated for development as part of the Hertsmere draft Local Plan.
- 3.38 In light of the requirements of the Duty to Cooperate and unmet needs in particular, we recommend LBE submit representations to the Hertsmere Local Plan consultation to ensure cross-boundary issues are considered and Land East of Junction 24 can be fully optimised both within LBE and also in Hertsmere.
- 3.39 This approach would assist in contributing to employment floorspace in the Borough, and ensure the Council are closer to meeting their requirement of 251,000 sqm within the plan period.

## 4. Case for Development at the site

4.1 This section summarises reasons which we consider the Crews Hill golf club should come forward for future development. It considers the following:

- Meeting Objectives of the Council;
- Achieving sustainable patterns of development;
- Addressing housing needs;
- Deliverability and developability; and
- Exceptional circumstances.

### Meeting the Council’s Strategic Objectives

4.2 The site is able to help meet the Council’s strategic objectives (Table 2.1 of the draft Local Plan) relating to creating a “nurturing place”; a “deeply green place”; “the workshop of London”; and “a distinct and leading part of London”. Our assessment of the site’s contribution is set out in **Table 4.1** below.

**Table 4.1 | Local Plan Key Objectives Site Assessment**

Objective	Site Contribution
<b>A Nurturing Place</b>	
Employment and jobs	Proposals for the site could contribute to providing employment uses whilst providing and supporting the delivery of infrastructure.
Health inequalities	Any development coming forward at the site would be supported by a Health Impact Assessment and will ensure good design to promote walkable communities, both within LBE and also within Hertsmere.
Supply of housing	N/A
Variety of housing	N/A
Public realm	Proposals for the site would be well-designed and include public and private features.
Active travel routes	Proposals could include new or enhanced connections to promote active travel.
<b>Deeply Green Place</b>	
Greening and natural world	Any development coming forward at the site would ensure it is landscape led and provide green open space.
Climate emergency	Any development coming forward at the site would strive to be zero carbon and will be supported by all the appropriate supporting documents in line with Local Plan policy and the London Plan (2021).
North London Waste Plan	This objective would be a key consideration for any application coming forward at the site.
Climate change	This objective would be a key consideration for any application coming forward at the site.
Blue infrastructure	Proposals for the site would seek to contribute to blue infrastructure priorities.

Green infrastructure	Proposals for the site would seek to contribute to green infrastructure and London National Park City priorities.
<b>The Workshop of London</b>	
Business needs	Proposals for the site could create significant new employment opportunities and help meet business needs.
Industrial intensification	Proposals could include industrial development and the site should be optimised to help address local needs.
Office development	N/A
Town centres	
<b>A Distinct and Leading Part of London</b>	
London National Park City	The site would contribute to meeting the key objectives of Policy PL8 (Rural Enfield) through providing key connections to other parts of the Borough and also creating a landscape-led development with biodiversity net gain and open space
Community facilities	N/A
Focus growth and investment	The site would ensure growth and investment is focused in sustainable locations.
Character and heritage	Development at the site would respect local character and heritage.

### Sustainable Patterns of Development

- 4.3 Future development at the site would support sustainable patterns of development, which is a key requirement of the NPPF. In terms of plan-making, the NPPF states that Local Plans should achieve sustainable patterns of development (Para 11). Further to this when drawing up or reviewing Green Belt boundaries “*the need to promote sustainable patterns of development should be taken into account*” and... “*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 and/or is well-served by public transport*” (Para 142).
- 4.4 The site is considered to be located in a sustainable location and future proposals at the site could significantly enhance connectivity and linkages in the north of the Borough.

### Employment Need

- 4.5 As set out in Section 3, there is a clear and identified need for employment floorspace within the Borough.
- 4.6 Policy E1 of the draft Local Plan states there is a need for a minimum of 251,000 sqm of additional industrial and logistics floorspace; and a 37,000 sqm of net additional office floorspace. Table 9.1 of the draft Local Plan only allocates c. 208,847 sqm of employment floorspace and as such there is a significant shortfall of employment floorspace allocated within the Plan period.
- 4.7 Land East of Junction 24 could be intensified in light of this, with a collaborative approach with HBC. An initial review of the site indicates the site in total across both Hertsmere and Enfield, could accommodate up to 75,000 sqm of employment floorspace.

## Deliverability / Developability

- 4.8 Land East of Junction 24 is considered to be deliverable, in accordance with the NPPF. is considered to be deliverable, in accordance with the NPPF. Such “deliverable” sites should “*be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on site within five years*”.
- 4.9 Whilst the site does not appear to have been assessed as part of Enfield’s Strategic Housing Land Availability Assessment (“SHLAA”) (2020), we consider the site is available, suitable and achievable for development.
- 4.10 Our comments on availability, suitability and achievability are set out below.
- **Available** – The site is in a single land ownership (LBE). At this stage, discussions are planned to take place between LBE and the leaseholder, in respect of the leaseholder’s interests in the future use of the site. LBE is also currently investigating any relevant legal matters. The objective of these tasks would be to support the draft Local Plan. Hertsmere are also in the process of reviewing their Local Plan, with Regulation 18 consultation anticipated in October 2021. Although the site is currently not allocated within Hertsmere’s draft Local Plan, we consider joint-working is essential to bring forward the site in a holistic manner. As such, representations should also be submitted to the Hertsmere Local Plan consultation, by LBE as landowners and as an LPA, to demonstrate availability of the full site (both within LBE and HBC).
  - **Suitable** – The Council have confirmed through their evidence base and draft Local Plan that Land East of Junction 24 is proposed to be released from the Green Belt and therefore is suitable for development. There are no insurmountable primary constraints to development and the site is located in a sustainable location, especially due to its proximity to the M25 / Junction 24. Through a design-led approach that seeks to respond to the surrounding area, we consider that there are no insurmountable issues which cannot be overcome through appropriate mitigation measures.
  - **Achievable** – Development on the site is considered to be inherently achievable, and there are considered to be no insurmountable constraints to development. In light of current market conditions and development needs, we consider that the site would represent an attractive prospect to a number of commercial / industrial developers, especially given the site’s proximity to the M25.

## Exceptional Circumstances

- 4.11 Paragraph 136 of the NPPF sets out that “Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans”.
- 4.12 In light of the above and other evidence provided in this Statement, it is considered that exceptional circumstances exist which justify the site’s release from the Green Belt. These circumstances include, but are not limited to, the following:
- Employment need and the need to ensure that the Borough contributes to meeting the employment floorspace requirements as a minimum, whilst also considering the shortfall of employment floorspace across London overall;

- Developable site which is available; offers a suitable location for development; and delivery is achievable;
- Significant and long-term employment creation (direct and indirect jobs) through various phases of development;
- Opportunities for beneficial use of the Green Belt in terms of providing enhanced landscaping, biodiversity, public access, green and blue infrastructure, contribution to the London National Park City;
- Opportunity for a high-quality flagship and gateway scheme;
- Achieving sustainable patterns of development;
- Significantly enhancing connectivity and linkages for walking and cycling;
- Lack of environmental or landscape constraints to development; and,
- The low performance of the site in Green Belt terms and how development could serve a greater purpose and facilitate a more beneficial use of the site.

4.13 We acknowledge that as set out in the Green Belt and Metropolitan Open Land (“MOL”) Study Final Report (August 2020), the site does make a positive contribution towards the Green Belt, however based on a variety of reasons, we agree that the site should be released from the Green Belt as outlined in the draft Local Plan.



## **5. Conclusion and Next Steps**

- 5.1 This Statement has considered the Regulation 18 draft Local Plan and the associated evidence base, and provides various comments and recommendations to the Council with the aim of ensuring a sound Local Plan is submitted for Examination.
- 5.2 In conclusion, we support the preparation of the new Local Plan and agree with the overall development strategy. We support the allocation of the site at Land East of Junction 24, and consider the site can make a significant contribution towards achieving the Council's vision and strategic objectives.
- 5.3 We propose that the site is bought forward for employment-led development and that exceptional circumstances exist for its release from the Green Belt. It would achieve sustainable patterns of development and address local development needs, and support the creation of the London National Park City.
- 5.4 In terms of next steps, we suggest that all of our comments are reviewed and addressed as part of the Regulation 19 Local Plan. We also welcome the opportunity to further engage with the Council and plan-makers to help bring forward the site for future development and work in a collaborative manner.

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