

Representation Statement.

Sloemans Farm

Prepared on behalf of the London Borough of Enfield

13 September 2021

Public

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Date	Originator		Approved	
13 September 2021	Name		Name	
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Contents

1.	Introduction	4
2.	Site and Surroundings	4
3.	Potential Development	5
4.	Response to draft Local Plan	5
5.	Case for Development	6
6.	Conclusion and Next Steps	9

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1. Introduction

- 1.1 This Representation Statement has been prepared by Knight Frank on behalf of the London Borough of Enfield Property Department ('LBE Client'), the landowners of Sloemans Farm ('the site'). This Statement has been submitted to the Regulation 18 Local Plan ('draft Local Plan') consultation currently being undertaken by the London Borough of Enfield ('LBE').
- 1.2 This Statement builds on the site information and redline submitted to the LBE Call for Sites exercise in early 2021. As outlined in the latest Housing and Economic Land Availability Assessment (2021), the site source reference is CFS171.
- 1.3 We support the preparation of a new Local Plan and agree with the overall development strategy. Our comments (including recommendations and points of clarification) aim to help strengthen the plan so that it is found to be sound by the Inspector at examination in public ('EiP').
- 1.4 In summary, we support the allocation of the site for natural burial uses however we consider that the smaller south western part of the site represents a logical and sustainable location for future residential development. It is suburban in nature and adjacent to existing built development (Crews Hill settlement). It is available, suitable and achievable as a potential housing site in the short-medium term of the draft Local Plan period and would add flexibility to the Borough's housing delivery targets to ensure that objectively-assessed requirements are met in full. The site can help to deliver high-quality residential-led development in a well-connected and sustainable location, in accordance with the fundamental principles and objectives of the draft Local Plan.
- 1.5 The site is currently Green Belt however the site is allocated for natural burial uses in the draft Local Plan. Given the level of housing and employment needs within the Borough and based on exceptional circumstances, we recommend that the south western corner of the site is split off and potentially allocated for future development.
- 1.6 This Statement covers the following: Site description (section 2); Potential Development (section 3); Response to draft Local Plan (section 4); Case for Development (section 5); Conclusion (section 6).

2. Site and Surroundings

- 2.1 The site is located on the northern side of Whitewebbs Road adjacent to the settlement of Crews Hill in the central northern part of the Borough.
- 2.2 It is 47.32 hectares (116.9 acres) in size and is currently comprises open grazing agricultural land split into fields. Access to is currently provided directly off Whitewebbs Road. The site is flat and is bounded by the M25 motorway to the north; agricultural land to the east; Whitewebbs Road to the south; and agricultural land and residential development to the west.
- 2.3 The surrounding area is suburban in nature. Crews Hill is adjacent to the site which is a settlement comprising predominately commercial uses including horticultural glasshouses and associated agricultural structures and building supply premises, with a small cluster of residential dwellings. Whitewebbs Park is located south of the site.
- 2.4 The site has a Public Transport Accessibility Level (PTAL) rating of 0 which is at the lowest end of the scoring system. Crews Hill train station is located 0.7 miles (13 minute walk / 4 minute cycle) away which provides two services an hour towards Hertford North and two services an hour towards Moorgate, London. The closest bus stops are on Rosewood Drive (5 minute walk) which provide access to route 456 with 2 stops an hour providing

access between Crews Hill and Edmonton. In terms of local services, Crews Hill contains a selection of local shops, a pub and an existing primary school.

2.5 The site has the following designations:

Adopted Local Plan	Draft Local Plan
Metropolitan Green Belt	Metropolitan Green Belt
	Burial
	London National Park City

Planning History

- 2.6 In terms of planning history, the Council's planning application database indicates that no recent planning applications of relevance have been submitted in relation to the site. The most recent application relates to the construction of a solar farm (ref: 14/02397/FUL) which was approved on 4th September 2014.
- 2.7 The site was previously promoted to LBE as part of the Call for Sites exercise (February 2021). The site was identified as "potentially suitable" in the Housing and Economic Land Availability Assessment (HEELAA, 2021) for burial uses.

3. Potential Development

- 3.1 The draft Local Plan allocates the site for natural burial uses however we consider the south west corner of the site offers potential for residential development, for approximately 57 to 95 new homes, based on 30-50 dwellings per hectare ('dph') and a net developable area of c. 60%. Proposals would include a policy compliant level of affordable housing and other requirements.
- 3.2 The site could also potentially come forward for employment-related uses if required.
- 3.3 At this stage no site surveys or masterplanning exercises have been undertaken however we would be able to complete this work if useful to support the emerging Local Plan.

4. Response to draft Local Plan

- 4.1 This section considers some of the policies put forward in the draft Local Plan. 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. In accordance with NPPF Para 35 this places various duties on the Council including, but not limited to, ensuring the Plan is: i) Positively prepared; ii) Justified; iii) Effective; and, iv) Consistent with national policy. If the Local Plan fails to accord with each of the above requirements, it is incapable of complying with the NPPF.
- 4.2 Overall, we support the preparation of a new Local Plan for LBE, however we have some recommendations and points of clarification which aim to make the plan sound. Our comments below relate to specific draft policies and evidence base documents.
- 4.3 We suggest that all of the matters which we raise are clarified within the Regulation 19 Local Plan.

Chapter Two – Good Growth in Enfield

Vision and Objectives

- 4.4 We support the Spatial Vision and Objectives which aim to provide new homes and jobs within a green setting. We suggest that the site can help achieve the Council's aspirations for the Borough. We support the creation of the London National Park City, which is outlined in the objectives.

Spatial Strategy

- 4.5 We support draft Policy SS1 (Spatial Strategy) and agree that at least 25,000 new homes should be provided by 2039, with the focus of growth at four placemaking areas where high quality and well-designed development will come forward.
- 4.6 The Council outline in SS1 and H4 that small sites will form part of the Council's housing supply and that the Council will seek to deliver 353 homes on sites of less than 0.25 hectares however Table 4.2 of the London Plan sets a target for Enfield to deliver 3,530 homes on small sites. We assume this is a drafting error that will be amended.

- 4.7 We consider that the medium growth option is appropriate however it could be increased. We consider that the high growth option is not deliverable or realistic, and the low growth option would not sufficiently meet development needs.
- 4.8 We recommend that the Council reviews the overall housing target (medium growth option) as we consider it could be potentially increased for a number of reasons. Firstly, we consider that additional development could come forward on other sites. Secondly, London's housing need is significant and we consider that housing needs and pressures will only increase into the future (following the next publication of the Government's standard method for calculating housing needs). We consider that an early review may need to be undertaken by the Council prior the statutory 5-year review to ensure sufficient progress towards this housing target.
- 4.9 We recommend that the south west part of Sloemans Farm is allocated for residential development to help deliver these additional new homes. We can provide further detail of the suggested area as part of future discussions.

Chapter 3 – Places

- 4.10 As states above we support proposals for the London National Park City.

Policy PL8 – Rural Enfield

- 4.11 We agree with the vision for Rural Enfield however we request the Council clarifies what status in planning policy terms the National Park City designation would carry. This is useful to understand in relation to future development taking place in the area. We also request further information on the timescales for delivery of the blue / green infrastructure.

Chapter 6 – Blue and Green Enfield

BG4: Green Belt and Metropolitan Open Land/BG5: Green Belt and edges of the countryside/urban areas

- 4.12 As stated previously the site is located within the Green Belt. We support these draft policies however section 5 below sets out the exceptional circumstances that we consider justify the release of the site from the greenbelt.

BG10: Burial and Crematorium Space

- 4.13 We support the allocation of Sloemans Farm (SA60) for natural burial uses under this policy to meet identified burial needs in Enfield. We consider this use will sit comfortably alongside the Green Belt and London National Park City designations for the site.

Chapter 8 – Homes for All

H1: Housing Development Sites

- 4.14 As explained in Para 4.5 above we agree that 24,920 new dwellings should be provided up to 2039 however we recommend that the Council reviews this figure as we consider it could be potentially increased. Also as stated in Para 4.11 we recommend that the total site capacities (beyond 2039) are set out. We recommend that the Council provides a Housing Trajectory to demonstrate delivery over the plan period.
- 4.15 In response to Table 8.3 we suggest that additional homes could be delivered during the plan period if for example start dates on sites take place sooner than expected e.g. Crews Hill placemaking area.
- 4.16 We support draft policies H2 and H3 which cover affordable housing, and housing mix and type. We would aim to achieve 35% affordable housing on site.
- 4.17 The HELAA identifies the site as 'potentially developable' for natural burial uses.

Other Policies

- 4.18 We also support the draft policies on sustainability (chapter 4), health and well-being (chapter 5), green and blue infrastructure (chapter 6), design and character (chapter 7), economy (chapter 9), town centres (chapter 10), rural Enfield (chapter 11), cultural, leisure and recreation (chapter 12), movement and connectivity (chapter 13), environmental protection (chapter 14) and delivery and monitoring (chapter 15).

5. Case for Development

- 5.1 We recommend that the site Sloemans Farm is split with the larger area brought forward as a burial site and the south western part of the site allocated for future housing or employment development within the new Local Plan. This section summarises the case for development of the south west corner of the site.

5.2 The case for development includes the following considerations:

- Sustainable Patterns of Development;
- Contribution to the role/function of the Green Belt;
- Development Needs;
- Deliverability/Developability; and
- Exceptional Circumstances.

Sustainable Patterns of Development

5.3 Future development at the site would support sustainable patterns of development, which is a requirement of the NPPF, because it is a brownfield site in close proximity to public transport. 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).

5.4 The site is 0.7 miles (13 minute walk) of Crews Hill Railway Station and a number of bus stops. The site is immediately adjacent to the edge of the Crews Hill settlement and within walking distance of the local centre. Therefore it’s sustainability credentials are not in question.

Contribution towards the Role and Function of the Green Belt

5.5 Looking at the south west part of the site only, we consider this smaller parcel makes a more limited contribution to the purposes of the Green Belt, and should therefore be considered for future development.

5.6 The Council’s Green Belt and Metropolitan Open Land Study Final Report (August 2020) concludes that the site (which is situated within a larger parcel) makes a relatively strong contribution towards the Green Belt purposes as follows:

Table 10.1 | Enfield’s Green Belt Site Scoring for Sloemans Farm

Green Belt Purpose	Assessment of Sloemans Farm
Purpose 1 (Sprawl)	Relatively Strong
Purpose 2 (Merging)	Weak/No
Purpose 3 (Safeguarding)	Strong Contribution
Purpose 4 (Setting)	Weak/No
Purpose 5 (Regeneration)	Strong Contribution

5.7 We consider that the south west part of the site is well defined and has clear and defensible boundaries, and as a result when assessed it isolation would make a more limited contribution.

5.8 The site is adjacent to the Crews Hill settlement which is proposed for release from the Greenbelt. The site is bound by Whitewebbs Road the south and will be contained by the proposed burial use to the west and north. Furthermore, the release of the Green Belt will bring much needed housing for the Borough.

Development Needs

- 5.9 As demonstrated by the draft Local Plan, there is a requirement to identify land for future development including housing and employment uses. The allocation of the site to contribute towards development targets for the Borough to help meet local needs, including affordable housing. We support the allocation of the larger part of the site for natural burial uses. At this early stage we consider the south west part of the site could provide 57-95 new homes.

Deliverability / Developability

- 5.10 Our comments on availability, suitability and achievability are set out below:

- **“Deliverable:** To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.
- **Developable:** To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”

- 5.11 The site is available; offers a suitable location for development; and delivery is achievable. Further detail in respect of these three requirements is set out below:

- **Available** – The site is in a single land ownership (LBE). At this stage, there are no identified issues in relation to the Council or a third-party bringing forward the site for development. As such, there are no constraints or restrictions in terms of ownership which might mean the site cannot come forward within the Plan period.
- **Suitable** – Whilst the Green Belt Assessment raises concerns regarding the harm of releasing this area of land from the Green Belt, we consider it offers a logical extension to the Crews Hill settlement and also has a more limited contribution to the Green Belt overall. The site is bounded by physical and natural barriers on three sides. The site is also located in a highly sustainable location, within 0.7 miles of Crews Hill railway station. 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. The site could be utilised to deliver a diverse range and type of housing, and would therefore be appealing to several developers and housebuilders. Hadley Wood is an attractive residential settlement with great sustainability credentials and therefore we consider that development would be able to commence on-site within the Plan period.

Exceptional Circumstances

- 5.12 We suggest that the following reasons cumulatively comprise “exceptional circumstances” which would justify the site’s release from the Green Belt and future development, in accordance with NPPF Para. 136.

- Meeting local development needs by contributing towards local and London housing targets which must be met as a minimum;

- Helping to address house price and affordability issues within the Borough and wider Market Area;
- Balancing out housing mix to ensure that the right type of housing (such as market / affordable housing, or senior living) is delivered in the right places in the Borough;
- Contributing towards housing delivery to help ensure the Borough has a positive housing land supply position;
- Developable site which is available; offers a suitable location for development; and delivery is achievable;
- Employment (direct and indirect job creation);
- Potential to provide a mix of land uses on-site in addition to housing e.g. employment and community facilities;
- 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;
- Achieving sustainable patterns of development; and
- Lack of environmental or landscape constraints to development.

5.13 The site can help to deliver high-quality residential-led development and thus align with some of the fundamental principles and objectives of the draft Local Plan.

6. Conclusion and Next Steps

6.1 This Statement has considered the Regulation 18 Draft Local Plan and the associated evidence base and, in the context of this, has outlined a number of clarifications and comments which we wish to be considered ahead of the next round of consultation.

6.2 Overall, we support the draft Local Plan, and consider that the site can contribute towards achieving the Council's vision and strategic objectives, because the site represents a logical and sustainable location for future development. In particular we recommend that the Council consider the site as two separate parcels, the first for burial use and the second for potential future development.

6.3 In terms of next steps, we welcome the opportunity to further discuss the site proposals with the Council and would be able to undertake any further technical studies considered necessary to support the case for development.

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