

# Representation Statement.

**Bulls Cross Nursery**

**Prepared on behalf of the London Borough of Enfield**

**13 September 2021**

**Public**

**KF Ref: 1101802**

## Quality Control

The signatories below verify that this document has been prepared in accordance with our quality control requirements. These procedures do not affect the content and views expressed by the originator.

This document must only be treated as a draft unless it has been signed by the Originators and approved by a Partner or Associate.

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

## Limitations

Unless you are the Client named within this report, or have been explicitly identified by us as a party to whom we owe a duty of care and who is entitled to rely on this report, Knight Frank LLP does not owe or assume any duty of care to you in respect of the contents of this report and you are not entitled to rely upon it.

Further, and without prejudice to the above, Knight Frank accepts no responsibility or liability for the consequences of this document being used for any purpose other than for which it was commissioned.

## 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

## **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 Bulls Cross Nursery ('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 CFS211.
- 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, the site represents a logical and sustainable location for future residential development. It is semi-urban in nature and is surrounded by a mix of uses and built development. 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 given the level of housing need within the Borough and based on exceptional circumstances, we recommend that the site is allocated for residential 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 eastern side of Bulls Cross in the central northern part of the Borough.
- 2.2 It is 0.69 hectares (1.7 acres) in size and is currently comprises horticultural glasshouses and a car parking area. Access to is currently provided directly off Bulls Cross. The site is flat and is bounded by green recreational space to the north, east and south used by Old Ignation's Football Club and St Josephs GAA Club Waltham Cross; and Bulls Cross to west
- 2.3 The surrounding area is relatively built up / urban fringe in nature. New River is located to the west of the site beyond Old Ignation's Football club with a number of 2 storey semi-detached and terraced dwellings located off of Turkey Street. Myddleton House Gardens and associated museum and visitor centre is located further west on the opposite side of Bulls Cross. The site has a Public Transport Accessibility Level (PTAL) rating of 0 – which is the lowest end of the scoring system. Turkey Street train station is located 0.7 miles (15 minute walk / 7 minute cycle) away which provides two services an hour towards London Liverpool Street and two services an hour towards Cheshunt. The closest bus stop is on Turkey Street which is located 0.4 miles (8 minute walk / 2 minute cycle) west of the site which provides access to routes 217 and 317 with several stops an hour providing access between Waltham Cross and Enfield Town/Turnpike Lane. In terms of local services, Bulls Cross contains a pub and a number of existing primary and secondary schools.
- 2.4 The site has the following designations:

Adopted Local Plan	Draft Local Plan
Metropolitan Green Belt	Metropolitan Green Belt
Local Open Space	London National Park City
Conservation Area	Conservation Area

### Planning History

- 2.5 In terms of planning history, the Council’s planning application database indicates that no recent planning applications have been submitted in relation to the site.
- 2.6 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 79 dwellings.

## 3. Potential Development

- 3.1 We consider that the site offers potential for residential development, for approximately 79 new homes in line with the HELAA. 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 Councils 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 Bulls Cross Nursery is allocated for residential development to help deliver additional new homes.

### **Chapter 3 – Places**

- 4.10 As stated 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 Green Belt.

### **Chapter 8 – Homes for All**

#### **H1: Housing Development Sites**

- 4.13 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.
- 4.14 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.
- 4.15 We support draft policies H2 and H3 which cover affordable housing, and housing mix and type. We aim to achieve 35% affordable housing on site.
- 4.16 The HELAA identifies the site as 'potentially developable' for 79 units. We suggest that this conclusion is reviewed as we consider the site is developable.

#### **Other Policies**

- 4.17 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 Bulls Cross Nursery is allocated for future housing or employment development within the new Local Plan. This section summarises the case for development at 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; 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 previously developed land and within 0.7 miles (14 minute walk) of Turkey Street Train Station and multiple bus stops. The site is urban fringe and surrounded by a range of leisure uses including two football clubs and is well served by local amenities. Therefore it’s sustainability credentials are not in question.

**Contribution towards the Role and Function of the Green Belt**

- 5.5 We consider that the site makes a relatively 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 Bulls Cross Nursery**

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

- 5.7 We consider that 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 surrounded by a range of leisure uses including three football clubs, a museum and a school, it is not set within an area of open countryside and therefore would have less contribution to the Green Belt than what is stated above. 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. At this early stage we consider the site could provide 20-34 new homes or provide employment land uses to help meet local development needs. We aim to achieve 35% affordable housing on site.

**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** – At this stage, discussions are planned to take place between LBE and the leaseholder, in respect of the leaseholder’s interested 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.
- **Suitable** – Whilst the Green Belt Assessment raises concerns regarding the harm of releasing this area of land from the Green Belt, we consider a residential use would be in keeping with the surrounding leisure uses and that the site has a more limited contribution to the Green Belt overall. The site is not located within open countryside and is surrounded by existing sporting uses on three sides and a road to the west. The site is also located in a highly sustainable location, within 0.7 miles of Turkey Street 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 Wodd 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;



- 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 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.

## **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. We recommend that the Council concludes that the site is developable.
- 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.

Knight Frank, Planning Team  
55 Baker Street, London, W1U 8AN  
+44 20 7629 8171

[knightfrank.co.uk](https://www.knightfrank.co.uk)

Your partners in property for 125 years

Knight Frank is the trading name of Knight Frank LLP. Knight Frank LLP is a limited liability partnership registered in England and Wales with registered number OC305934. Our registered office is at 55 Baker Street, London W1U 8AN where you may look at a list of members' names. If we use the term 'partner' when referring to one of our representatives, that person will either be a member, employee, worker or consultant of Knight Frank LLP and not a partner in a partnership.