

# Representation Statement.

**Botany Bay Sites – Botany Bay Cricket Club, East Lodge  
Nursery and Rectory Farm**

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

**13 September 2021**

**Public**

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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 three sites in Botany Bay – Botany Bay Cricket Club, East Lodge Nursery and Rectory Farm ('the sites'). 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 references are CFS212, LP1141 and LP1143.
- 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 sites are considered to potentially represent logical and sustainable locations for future residential development. We suggest they are considered in a holistic manner, as part of potential development opportunities at the village. They are semi-urban in nature and is surrounded by a mix of uses. They are 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 sites currently sit in the Green Belt however given the level of housing need within the Borough and based on exceptional circumstances, we recommend that the sites are considered for allocation for future housing, employment and / or community 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 sites are located in Botany Bay on East Lodge Lane in the north west part of the Borough.
- 2.2 Botany Bay Cricket Club is 3.08 hectares (7.6 acres) in size and comprises an open greenfield on the western side of East Lodge Lane. Access is currently provided directly off East Lodge Lane. The site is flat and is bound by agricultural fields to the north; East Lodge Lane to the east; residential dwellings and Botany Bay Chapel to the south; and agricultural fields and the Ridgeway (S1005) to the west.
- 2.3 The Rectory Farm site is located on the eastern side of The Ridgeway (A1005) and is 2.45 hectares (6.1 acres) in size, it is a very small part of the overall Rectory Farm site. The site comprises undeveloped agricultural fields. Access is currently provided directly off The Ridgeway. The site is flat and is bound by agricultural fields to the north and east; The Ridgeway to the south; and Botany Bay Cricket Club to the west. There is also a large detached dwelling located to the north of site.
- 2.4 East Lodge Nursery is located on the southern side of East Lodge Lane and is 1.9 hectares (4.7 acres) in size. The site comprises an existing industrial estate containing a number of buildings and large areas of hardstanding/car parking. Access is provided directly off East Lodge Lane. The site is flat and is bound by agricultural fields to the east and south; Botany Bay Cricket Club to the west; and East Lodge Lane to the north.

- 2.5 The surrounding area is semi-rural/urban fringe in nature. There are residential properties located along The Ridgeway alongside some commercial uses. The wider area is predominately undeveloped agricultural land. The sites have a a Public Transport Accessibility Level (PTAL) rating of 1a which is the lowest end of the scoring system. Crews Hill railway station is located 1.1 mile away 23 minute walk / 8 minute cycle) away at the closest point which provides two services an hour towards Hertford North and two services an hour towards Moorgate, London. The closest bus stop is on The Ridgeway which is located adjacent to the Cricket Club site which provides access to route 313 with 2 stops an hour providing access between Potters Bar and Chingford. In terms of local services, Botany Bay contains a pub and some local shops along The Ridgeway.
- 2.6 The sites have the following designations:

Adopted Local Plan	Draft Local Plan
Metropolitan Green Belt	Metropolitan Green Belt
Local Open Space (Botany Bay Cricket Club only)	London National Park City
	Local Open Space (Botany Bay Cricket Club only)

### Planning History

- 2.7 In terms of planning history, the Council’s planning application database indicates that no planning applications of relevance have been submitted in relation to the sites.
- 2.8 The sites were previously promoted to LBE individually as part of the Call for Sites exercise (February 2021). The sites were identified as “potentially suitable” in the Housing and Economic Land Availability Assessment (HEELAA, 2021). The cricket club was identified with potential for 100 new units. East Lodge Nursery and Rectory Farm both form part of wider sites which have been identified as potential for 128 new units and 503 units respectively.

## 3. Potential Development

- 3.1 We suggest that the village of Botany Bay is looked at in a holistic manner and that these three sites have the potential to provide new housing, employment and / or community development. Proposals would include a policy compliant level of affordable housing and other requirements.
- 3.2 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 recommend that these three sites in Botany Bay – Botany Bay Cricket Club, East Lodge Nursery and Part of Rectory Farm- be allocated for residential development to help deliver additional new homes.

### **Chapter 3 – Places**

- 4.9 As stated above we support proposals for the London National Park City.

#### **Policy PL8 – Rural Enfield**

- 4.10 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**

- 4.11 As stated previously the sites are 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 sites from the greenbelt.

### **Chapter 8 – Homes for All**

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

- 4.12 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.
- 4.13 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.
- 4.14 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.
- 4.15 The HELAA identifies the sites as 'potentially developable'.

### **Chapter 12 – Culture, Leisure and Recreation**

#### **CL5: Sport, Open Space and Recreation**

- 4.16 We support this policy and the protection of existing leisure and sporting facilities. We recognise that the Cricket Club would need to be relocated to an alternative site, potentially from LBE's rural portfolio.

#### **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 these three sites in Botany Bay are 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/Developability; and
  - Exceptional Circumstances.

### Sustainable Patterns of Development

- 5.3 Future development at the site could contribute towards supporting 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 sites are located within a small settlement and East Lodge Nursery is previously developed land. At the closest point the sites are approximately 1.1 mile (23 minute walk) of Crews Hill Train Station and near to bus stops. The sites are located within a small existing settlement with some basic local amenities therefore can be considered a reasonable sustainable location.

### 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 sites (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 Botany Bay sites**

Green Belt Purpose	Assessment of Botany Bay sites
Purpose 1 (Sprawl)	Strong/Relatively strong Contribution
Purpose 2 (Merging)	Relatively strong contribution
Purpose 3 (Safeguarding)	Strong contribution
Purpose 4 (Setting)	Weak/No contribution
Purpose 5 (Regeneration)	Strong contribution

- 5.7 We consider that the sites are relatively 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 sites are located within the existing village of Botany Bay and we suggest the Council view any potential residential allocation in a holistic manner to ensure a critical mass of development within the village. The release of the Green Belt will bring much needed housing for the Borough and we would welcome the opportunity to discuss potential unit numbers with the Council.

### Development Needs

5.9 As demonstrated by the draft Local Plan, there is a requirement to identify land for future development including housing, employment and / or community uses. The allocation of the sites to contribute towards development targets for the Borough to help meet local needs, including affordable housing.

### 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 sites are 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 a residential use would be suitable within the existing Botany Bay village. Subject to sufficient critical mass the village could be suitably expanded to deliver much needed new housing. The site is also located in a sustainable location, within 1 mile of Crews Hill Station (at the closest point). 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. Botany Bay is an attractive residential settlement 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; 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 sites do 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 sites could contribute towards achieving the Council’s vision and strategic objectives, because the site represents a logical and sustainable location for future development. We suggest that the Council considers whether potential future development should take place at the village.
- 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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