

Representation Statement.

North Lodge Farm South

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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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 North Lodge Farm South ('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 CFS214.
- 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 potential location for future residential 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 northern side of The Ridgeway in the north east corner of the Borough.
- 2.2 It is 0.9 hectares (2.2 acres) in size and currently comprises farm buildings set in open grazing agricultural land. Access to is currently provided via a private access road off of The Ridgeway. The site is flat and is bounded by The Ridgeway to the south; a large detached dwelling to the west; a road to the north providing access to St John's Senior School; and a car park and playing fields associated with the school to the east.
- 2.3 The surrounding area is semi-rural in nature. The wider surrounds comprise undeveloped agricultural fields. The M25 is located approximately 0.5 miles north of the site. The site has a Public Transport Accessibility Level (PTAL) rating – 1a – which is at the lowest end of the scoring system. Crews Hill train station is located 2.3 miles (44 minute walk / 11 minute cycle) away which provides four services an hour towards Welwyn Garden City and four services an hour towards Moorgate, London. There is are two bus stops within close proximity to the site on The Ridgeway which provide access to route 313 each with 2 stops an hour providing access between Potters Bar and Chingford. In terms of local services, St John's Senior School is located immediately north of the site. Crews Hill would be the closest settlement to access local shops/facilities which is located 2.1 miles east of the site.
- 2.4 The site has the following designations:

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

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 22 dwellings.

3. Potential Development

- 3.1 We consider that the site offers potential for residential development, for approximately 13 to 22 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 to the statutory 5-year review to ensure sufficient progress towards this housing target.
- 4.9 We recommend that North Lodge Farm South is allocated for residential development to help deliver these additional new homes.

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.

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 would aim to provide 35% affordable housing on site.
- 4.16 The HELAA identifies the site as 'potentially developable' for 22 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 North Lodge Farm South 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:
- Contribution to the role/function of the Green Belt;
 - Development Needs;
 - Deliverability/Developability; and
 - Exceptional Circumstances.

Contribution towards the Role and Function of the Green Belt

- 5.3 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.
- 5.4 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 North Lodge Farm South

Green Belt Purpose	Assessment of North Lodge Farm South
Purpose 1 (Sprawl)	Relatively strong
Purpose 2 (Merging)	Strong contribution
Purpose 3 (Safeguarding)	Strong contribution
Purpose 4 (Setting)	Weak/No
Purpose 5 (Regeneration)	Strong contribution

- 5.5 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.
- 5.6 The site is bound by The Ridgeway to the south; a large detached dwelling to the west; a road to the north providing access to St John’s Senior School; and a car park and playing fields associated with the school to the west to ensure the site is well contained within its setting. Furthermore, the release of the Green Belt will bring much needed housing for the Borough.

Development Needs

- 5.7 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 or provide employment land uses to help meet local development needs.

Deliverability / Developability

- 5.8 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.”
- 5.9 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). LBE is also investigating any relevant covenants and legal matters. The objective of this task 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 it could offer a suitable location for small scale residential development. The site is bounded by physical and natural barriers to ensure the site is well contained within its setting.

- **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 range and type of housing, and would therefore be appealing to several developers and housebuilders. It is located in an attractive rural area and we consider that development would be able to commence on-site within the Plan period.

Exceptional Circumstances

- 5.10 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.
- 5.11 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.

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