

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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Date	Originator		Approved	
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 Staggy Ridge Flats, Staggy Hill, Potters Bar (Located to the north of Staggy 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
A Nurturing Place	
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.
Deeply Green Place	
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.
The Workshop of London	
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	
A Distinct and Leading Part of London	
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.

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

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

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Enfield Local Plan Regulation 18- Representation.

Whitewebbs Golf Course, Beggar's Hollow, Enfield, EN2 9JN
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Whitewebbs Golf Course, Beggar's Hollow, Enfield, EN2 9JN ('the site').

This Representation 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 **CFS161**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site measures 43 hectares in size and currently comprises a golf course. The site is situated within the Green Belt in both the adopted and the draft Local Plan.

Landowner Proposals

The site is proposed for a "blue green infrastructure site" incorporating outdoor leisure, sports, recreation and nature recovery / rewilding uses incorporating café, community facilities, welfare facilities and visitor parking.

Comments on draft Local Plan

We support draft Site Allocation SA57 which allocates the site for nature recovery uses. We consider it can support the London National Park City proposals.

We seek clarity from the Council regarding the type of development which shall be sought on site in relation to other land uses include café / community facilities.

Case for Development

Development of the site for nature recovery uses would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the nature recovery aspirations (draft Policy PL8 and draft Policy BG1).

Enfield Local Plan Regulation 18 - Representation.

Firs Farm, Firs Lane, Enfield, N21 2PJ
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Firs Farm, Firs Lane, Enfield N21 2PJ ('the site').

This Representation 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 **CFS168**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site is 3.67 hectares in size and is currently in use as a playing field with a small car park at the southwest corner. The site is situated with the larger setting of the Firs Farm Playing Fields beyond which are residential dwellings of predominantly 2no. storeys. Several bus stops are situated along Firs Lane to the immediate west of the site.

The Site is designated as Metropolitan Open Land in the draft Local Plan.

Landowner Proposals

The site is proposed for a crematorium use alongside an improved café, community facilities, welfare facilities and visitor parking.

Comments on draft Local Plan

We support draft Site Allocation SA59 which allocates the site for a new crematorium use.

We seek conformation from the Council regarding the prospect of development to incorporate an improved café, community facilities, welfare facilities and visitor parking.

Case for Development

Development of the site for crematorium use would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the required number of burial and crematorium spaces (draft Policy DM BG10).

The site is deliverable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Representation Statement.

Kings Oak Equestrian Centre, Crews Hill

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.

Date	Originator		Approved	
13 September 2021	Name	Ellen Nicholson	Name	Roland Brass
	Position	Senior Planner	Position	Partner

Limitations

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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.

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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 Kings Oak Equestrian Centre, Crews Hill ('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 CFS169.
- 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 sub-urban in nature and is surrounded on two sides by built development (Crews Hill settlement). It is available, suitable and achievable as a potential housing site in the short-medium term of the 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 is proposed to be removed to form part of the Crews Hill Placemaking Area (Draft Policy PL9) to help meet identified needs within the plan period and beyond. Given the level of housing need within the Borough, 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 western side of Theobalds Park Road within the settlement of Crews Hill in the central northern part of the Borough.
- 2.2 It is 4.3 hectares (10.6 acres) in size and is currently in use as an equestrian centre comprising several single storey structures, a car park and three paddocks. Access to is currently provided directly off Theobalds Park Road. The site is flat and is bounded Theobalds Park Road to the east; commercial uses to the south; the railway line to the west and residential development to the north.
- 2.3 The surrounding area is relatively built up / urban fringe in nature. The Crews Hill area comprises predominately commercial uses including horticultural glasshouses and associated agricultural structures and building supply premises. There is a cluster of large detached residential properties in the centre of the settlement. The site has a Public Transport Accessibility Level (PTAL) rating – 0 – which is at the lowest end of the scoring system. Crews Hill train station is located 0.6 miles (12 minute walk / 4 minute cycle) away which provides two services an hour towards Hertford North and two services an hour towards Moorgate, London. There are two bus stops adjacent to the site on Theobalds Park Road 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.

2.4 The site has the following designations:

Adopted Local Plan	Draft Local Plan
Metropolitan Green Belt	Indicative location for housing-led areas in Green Belt
Crews Hill Defined Area	Rural place making areas- Crews Hill
Area of Special Character	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 of any relevance have been submitted in relation to the site. The most recent application granted on site was for the erection of replacement stables (Ref: TP/88/1159) which was approved on 14th November 1988.
- 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 127 dwellings.

3. Potential Development

- 3.1 We consider that the site offers potential for residential development, for approximately 129 to 215 new homes, based on 30-50 dwellings per hectare ('dph'). Proposals would include a policy compliant level of affordable housing and other requirements. The site could also come forward for employment related uses if required.
- 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.
- 3.3 The draft Local Plan intends to retain the equestrian use on site however we consider that it could be re-provided (with upgraded facilities) on another nearby site within LBE's rural portfolio. The relocated equestrian centre with enhanced facilities could make a positive contribution to economic development, leisure and tourism and potential facilitate investment in Heritage assets at risk.

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 e.g. at Crews Hill placemaking area and potentially 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 Kings Oak Equestrian Centre is identified as part of the Crew Hill place-making area to help deliver additional new homes.

Chapter 3 – Places

- 4.10 As stated above we support proposals for the Crews Hill placemaking area and 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.

Policy PL9 – Crews Hill

- 4.12 We support the Vision for Crews Hill placemaking area, which includes the site. We agree that the area can provide a mix of land use opportunities. We recommend that the Council provides information in relation to what development could be delivered beyond 2039 and what areas of land would be safeguarded to help better understand how the area is planned to change. We also recommend that a key is provided to support Figure 3.10 (Crews Hill Concept Plan).

Chapter 8 – Homes for All

H1: Housing Development Sites

- 4.13 As explained in Para 4.5 above we agree that at least 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 achieve 35% affordable housing on site.

Site Allocation SA27 (Land at Crews Hill)

- 4.16 We support the site allocation of Crews Hill. We recommend that the Council reviews whether the equestrian use (at the site) should be retained as part of future development proposals. We consider that the site could be re-provided (with upgraded facilities) on another nearby site within LBE's rural portfolio.
- 4.17 This approach aims to optimise the development opportunity at the Crews Hill placemaking area whilst seeking to retain a valuable community and recreational asset.
- 4.18 The HELAA identifies the site as 'potentially developable' for 127 units in a terrace arrangement.

Chapter 12 – Culture, Leisure and Recreation

CL5: Sport, Open Space and Recreation

- 4.19 We support this policy and the protection of existing leisure and sporting facilities. We consider that the site could potentially make a more effective contribution to the local area as a residential or employment site and that the

existing equestrian use could be re-provided (with upgraded facilities) on another nearby site within LBE's rural portfolio.

Other Policies

4.20 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 Kings Oak Equestrian Centre is allocated for future housing or employment development within the new Local Plan. This section summarises the case for development at the site which includes:

- Sustainable Patterns of Development;
- Development Needs;
- Deliverability/Developability; and
- Exceptional Circumstances.

Sustainable Patterns of Development

5.2 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).

5.3 The site is previously developed land and within 600m (12 minute walk) of Crews Hill Railway Station and multiple bus stops. In addition, the site is located in the centre of the Crews Hill placemaking area which is proposed for significant future growth. Therefore it's sustainability credentials are not in question.

Development Needs

5.4 NPPF Para 11 requires Local Plans to meet local development needs. 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 of the Crews Hill placemaking area would help meet local needs. We aim to achieve 35% affordable housing on site.

Deliverability / Developability

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

- 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.

- 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.”

5.6 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, 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** – The Council have confirmed through their evidence base and Draft Local Plan that the site is proposed to be released from the Green Belt. 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 area and also has a more limited contribution to the Green Belt overall. The site is bounded by physical and natural barriers on all sides and is located to the eastern side of the railway line. The site is also located in a highly sustainable location, within 600m 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. Crews Hill is set to be an attractive new community with great sustainability credentials and therefore we consider that development would be able to commence on-site within an earlier phase of development, and within the Plan period.

Exceptional Circumstances

5.7 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.

5.8 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.
- 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)

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Representation Statement.

Sloemans Farm

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.

Date	Originator		Approved	
13 September 2021	Name	Ellen Nicholson	Name	Roland Brass
	Position	Senior Planner	Position	Partner

Limitations

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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.

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

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

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Representation Statement.

Sunbeam Stud, Strayfield Lane

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.

Date	Originator		Approved	
13 September 2021	Name	Ellen Nicholson	Name	Roland Brass
	Position	Senior Planner	Position	Partner

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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 Sunbeam Stud, Strayfield Lane ('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 CFS174.
- 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 suburban in nature and adjacent to existing built development within the 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 given the level of housing need within the Borough and based on exceptional circumstances, we recommend that the site is allocated for residential development. The site would make a logical addition to the wider Crews Hill site allocation.
- 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 western side of Theobalds Park Road within the settlement of Crews Hill in the central northern part of the Borough.
- 2.2 It is 2.06 hectares (10.6 acres) in size. The site is currently in use as a stud farm comprising several single storey structures and two paddocks. The site is flat and is bounded by Strayfield Road to the north and west; Anglo Aquatic Plant to the east and the railway line to the south. Access to the site is currently sought directly off Strayfield Road however this section of the road is not an adopted highway.
- 2.3 The surrounding area is relatively built up / urban fringe in nature. The Crews Hill area comprises predominately commercial uses including horticultural glasshouses and associated agricultural structures and building supply premises. There is a cluster of large detached residential properties in the centre of the settlement. The site has a Public Transport Accessibility Level (PTAL) rating – 0 – which is at the lowest end of the scoring system. Crews Hill train station is located 1.3 miles (27 minute walk / 8 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 Theobalds Park Road (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.

2.4 The site has the following designations:

Adopted Local Plan	Draft Local Plan
Metropolitan Green Belt	Metropolitan Green Belt
Area of Special Character	Rural place making areas- Crews Hill
	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 of any relevance 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 61 dwellings.

3. Potential Development

- 3.1 We consider that the site offers potential for residential development, for approximately 39 to 65 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 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.
- 4.7 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.
- 4.8 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 e.g. at Crews Hill placemaking area and potentially 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 Sunbeam Stud is allocated for residential development as part of the Crew Hill place-making area to help deliver additional new homes.

Chapter 3 – Places

- 4.10 As stated above we support proposals for the Crews Hill placemaking area and 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.

Policy PL9 – Crews Hill

- 4.12 We support the Vision for Crews Hill placemaking area, which includes the site. We agree that the area can provide a mix of land use opportunities. We recommend that the Council provides information in relation to what development could be delivered beyond 2039 and what areas of land would be safeguarded to help better understand how the area is planned to change. We also recommend that a key is provided to support Figure 3.10 (Crews Hill Concept Plan).

Chapter 6 – Blue and Green Enfield

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

- 4.13 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

- 4.14 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.

Site Allocation SA27 (Land at Crews Hill)

- 4.17 We support the site allocation of Crews Hill. We consider that the site could be included within the indicative locations for housing led areas that form part of the allocation.
- 4.18 The HELAA identifies the site as 'potentially developable' for 61 units in a terrace arrangement and therefore we suggest the Council reviews whether the site is included in the Local Plan or could come forward as part of the development strategy.

Other Policies

- 4.19 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 Sunbeam Stud 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/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 within 1.4 miles (27 minute walk) of Crews Hill Railway Station and multiple bus stops. In addition, the site is located within the Crews Hill placemaking area which is proposed for significant future growth. 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 Sunbeam Stud

Green Belt Purpose	Assessment of Sunbeam Stud
Purpose 1 (Sprawl)	Strong contribution
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 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 Whilst recognising the impact of the expansion of Crews Hill onto the wider setting of Enfield, we consider the release of this parcel, alongside other parcels around Crews Hill would have less contribution to the Green Belt

than what is stated above. The site forms part of a wider site allocation proposed for release from the Green Belt therefore its impact should not be considered in isolation.

- 5.9 Sunbeam Stud is bound by Strayfield Road to the west and north; Anglo Aquatic Plant to the east; and the railway line to the south. As such, 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

- 5.10 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 of the Crews Hill placemaking area would help meet local needs, including affordable housing.
- 5.11 At this early stage we consider the site could provide 39 - 65 new homes set within suitable landscaping.

Deliverability / Deliverability

- 5.12 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.”
- 5.13 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** – The Council have confirmed through their evidence base and Draft Local Plan that the site is proposed to be released from the Green Belt. 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 area and also has a more limited contribution to the Green Belt overall. The site is bounded by physical and natural barriers on all sides and is located to the eastern side of the railway line. The site is also located in a highly sustainable location, within 1.4 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. Crews Hill is set to be an attractive new community with great sustainability credentials and therefore we consider that

development would be able to commence on-site within an earlier phase of development, and within the Plan period.

Exceptional Circumstances

- 5.14 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.
- 5.15 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.
- 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

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Enfield Local Plan Regulation 18 - Representation.

Former Enfield Arms, Genotin Road, Enfield, EN1 2AG
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Former Enfield Arms, Genotin Road, Enfield, EN1 2AG ('the site').

This Representation 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 **CFS183**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site is 0.66 hectares and is situated adjacent to Enfield Town Railway Station. The former public house was demolished over 10 years ago. The site sits within the Enfield Major Centre and within the Enfield placemaking area. The immediate surrounding area is characterised predominantly by a range of commercial / retail uses with residential uses also in close proximity. The site has a Public Transport Accessibility Level (PTAL) of 6 'excellent'.

Landowner Proposals

The site is proposed for residential-led development in the form of new apartments.

Comments on draft Local Plan

We support draft Site Allocation SA4 which allocates the site alongside Enfield Town Station for circa 100 new homes and a renewed station entrance, public square and public realm improvements. We seek a greater understanding from the Council of the quantum of development proposed for the Former Enfield Arms site to ensure that the site is being optimised. The site lies within the Enfield placemaking area and therefore we suggest it is a priority for development.

Case for Development

Development of the site for residential uses would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the housing target (draft Policy H1).

The site is previously developed land, with a high PTAL. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is deliverable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18-Representation.

Covert Way Fields, Covert Way, Enfield, EN4 0LT
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Covert Way Fields, Covert Way, Enfield, EN4 0LT ('the site').

This Representation 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 **CFS188**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site measures 7.0 hectares in size and currently comprises a nature reserve. The site is allocated as Local Open Space and a Site of Borough Importance for Nature Conservation in the adopted Local Plan. The site is located south of Hadley Wood which is characterised by residential accommodation. The site achieves a Public Transport Accessibility Level ('PTAL') of 0 which is the lowest possible score and is located 0/8 miles south of Hadley Wood Railway Station.

Landowner Proposals

The site is proposed for re-wilding and green infrastructure uses.

Comments on draft Local Plan

We support the re-wilding proposal for the site. The draft Local Plan explains that development will not be permitted where it would adversely affect (directly or indirectly) the integrity of Covert Way Local Nature Reserves.

The site could help support the National Park City proposals.

Enfield Local Plan Regulation 18 - Representation.

Swan Annexe, 221 High Street, Enfield North, EN3 4DX
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Swan Annexe, 221 High Street, Enfield North, EN3 4DX ('the site').

This Representation 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 ("HELAA") (2021), the site source reference is **CFS190**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site is 0.19 hectares in size and currently comprises a campus of West Lea School. It is occupied by large two storey buildings with a central car park. The site is located within the Ponders End Local Centre. The surrounding area is characterised by a range of uses includes residential accommodation, commercial / retail uses and Ponders End Park. The site achieves a Public Transport Accessibility Level ('PTAL') of 4 'good' and is located 700m south east of Southgate London Underground Station.

Landowner Proposals

The development opportunity at the site proposes a mixed use redevelopment comprising approximately 10 residential units alongside some potential for an educational / commercial use.

Comments on draft Local Plan

We support the local plan vision and objectives for the Borough. We support the findings of the Council's HELAA which identifies the site as developable for 10 units. Table 8.2 of the Plan sets out the Borough's total housing supply over the plan period which includes 'other developable sites' identified in the HELAA. Therefore, we expect the site to come forward for development within the plan period. We suggest the Council reviews this site, to ensure it is fully optimised and consider when it might come forward for development.

Case for Development

Development of the site for housing and education / community uses would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the housing target (draft Policy H1).

The site is previously developed land, with a high public transport accessibility rate. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is deliverable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18- Representation.

Civic Centre, Silver Street, Enfield, EN1 3XA
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Civic Centre, Silver Street, Enfield, EN1 3XA ('the site').

This Representation 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 **CFS191**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site is 1.41 hectares in size and currently comprises the civic centre offices and a car park. The surrounding area is characterised by a range of uses includes residential accommodation and commercial / retail uses. Enfield Town Centre is located approximately 250m to the south. The site achieves a Public Transport Accessibility Level ('PTAL') of 4 'good' and is located 300m north of Enfield Town Railway Station.

Proposals

The site is proposed for mixed use offices and residential uses.

Comments on draft Local Plan

We support draft Site Allocation SA5 which allocates the site for mixed use redevelopment comprising 150 new homes alongside re-provided office floorspace. We suggest that we review the capacity of the site with the Council to agree the content of the site allocation. The site is located within the Enfield urban place making area which is positive and should be a priority for development.

Case for Development

Development of the site for housing and offices would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the housing target (draft Policy H1).

The site is previously developed land, with a high PTAL. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is deliverable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18- Representation.

Former Magistrates Court, 2 and 2A Windmill Hill, Enfield, EN2 6SA
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Former Magistrates Court, 2 and 2a Windmill Hill, Enfield EN2 6SA ('the site').

This Representation 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 **CFS192**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site measures 0.21 hectares in size and is located in Enfield town. It currently comprises Probation Service Offices and a derelict house to the rear. The building on site is locally listed and the site is located within a conservation area.

The surrounding area is characterised by a range of uses includes residential accommodation, commercial / retail uses and Ponders End Park. The site achieves a Public Transport Accessibility Level ('PTAL') of 5 and is located 160m east of Enfield Chase Railway Station.

Landowner Proposals

The proposals for the site are for mixed use redevelopment including residential development which could enable community / business uses / cultural venue. This could provide premise and facilities for start-ups and other small businesses also.

Comments on draft Local Plan

We support the vision and objectives for the Borough. The site is located in Enfield placemaking area and therefore should be a priority location for future growth. We suggest the Council reviews the conclusions of the HELAA which state that the site is potentially developable as we consider the site to be developable.

Case for Development

Development of the site for housing and cultural uses would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the housing target (draft Policy H1).

The site is previously developed land, with a high public transport accessibility rate. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is developable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18 - Representation.

Drill Hall, 1 Old Park Avenue, Enfield, EN2 6PJ
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Drill Hall, 1 Old Park Avenue, Enfield, EN2 6PJ ('the site').

This Representation 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 **CFS193**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site measures 0.08 hectares in size and currently comprises a sports hall. The site borders a conservation area and the bowling green to the rear is Metropolitan Open Land. The surrounding area is characterised by a range of uses including residential accommodation, commercial / retail uses and areas of open space. The site achieves a Public Transport Accessibility Level ('PTAL') of 5 and is located 300m west of Enfield Chase Railway Station.

Landowner Proposals

The site is proposed for community uses.

Comments on draft Local Plan

We support the vision and objectives for the Borough. We seek to ensure the Local Plan considers the site to be suitable for community uses and not housing. Therefore, we suggest that the site is removed from the HELAA.

Enfield Local Plan Regulation 18- Representation.

Sydney Road Car Park, Sydney Road, Enfield, EN2 6TS
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Sydney Road Car Park, Sydney Road, Enfield EN2 6TS ('the site').

This Representation 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 **CFS194**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site measures 0.16 hectares in size and currently comprises a car park. The site is located within a conservation area. The surrounding area is characterised by a range of uses including residential accommodation, commercial / retail uses and areas of public open space. The site achieves a Public Transport Accessibility Level ('PTAL') of 4/5 and is located 500m south of Enfield Town London Overground Station.

Landowner Proposals

The site is proposed for residential development. We consider the site could be brought forward for development within the next 5 years.

Comments on draft Local Plan

We support the local plan vision and objectives for the Borough. We support the findings of the Council's HELAA which identifies the site as developable for 15 units. Table 8.2 of the Plan sets out the Borough's total housing supply over the plan period which includes 'other developable sites' identified in the HELAA. Therefore, we expect the site to come forward for development within the plan period. We suggest the Council reviews this site, to ensure it is fully optimised and consider when it might come forward for development.

Case for Development

Development of the site for housing would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the housing target (draft Policy H1).

The site is previously developed land, with a high public transport accessibility rate. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is developable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18 - Representation.

Kenninghall Open Space South, Kenninghall Road, London, N18 2PE – CFS21
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Kenninghall Open Space South, Kenninghall Road, London, N18 2PE ('the site').

This Representation 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 **CFS198-1**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site measures 1.85 hectares in size and currently comprises an area of public open space. The site is designated as local open space under the adopted Local Plan. The site is also identified in the North London Waste Plan protection for Recycling capacity. The surrounding area is characterised by a range of uses includes residential accommodation, commercial / retail uses and areas of open space. The site achieves a Public Transport Accessibility Level ('PTAL') of 2 and is located 500m north west of Meridian Water Railway Station.

Landowner Proposals

The site could provide a range of development opportunities including community uses or a gypsy / traveller site. We suggest the site could come forward in the next 6-10 years.

Comments on draft Local Plan

We support the vision and objectives for the Borough. We recommend that the Local Plan considers the site for gypsy / traveller related uses. In this connection, the HELAA concludes that the site is not developable however we request clarification / explanation for this conclusion and suggest it is re-assessed.

Case for Development

Development of the site for a community use or gypsy/traveller accommodation would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2). The site is well connected to local services and transport links.

Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is developable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18- Representation.

Ford's Grove Car Park, Ford's Grove, Enfield, N21 3DN
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Ford's Grove Car Park, Ford's Grove, Enfield, N21 3DN ('the site').

This Representation 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 **CFS201**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site is 0.24 hectares in size and is currently in use as a car park. It is located at the junction of Ford's Grove and Farm Road approximately 20m east of the Winchmore Hill Broadway Local Centre. The surrounding area is characterised by terraced and semi-detached residential dwellings with a range of commercial / retail uses within the Local Centre.

Although the sites Public Transport Accessibility Level (PTAL) is low the site is located 500m east of Winchmore Hill Railway Station and is in close proximity to several bus stops.

Landowner Proposals

The site is proposed for residential development (with possible undercroft parking if required). It is proposed that the site could deliver at least 40 dwellings, as apartments.

Comments on draft Local Plan

We support draft Site Allocation SA42 which allocates the site for circa 24 new homes. We suggest it would be useful to review the site capacity with the Council.

Case for Development

Development of the site for residential use would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the housing target (draft Policy H1).

The site is previously developed land in a location close to a variety of shops and transport modes. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is deliverable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18 - Representation.

Lodge Drive Car Park (incl. Depot), Palmers Green, N13 5LB
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Lodge Drive Car Park (incl. Depot), Palmers Green, N13 5LB ('the site').

This Representation 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 **CFS204**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site is 0.6 hectares in size and is currently in use as a car park and a small works depot. The site is situated directly adjacent to the Palmers Green District Centre. The surrounding area is characterised to the east by residential uses (2no. storey) and to the west by commercial / retail at ground floor with residential uses above. The site achieves a Public Transport Accessibility Level (PTAL) of 3, however is situated 200m east of Palmers Green Railway Station and in close proximity to several bus stops.

Landowner Proposals

The site is proposed to be reconfigured to retain a car park and allow the delivery of residential development.

Comments on draft Local Plan

We support draft Site Allocation SA43 which allocates the site for circa 50 new homes. We suggest the Council ensures that the development potential of the site is optimised.

Case for Development

Development of the site for residential uses would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the housing target (draft Policy H1).

The site is previously developed land and in close proximity to a range of transport modes. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is deliverable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Representation Statement.

Land North of Waggon Road, Hadley Wood

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.

Date	Originator		Approved	
13 September 2021	Name	Ellen Nicholson	Name	Roland Brass
	Position	Senior Planner	Position	Partner

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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 Land north of Waggon Road, Hadley Wood ('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 CFS208.
- 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 suburban in nature and is surrounded on two sides by built development (Hadley Wood 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 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 Waggon Road on the edge of the settlement of Hadley Wood in the western most part of the Borough.
- 2.1 It is 9.51 hectares (23.5 acres) in size and is currently comprises open grazing agricultural land split into three fields. Access to is currently provided directly off Waggon Road. The site is flat and is bounded by Chase and Slopers Pond Farm and associated agricultural land to the north; Stag Hill to the east; Waggons Road to the south; and residential development to the west. An access road into Slopers Pond Farm also runs through a section of the site north south from Waggon Road.
- 2.2 The surrounding area is relatively built up / urban fringe in nature. Hadley Wood is an established settlement which is residential in nature consisting of mainly 2 storey detached dwellings. The surrounding area to the north and east comprises undeveloped agricultural land. Salmon's Brook is also located to the north of the site running east west. The site has a Public Transport Accessibility Level (PTAL) rating – 0/1a – which is at the lower end of the scoring system. Hadley Wood train station is located 0.5 miles (10 minute walk / 3 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 Stag Hill/Cockfosters Road which provide access to route 298 each with 2 stops an hour providing access between Potters Bar Station and Arnos Grove. In terms of local services, Hadley Wood contains a selection of local shops, a pub and two existing primary schools.

2.3 The site has the following designations:

Adopted Local Plan	Draft Local Plan
Metropolitan Green Belt	Metropolitan Green Belt
Area of Special Character	London National Park City

Planning History

- 2.4 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.
- 2.5 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 53 dwellings.

3. Potential Development

- 3.1 We consider that the site offers potential for residential development, for approximately 142 to 237 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 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 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.
- 4.7 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.
- 4.8 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 Land North of Waggon Road is allocated for residential development to help deliver these additional new homes.

Chapter 3 – Places

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 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

- 4.12 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 provide 35% affordable housing on site.
- 4.15 The HELAA identifies the site as 'potentially developable' for 127 units in a terrace arrangement and therefore we suggest the Council reviews whether the site is included in the Local Plan or could come forward as part of the development strategy.

Other Policies

- 4.16 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 Land North of Waggon Road is allocated for future housing or employment development within the new Local Plan. This section summarises the case for development at the site, which includes:

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

Sustainable Patterns of Development

- 5.2 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).
- 5.3 The site is within 500m (10 minute walk) of Hadley Wood Railway Station and multiple bus stops. The site is immediately adjacent to the edge of the Hadley Wood 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

- 5.4 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.
- 5.5 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 strong contribution towards the Green Belt purposes as follows:

Table 10.1 | Enfield’s Green Belt Site Scoring for Land North of Waggon Road

Green Belt Purpose	Assessment of Land North of Waggon Road
Purpose 1 (Sprawl)	Strong Contribution
Purpose 2 (Merging)	Strong Contribution
Purpose 3 (Safeguarding)	Strong Contribution
Purpose 4 (Setting)	Weak / No
Purpose 5 (Regeneration)	Strong Contribution

- 5.6 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.
- 5.7 The site is bound by Waggon Road to the south; Stagg Lane to the east and existing residential development to the west. The site area could be extended to the north to include the rest of the field bordering Salmon’ Brook to ensure the site is well contained within its setting.

Development Needs

- 5.8 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.
- 5.9 At this early stage we consider the site could provide approximately 142 to 237 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.

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 Hadley Wood 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 500m of Hadley Wood 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;
- 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.

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)

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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.

Date	Originator		Approved	
13 September 2021	Name	Ellen Nicholson	Name	Roland Brass
	Position	Senior Planner	Position	Partner

Limitations

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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 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

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Representation Statement.

North Lodge Farm South

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.

Date	Originator		Approved	
13 September 2021	Name	Ellen Nicholson	Name	Roland Brass
	Position	Senior Planner	Position	Partner

Limitations

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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 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 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.

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

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

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Enfield Local Plan Regulation 18 - Representation.

58-60 Silver Street, Enfield, EN1 3EP
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to 58-60 Silver Street, Enfield, EN1 3EP (with Church Lane car park) ('the site').

This Representation 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 **CFS215**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site measures 0.19ha in size and currently comprises offices and a car park. The site contains a Grade II listed building and is located within the Enfield Town Major Centre and the Enfield Town conservation area. The site is also adjacent to Metropolitan Open Land. The surrounding area is characterised by a range of uses including residential accommodation, commercial / retail uses and areas of open space. The site achieves a Public Transport Accessibility Level ('PTAL') of 5 and is located 300m north of Enfield Town London Overground Station.

Landowner Proposals

The site is proposed for residential development. We consider the site could be brought forward for development within the next 5 years.

Comments on draft Local Plan

We support the local plan vision and objectives for the Borough. The Council's HELAA concludes that the site is not developable for 18 residential units. We request clarification/explanation for this conclusion. We consider proposals could be sensitively designed to respect the Grade II Listed Building, wider conservation area and Metropolitan open space. We suggest the Council reviews this site, to ensure it is fully optimised, and should consider it as developable in the draft Local Plan.

Case for Development

Development of the site for a hotel and housing would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the housing target (draft Policy H1).

The site is previously developed land, with an excellent public transport accessibility rating. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is developable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18- Representation.

Brimsdown Sports Ground, Goldsdown, Enfield, EN3 7RN
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Brimsdown Sports Ground, Goldsdown Road, Enfield, EN3 7RN ('the site').

This Representation 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 **CFS217**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site is 8.06 hectares in size and currently comprises disused sports pitches. The site is bound by residential dwellings (2no. storeys) on all sides. Although the site achieves a low Public Transport Accessibility Level (PTAL), the site is situated 350m north west of Brimsdown Railway Station.

Landowner Proposals

The site is considered appropriate for mixed use development including residential units, sports provision, a park and community uses. No capacity studies have been undertaken to date and we wish to discuss this matter further with the Council.

Comments on draft Local Plan

We support draft Site Allocation SA40 which allocates the site for renewed community uses alongside a limited amount of other enabling uses (as any net loss of open space would need to be supported by a masterplan approach).

We note that draft Local Plan Table 8.1 states that 'Land known as Brimsdown Sports Ground' should be allocated for mixed use comprising "50 homes and community uses". However, SA40 does not explicitly state that 50 homes shall be expected to come forward on the site. We are of the view that the site is suitable for more than 50 dwellings and seek to further discuss capacity and land use mix with the Council to ensure that the development opportunity is optimised.

Case for Development

Development of the site for renewed community uses would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and supporting the new housing to be delivered (draft Policy H1).

Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is deliverable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18 - Representation.

Lion Road Car Park, Church Street, Enfield, N9 9DY
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Lion Road Car Park, Church Street, Enfield, N9 9DY ('the site').

This Representation 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 **CFS218**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site measures 0.05 hectares in size and currently comprises a car park. The site is located within a conservation area and adjacent to Edmonton Local Centre. The surrounding area is characterised by a range of uses including residential accommodation and commercial / retail. The site achieves a Public Transport Accessibility Level ('PTAL') of 6a and is located 150m west of Edmonton Green London Overground Station.

Landowner Proposals

The site is proposed for residential development. We consider the site could be brought forward for development within the next 5 years.

Comments on draft Local Plan

We support the vision and objectives for the Borough. We support the findings of the Council's HELAA which identifies the site as developable for 10 units. Table 8.2 of the Plan sets out the Borough's total housing supply over the plan period which includes 'other developable sites' identified in the HELAA. Therefore, we expect the site to come forward for development within the plan period. We suggest the Council reviews this site, to ensure it is fully optimised and consider when it might come forward for development.

Case for Development

Development of the site for housing would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the housing target (draft Policy H1).

The site is previously developed land, with a high public transport accessibility rate. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is developable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18- Representation.

John Wilkes House, 79 High Street, Enfield, EN3 4EN
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to John Wilkes House, 79 High Street, Enfield, EN3 4EN ('the site').

This Representation 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 **CFS221**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site measures 0.09 hectares in size and currently comprises an office building. The site is located in Ponders End Local Centre. The surrounding area is characterised by a range of uses including residential accommodation and commercial / retail uses. The site achieves a Public Transport Accessibility Level ('PTAL') of 2-3 and is located 1km north of Ponders End Railway Station.

Landowner Proposals

The site is proposed for residential development. We suggest the site could come forward in the next 5 years.

Comments on draft Local Plan

We support the vision and objectives for the Borough. We support the findings of the Council's HELAA which identifies the site as developable for 15 units. Table 8.2 of the Plan sets out the Borough's total housing supply over the plan period which includes 'other developable sites' identified in the HELAA. Therefore, we expect the site to come forward for development within the plan period. We suggest the Council reviews this site, to ensure it is fully optimised and consider when it might come forward for development.

Case for Development

Development of the site for housing and community uses would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the housing target (draft Policy H1).

The site is previously developed land well connected to local services and transport links. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is developable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18 - Representation.

Stable Yard – Broomfield Park, Broomfield Lane, London, N13 4HE
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Stable Yard – Broomfield Park, Broomfield Lane, London N13 4HE ('the site').

This Representation 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 **CFS223**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site measures 0.31 hectares in size and currently comprises a disused parks depot and derelict residential unit including a former stable block and yard. The site forms part of Broomfield Park which is a Grade II listed park and garden. It is also designated as Metropolitan open land, local open space and a site of local importance for nature conservation. The surrounding area is predominately characterised by residential accommodation and areas of public open space. The site achieves a Public Transport Accessibility Level ('PTAL') of 2 and is located 650m north of Palmers Green Railway Station.

Landowner Proposals

The site is proposed for residential and community uses. New homes could be set out in a mews / courtyard arrangement with potential community use in the stable block. Some open parts of the stable yard have development opportunities to support the wider site e.g. conservation and restoration of Broomfield Park and manor house. We suggest the site could come forward in the next 5 years.

Comments on draft Local Plan

We support the vision and objectives for the Borough however we query the HELAA's conclusion that the site is not developable. We consider the site could provide some enabling residential uses to conserve and restore Broomfield Park and manor house and associated community uses. We suggest the Council reviews this site and the HELAA, and considers it to be developable so that it can come forward in the new Local Plan.

Case for Development

Development of the site for housing and community uses would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the housing target (draft Policy H1). The proposals also offer a range of community and heritage benefits. The site is previously developed land well connected to local services and transport links. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is developable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18 - Representation.

1-3 Gentlemans Row, Enfield EN2 6PT
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to 1-3 Gentlemans Row, Enfield, EN2 6PT ('the site').

This Representation 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 **CFS228**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site measures 0.25 hectares in size and currently comprises corporate offices, a marriage ceremony room and registry office. No. 1 Gentleman's Row is a Grade II listed building. The site is also located within Enfield Town Centre and Enfield Town conservation area. The surrounding area is characterised by a range of uses includes residential accommodation and commercial / retail uses. The site achieves a Public Transport Accessibility Level ('PTAL') of 6a and is located 400m east of Enfield Chase Railway Station.

Landowner Proposals

The site is proposed for the continuation of its current use for the short to medium term. In terms of future development, the existing uses would require relocation.

Comments on draft Local Plan

We support the vision and objectives for the Borough. The Council's HELAA concludes that the site is not developable within the next 15 years. However, we consider that proposals could be sensitively designed to respect the listed building on site and the wider Enfield Town conservation area. We suggest the Council review this site as we consider the site is developable in the longer term and therefore could come forward as part of the new Local Plan.

Case for Development

Development of the site for a hotel and housing would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the housing target (draft Policy H1).

The site is previously developed land, with an excellent public transport accessibility rate. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is developable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18- Representation.

Church Street Recreation Ground, Enfield, N9 9HH
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Church Street Recreation Ground, Enfield, N9 9HH ('the site').

This Representation 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 **CFS230**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). This builds on the site information which were submitted to the Call for Sites exercise in early 2021. Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site is 4.43 hectares and is currently in use as a playing field & a park. It is situated with the larger setting of the Church Street Recreation Ground beyond which are residential dwellings of predominantly 2no. storeys. Several bus stops are situated along Great Cambridge Road to the immediate west of the site. The Site is designated as Metropolitan Open Land in the draft Local Plan.

Landowner Proposals

The site is proposed for a crematorium use alongside an improved café, community facilities, welfare facilities and visitor parking.

Comments on draft Local Plan

We support draft site allocation SA61 which allocates the site for a new crematorium use. We seek conformation from the Council regarding the prospect of development to incorporate an improved café, community facilities, welfare facilities and visitor parking.

Case for Development

Development of the site for crematorium use would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the required number of burial and crematorium spaces (draft Policy DM BG10).

The site is deliverable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18 - Representation.

Bullsmoor Library, 58 Kempe Road, Enfield, EN1 4QS
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Bullsmoor Library, 58 Kempe Road, Enfield, EN1 4QS ('the site').

This Representation 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 **CFS231**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site measures 0.17 hectares in size and currently comprises a library, community centre and car park. The derelict garages on the adjacent land could also form part of the site bringing the total site area to 0.3ha.

The site has no designations under the adopted Local Plan. The surrounding area is characterised by a range of uses includes residential accommodation, commercial / retail uses and areas of open space. The site achieves a Public Transport Accessibility Level ('PTAL') of 1b and is located 850m north of Turkey Street London Underground Station.

Landowner Proposals

The site is proposed for a mix of uses comprising residential units alongside a the reprovision of a community / library use. We suggest the site could come forward in the next 5 years.

Comments on draft Local Plan

We support the local plan vision and objectives for the Borough. We support the findings of the Council's HELAA which identifies the site as developable for 31 units. Table 8.2 of the Plan sets out the Borough's total housing supply over the plan period which includes 'other developable sites' identified in the HELAA. Therefore we expect the site to come forward for development within the plan period. We suggest the Council reviews this site, to ensure it is fully optimised and consider when it might come forward for development.

Case for Development

Development of the site for housing and a library / community use would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the housing target (draft Policy H1).

The site is previously developed land well connected to local services and transport links. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is developable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18 - Representation.

Crown Road Lorry Park, Crown Road, Enfield, EN1 1TH
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Crown Road Lorry Park, Crown Road, Enfield, EN1 1TH ('the site').

This Representation 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 **LP656_1**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site is 0.7 hectares in size and currently comprises a lorry park and car compound. It is located in the Southbury Industrial Estate. The surrounding area is characterised by a range of commercial and industrial uses. The site is located 150m northwest of Southbury Railway Station.

Landowner Proposals

The site is proposed to deliver new employment / industrial uses via both small and medium units. We suggest it could deliver up to 50,000 sqft (4,645 sqm.) of new floorspace. Detailed capacity studies have not been undertaken so we suggest the potential level of development is reviewed with the Council.

Comments on draft Local Plan

We support draft Site Allocation SA46 which allocates the site for redevelopment to provide an additional 4,530 sqm of employment floorspace (light industrial, general industrial, storage and distribution, and related sui generis) floorspace.

Case for Development

Development of the site for employment / industrial uses would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the employment target (draft Policy E1).

The site is previously developed land, situated within an existing industrial estate. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is deliverable (in accordance with the NPPF). It is available for development (in the plan period), and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18 - Representation.

Asda, 130 Chase Side, Southgate, N14 5PH
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Asda, 130 Chase Side, Southgate N14 5PH ('the site').

This Representation 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 **LP662**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site is 1.65 hectares in size and currently comprises a retail store and accompanying surface level car park. The surrounding area is characterised by a range of uses includes residential dwellings, commercial / retail uses and allotments. The site achieves a Public Transport Accessibility Level (PTAL) of 4 'good' and is located 300m west of Southgate London Underground Station.

Landowner Proposals

The site (LP662) is proposed for a mix of uses comprising ground floor retail and residential uses at the upper storeys.

Comments on draft Local Plan

We support draft Site Allocation SA20 which allocates the site for comprehensive mixed-use redevelopment comprising circa 165 new homes alongside compatible town centre non-residential uses. The site is located within the Southgate urban place making area.

Case for Development

Development of the site for housing and commercial / retail uses would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the housing target (draft Policy H1) and employment target (draft Policy E1).

The site is previously developed land, with a high public transport accessibility rate. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is developable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18 - Representation.

Alma Road Open Space
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Alma Road Open Space ('the site').

This Representation 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 **LP1139**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site is 2.65 hectares in size and is currently open space. The surrounding area is a mix of light industrial / warehousing and residential uses. The site is bound to the north by Avondale Crescent; to the east by railway lines; to the south by an allotment; and to the west by Alma Road. It achieves a Public Transport Accessibility Level (PTAL) of 3 however is situated 500m south of Brimsdown Railway Station and several bus stops are situated along Alma Road to the immediate west of the site. The Site is designated as Metropolitan Open Land in the draft Local Plan.

Landowner Proposals

The site is proposed for a crematorium use or a residential use, and we acknowledge that further feasibility work would need to be undertaken to support future development.

Comments on draft Local Plan

We support draft site allocation SA58 which allocates the site for a new cemetery use. We retain the view that the site could offer potential for residential use and suggest that the Council reviews this matter.

Case for Development

Development of the site for crematorium use would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the required number of burial and crematorium spaces (draft Policy DM BG10). Development for residential uses would contribute towards achieving the required housing target (draft Policy H1).

The site is deliverable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Representation Statement.

Crews Hill Golf Course, Enfield, EN2 8AZ

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

I: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.

Date	Originator		Approved	
13 September 2021	Name:	Becky Anderson	Name	Roland Brass
	Position	Planner	Position	Partner

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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.

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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 Crews Hill Golf Course, Enfield, EN2 8AZ (referred to hereafter as “the site”).
- 1.2 This Statement is submitted to the Regulation 18 Local Plan (“draft Local Plan”) public consultation currently being undertaken by the London Borough of Enfield (“the Council” / “the Borough”/ “LBE”).
- 1.3 This Statement builds on the site information and redline 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 **LP1142**.
- 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 Crews Hill Golf Course as part of one of the new ten placemaking areas 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 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 residential-led development and that exceptional circumstances exist for its release from the Green Belt. The site would achieve sustainable patterns of development, address local development needs, and support the creation of the London National Park City.
- 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 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.
- 1.10 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 Crews Hill Golf Course, Cattlegate Road, Enfield EN2 8AZ. It is located in the northern part of the Borough and lies to the south west of Crews Hill Railway Station.
- 2.3 The site is approximately 44 hectares (109 acres) in size. It is bounded by Cattlegate Road to the north; undeveloped agricultural land to the south; the railway line to the east; and East Lodge Lane to the west. Turkey Brook (a watercourse) also runs (north-south) through the site along its western edge.
- 2.4 The site currently comprises a golf clubhouse and an 18-hole golf course. The golf clubhouse is principally two-storeys with a number of single storey extensions that have been added to the main structure over the last 10-15 years. A large roof terrace is also located to the rear of the golf club, overlooking the golf course. Various buildings and hardstanding exist on site, including car parking spaces at the front and side of the golf club and a number of storage buildings located to the south of the golf club, on the golf course.
- 2.5 By virtue of being a golf course the site is well landscaped with a number of trees located around the course. None of these trees appear to be protected through a Tree Protection Order (“TPO”).
- 2.6 The existing site access is directly off Cattlegate Road.
- 2.7 The topography of the site is variable as a result of being a golf course but is generally flat, sloping down-hill towards its western edge. The site is also located on the highest point of Crews Hill, with Cattlegate Road gently sloping down towards Crews Hill to the east, and towards the M25 to the west.

Surroundings

- 2.8 The surrounding area is generally rural in nature, with the Crews Hill area comprising predominately horticultural glasshouses and associated agricultural structures / areas of hardstanding alongside a number of other commercial uses to the east beyond the railway line. Several residential dwellings are also located to the east of the site consisting of mainly 2-3 storey semi-detached dwellings. Nearly all of Crews Hill (including the site) is currently located within the Metropolitan Green Belt. The site is also designated as “Local Open Space”.
- 2.9 Within 400m of the site / 5-minute walking distance, is Crews Hill Railway Station which is accessible via Cattlegate Road. Crews Hill Railway Station provides two northbound services per hour towards Hertford North (journey time of 12 minutes) and two southbound services per hour towards London Moorgate (journey time of 40 minutes). Southbound services stop at Finsbury Park Station where interchange is available for trains to London Kings Cross and for London Underground Piccadilly and Victoria Line services.
- 2.10 The closest bus stop is located on Theobalds Park Road, 1.2km to the east of the site (15-minute walking distance) which provides services towards North Middlesex Hospital, via Enfield Town Centre four times per hour.

Cattlegate Road contains a single footpath which extends from the site, towards Crews Hill Railway Station and Crews Hill. The site has strong sustainability credentials.

- 2.11 A Public Right of Way ('PROW') also dissects through the site, from the northern entrance of the Golf Course through to the southern end of Crews Hill, connecting to Strayfield Road to the east of the railway line. The PROW therefore includes a crossing over the railway line, connecting land west of the railway line to the wider Crews Hill area and Crews Hill Railway Station.

Planning & Environmental Designations

Existing Designations

- 2.12 Designations covering and relating to the site include:
- The site is within the Metropolitan Green Belt;
 - The site sits adjacent to the "Crews Hill Defined Area".
 - The site is designated as a "Local Open Space".
 - A majority of the site is located entirely within Flood Zone 1 and therefore at the lowest risk of fluvial flooding. A majority of the western edge of the site is located within Flood Zone 3.
 - The site is not located within a Conservation Area, nor does it contain any designated heritage assets. There are a number of listed buildings located within the wider vicinity, however these are located north of Cattlegate Road.
 - The site lies adjacent to the "Special Character Area" of Crews Hill.
 - The site is also designated as a "Local Importance for Nature Conservation".

Proposed Designations

- 2.13 The draft Local Plan proposes to release the site from the Green Belt, as part of the Crews Hill placemaking area.
- 2.14 The updated draft Policies Map identifies a majority of the site as an "indicative location for housing-led areas in Green Belt" within the wider Crews Hill Rural Placemaking Area.
- 2.15 The site also retains its designation as a Site of Borough Importance for Nature Conservation and appears to retain its designation as a Local Open Space.
- 2.16 The site also now falls within the London National Park City covered by Policy PL8 of the draft Local Plan.

Planning History

- 2.17 The planning history for the site mainly comprises applications related to the continued maintenance and expansion of the golf club and course. A summary of the most recent planning applications is detailed in **Table 2.1** below.

Table 2.1 – Planning History

Application Reference	Proposal	Decision
P13-01600PLA	Erection of machinery store	Granted Wed 24 Jul 2013
TP/09/1071	Erection of an extension to side of club house under existing first floor terrace.	Granted Wed 02 Dec 2009
TP/08/1402	Extension to first floor roof terrace to rear of building.	Granted Tue 28 Oct 2008
TP/07/1913	Formation of a Junior practice green with associated land works.	Granted Wed 19 Dec 2007
TP/05/0021	Installation of replacement irrigation pumphouse and water storage tank.	Granted Wed 16 Feb 2005
TP/04/2025	Enclosure of covered storage area to provide a trolley store and changing rooms.	Granted Thu 02 Dec 2004
TP/00/1618	Construction of additional 33 car parking spaces.	Granted Fri 16 Mar 2001
TP/92/0190	Erection of a part single storey part 2-storey extensions to club house to provide pro-shop junior accommodation and improved dining and lounge facilities.	Granted Thu 17 Sep 1992

- 2.18 There are no relevant applications in the wider setting of the site.
- 2.19 The site was also submitted to the Council's Call for Sites exercise in early 2021 (Site ID: CFS02). This submission stated that the site should come forward for residential-led development.

Proposed Development

- 2.20 Crews Hill Golf Course is 82 hectares in size. It is a strategic development site and forms part of the Crews Hill placemaking area. We consider that it is capable of providing residential-led development supported by a range of other land uses.
- 2.21 In terms of residential development, based on a net developable area of c. 60% and densities of 30-50 dph, around 1,500 to 2,500 new homes could be delivered at the site.
- 2.22 In addition, any proposals could provide employment / commercial land uses and supporting community, landscaping and enabling infrastructure. We would assume these details would be set out within the SPD for the placemaking area following a more detailed stage of design.
- 2.23 In addition, as set out in separate Representation Statements, we consider that land at Rectory Farms and Kings Oak Equestrian Centre could also provide additional development opportunities within the Crews Hill placemaking area.

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), however we consider that the overall housing target should be reviewed as we consider there is potential for this to be increased. We consider that the option for growth identified within Policy SS1 (Medium Growth) should be treated as a minimum in consideration that the Council could further optimise sites, including Crews Hill placemaking area.

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

- 3.8 Yes. We support the proposed spatial strategy option (Medium Growth 1) which proposes at least 25,000 new homes, some Green Belt release, the creation of the National Park City and placemaking areas for the focus of growth.
- 3.9 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.
- 3.10 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).
- 3.11 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.”*
- 3.12 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. In this respect, we recommend that the total potential capacity of placemaking sites (e.g. Crews Hill) is stated.
- 3.13 However, as outlined within Table 2.2 of the draft Local Plan, Medium Growth Option 1 states that this option will only “*meet much of the housing requirement*” rather than meeting the housing requirement in full. In line with Para 11 of the NPPF, we suggest that the Council should seek to meet their housing requirement in full therefore Medium Growth 1 option of providing 25,000 homes should be treated as an absolute minimum within the plan period to 2039. Our detailed comments regarding the housing requirement are set out under our Chapter 8 comments.

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

- 3.14 We support the key diagram and the allocation of Crews Hill as a rural placemaking area. However, we consider that this development area could potentially be optimised to deliver additional development. We suggest that the placemaking area could also include development opportunities at Kings Oak Equestrian Centre and Rectory Farm (which are considered in more detail in separate Representations Statements).

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

- 3.15 We do not have any suggested changes for the proposed Spatial Strategy set out at Policy SS1.
- 3.16 We agree with the policy wording of Policy SS1, notably Point 2 which states “*provision will be made for at least 25,000 new homes up to 2039 with a large proportion of the Borough’s future development needs provided by the four main placemaking areas of Meridian Water, Southbury, Crews Hill and Chase Park*”.
- 3.17 We support the inclusion of Point 7 of Policy SS1 on the Crews Hill placemaking area, which states that the Crews Hill gateway settlement will extend beyond the plan period. This is important in respect of Para 22 of the NPPF and we recommend that the Council clearly explain the total development potential of the Crews Hill placemaking area, including how much development could come forward beyond 2039. Understanding this total figure is important as it has an impact on deliverability and viability (especially as there are multiple landowners across the site) which are key considerations to help bring the site forward.

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

- 3.18 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.

Other Comments

- 3.19 Policy SS2 (Making Good Places) Point 5 sets out the Council will ensure that development is planned and implemented in a coordinated way in the identified placemaking areas, guided by Supplementary Planning Documents (“SPDs”), Area Investment Plans, Masterplans and/or planning briefs where appropriate. We agree with this approach and consider SPDs should come forward, however we request that the Council provides further clarity on the timescales for the production of the SPD and how this will work in practice to ensure homes, employment and infrastructure can be provided within the Plan period and beyond. We have concerns that the slow production of an SPD within Crews Hill may lead to a slow delivery of development within the plan period.
- 3.20 The creation of an SPD prior to examination will ensure the Council can demonstrate deliverability and overall soundness of the Local Plan.

Chapter 3 – Places

- 3.21 Chapter 3 of the draft Local Plan sets out the ten identified placemaking areas, including Policy PL8 (Rural Enfield) and Policy PL9 (Crews Hill).

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

- 3.22 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.
- 3.23 Our comments to each question on Policy PL8 are provided below.

Policy PL8 – Rural Enfield

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

- 3.24 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?

- 3.25 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. As stated above 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?

- 3.26 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.
- 3.27 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?

- 3.28 We suggest that Figure 3.9 of the draft Local Plan is reviewed as some of the land uses do not appear to be accurate e.g. woodland to the south west of Crews Hill Golf Club. We also suggest that Figure 3.9 should show the PROW that dissects through the site, and how this might link up with other key routes within Rural Enfield including Crews Hill Railway Station. There is a network of paths within this area, and we consider this is a key placemaking quality for Rural Enfield.

Policy PL9 – Crews Hill

Q1. Does the vision for Crews Hill set out an appropriate vision for the future of this place? If not, what components do you think should be changed or are missing?

- 3.29 We support the vision for Crews Hill, Policy PL9 and its allocation as a placemaking area. We agree that Crews Hill has significant potential to meet housing, employment and infrastructure needs within the plan period and beyond. We also support the approach in terms of long-term planning and looking beyond 2039, however as previously stated we recommend that further information on this matter is provided e.g. total residential development capacity.

Q2. Will the proposed placemaking policy for Crews Hill help to adequately deliver the aspirations set out in the vision? If not, what proposed changes, omissions or additions are required in the policy to help deliver the vision?

- 3.30 We consider that the proposed placemaking policy for Crews Hill will broadly deliver the aspirations set out in the vision, however we have the following comments in relation to Policy PL9 and the supporting text.

Figure 3.10

- 3.31 We recommend that a key is provided to help explain the proposals for the placemaking area set out in Figure 3.10. We also suggest that the PROWs are reviewed as the PROW which cuts through Crews Hill Golf Course is not shown.
- 3.32 We also suggest that the placemaking area could be extended to the south west of Crews Hill Golf Course, to include land at Rectory Farm, as outlined at Appendix 1. This land is located to the east of Turkey Brook so would form a logical part of the placemaking area. We have submitted a separate Representations Statement for Rectory Farm.

Point 1 of Policy PL9

- 3.33 Point 1 of Policy PL9 states that “*sites anticipated to come forward in the next plan period will be removed from the Green Belt, as shown on the policies map*”. We recommend that further clarification is provided by the Council on this matter because as currently drafted this proposal is not clear.
- 3.34 In terms of phasing, we suggest it is important that the Council recognise that the Crews Hill Golf Course could potentially come forward as the first phase of development. This is because the site is in single landownership, it is located next to the railway station and could enhance connectivity to the south. Also, importantly, it has the potential to deliver a critical mass to kickstart development of the placemaking area and bring forward a flagship and gateway scheme.
- 3.35 As previously stated, we also recommend that the Council clearly identifies within Policy PL9 the total quantum of development to be provided within and beyond the plan period (before and after 2039).

Point 2 of Policy PL9

- 3.36 Point 2 of Policy PL9 states that “*planning permission on allocated sites will only be granted following the approval by the Council of a comprehensive masterplan (in the form of an SPD)*”.
- 3.37 We support the preparation of an SPD to ensure a collaborative and holistic approach to placemaking is achieved. We are keen to work with the Council and other landowners to deliver the vision set out in Policy PL9.
- 3.38 Such SPDs are useful planning tools to help bring forward sites, however they are complex documents and can be challenging to prepare, especially on strategic sites with a number of landowners and upfront infrastructure requirements. Therefore, we consider that work should be progressed as soon as possible towards the adoption of an SPD to ensure it is prepared in time for Examination. This will be vital to demonstrate the deliverability of Crews Hill to the Inspector, which will be important to the soundness of the Local Plan.
- 3.39 We consider that this SPD should include all the landowners at Crews Hill. Therefore, we recommend that Figure 7 in the Crews Hill Topic Paper (2021) is updated to include all landowners. We assume that the Council has these details from the Call for Sites exercise (2021) and will also update Figure 7 to reflect any further sites

submitted through the Regulation 18 Consultation. The preparation of the SPD needs strong leadership and incentives to ensure collaboration between landowners and agreement over the proposed masterplan for the placemaking area.

Point 9 of Policy PL9

3.40 Point 9 of Policy PL9 states that “*a greater intensity of development at Crews Hill may be appropriate where it is able to deliver new or improved links across the railway as well as facilitating additional stopping train services at Crews Hill station to enhance the area’s sustainability and its role as a gateway to the rural north for visitors and tourists*”.

3.41 We support this point and recommend that densities are optimised at sites close to the railway station, particularly sites that are within walking distance, such as Crews Hill Golf Course. The site could significantly enhance the sustainability of the area by providing a link over the railway line to the south (which connects existing PROWs).

Point 16 of Policy PL9

3.42 Point 16 of Policy PL9 states that “*mixed use development should be focused on the area around the station and along the corridor of the existing road under the railway*”.

3.43 We recommend that the Council provides further clarity on the mix, location and quantum of land uses proposed across the placemaking area. We suggest that Crews Hill Golf Course should come forward as a residential-led scheme, which could include a mix of uses including enabling infrastructure. As previously stated, the site could come forward as a phase 1 flagship and gateway scheme.

Chapter 4 – Sustainable Enfield

3.44 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.

3.45 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 Crews Hill Golf Course would contribute towards achieving these targets and policies.

Chapter 5 - Addressing equality and improving health and wellbeing

- 3.46 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.
- 3.47 The intention is that the golf course is not closed, and its future is subject to further discussions. However, if any facilities need to be re-located as part of development proposals at Crew Hill Golf Course, opportunities to re-provide (and potentially enhance) facilities on other land part of the LBE rural portfolio will be explored.

Chapter 6 – Blue and Green Enfield

- 3.48 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.
- 3.49 We support Policies BG1 to BG11 and consider Crews Hill placemaking area would bring significant landscaping and biodiversity benefits to the Borough, including biodiversity net gain. We consider this could be achieved through carefully planned development and it would be a key component of the SPD.
- 3.50 The draft Policies Map (2021) designates Crews Hill Golf Course as a “Site of Borough Importance for Nature Conservation” and “Local Open Space”, as well as draft Site Allocation SA27 (Land at Crews Hill) and draft Policy PL9 (Crews Hill placemaking area). These designations relate to Policy BG2 (Protecting Nature Conservation Sites) and Policy BG6 (Protecting Open Space). We recommend that the Council provides further information on the relationship between these proposed policies, especially as the site is proposed to come forward for strategic development.

Chapter 8 – Homes for all

- 3.51 Chapter 8 of the draft Local Plan provides the detailed policies on housing. Overall, we support the housing policies.

H1: Housing Development Sites

- 3.52 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 assume a dwellings per annum figure is not provided due to the implementation of stepped housing phasing.
- 3.53 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 supply in London.
- 3.54 In response to the list of allocated sites in Table 8.1, given that this provides dwelling totals and site area, we recommend that the Council confirms its approach to housing density. This will be important to justify the level of development at each site. As previously stated, we also recommend the Council provides an indication of the number of dwellings that could be provide post 2039 also.

Site Allocation SA27 (Land at Crews Hill)

- 3.55 We support the allocation of Crews Hill within the draft Local Plan. The site provides a strategic and significant development opportunity to help achieve the Council's vision and objectives.

- 3.56 However, we suggest that the Council provides further clarity on several matters including level of development post 2039, phasing of the site, density of development, potential mix of uses etc. We assume that much of this detail will be set out in the Regulation 19 Local Plan and any future SPD.
- 3.57 Table 8.2 of the draft Local Plan sets out the overall supply of housing within the plan period, equating to 30,192 dwellings. This includes 23,566 dwellings identified within Policy H1.
- 3.58 We recommend that the Council provides a housing trajectory to support the draft Local Plan. We consider this is important to inform the phasing of development and is necessary in respect of the Borough's latest Housing Delivery Test Measurement (56%).
- 3.59 If the Council proposes a stepped housing trajectory across a number of 5-10 year phases, we recommend that this is carefully considered to ensure that the trajectory is as flat as possible – making use of deliverable sites – so that the level of housing proposed towards the later end of the plan period does not represent a significant uplift. If this is the case, we suggest that the reference to 1,246 homes per year is clearly explained to be an average.
- 3.60 We support the fact that the draft Local Plan will provide at least 24,920 new dwellings in the plan period up to 2039. However, we consider that this target could be increased. Firstly, we consider that additional development could come forward e.g. at Crews Hill placemaking area and potentially 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 the Crews Hill Golf Course and surrounding area could deliver additional new homes.

H2: Affordable Housing

- 3.61 In terms of affordable housing, Policy H2 requires 50% affordable homes in all areas of the Green Belt, including the placemaking areas of Crews Hill. We support this approach and would aim to achieve 50% affordable housing at Crews Hill Golf Course.

H3: Housing Mix and Types

- 3.62 Policy H3 identifies that larger properties are of high priority within the Borough, with Para 8.3.3 of the draft Local Plan stating that "*most new households expected to form over the plan period are likely to need larger homes (3 bedrooms and larger)*". We recommend that the Council confirms whether this is a policy requirement or an ambition for the Borough. If a policy requirement, it would be useful for the Council to clarify what housing mix and types are anticipated to be provided within the placemaking areas, particularly Crews Hill.
- 3.63 We support this policy approach towards housing mix and types. Many of the brownfield sites identified within Policy H1 may struggle to provide larger units, with larger units (i.e. 3 bedroom properties) often more appropriate for greenfield sites since they are able to provide gardens, car parking and open space. As such, we consider that the Council will struggle to meet this requirement on brownfield sites alone, and consider that the identification of Crews Hill placemaking area can ensure a large number of family units can be provided.

4. Case for Development at the site

4.1 This section summarises reasons which we consider the Crews Hill Golf Course 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
A Nurturing Place	
Employment and jobs	Proposals for the site could contribute to providing quality homes whilst providing and supporting the delivery of infrastructure across the Crews Hill placemaking area.
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. The site is located within 500m of Crews Hill Railway Station and also has a PROW dissecting through the site connecting Cattlegate Road at the northern end with Strayfield Road to the south east.
Supply of housing	The site could provide up to 1,300 new homes in a sustainable location. The site also presents an opportunity to provide family housing (both affordable and market homes).
Variety of housing	The site could provide 50% affordable housing and will support meeting the needs of specific communities.
Public realm	The site has the potential to improve connectivity around Crews Hill. There is a PROW that dissects through the site which can improve east-west links given there is a railway crossing, and also improve links to Crews Hill Railway Station.
Active travel routes	The site has the potential to improve east-west links via the PROW and create active travel routes around the placemaking area.
Deeply Green Place	
Greening and natural world	Any development coming forward at the site would ensure it is landscape led and provide green open space. Turkey Brook would also be enhanced.

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. Turkey Brook would be enhanced with appropriate flood mitigation measures to create a liveable community.
Blue infrastructure	Turkey Brook would be enhanced to ensure this strategic objective can be met.
Green infrastructure	Any development coming forward at the site would support London as a National Park City and ensure it acts as a gateway into the wider “Rural Enfield”.
The Workshop of London	
Business needs	The site would support employment generating uses where possible.
Industrial intensification	The site would ensure increased connectivity to key employment areas around the Borough, and will ensure positive placemaking to attract businesses and investment.
Office development	The site can contribute to economic growth across the Borough, and provide the housing to accommodate workers. The site (where possible) would also support employment floorspace.
Town centres	
A Distinct and Leading Part of London	
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	The site would provide community facilities and high-quality infrastructure, if required.
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.

Achieving 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, is well-served by public transport and contains some previously developed land. Future proposals at the site could significantly enhance connectivity and linkages in the north of the Borough.
- 4.5 Crews Hill Railway Station is within 400m of the site / 5 minute walking distance, which provides two services per hour northbound towards Hertford North (journey time of 12 minutes) and two services per hour southbound towards London Kings Cross.

southbound towards London Moorgate (journey time of 40 minutes). Southbound services stop at Finsbury Park Station where interchange is available for trains to London Kings Cross and for London Underground Piccadilly and Victoria Line services.

- 4.6 The closest bus stop is located on Theobalds Park Road, 1.2km to the east of the site (15 minute walking distance) which provides services towards North Middlesex Hospital, via Enfield Town Centre four times an hour.
- 4.7 The site also contains a PROW which connects Cattlegate Road with Strayfield Road to the south, cutting across the railway line and connecting the eastern side of Crews Hill with the west. The PROW then connects to Cattlegate Road which contains a single footpath which extends from the site, towards Crews Hill Railway Station and Crews Hill.

Addressing Development Needs

- 4.8 Future residential-led development at the site would significantly help address local development needs. As identified in the draft Local Plan, there is a clear and identified need for additional housing delivery within the Borough. In terms of plan-making, the NPPF states that Local Plans should meet development needs across their area (Para 11).
- 4.9 Crews Hill Golf Course is 82 hectares in size and therefore based on a net developable area of c. 60% and densities of 30-50 dph, around 1,500 to 2,500 new homes could be delivered at the site. In addition, any proposals could provide employment / commercial land uses and supporting community and enabling infrastructure. We would assume these details would be set out within the SPD for the placemaking area following a more detailed stage of design.
- 4.10 In addition, as out in separate Representation Statements, we consider that land at Rectory Farm and Kings Oak Equestrian Centre could also provide additional development opportunities.

Deliverability / Developability

- 4.11 Crews Hill Golf Course 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*”.
- 4.12 Enfield’s Strategic Housing Land Availability Assessment (“SHLAA”) (2020) considered the site (CHC7) to be available; potentially suitable; potentially achievable; and potentially developable. The assessment concluded that the site could be considered developable subject to confirming viability and review of Green Belt policy constraints, and was calculated as having an indicative capacity of 491 dwellings. The SHLAA also considered that 15% of the site should be excluded as it is covered by Flood Zone 3. We support this finding in principle however, as previously explained, we consider the site to offer additional residential development potential.
- 4.13 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.

- **Suitable** – The Council have confirmed through their evidence base and draft Local Plan that Crews Hill Golf Course is proposed to be released from the Green Belt. 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 area and also has a more limited contribution to the Green Belt overall. The site is bounded by physical and natural barriers on all sides and is located to the eastern side of Turkey Brook. The site is also located in a highly sustainable location, within 500m of Crews Hill Railway Station. Through a masterplan-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. The site could be utilised to deliver a diverse range and type of housing, and would therefore be appealing to several developers and housebuilders. Crews Hill is set to be an attractive new community with excellent sustainability credentials and therefore we consider that development would be able to commence on-site within an earlier phase of development, and within the Plan period.

Exceptional Circumstances

4.14 In accordance with Para 136 of the NPPF, we consider that “exceptional circumstances” exist which justify the release of the site from the Green Belt for future development. These reasons are listed below:

- 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, senior living and larger family housing) 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;
- Significant employment (direct and indirect job creation) through various phases of development;
- Potential to provide a mix of land uses on-site in addition to housing e.g. employment / commercial 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;
- Opportunity for a high-quality flagship and gateway scheme;

- Potential to provide early enabling and infrastructure works to support the wider placemaking area;
- Achieving sustainable patterns of development;
- Significantly enhancing connectivity and linkages for walking and cycling; and,
- Lack of environmental or landscape constraints to development.

4.15 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.

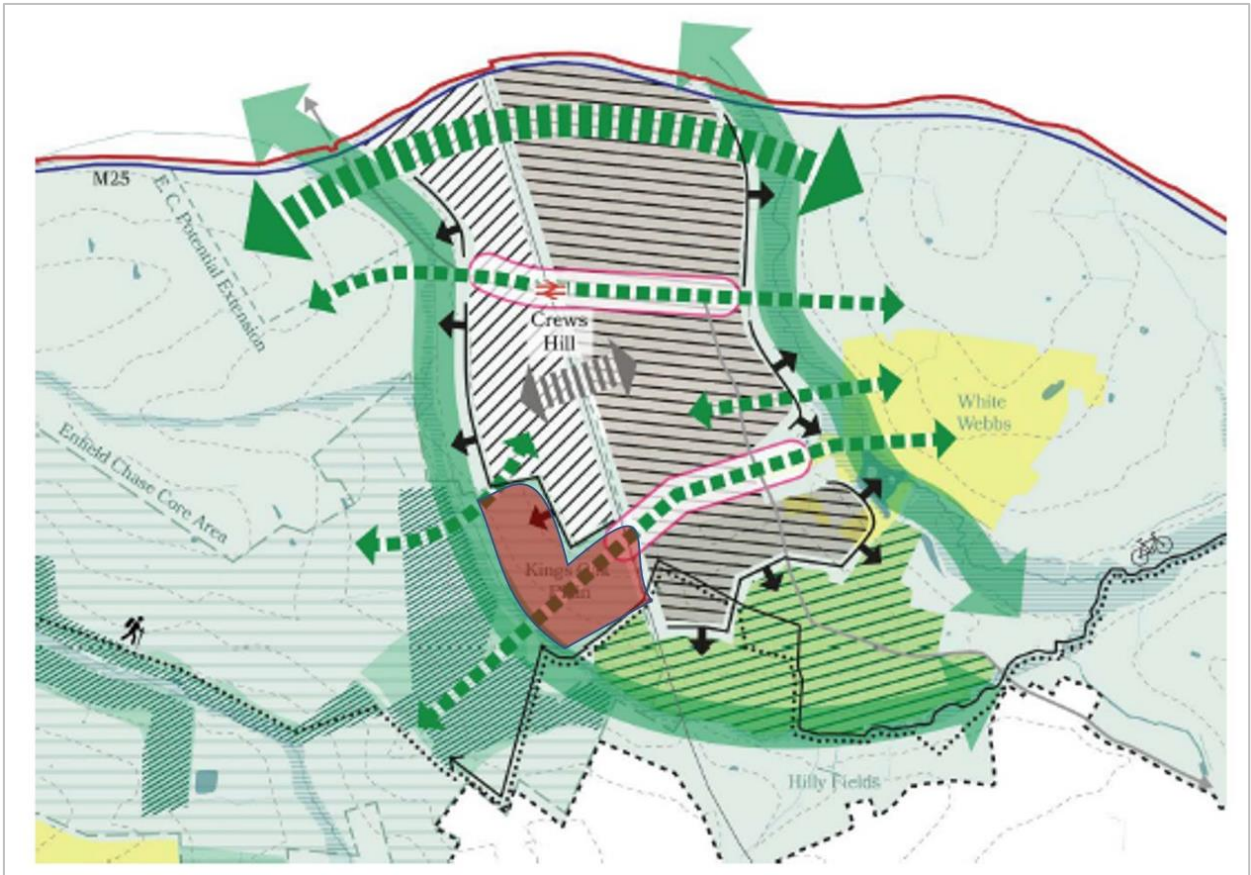
5. Conclusion and Next Steps

- 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 Crews Hill Golf Course as part of one of the new ten placemaking areas, 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 residential-led development and that exceptional circumstances exist for its release from the Green Belt. It would achieve sustainable patterns of development, 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.

Appendices

Appendix 1. Suggested extension to Crews Hill placemaking area

We consider that the Crews Hill placemaking area could be extended to include Rectory Farm (marked as red), located to the south of Crews Hill Golf Course.



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

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

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Representation Statement.

Rectory Farm

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.

Date	Originator		Approved	
13 September 2021	Name	Ellen Nicholson	Name	Roland Brass
	Position	Senior Planner	Position	Partner

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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 Rectory 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 As outlined in the latest Housing and Economic Land Availability Assessment (2021), the site source reference is 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 site represents a logical and sustainable location for future residential development. It is suburban in nature and adjacent to existing built development within the 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 given the level of housing need within the Borough and based on exceptional circumstances, we recommend that the site is allocated for residential development. The site would make a logical addition to the wider Crews Hill site allocation.
- 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 Strayfield Road adjacent to the settlement of Crews Hill in the central northern part of the Borough. A site location plan is set out at **Appendix 1**.
- 2.2 Rectory Farm comprises a vast area of undeveloped agricultural land with associated farm house and agricultural buildings. The site subject of this statement is a small portion of the wider Rectory Road site. It is flat and is bounded by Crews Hill Golf Course to the north; the railway line to the east; Strayfield Road to the south and Turkey Brook to the east. Access to the site appears to be currently sought directly off Strayfield Road however this section of the road is not an adopted highway.
- 2.3 The surrounding area is relatively built up / urban fringe in nature. The Crews Hill area to the east comprises predominately commercial uses including horticultural glasshouses and associated agricultural structures and building supply premises. There is a cluster of large detached residential properties in the centre of the settlement. The site has a Public Transport Accessibility Level (PTAL) rating – 0/1a – which is at the lowest end of the scoring system. Crews Hill train station is located approximately 0.9 miles (18 minute walk / 6 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 Theobalds Park Road (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.

2.4 The site has the following designations:

Adopted Local Plan	Draft Local Plan
Metropolitan Green Belt	Metropolitan Green Belt
Area of Special Character	Rural place making areas- Crews Hill
	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 of relevance have been submitted in relation to the site. The most recent applications relate to the agricultural use of the site, an application for the change of use of an existing building to storage (ref: 18/02097/FUL) was approved on 29th October 2018.
- 2.6 The site in its entirety 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 503 dwellings.

3. Potential Development

- 3.1 We consider that the site (adjacent to Crews Hill Golf Course) offers potential for residential development, for approximately 39 to 65 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 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 e.g. at Crews Hill placemaking area and potentially 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 Rectory Farm is allocated for residential development as part of the Crew Hill place-making area to help deliver additional new homes.

Chapter 3 – Places

- 4.10 As stated above we support proposals for the Crews Hill placemaking area and 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.

Policy PL9 – Crews Hill

- 4.12 We support the Vision for Crews Hill placemaking area, which includes part of the site. We agree that the area can provide a mix of land use opportunities. We suggest that the placemaking area could be extended to include this sites. We recommend that the Council provides information in relation to what development could be delivered beyond 2039 and what areas of land would be safeguarded to help better understand how the area is planned to change. We also recommend that a key is provided to support Figure 3.10 (Crews Hill Concept Plan).

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 achieve 35% affordable housing on site.

Site Allocation SA27 (Land at Crews Hill)

- 4.16 We support the site allocation of Crews Hill however we consider that the allocation could be extended to include this part of Rectory Farm. We consider that the site could be included within the indicative locations for housing led areas that form part of the allocation. The site would logically round off the indicative placemaking area.
- 4.17 The HELAA identifies the Rectory Farm site as a whole as 'potentially developable' for 503 units.

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 Sunbeam Stud 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/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 within 0.9 miles (18 minute walk) of Crews Hill Railway Station and multiple bus stops. In addition, part of the site is located within the Crews Hill placemaking area which is proposed for significant future growth. 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 strong contribution towards the Green Belt purposes as follows:

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

Green Belt Purpose	Assessment of Rectory Farm
Purpose 1 (Sprawl)	Strong/Relatively Strong
Purpose 2 (Merging)	Relatively Strong
Purpose 3 (Safeguarding)	Strong
Purpose 4 (Setting)	Weak
Purpose 5 (Regeneration)	Strong

- 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 Whilst recognising the impact of the expansion of Crews Hill onto the wider setting of Enfield, we consider the release of this parcel, alongside other parcels around Crews Hill would have less contribution to the Green Belt than what is stated above. Part of the site forms part of a wider site allocation proposed for release from the Green Belt therefore its impact should not be considered in isolation.
- 5.9 Rectory Farm is by Crews Hill Golf Course to the north; the railway line to the east; Strayfield Road to the south and Turkey Brook to the east. As such, 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

- 5.10 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 of the Crews Hill placemaking area would help meet local needs, including affordable housing.
- 5.11 At this early stage we consider the site could provide 39 - 65 new homes set within suitable landscaping.

Deliverability / Developability

- 5.12 In respect of the NPPF we consider that the site is 'deliverable' and / or 'developable'.
- **"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."
- 5.13 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** – The Council have confirmed through their evidence base and Draft Local Plan that part of the site is proposed to be released from the Green Belt. 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 area and also has a more limited contribution to the Green Belt overall. The site is bounded by physical and natural barriers on all sides and is located to the western side of the railway line. The site is also located in a highly sustainable location, within 0.9 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. Crews Hill is set to be an attractive new community with great sustainability credentials and therefore we consider that development would be able to commence on-site within an earlier phase of development, and within the Plan period.

Exceptional Circumstances

- 5.14 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.

5.15 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.

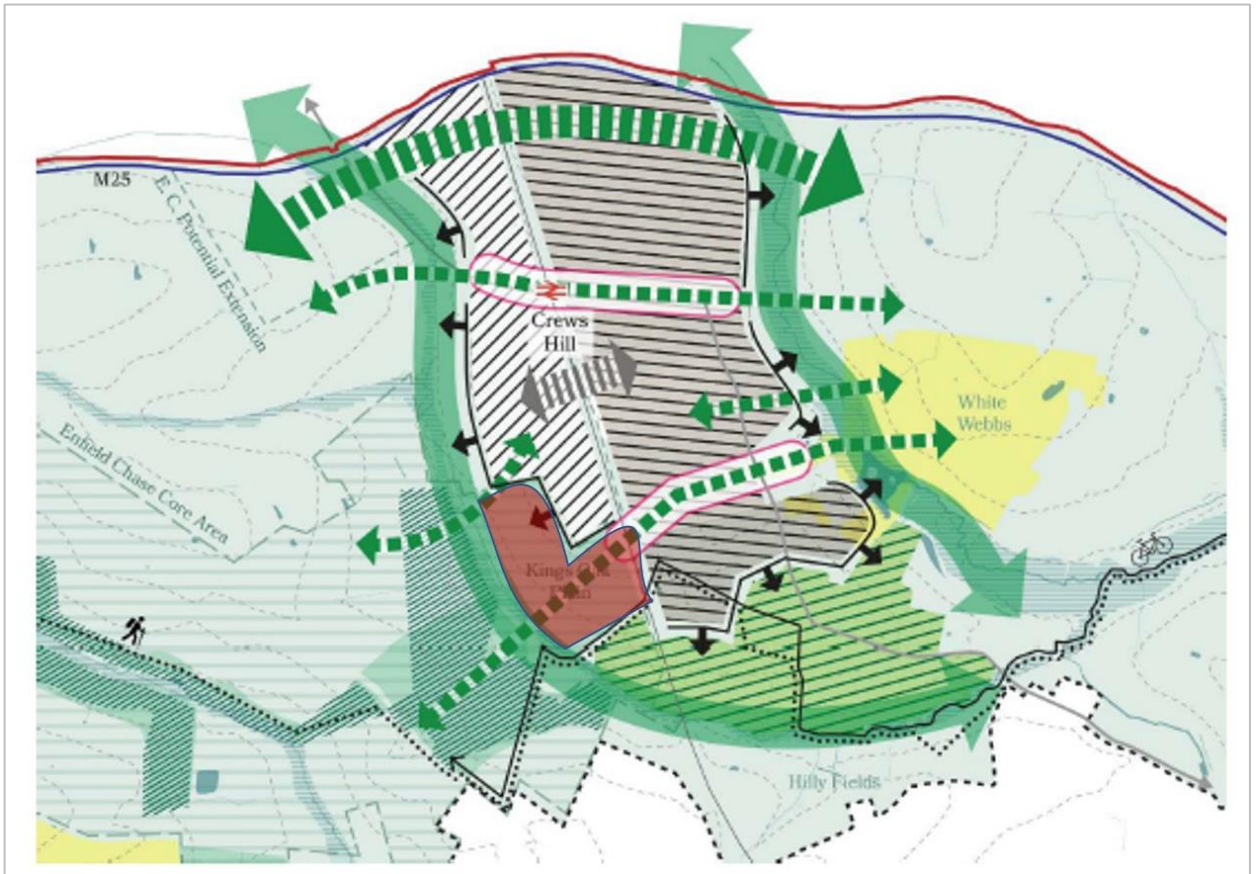
6. Conclusion and Next Steps

- 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.
- 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.

Appendices

Appendix 1. Rectory Farm Site Plan

Rectory Farm (marked as red), located to the south of Crews Hill Golf Course.



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

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Enfield Local Plan Regulation 18 - Representation.

Park Avenue Day Centre, 65C Park Avenue, Bush Hill Park, Enfield EN1 2HL
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Park Avenue Day Centre, 65C Park Avenue, Bush Hill Park, Enfield EN1 2HL ('the site').

This Representation 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 **LP1152**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site is 0.27 hectares in size and currently comprises an adult day care centre and offices. It has no designations in the adopted local plan. The surrounding area is characterised by a range of uses includes residential accommodation and commercial / retail uses. The site achieves a Public Transport Accessibility Level ('PTAL') of 2-3 and is located 800m west of Bush Hill Park London Underground Station.

Landowner Proposals

The development opportunity at the site is for a mixed use development comprising approximately 30-40 residential units arranged as flats alongside a health / community use.

Comments on draft Local Plan

We support the local plan vision and objectives for the Borough. We support the findings of the Council's HELAA which identifies the site as developable for 42 residential units. Table 8.2 of the Plan sets out the Borough's total housing supply over the plan period which includes 'other developable sites' identified in the HELAA. Therefore, we expect the site to come forward for development within the plan period. We suggest the Council reviews this site, to ensure it is fully optimised and consider when it might come forward for development.

Case for Development

Development of the site for housing and a health / community use would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the housing target (draft Policy H1).

The site is previously developed land, with a good public transport accessibility rate. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is developable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.

Enfield Local Plan Regulation 18- Representation.

Ramney Marsh, Mollison Avenue, Enfield, EN3
13 September 2021 | Public

Introduction

This Representation has been prepared by Knight Frank LLP on behalf of the London Borough of Enfield ('LBE') in relation to Ramney Marsh, Mollison Avenue, Enfield EN3 ('the site').

This Representation 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 **LP1162** and **LP606**.

LBE (the landowner) support the preparation of the new LBE Local Plan, and this Representation provides a summary of the site and proposals, and high-level comments on the draft Local Plan (Regulation 18). Our objective is to help the Council produce a sound Local Plan. We expect that all our suggestions are addressed as part of the Local Plan (Regulation 19).

We would be happy to discuss any matters with the Council and work in a collaborative manner to bring the site forward for future development.

The Site

The site is 12. hectares and is currently an area of open space. It is bound to the south by Mollison Avenue; to the east by Ramney Marsh; to the north by the M25; and to the west by a railway line. Beyond Mollison Avenue, the M25 and the railway line are industrial estates which characterise the area. Several bus stops are located 500m to the west of the site. The location has excellent access links to the M25 motorway.

Landowner Proposals

The site is proposed for employment / industrial uses with aspirations to be designated as Strategic Industrial Land.

Comments on draft Local Plan

We support draft Site Allocation SA52 which allocates the site for redevelopment to provide at least 70,200 sqm. of new employment floorspace (light industrial, general industrial, storage and distribution, and related sui generis) floorspace. We suggest the Council further consider the potential development capacity of the site to ensure that it is fully optimised.

Case for Development

Development of the site for employment floorspace would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the employment target (draft Policy E1).

Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is deliverable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.