

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

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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 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.

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.

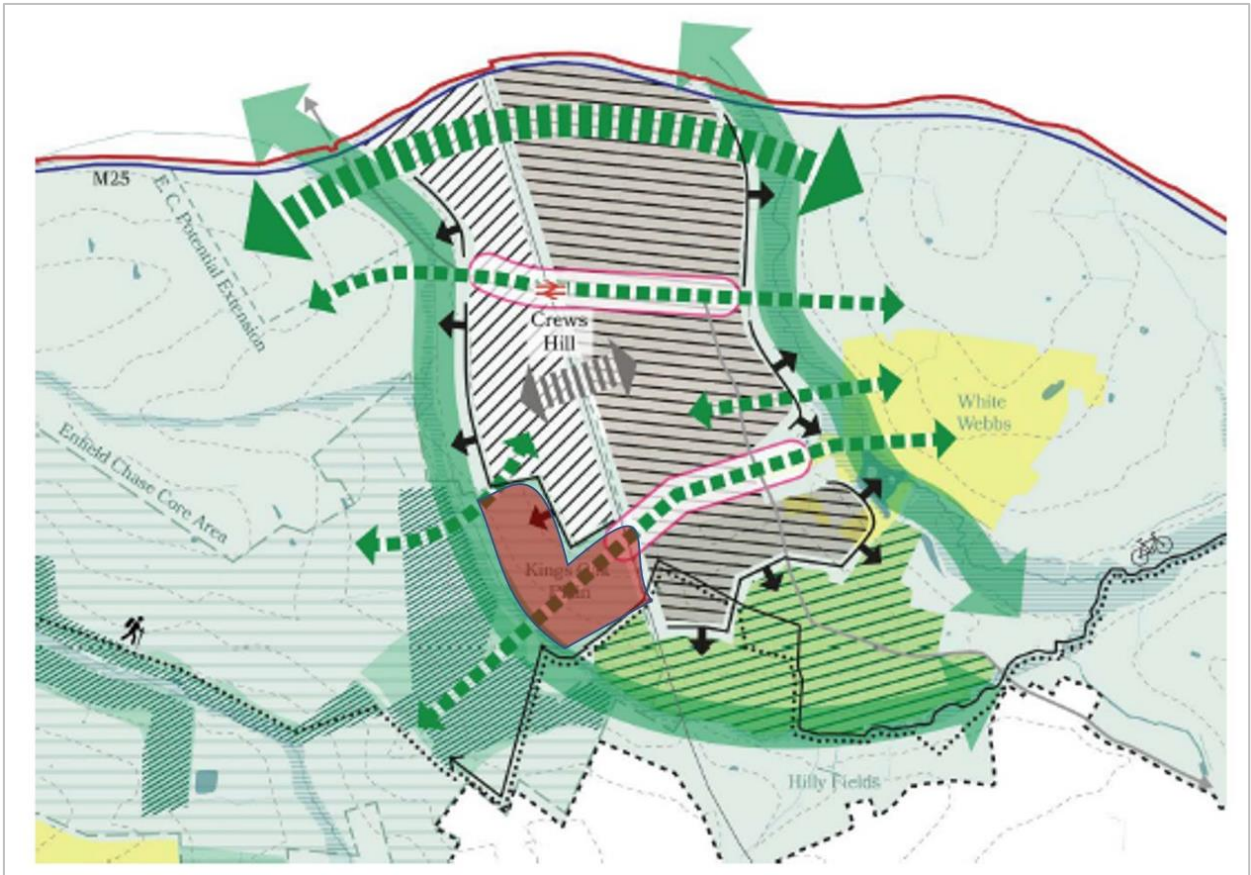
5. Conclusion and Next Steps

- 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.



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