



Draft Enfield Local Plan, June 2021
Representations by Woldens Garden Centre
September 2021

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1.0 Introduction

- 1.1 These representations have been prepared on behalf of our client, Wolden Garden Centre Limited, in relation to the site at Wolden Garden Centre, Cattlegate Road, Crews Hill, Enfield, Middlesex, EN2 9DW (hereafter referred to as “the site”). The site falls within Crews Hill which is situated to the north of Enfield Town in the London Borough of Enfield (LBE). See Appendix 1 for photographs of the site and context.
- 1.2 We hereby formally submit these representations in response to the new draft Local Plan document titled ‘*Enfield Local Plan Main issues and preferred approaches*’ June 2021 (Regulation 18). This round of the public consultation began on 21st June 2021 and will run until 13th September 2021.
- 1.3 It should be noted that we previously submitted representations on behalf of our client for the previous round of consultation (also Regulation 18) concerning the ‘*Enfield: Towards a New Plan for Enfield 2036*’ document. The previous representations also responded to LB Enfield’s ‘*Call for Sites*’ through which the ‘Wolden Garden Centre’ site was promoted.
- 1.4 Therefore, the following representations seek to specifically respond to the current draft new Local Plan document. We also seek to review and respond to the ***Draft Site Allocation 27 ‘Land at Crews Hill’***, which encompasses our client’s site. We maintain that the site has significant development potential during the next plan period.
- 1.5 The format of the representations are as follows:
 - Background;
 - Site Description;
 - Planning History;
 - Planning Policy Context;
 - Housing Need;
 - Site Allocation 27: ‘Land at Crews Hill’; and
 - Conclusion.

2.0 Background

- 2.1 The site is currently occupied by Wolden Garden Centre, which opened in 1964. The company is one of the longest established garden centres located within the Crews Hill district of Enfield. The site benefits from its close proximity to Crews Hill Railway Station, which sits approximately 482 ft (150m) to the north-west of the site. It is important to note that the site is located within the Green Belt.
- 2.2 It should be noted that the site falls within an area designated within the LBE Development Management Document (DMD) as the '**Crews Hill Defined Area**' (Policy DMD 90). The Crews Hill Defined Area recognises the area as a distinctive part of the borough which provides a major hub for horticultural activity. However, it is generally understood that the area has undergone an economic transition in recent years.
- 2.3 We understand from our client that there is a desire to explore the potential to redevelop the site in the medium term (e.g., 3- 5 years) to provide residential use.

3.0 Site Description

- 3.1 The Wolden Garden Centre site is located to the south of Cattlegate Road and falls within the Crews Hill area in the north of Enfield. The existing site comprises a large garden centre building to the north, which is used for retail sales and an associated nursery premises at the south. The site has a rectangular form, and the total area amounts to approx. 1.2 hectare. See Appendix 1 for '*Site Photographs*'.
- 3.2 The garden centre is served by an on-site car park, which is positioned along the western boundary of the site. It should also be noted that a pedestrian footway, which runs adjacent the western boundary of the site, provides access between Crews Hill Railway Station to the north, and the residential area to the south of the site.
- 3.3 To the rear of the garden centre is a detached property called '*The Hollies*', which lies within the site. The dwelling is two storeys high and includes a rear garden. The south of the site comprises a variety of storage buildings; manufacturing workshops and loose gardening paraphernalia. The south of the site contains two greenhouses which primarily provide storage for gardening equipment and antiques as well as minor sections for plant growth.
- 3.4 It should be noted that the site contains a number of perimeter trees and hedges that assist in defining its boundaries. The Environment Agency's, '*Flood Map for Planning*' reveals that the site is located within Flood Zone 1, which indicates a low flood risk.
- 3.5 Further afield, the surrounding uses to the north, east and west are predominantly characterised by horticultural activity, all of which contain large buildings used for a variety of retail and associated purposes. Further west, on the other side of the railway line, lies the Crews Hill Golf Course.
- 3.6 It is also important to note that there is a large established residential area (Beech Drive etc), which lies immediately to the south of the site.
- 3.7 The site is served by Crews Hill Railway Station, which falls within Zone 6. The station, and all trains serving it, is operated by Great Northern and runs down the line from King's Cross on the Hertford Loop Line. The typical weekday service is three trains per hour to Moorgate, and to Hertford North; and one train per hour northbound to Letchworth Garden City via Stevenage.
- 3.8 In terms of transport connectivity, the site has a Public Transport Accessibility Level (PTAL) of 1b, which indicates a low level of accessibility (See figure 1.1). However as noted, the site is located a 2-minute walk (approx.) (150m approx.) to the east of Crews Hill Railway Station, which benefits from travel times into central London of 38-minutes (approx.). In addition, the site is located only a few minutes' drive from very good road transport links via the A10 and M25.

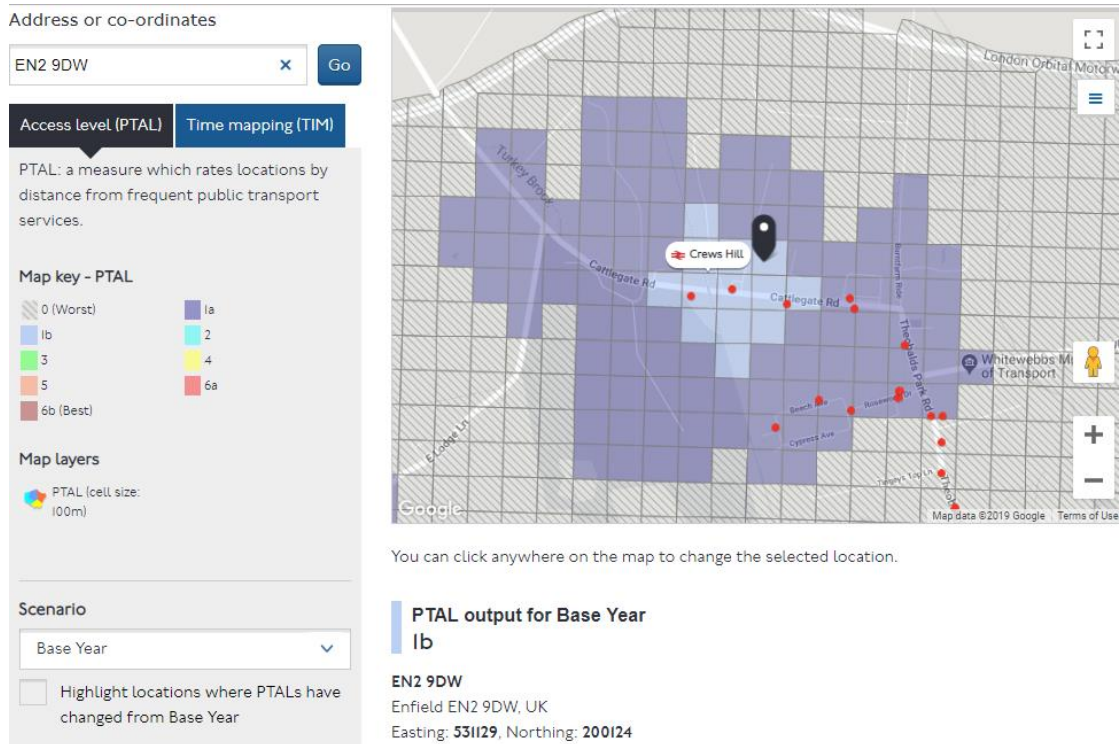


Figure 1.1: PTAL Rating for the Site: source, WebCAT

4.0 Planning History

- 4.1 The following provides a summary of the recent planning history at the site. The online records indicate that the site has a limited planning history. The one relevant planning application was as follows:
- 4.2 A planning application (AD/09/0075) at Wolden Nursery, Cattlegate Road, Enfield, EN2 9DW 'the site' for the '*Installation of 6 x non-illuminated double-sided, pole mounted hanging signs to site frontage*' was refused on 21st October 2009. A copy of the Decision Notice is provided at Appendix 2.
- 4.3 It should be noted that this decision was appealed (APP/Q5300/H/09/211/8495) and subsequently dismissed on 12th February 2010. A copy of the Appeal Decision is provided at Appendix 3.

5.0 Planning Policy Context

5.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the relevant Development Plan documents comprise Enfield's 'Local Plan', which include the Core Strategy (2010) and the Development Management Document (DMD), which was adopted in November 2014. The London Plan, published on 2nd March 2021 also forms part of the Development Plan.

5.2 Section 13 '*Protecting Green Belt land*', within the National Planning Policy Framework (NPPF), July 2021, attaches great importance to the Green Belt and generally seeks to preserve its existence. However, paragraph 140 sets out specific expectations regarding new development on the Green Belt. It states (in part):

'140. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.'

5.3 In addition, paragraph 142 is also relevant and states (in part):

'142. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. 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. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.'

5.4 Policy G2 '*London's Green Belt*', within the London Plan seeks to preserve and enhance the Green Belt while resisting harmful and inappropriate development. Part 'B' within Policy G2 is relevant and states that '*Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan*'.

- 5.5 Core Policy 33 *'Green Belt and Countryside'*, within Enfield's Core Strategy (2010) and Policy DMD 82 *'Protecting the Green Belt'*, within Enfield's Development Management Document (DMD) are relevant and generally seek to support the preservation and enhancement of the Green Belt while restricting inappropriate development within it.
- 5.6 As noted, Crews Hill falls within an area designated within the DMD as the *'Crews Hill Defined Area'*, which seeks to protect horticultural activity in the area. Policy DMD 90 *'Appropriate uses in the Crews Hill Defined Area'*, is relevant and supports the retention of horticultural uses within Crews Hill. With regards to change of use, part 3 of DMD 90 states *'3. Proposals for residential development within the Defined Area, including the change of use of existing buildings, will be refused'*.
- 5.7 Furthermore, section 5 *'Delivering a sufficient supply of homes'*, within the NPPF actively supports the Government's Objective of significantly boosting the supply of homes in England. It should also be noted that paragraph 68 advocates the sufficient supply of land and a mix of sites that take into account availability, suitability, and economic viability. Additionally, Policy H1 *'Increasing housing supply'*, within the London Plan support the principle of additional housing which optimise the development potential of sites in London.

Enfield draft Local Plan 2039

- 5.8 Enfield's draft Local Plan 2039 (ELP) seeks to supersede the Core Strategy (2010) and the DMD (2014) to provide a positive and cohesive strategy for delivering sustainable development and optimising regeneration over the plan period (2019 - 2039). Although it is currently in the early stages of consultation and holds limited weight, the ELP will gain more weight as a *'material consideration'*, in planning decisions as it moves through the process to adoption.
- 5.9 Strategic Policy SP SS1 *'Spatial Strategy'* within the ELP generally seeks to promote sustainable growth across the borough. Part '2' of Policy SP SS1 identifies the housing needs for the Enfield and states that the provision will be focussed in four main ***'placemaking areas'***, which includes **Crews Hill**, where the Wolden Garden Centre site is located. It 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'.*
- 5.10 Strategic Policy SP PL9 *'Crews Hill'*, within the ELP builds upon Policy SP SS1 and identifies Crews Hill (area delineated by the boundary at Figure 3.10) as an area with sufficient land to deliver more development beyond 2039 to enable the creation of a new sustainable community.

- 5.11 Part 1 of Policy SP PL9 adds (in part) 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 can confirm that the site falls within the Crews Hill Concept Plan Map at Figure 3.10 and also within Site Allocation 27: Land at Crews Hill.
- 5.12 On this basis, we can confirm that our client is fully supportive of the Council's ambition to remove the area identified within the Crews Hill Concept Plan Map (see Figure 3.10), which includes the site, from the Green Belt. We also concur that Crews Hill has the potential to create a new sustainable residential community to meet the anticipated housing need over the plan period.
- 5.13 We consider the nature of the businesses and the large retail goods they offer has caused this part of the Green Belt to become notably urbanised and suited to car use (due to the sale of heavy garden plants and equipment). On this basis, promoting sustainable residential led mixed-use development around the station would provide environmental and economic benefits to Crews Hill.
- 5.14 With regards to housing, Policy SP H1 *'Housing development sites'*, sets out a list of sites to help deliver at least 24,920 new dwellings in the plan period up to 2039. This equates to 1,246 homes per year. Specifically, the Policy lists sites to be allocated for housing development. Site Allocation 27 (SA27) *'Land at Crews Hill'* encompasses our client's site and identifies it as a key contributor with a capacity for **3,000 homes** (further analysis of SA27 is provided in Section 7).
- 5.15 Spatial Policy SP H2 *'Affordable housing'*, is also relevant as the council have set a strategic target of delivering 50% additional affordable housing across the borough between 2019 - 2039. Part 3 of the Policy sets out the affordable housing provision for various sites and states the following:
- 'a. 50% affordable housing on estate regeneration schemes and council-owned sites;*
 - b. 50% affordable housing where developments delivering net additional homes on industrial land would result in the net loss of industrial floorspace;*
 - c. 50% affordable housing in all areas of the Green Belt, including the proposed rural place making areas at Crews Hill and Chase Park; and*
 - d. 35% affordable housing on all other major housing development.'*
- 5.16 In response, we note that the Wolden Garden Centre site and the allocated Crews Hill area is proposed to be removed from Green Belt, as stated in Part 1 of Policy SP PL9. As discussed in our previous representations, we consider the nature of the businesses and the large retail goods they offer has caused this part of the Green Belt to become notably urbanised and suited to car use (due to the sale of heavy plants and equipment), hence its removal from the designation.

- 5.17 On this basis, we consider that the stipulation which includes Crews Hill and Chase Park within the Green Belt affordable housing requirement (at the end of part '3 c') should be removed. This will enable new sites which are earmarked for residential development to have a greater chance of delivering a viable scheme whilst contributing 35% affordable housing (part '3 d'), subject to viability tests.
- 5.18 Policy DM H3 '*Housing mix and type*', is also noteworthy and seeks to deliver a variety of sizes and tenures to accommodate a mix of housing needs in the borough. We concur with part 1a that the dwelling mix should reflecting the most up to date evidence as set out in the Local Housing Needs Assessment (2020) or successor documents.

6.0 Enfield's Housing Need and Delivery

6.1 Paragraphs 74-77 within the National Planning Policy Framework (NPPF) are most relevant. They assert that local planning authorities should identify annually a supply of deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing need, set out in adopted strategic policies or against their most up-to-date identified housing need.

6.2 Paragraph: 001 Reference ID: 68-001-20190722 of the National Planning Practice Guidance (NPPG) expands on paragraphs 74-77 within the NPPF and provides additional guidance on the Housing Delivery Test and 5-year housing land supply. It states (in part):

'The Housing Delivery Test measures whether planned requirements (or, in some cases, local housing need) have been met over the last 3 years. The 5 year housing land supply is a calculation of whether there is a deliverable supply of homes to meet the planned housing requirement (or, in some circumstances, local housing need) over the next 5 years.'

6.3 Where delivery of housing has fallen below the Local Authority's housing requirement, certain policies set out within the NPPF become relevant. Depending on the level of delivery, Paragraph 74 and (Footnote 8) of the NPPF indicates that:

- The authority should publish an action plan if housing delivery falls below 95% of the housing requirement;
- A 20% buffer on the local planning authority's 5-year land supply if housing delivery falls below 85% of the housing requirement; and
- Application of the presumption in favour of sustainable development if housing delivery falls below 75% of the housing requirement.

6.4 In light of this guidance, the London Borough of Enfield released a Housing Delivery Test Briefing Note (dated 10th February 2021), which sets out and assesses the statistics of the borough's housing delivery over the last 3 years. A copy of the Council's Briefing Note is provided at Appendix 4.

6.5 In short, the Briefing Note identifies that 1,314 homes were delivered in Enfield in the past 3 years (2018 - 2020) against a net additional homes target of 2,328 arising from the existing Local Plan. This means that Enfield has delivered an average 56% of the housing against the target over the last 3 years.

6.6 This delivery has now worsened by the publication of the new London Plan on 2nd March 2021 which sets out a higher housing target for Enfield of 1,246 dwellings per annum. This figure was previously 798 dwellings per annum.

6.7 The Briefing Note also indicates that the borough met 85% of the housing requirement in 2018. In 2019 Enfield met 77% of their housing need and the figure fell below 75% of the housing need in 2020. Paragraph 6 of the Briefing Note highlights the implications of the 2020 housing delivery against the NPPF stipulations and states:

*'6. In 2020 Enfield fell below the 75% threshold, and **we now fall into the "presumption in favour of sustainable development" category.** What this means in practice, is that **applications for new homes should be considered with more weight by planning committee and the planning service.** It also means that **applicants are more likely to be successful at appeal and are likely to submit speculative applications which are not policy compliant and are less likely to meet our design quality aspirations.** In short, it erodes, the ability of the planning service and local councillors to control development for housing and is likely to lead to a mix and quality of housing beneath our needs.'*

6.8 In this vein, it is important to emphasise that the borough has been placed within the "*presumption in favour of sustainable development*" category. Therefore, the planning process in Enfield needs to ensure that it is as efficient and effective as possible to assist in delivering much needed new homes, especially given the fact that the housing target has increased by an additional 448 units per annum within the publication of the London Plan on 2nd March 2021.

6.9 Additionally, Paragraph 60 at the section titled '*Delivering a sufficient supply of homes*' within the NPPF (July 2021), is relevant and states:

*'**To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.***

6.10 The new housing target set out within the London Plan (Published 2nd March 2021) for LBE totals 1,246 new dwellings per annum, compared to 798 in the previous London Plan. This represents a significant increase of 56% (448 additional dwellings) against the previous London Plan annual housing target for Enfield.

6.11 It should also be noted that the most recent Annual Monitoring Report (AMR) indicates that Enfield fell short of its housing target in 2019 / 2020 with only 429 net new homes completed in the borough. This failed to meet the previous annual monitoring target (798) and falls considerably below the new London Plan target (1,246). This is shown in Figure 1.2 and a copy of the LBE AMR for 2019 / 2020 is provided at Appendix 5.

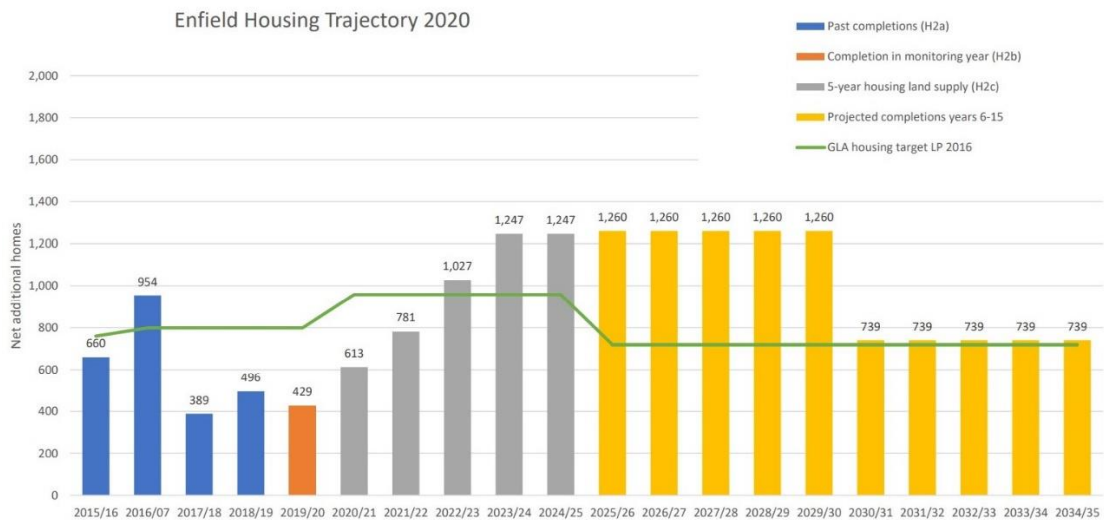


Figure 1.2: LB Enfield Housing Trajectory 2020 (Source: LBE AMR 2019 / 2020)

6.12 Furthermore, an article titled 'Enfield: Council's Local Plan proposals for Green Belt homes could be in a for a rough ride' (June 2021), identifies the pressure that Enfield Council are under to deliver new homes to house 3,500 families currently in temporary accommodation. As a result, the Draft Local Plan policy is advocating the delivery of new homes on existing Green Belt land to meet the growing housing requirements (via the Plan Review process). A copy of the article is provided at Appendix 6.

6.13 On this basis, we consider that Crews Hill is ideally suited to make significant contributions to these emerging housing targets to support housing delivery in Enfield and London as a whole.

7.0 Site Allocation 27: Land at Crews Hill

- 7.1 As noted previously, our client owns the Wolden Garden Centre site, which falls within Site Allocation **SA27 'Land at Crews Hill'**, within the Draft ELP (p. 346). A copy of the Draft Site Allocation is provided at Appendix 7.
- 7.2 This section of our representations provides a summary of the site allocation (SA27) and our specific comments. We trust that these comments will be fully considered and incorporated into a revised Site Allocation for Crews Hill. A Site Plan of the Wolden Garden Centre site is provided at Appendix 8.
- 7.3 We note that **SA27 'Land at Crews Hill'** encompasses several sites within Crews Hill. The Wolden Garden Centre site is located within the centre of the Draft Site Allocation (SA27) boundary, a short distance south-east of Crews Hill Railway Station. The site runs parallel with the eastern boundary of the railway line. The site allocation boundary map is shown at Figure 1.3 below.

SA27: Land at Crews Hill



Figure 1.3: Draft SA27 Boundary Map

- 7.4 We note that Draft Site Allocation includes a red-dotted line, which indicates the **“indicative location for housing-led areas”**. We note that the northern section of the Wolden Garden Centre Site (approx. 1/3) is not located within this area, and the remaining southern section is.

- 7.5 At this early stage, we consider that such an approach is **“unnecessarily prescriptive”** and **“premature”**. Furthermore, we note that Part 2 of Strategic Policy **SP PL9 ‘Crews Hill’** seeks *‘to ensure that development in the Crews Hill placemaking area comes forward in a strategic and comprehensive manner’*. It goes on to state that **‘planning permission on the allocated sites will only be granted following the approval by the Council for a comprehensive masterplan (in the form of an SPD), for the area as a whole’**.
- 7.6 On this basis, we consider that all parts of the Crews Hill ‘Place Making Area’ have the potential to provide residential-led or wholly residential development. Therefore, we do not consider that these areas need to be unnecessarily restricted (or entirely excluded) at this early stage. The exact details of how Crews Hill could be developed (subject to removal from the Green Belt) should be explored via an iterative masterplan consultation exercise involving relevant landowners and stakeholders.
- 7.7 We also note that the **‘Proposed Land Use Requirements’** for SA27 state that the **‘Redevelopment should provide new homes, associated community and social infrastructure, and enhanced open space’**. It goes on to state that it **‘must also retain the existing riding school’**, which we assume refers to the **‘Kings Oak Equestrian Centre’** at the south-east of the SA boundary. There is no riding school or paddock at our client’s site.
- 7.8 We also note that the Draft Site Allocation also states, **‘Mixed Use Capacity Estimate’** and states, **‘Approximately 3,000 homes’**. Given the substantial scale of the Draft Site Allocation (approx. 82 hectares) we consider that this wording should be amended to state **‘a minimum of 3,000 homes’**.
- 7.9 We consider that the site has the potential to deliver a high-quality and sustainable residential led development. Additionally, we consider that it would be beneficial to start to set out a brief development framework for each site (e.g., Wolden Garden Centre site) due to the substantial number of dwellings that could be provided. We note that some draft site allocations only provide for 18 dwellings (e.g., SA 43).
- 7.10 The key wording for the Site Allocation **‘Wolden Garden Centre’** could include as follows (note that the rationale for this is provided in the sub-section below):

‘Site Address: *Wolden Garden Centre, Cattlegate Road, Crews Hill, Enfield, Middlesex, EN2 9DW*

Site Area: *1.19 ha*

Existing Use(s): *Garden Centre and residential use*

Proposed Land Use Requirements: *The provision of a residential-led mixed use development and a solely residential development is supported in principle, subject to viability assessments.*

Timeframe for Delivery: 6-10 years

Residential Capacity Element: 135+

Residential Density: 162 dwellings per hectare+

Rationale:

- 7.11 The Housing and Economic Land Availability Assessment (HELAA) (June 2021) forms part of the evidence base for the DLP and provides a specific summary of the Site after it was put forward at the previous 'Call for Sites' consultation. In short, Appendix E '**Full Assessment of potential sites**' within the document indicates that the Wolden Garden Centre site (ref: CHC2) is suitable for 'residential use' and has the potential to deliver **135 new homes over a 6-10 year period.**
- 7.12 Furthermore, Appendix E of the HELAA states that the site has the potential to deliver a density of 162 dwellings per hectare (approx.). To achieve this, the HELAA considers that it would be suitable to create linear blocks (no podium) at the site. This typology '*allows a similar relationship to the street as terraces, but offer higher densities by accommodating multiple dwellings in a vertical stack*' (see Table on p. 37). On the basis of a density of 162 dwellings per hectare, a total of **192 dwellings could potentially be delivered at this 1.19 hectare site.** A copy of Appendix 'E' of the HELAA is provided at Appendix 9.
- 7.13 In light of this, we concur with the general assessment of the Site and its redevelopment potential, as indicated at Appendix E of the HELAA. However, we consider that at least 80% of the site could be '**developed**' rather than the 70% figure indicated in Appendix E. We also consider that the site is suitable for dense residential development as it meets the criteria set out within Part 2 of Policy H1 '*Increasing housing supply*' of the London Plan. This encourages the optimisation of housing delivery at sustainable sites located '**within 800m of a station**', which applies to the site.
- 7.14 Given these characteristics, we consider the area is not representative of typical 'Green Belt' land, rather, it engenders distinct traits of an urban or suburban area. On this basis, we consider a sensitively designed residential-led redevelopment at the site would be acceptable and compliant with the character of the area, subject to removal of the area from the Green Belt.
- 7.15 The assessment of the site within Appendix E also identifies the Ryle Yard redevelopment in Eddington, North-West Cambridge, as a useful case study for the site at the Wolden Garden Centre Site. Cambridge City Council granted outline planning permission (ref: 11/1114/OUT) on 22nd February 2013 to create a vibrant new community of housing, employment, and local services. It also delivers accommodation and academic floor space for the University of Cambridge.

- 7.16 We note that the site and surrounding area has a similar context to Crews Hill as it is located within the leafy outskirts of Cambridge and was previously within the Green Belt. The permission paved the way for a comprehensive redevelopment that delivered 3,000 dwellings in predominantly linear blocks (no podium), which rise to 5 storeys in height. Figure 1.4 below provides an example of some of the residential blocks.



Figure 1.4: Residential blocks at Ryle Yard, Eddington (Maccreanor and Lavington)

- 7.17 In terms of the residential density, the Planning Committee Report (a copy of which is provided at Appendix 10) provides useful commentary on how the density varies across the extensive site. Paragraph 8.39 is most relevant and states (in part):

‘For example, they propose a much lower density on the edges of the site, to reflect the surrounding residential character as highlighted through neighbour representations, compared with a higher density in the local centre, away from existing properties and close to facilities and transport nodes.’

- 7.18 In this vein, we consider the same general approach could be taken in the Crews Hill Placemaking Area, subject to consultation and a detailed masterplan. Given the fact that the site at the Wolden Garden Centre is located beside the established Railway Station (approx. 150 metres), we consider that it could also deliver a similar residential density (162 dwellings per hectare) and built typology (linear blocks up to 5 storeys), as identified in the HELAA.
- 7.19 We note that the Appendix E of the HELAA considers that *‘the site is developable’*, subject to *‘confirming viability and review of Green Belt policy constraint’*. It should be noted that the previous Draft ELP consultation document identified that 37% of Enfield is located within the Green Belt. It also predicted that Enfield’s population is estimated to increase to 390,000 by

2036. Therefore, we consider that housing delivery must be considered from a wide range of sources (including Green Belt release). On this basis, we consider that Crews Hill has the infrastructure to accommodate a new residential community in Enfield.

- 7.20 We consider that the location and connectivity of the site is particularly advantageous when assessing the potential for a new residential hub and sustainable community within Crews Hill. Given the fact that the site lies adjacent to an established residential area to the south, the creation of new housing in this part of Crews Hill would provide a natural progression to the existing residential area.
- 7.21 Moreover, while Crews Hill is located within the Green Belt, the area around the station is notably built up in character, comprising a range of buildings, garden centres and storage facilities. This built form is particularly evident within the site itself which contains several large outbuildings and paved road networks. Given these characteristics, we consider the area is not representative of typical 'Green Belt' land, rather, it engenders distinct traits of an urbanised area.
- 7.22 This view is supported by the Inspector's commentary from an appeal decision (AAP/Q5300/W/15/3138244) at '*The Stables*', which lies immediately east of the site within the land occupied by Warmerdam Nursery. It recognises that '*the area has undergone significant change and diversification over the years and that the amount of horticultural activity has reduced.*' A copy of the Appeal Decision is provided at Appendix 11.
- 7.23 Currently, we consider that the existing transport infrastructure (in the form of the Crews Hill station) is not being utilised to its full potential. Due to the nature of the garden centres and the large goods they trade, Crews Hill is heavily dominated by car use which overshadows the existence of the train station.
- 7.24 On this basis, we consider that new residential or residential led mixed-use development should be welcomed at the site. Therefore, any potential replacement of horticultural uses and garden centres could be clustered away from the station to an area which is more suitable for car access as customers will still require cars to transport plants and large good (e.g., garden furniture and equipment).
- 7.25 As noted, there is an immediate need for new housing within Enfield and London as a whole. We are aware of the £6bn Meridian Water regeneration programme in Upper Edmonton which will positively contribute 10,000 homes and thousands of jobs to Enfield. However, due to the sheer magnitude of the scheme, the delivery of new homes is expected to take place over a 20-year period.
- 7.26 The site and Crews Hill would provide a feasible option to locate new residential or residential-led mixed use development in a shorter timeframe (approx. 6-10 years). On this basis, subject to viability, this could contribute much needed affordable and private family dwellings, which would accord with the priorities set out in Draft Policies SP H1 and SP H2 within the Draft ELP.

8.0 Conclusion

- 8.1 We trust that these representations will be fully considered in relation to the site. We also support the broad principle of the Council's ambitions set out within Strategic Policy SP PL9 'Crews Hill', within this version of the Draft ELP (subject to our comments). We consider that the creation of the "**Crews Hill Placemaking Area**" has the potential to create a highly sustainable and exemplary residential community to support housing delivery over the plan period and beyond.
- 8.2 We consider that the horticultural area east of Crews Hill Station and particularly the site itself, which is currently restricted by the Crews Hill Defined Area, has significant opportunity for new residential-led mixed use development.
- 8.3 We also support the Draft SA27: Land at Crews Hill, which includes the site. However, we consider that the specific designations for housing and other land uses is overly prescriptive and could unnecessarily restrict the development potential of our client's site at the Wolden Garden Centre site.
- 8.4 Although we note that the site could accommodate a residential-led mixed use redevelopment, we also consider that its location adjacent to the Station is suitable for a wholly residential scheme, subject to viability. In addition, the HELAA identifies the potential to deliver 135 new homes in linear blocks at a residential density of 162 dwellings per hectare. We consider that this figure should act as a minimum 'benchmark' to 'optimise' the development potential of the site.
- 8.5 On this basis, we consider that a pragmatic and flexible approach to the specific sites within SA27 should be adopted to maximise the delivery of viable schemes to support housing delivery. We trust that the allocation will be updated in accordance with our comments and included within the next version of the Draft Plan.