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## Enfield Local Plan Consultation

### Objection to the Enfield Draft Local Plan of June 2021

By

The Directors and 553 Members of  
Crews Hill Golf Club

August 2021

Crews Hill Golf Club (CHGC) wishes to register its objection to the London Borough of Enfield's (LBE) Draft Local Plan (PLAN) and specifically:

**PL9 which is contained in section 3.9 "Crews Hill" on pages 75 to 80 (inclusive).**

~~CHGC has 553no members (at 16<sup>th</sup> August 2021) and makes itself open to members of the public to book and play in accordance with the requirements of its lease with LBE.~~

Of CHGC members around 75% live in the LBE area. The Club provides highly regarded opportunities to walk and enjoy leisure and sports time within well maintained Green Belt land.

We are losing Golf Courses everywhere and during the recent lease offering to outside interests by the LBE of Whitewebbs Park (Golf Course and Woodlands), the LBE closed Whitewebbs Golf Course and stated in their publicity that CHGC was a place where those golfers displaced by the closure could play golf. So it begs the question, where is the logic of LBE using CHGC to enhance their reasons for selling-off the lease at Whitewebbs then in this PLAN trying to remove the same facility upon which they rely?

As the Council owns the freehold of the land at Whitewebbs Park, why have they chosen to offer a 25 year lease for sale on all of the Park land including 43.05 hectares of Golf Course which is now fully closed? The LBE are seeking payment from Private interested parties and not considering building homes, why? They appear to be very close to a deal with Tottenham Hotspur plc whose training facilities adjoin Whitewebbs Park. I smacks of serious double standards when they could have included this land in their PLAN to build many homes. We at CHGC would stress we are totally against any such development within the Green Belt but the question must be asked of the LBE - why have they not included this within the PLAN if they truly feel they need Green Belt land for housing?

In a report commissioned by the LBE with Land Use Consultants (LUC) "*Review of Sites of Importance for Nature*" initially drafted 6<sup>th</sup> November 2020 and issued as a Final Report on 1<sup>st</sup> April 2021, CHGC is noted as a Borough Level Site of Importance for Nature Conservation (SINC) with a recommendation to be Upgraded from Borough to Metropolitan SINC as:

The Crews Hill Club (1920) Ltd.

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***“The site supports unique relict grassland habitat which has previously been considered to be one of the best examples in the borough and is of distinct value in London. This habitat is particularly rare in London and is considered irreplaceable.***

***Given the size and location of the site ..... Crews Hill Golf Course is considered to be of considerable strategic value in the north of the borough.***

***In addition, the ridge and furrow indicate the historical nature and value of the site.***

***Due to the value of this grassland habitat present, as well as the ecological importance of the location, it is considered that this site should be upgraded to a metropolitan SINC site.”***

Unbelievably, the LBE draft PLAN proposes building houses on CHGC, an area of Green Belt land which is said by the LUC report to be:

***“ unique .... rare .... irreplaceable .... of considerable strategic value .... of historical nature and value and having ecological importance”.***

To propose building houses on the CHGC land is therefore utter madness and goes against professional advice given to them by LUC.

Metropolitan and Borough SINC sites as noted within this LUC report are said to be of the highest priority for protection: the LBE should take note of this.

The LBE are and any Inspector will be aware that Green Belt land is protected under the National Planning Policy Framework (NPPF). CHGC site is a Borough SINC with proposal to be raised to Metropolitan status, it lies within the protected Green Belt and provides sports and leisure facilities.

CHGC provides access to our Green Belt Countryside for all:-

- To long established public footpaths through the golf course lands,
- To the Course lands for the Public and Members,
- To hundreds of large and specimen trees, shrubs and unique grasslands helping in the fight against climate change.
- To beautiful views across this irreplaceable countryside

To destroy this for housing-led development would be an act of pure vandalism and would stand against all National, London and Local Policies. The Mayor of London is completely opposed to any use of Green Belt land for development and has already voiced his stated view and trusts that any appointed Inspector will fully take his views and objections on-board during their review of the LBE’s PLAN.

**The London Plan dated March 2021 states:**

The London Mayor (Sadiq Khan) strongly supports the continued protection of London's Green Belt. The NPPF provides a clear direction for the management of development within the Green Belt and sets out the processes and considerations for defining Green Belt boundaries. London's Green Belt makes up 22 per cent of London's land area and performs multiple beneficial functions for London, such as combating the urban heat island effect, growing food, and providing space for recreation. It also provides the vital function of containing the further expansion of built development. This has helped to drive the re-use and intensification of London's previously developed brownfield land to ensure London makes efficient use of its land and infrastructure, and that inner urban areas benefit from regeneration and investment. Brownfield sites may cost more to develop as over the years these sites have been allowed to pollute the land upon which they stand – this remediation and clean-up of such sites is essential and we have a responsibility to do this to improve our environment.

Openness and permanence are essential characteristics of the Green Belt, but, despite being open in character, some parts of the Green Belt do not provide significant benefits to Londoners as they have become derelict and unsightly. This is not, however, an acceptable reason to allow development to take place. These derelict sites may be making positive contributions to biodiversity, flood prevention, and climate resilience. The [London] Mayor will work with boroughs and other strategic partners to enhance access to the Green Belt and to improve the quality of these areas in ways that are appropriate within the Green Belt.

In the draft LBE PLAN, Figure 3.9 sets out the LBE "place making vision". This shows substantial areas of Green Belt and Metropolitan Open Land (MOL) being destroyed for housing-led schemes throughout the Borough but with an emphasis to the North West of Enfield including Crews Hill & "Chase Park".

As already stated, Green Belt land is protected from development by the NPPF. NPPF Section 13 covers Green Belt land and the whole of this section is relevant. Paragraph 133 which states that *"the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence"*.

The NPPF at para. 141 goes on to state *"local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land"*

The Inspector should accept that CHGC provides a perfect example of a beneficial use within the Green Belt, providing outdoor sport and recreation for the local community which was established in 1916. CHGC is registered as a Community Amateur Sports Club (CASC) member. The lands are accessible to the public and are extensively used and enjoyed by all.

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. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

Paragraph 143 and 144 state that *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances...”*

Therefore, it is an absolute precedent that the LBE, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account whether their stated strategy:

- a. makes as much use as possible of suitable brownfield sites and underutilised land;
- b. optimises the density of development in line with the policies in chapter 11 of the NPPF, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

Taking into account the requirements of the NPPF, it is our view that the LBE have failed in the drafting of the PLAN to make as much use as possible of other, available, useable sites.

As evidence to this, we attach a document titled **“Space to Build, Enfield”** dated January 2019 and compiled by:

**Enfield RoadWatch, The Enfield Society and CPRE London. ([Space Survey](#))**

This Space Survey maybe 2 years old but is still current and a detailed and in depth report of the entire Borough of Enfield, ward by ward, to establish a list of sites which could provide space to build without the need to use Green Belt land. The sites listed currently make poor use of space and which could be intensified and put to better use. These range from some very large sites to hundreds of ‘micro’ sites. In total this Survey details that over 37,000 homes could be built on these sites, more than satisfying the numbers stated as needed within the PLAN.

Within the Survey, a document has been created for each of the 21 wards in Enfield which lists and provides images of each and every site and for completeness the sites are also all listed in a spreadsheet.

Sites identified within this Space Survey are not properly considered within the PLAN. The Space Survey shows many other options are available with existing and more accessible, transport served areas and it forms a powerful case for the LBE to be more thorough in their search for suitable sites for housing-led and possible further industrial development in urban areas without the need to use any Green Belt land.

CHGC forms a vitally important part of the Green Belt in the North of the Borough. However, within the PLAN at PL9 - Crews Hill, pages 75 to 80, CHGC is never actually mentioned by name in the text. Why is that? It takes closer examination of the PLAN document to see that it is affected in a major way. Within the PLAN at Figure 3.9 titled 'Rural Enfield Place making Vision' (page 71) shows approximately 80% of the 109 acres of CHGC being proposed as an *"Indicative location for Housing-Led areas – Crews Hill.."*

Figure 3.10 titled 'Crews Hill concept plan' makes no real sense to ourselves at CHGC as there is no legend to explain the marking and philosophy behind this so called 'concept plan'. Are we supposed to guess? Surely that is not the point of the PLAN document. It should be providing clear and understandable draft proposals.

To confirm, the LBE have made no approach to CHGC regarding the PLAN. We have only had to take information from the PLAN document itself. We are tenants of the LBE with 30 years & 8 months left on our Lease (at 22<sup>nd</sup> August 2021) and the Lease has no break clause – so you think the LBE would have had the decency to at least inform us of their PLAN in advance.

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The LBE are and any Inspector will be aware that within the PLAN, the LBE make many references to the London National Park City as some sort of reason for the use of Green Belt land, such as CHGC, for development.

National Park City Foundation on 14<sup>th</sup> July 2021 wrote a letter (copy attached) to LBE Council leader Nesil Caliskan (copied to all councillors) heavily criticising the way the council had used the charity's London National Park City (LNPC) concept as "a bargaining chip to justify loss of Green Belt".

The LBE has apparently, via the Press, denied claims it used the name of a London environmental project to "mislead" people about its Green Belt homebuilding plans.

The charity's chair Paul de Zylva and founder Daniel Raven-Ellison claimed the LBE had "misread" LNPC as a project only focused on parks and green spaces rather than the whole of London. They wrote: *"It is therefore misleading for Enfield [Council] to refer to London National Park City in writing or verbally as part of justifying its proposals for the loss of Green Belt."*

LNPC is mentioned several times in the PLAN, published in June 2021. The PLAN includes a new policy called *"Rural Enfield – a leading destination in the London National Park City"* which sets out plans for placing part of the borough under the LNPC banner *"to bring many sustainable rural activities together to create a unique and exemplary destination"* and adding that it *"has the potential to achieve a net increase of 25% green cover in Enfield"*.

LNPC is also mentioned in a section of the PLAN outlining how 3,000 homes could be built on current Green Belt land at Crews Hill. It states: *"In order to support its emergence as a gateway to the London National Park City and the green and rural north of Enfield for new*

*and existing residents, development at Crews Hill should incorporate high-quality public realm and green links to surrounding landscapes.”*

In their letter to Cllr Caliskan, Paul de Zylva and Daniel Raven-Ellison wrote: *“Serious application of London National Park City thinking can and should lead elected members, officers and others to make better decisions, but it cannot make up for political decisions which require the loss of green space.*

*“Enfield and all local authorities in London should be examining the entire urban fabric and avoid using National Park City as a bargaining chip to justify loss of Green Belt and green space.”*

It would appear that the LBE is somewhat in ‘denial’ over its use of the LNPC as a reason for the loss of Green Belt land. As at mid-August 2021 Paul de Zylva told the *Enfield Dispatch* (local free paper) that he had yet to receive a reply from the LBE. The LNPC charity’s chair said his *“door was open”* and added: *“We don’t have any problem with Enfield Council mentioning London National Park City but we don’t think it is right that it should be used as part of making the case to erode something [Green Belt] we don’t think should be eroded.*

*“It is there in black and white – it’s interesting if they (LBE) have rejected it [the letter from the National Park City Foundation] before speaking to us. I suspect they need to read their own policies.”*

CHGC totally agree with Carol Fisk, from the Enfield Road Watch group who are campaigning to protect the Green Belt, when she commented that the row between the council (LBE) and National Park City Foundation was *“symptomatic of the shoddy reasoning behind the plan”*.

As an important background, apparently a LBE Council spokesperson did issue a statement denying this was how LNPC had been used by the council in its Local Plan, saying Enfield Council is a keen supporter of the National Park City concept, LBE rejected any suggestion they had linked the National Park City concept with the draft Plan preferred option to release a limited section of the Green Belt having made every effort to look at brownfield first.

Any appointed Inspector will be aware from all the evidence provided, that the LBE’s draft PLAN has been shown by the Space Survey to have ignored large developable areas of Brownfield and under-utilised areas within the Borough. There is sufficient urban land available within the Borough and the LBE’s own lack of action in moving the vast Meridian Water site forward at an earlier stage has compounded their housing numbers problem.

LBE goes on to say that the PLAN, *“ ... includes transforming many largely forgotten and neglected rural parts of the borough into accessible and vibrant destinations for Enfield’s residents, where they can enjoy nature, recreation, sporting excellence and eco-tourism”*. By this statement it is untrue to say these areas are forgotten, they are not [proof positive by their use].

The Inspector must decide why the LBE feel that by the removal of areas of established, irreplaceable Green Belt land which currently provides nature, recreation, sporting facilities and climate protection from nature itself, the same can be provided by allowing development of the land in such a way as to increase pollution from increased traffic and occupation, remove nature at its best and to take away sporting and recreational facilities which are available to all and extensively used by the general public. Again, this just does not make any sense.

The LBE make a serious misjudgement by suggesting available urban areas do not have supporting infrastructure – the infrastructure is already in place, there will be requirements for upgrading yes but these areas provide a far superior option than trying to build new settlements in remote Green Belt areas which in truth will not provide affordable housing and do not have the services nor transport infrastructure which are essential.

The LBE has stated this means “..... a stark choice between packing people into small units in dense towers with a lack of access to open space and supporting infrastructure, or using a small amount of rural areas for high-quality affordable housing with access to gardens and extensive public space.” If this were really the case, we would point any Inspector to examine why has LBE granted permission for a 29 storey housing tower to be built at the Colosseum Retail Park at the junction of the main A10 and Southbury Road?

On this very issue, Alice Roberts the Head of Campaigns at CPRE London, sent an email to Cllr. Caliskan Leader of Enfield Council on 21<sup>st</sup> July 2021 and we copy this herewith, in full, as it raises many valid matters and backs-up much of the evidence we have provided in our objection, she wrote:

*Alice Roberts 21 July 2021 at 10:29*

*To: "cllr.nesil.caliskan@enfield.gov.uk" Cc: Carol Fisk - Enfield RoadWatch Action Group , John Sadler, Neil Sinden , "joanne.mccartney@london.gov.uk"*

*Dear Cllr Caliskan,*

***“Packing people into small units in dense towers” comment in Enfield Dispatch***

*We are writing to ask the council to retract comments made by Enfield Council in yesterday’s Enfield Dispatch article where a council spokesperson is quoted as saying “insufficient urban land means a stark choice between packing people into small units in dense towers with a lack of access to open space and supporting infrastructure, or using a small amount of rural areas for high-quality affordable housing with access to gardens and extensive public space” because this presents a false choice using emotive and inflammatory language which appears designed to prejudice consultation responses.*

*It is the strong opinion of ourselves, and many Enfield and London stakeholders, based on carefully collated evidence and data, that no such ‘stark choice’ exists:*

*There is enough brownfield land in Enfield to build enough new homes at appropriate density (not packing people into small units in dense towers) and provide for other development needs  
Green Belt developments do not deliver affordable housing:*

*a recent CPRE report showed the average percentage of all new housing in the Metropolitan (London) Green Belt that was classed 'affordable' is 7% for the most recent year data was collected*

*'Access to open space and supporting infrastructure' must – and can – be planned wherever housing development takes place: the implication that it is only possible to provide 'open space and supporting infrastructure' in a rural setting is false. In fact, unless new shops, schools, surgeries and bus routes are provided, residents in new Green Belt developments would need to travel by car to reach existing amenities elsewhere in Enfield.*

*Developments in urban settings, on the other hand, can take advantage of existing infrastructure like sewers, electricity mains, buses and shops; other supporting infrastructure can be provided as part of the development; and people can live close to jobs and amenities thereby reducing the need to travel. And derelict green space can be brought back into use as we have shown in relation to land to the east of Meridian Water.*

*The statement fails to mention the lack of supporting transport infrastructure in Green Belt developments where evidence shows the vast majority of trips will be made by car, whereas in urban settings homes can be built 'car free' or using car share schemes, so reducing congestion and pollution and enabling people to adopt healthy lifestyles – using public transport, walking and cycling to travel (a central tenet of the London Mayor's Transport Strategy and the London Plan). More generally, this statement does not mention the negative impact of building on London's Green Belt or the critical role London's Green Belt is increasingly playing in managing the climate and nature crises, and providing local food growing opportunities.*

*As you know, it is the council's duty to investigate brownfield opportunities and present evidence via the Local Plan Development process to make a case for land allocation. At a minimum, given there are a large number of well-informed and well-respected stakeholders who believe there is no need to build on Enfield's Green Belt, and that doing so would in fact be the worst possible option, we believe the council should be giving brownfield options more serious consideration.*

*Instead it has put forward its own opinion publicly, in a way which is itself prejudiced and, in using emotive language, appears designed to prejudice responses to the Local Plan consultation. We ask that you retract the comments publicly and engage with ourselves and other stakeholders to create a Local Plan framework which can support the delivery of genuinely sustainable development in Enfield. I look forward to hearing from you.*

*Yours sincerely  
Alice Roberts  
Head of Campaigns CPRE London*

In summary,

The PLAN, as it stands, goes against all issued Planning Policies including the NPPF and even more so now that the NPPF has been update as of July 2021; due to this Councils will have to re-think there Local Plans.

CHGC provides access to the Countryside, Recreation & Sport for all.

CHGC is an outstanding area SINC importance recommended for further upgrade of importance



The PLAN is flawed as there are more than sufficient alternatives for further homes to be built within urban areas with existing Infrastructure including established transport links

Local and National groups have voiced their views against this PLAN

Central Government have stated they are against the use of Green Belt land for development

It is so important to remember that the Green Belt land in this area of North Enfield, of which CHGC is a major part, provides the opportunity for all members of the public to improve both their physical and mental health. It is open land with footpaths and small country roads giving space, time and solace to all for access to some of the loveliest countryside with far reaching views across to the Ridgeway with the beautiful trees and fields changing in colour and nature as each season comes and goes. Theobalds Park Road then Cattlegate Road serve the area, together with the narrow East Lodge Lane down to its junction with The Ridgeway at Botany Bay; these roads could not possibly cope with the extra traffic from a 3,000 home estate built right at the top of the Crews Hill 'ridge' at CHGC.

The land upon which CHGC stands is part of our heritage having been designed by one of the greatest ever Golf Course designers, Harry Colt. It was designed 105 years ago to blend and enhance the beautiful fields and trees across this area which once formed the Royal hunting grounds at En-felde, the clearing in the forest. We have no right to take this away. We have a responsibility to future generations to keep this land, our Countryside, for them and the climate resilience it provides.

By this PLAN, the Council just seem to be looking at the easy option, the developers' dream i.e. building in the Green Belt. This will not produce social/affordable homes, this will not reduce the traffic on our roads and this will not improve our environment. It will set about the absolute opposite, the destruction of our countryside upon which we depend as the 'lungs' of our towns and cities.

Presented by Crews Hill Golf Club (1920) Limited



LUC

London Borough of Enfield

# Review of Sites of Importance for Nature Conservation

An Addendum to the  
Enfield **Blue and Green**  
Strategy

Final report

## London Borough of Enfield

### Review of Sites of Importance for Nature Conservation

An Addendum to the Enfield Blue and Green Strategy

Version	Status	Prepared	Checked	Approved	Date
1.	Draft report for client comment	R. Turner A. Coleman R. Glackin	S. Swindlehurst	S. Swindlehurst	06.11.2020
2.	Final Report	R. Turner	R. Turner	R. Turner	17.11.2020
3.	Final Report – re-issued to take into consideration comments from stakeholders	R. Turner	R. Turner	R. Turner	01.04.2021

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# Chapter 1

## Introduction

**1.1** LUC was appointed in June 2020 by Enfield London Borough Council to undertake a review of existing Sites of Importance for Nature Conservation (SINC) within the borough.

**1.2** This review is an addendum to the Enfield Blue and Green Strategy and will form part of the evidence base of the emerging Local Plan. It is the council's duty to ensure that the conservation of biodiversity is considered as part of the plan-making process. The recommendations outlined in this report will need to be subject to consultation with relevant stakeholders, including local natural history experts and representatives of "Friends of..." groups, at the borough level prior to submitting these recommendations to the ondon Wildlife Sites Board (LWSB). This part of the SINC Review process will need to be led by Enfield Council.

### Background

**1.3** The London Borough of Enfield supports a range of existing biodiversity assets, including:

- **1 Site of Special Scientific Interest (SSSI);**
- **1 Local Nature Reserve (LNR);**
- **41 Sites of Importance for Nature Conservation (SINC);**
- **ancient woodland** – large and small fragments of ancient woodland are recorded to the north and north-west of Enfield, including Whitewebbs Wood and Trent Park;
- **priority habitats**, including deciduous woodland, wood pasture and parkland, good quality semi-improved grassland, lowland dry acid grassland, and coastal and floodplain grazing marsh;
- **green corridors** – a network of natural and semi-natural habitat, which connects wildlife populations in areas, which are separated by human activity, such as development and farming. Enfield supports several green corridors, which span the length of the borough and provide important corridors for species to disperse through Enfield Town to open countryside in the north.
- **blue corridors** – a network of waterbodies, which connect wildlife populations that are separated by human activity. There are a number of blue corridors,

which run through the centre of Enfield in highly urbanised areas and at Lee Valley, which is located along the eastern boundary of the borough. These provide important corridors for wildlife to disperse to suitable habitat, such as open country side in the north in the wider area.

- **Buglife B-Line corridor** – a network of 'insect pathways' where wildflower-rich habitat will be restored and created to connect existing wildlife areas, which will be of benefit to insects, such as bees and butterflies

**1.4** A map of biodiversity assets within the borough is presented in **Figure 1.1, 1.2 and 1.3** in **Appendix A** and Areas of Deficiency (AoD) in access to nature are presented in **Figure 1.4** in **Appendix A**.

## Chapter 2

### Methods

#### Site Selection

**2.1** The SINC review included the assessment of all 41 existing SINC<sup>1</sup>s within the London Borough of Enfield. Reference should be made to **Figure 2.1** in **Appendix B** which presents the locations of the site reviewed as part of this assessment.

#### Desk Review

**2.2** To provide additional background and to highlight likely features or species groups of interest, a study of available biological records was undertaken within each site. This included statutory and non-statutory sites and existing records of protected<sup>1</sup> and/or notable<sup>2</sup> species of relevance to the site. The following resources were used:

- The Government's Multi-Agency Geographical Information for the Countryside (MAGIC);
- Ordnance Survey (OS) mapping; and
- Aerial photography.

**2.3** The findings of this review are presented in the proformas provided in **Appendix E**.

#### Site Survey

**2.4** The sites were surveyed using the Greater London Authority's (GLA) Open Space and Habitat Survey Methodology<sup>3</sup> which has been specifically developed to enable the identification of SINC<sup>1</sup>s and enables the collection of the key site information. This involved the collection of data relating to a range of site attributes as detailed in **Table 2.1** below.

**2.5** Detailed plant species lists were only collected for species-rich or particularly notable habitats as per the GLA methodology.

**2.6** Surveys were completed by Rebecca Turner BSc MSc ACIEEM, Amy Coleman BSc ACIEEM and Rory Glackin BSc GradCIEEM in June during the flowering season to allow for

<sup>1</sup> Protected species are those which are listed within conservation designation and afforded protection under national and international legislation. JNCC create and maintain the list of conservation designations.

<sup>2</sup> Notable species are those which have been listed as rare, endangered or a priority species of conservation concern. JNCC create and maintain the list of conservation designations.

<sup>3</sup> Greater London Authority - Open space and habitat survey for Greater London

## Chapter 2

### Methods

Review of Sites of Importance for Nature Conservation  
November 2020

optimal opportunities for floral identification, particularly for rare and notable species.

## Site Evaluation

2.7 The sites were assessed against a consistent and well-established methodology and set of criteria which is set out in

**Table 2.1** and **2.2** below. This will follow the methodology established by the London Wildlife Sites Board as published in 2019, which sets out the Mayor of London's criteria on SINC's selection.

Table 2.1: Definitions of each SINC Grade

SINC Grade	Description
Metropolitan	<p>Sites of Metropolitan Importance for Nature Conservation are those sites which contain the best examples of London's habitats, sites which contain particularly rare species, rare assemblages of species or important populations of species, or sites which are of particular significance within otherwise heavily built-up areas of London.</p> <p>They are of the highest priority for protection. The identification and protection of Metropolitan Sites is necessary, not only to support a significant proportion of London's wildlife, but also to provide opportunities for people to have contact with the natural environment.</p>
	<p>Sites of Metropolitan Importance include not only the best examples of each habitat type, but also areas which are outstanding because of their assemblage of habitats.</p> <p>A small number of sites are selected which are of particular significance within heavily built up areas of London. Although these are of lesser intrinsic quality than those sites selected as the best examples of habitats on a London-wide basis they are outstanding oases and provide the opportunity for enjoyment of nature in extensive built environments.</p> <p>Should one of these sites be lost or damaged, something would be lost which exists in a very few other places in London. Management of these sites should as a first priority seek to maintain and enhance their interest but use by the public for education and passive recreation should be encouraged unless these are inconsistent with nature conservation.</p>
Borough	<p>These are sites which are important on a borough perspective in the same way as the Metropolitan sites are important to the whole of London. Although sites of similar quality may be found elsewhere in London, damage to these sites would mean a significant loss to the borough. As with Metropolitan sites, while protection is important, management of borough sites should usually allow and encourage their enjoyment by people and their use for education</p> <p>In defining Sites of Borough Importance, the search is not confined rigidly to borough boundaries; these are used for convenience of defining areas substantially smaller than the whole of Greater London, and the needs of neighbouring boroughs should be taken into account. In the same way as for Sites of Metropolitan Importance, parts of some boroughs are more heavily built-up, and some borough sites are chosen there as oases providing the opportunity for enjoyment of nature in extensive built environments.</p>
Local	<p>A Site of Local Importance is one which is, or may be, of particular value to people nearby (such as residents or schools). These sites may already be used for nature study or be run by management committees mainly composed of local people. Where a Site of Metropolitan or Borough Importance may be so enjoyed it acts as a Local site, but further sites are given this designation in recognition of their role. This local importance means that these sites also deserve protection in planning.</p> <p>Local sites are particularly important in areas otherwise deficient in nearby wildlife sites. To aid the choice of these further local sites, AoD are identified. Further Local sites are chosen as the best available to alleviate this deficiency; such sites need not lie in the AoD but should be as near to it as possible. Where no such sites are available, opportunities should be taken to provide them by habitat enhancement or creation, by negotiating access and management agreements, or by direct acquisition. Only those sites that provide a significant contribution to the ecology of an area are identified.</p>



Table 2.2 SINC Assessment Criteria

Assessment Criteria	Guidance
Representation	The best examples of each major habitat type are selected. These include typical urban habitats such as abandoned land colonised by nature. Where a habitat is not extensive in the search area it will be appropriate to conserve all or most of it, whereas where it is more extensive a smaller percentage will be conserved.
Habitat rarity	The presence of a rare habitat makes a site important, because the loss of, or damage to, only a few sites threatens the survival of the habitat in the search area.
Species rarity	The presence of a rare species makes the site important in a way that parallels rare habitat.
Habitat Richness	Protecting a site with a rich selection of habitat types not only conserves those habitats, but also the wide range of organisms that live within them and the species that require more than one habitat type for their survival. Rich sites also afford more opportunities for enjoyment and educational use.
Species richness	Generally, sites that are species rich are preferred, as this permits the conservation of a correspondingly large number of species. (However, some habitats such as reed beds, heaths and acid woodlands, are intrinsically relatively species poor.)
Size	Large sites are generally more important than small sites. They may allow for species with special area requirements. Larger sites may be less vulnerable to small scale disturbance, as recovery is sometimes possible from the undisturbed remainder. They are more able to withstand visitors. Size is also related to the richness of habitat and species.
Important populations of species	Some sites are important because they hold a large proportion of the population of a species for the search area.
Ancient character	Some sites have valuable ecological characteristics derived from long periods of traditional management, or even continuity in time to woodlands and wetlands that occupied before agriculture. Ancient woodlands, old parkland trees and traditionally managed grasslands tend to have typical species that are rare elsewhere. These habitats deserve protection also because of the ease with which they are damaged by changes in management.
Recreatability	The more difficult it is to recreate a sites habitat the more important it is to retain it. (Ponds can be created from scratch within a few years – whereas woodlands take decades.) Certain habitats cannot be recreated because of practical reasons such as land availability and cost.
Typical urban character	Features such as canals, walls, bridges, railway sidings colonised by nature often have a juxtaposition of artificial and wild features. Some of these habitats are particularly rich in species / have rare species / communities. Particular physical or chemical substrates may allow rare species to thrive. They may also have particular visual qualities.
Cultural and historic character	Sites such as historic gardens with semi-wild areas, garden suburbs, churchyards which have reverted to the wild may have a unique blend of cultural and natural history.
Geographic position	This criterion is operated using search areas and areas of deficiency. Reference should be made to <b>Figure 1.4 in Appendix A</b> , which outlines Areas of Deficiency in access to nature.
Access	An important consideration – especially in areas where there are limited opportunities for large urban populations to enjoy the natural world. Some access is desirable to all but the most sensitive sites, but direct physical access to all parts of a site may not be desirable.
Use	The current use of the site, relating to how the site is used by people e.g. education, research, or quiet enjoyment of nature.
Potential	Where a site can be enhanced given modest changes in management practices gives it value. Opportunity exists where a site is likely to become available for nature conservation use, or where there is local enthusiasm.
Aesthetic Appeal	Factors which contribute to the enjoyment of the experience of visiting a site –seclusion/views/variety of landscape etc.

**2.8** The assessment included a set of recommendations based on the following categories detailed below. This included:

- **Proposed upgrade and/or extension** – this category identified SINC sites, which were recommended for an upgrade in SINC designation and/or alteration of the site boundary to include additional habitats, which were considered to contribute to the value of the SINC.
- **At Risk** – this category identified sites, which were at risk of downgrade or de-designation due to a decline in ecological value. These sites should retain their existing SINC designation, however, it is recommended that action is taken to ensure that these sites retain their value as a SINC.
- **De-designation** – this category identified sites that had changed significantly and were therefore no longer considered to support habitats of SINC value, and which were not considered viable for restoration. This included changes to site boundaries to exclude areas where the site no longer supported habitats that contributed to the value of the SINC.
- **Opportunity** – this category identified sites, which have potential through further management and establishment of habitats to be recommended for upgrade in the future. At this stage, these sites were recommended to retain their SINC designation in this SINC review.
- **No change** – this category identified sites, which were not considered to have changed since the previous survey and continued to retain their value as a SINC. These sites were recommended to retain their SINC designation.

**2.9** Given the nature of the assessment methodology and criteria, field-based assessments were necessarily subjective to a degree and based on the professional judgement of experienced ecologists. In addition, not all criteria are necessarily applicable to all sites. Following completion of the surveys, a workshop was held with the project manager to develop recommendations and ensure consistency during the assessment.

## Limitations

**2.10** Data was sought from Greenspace Information for Greater London CIC (GIGL); however, it was not possible to obtain this data without an existing service level agreement between Enfield London Borough Council and GIGL. The review was based on data sources provided by Enfield London Borough Council and mapping produced as part of

this project, which provided sufficient information to inform the review.

**2.11** SINC citations used as part of this review were obtained from the previous SINC review<sup>4</sup>. As this was the most recent review completed to date, this was considered to provide relevant information to inform this assessment.

**2.12** The SINC citations used as part of this assessment do not distinguish between a borough grade I and II site. Therefore, this assessment has considered the sites for their value as a borough grade site only.

**2.13** No access was available to West Lodge Park Hotel Grounds SINC or to Hadley Wood Golf Course and Covert Way Field SINC due to COVID-19. In addition, there was restricted access and view to the following three sites: Riverside Park and Saddler's Mill SINC, Glasgow Stud and Plumridge SINC, Vault Hill and Little Beech Hill Woods SINC. Assessment of these five sites was therefore led by a desk-based review and, where possible, site conditions were obtained from adjacent public rights of way. However, it should be noted that existing conditions of the site could not be obtained in all cases. It is recommended that where site conditions could not be verified that a site survey is completed.

<sup>4</sup> Enfield London Borough Council (2013) Enfield's Local Plan: Evidence base: Sites of Importance for Nature Conservation Citations

## Chapter 3

# Summary of the SINC Assessment

**3.1** The findings of the SINC review are detailed below with a summary of the survey findings presented in **Figure 3.1**, **Appendix B** and **Table 3.1** found **Appendix C**.

**3.2** Site survey proformas presenting the information recorded during the surveys and photos, are provided in **Appendix D**.

### Summary

**3.3** In summary, a total of 41 sites were surveyed and reviewed as part of the project. This comprised:

- 7 metropolitan sites;
- 19 borough sites; and
- 15 local sites.

### Recommendations

**3.4** Following a review of existing and potential SINC, the following recommendations were identified:

#### Sites to Upgrade and Extend

**3.5** The following six sites were considered suitable for upgrade and/or extension:

- Jubilee Park SINC;
- Tatem Park SINC;
- Bush Hill Golf Course SINC;
- Crews Hill Golf Course SINC;
- Plumridge, Vault Hill and Little Beechill Woods SINC; and
- Forty Hall Park and Estate SINC.

**3.6** These sites were considered to support habitats of higher quality, variety and value than previously identified and/or were of sufficient size to provide valuable opportunities for wildlife in an urban setting and to contribute to the strategic ecological corridors in the borough.

#### Risk

**3.7** Turkey Brook SINC was identified at risk of de-designation as the ecological value of these sites have

declined since the previous survey and would require management to maintain the sites at their current status.

### Sites Recommended for De-Designation

**3.8** None of the sites reviewed were found appropriate for de-designation and therefore this category does not need to be considered further.

### No Change in Designation

**3.9** The status of the remaining 34 sites was considered to be unchanged. However, three were identified as opportunity sites, which with further management and establishment of habitats could be considered for upgrade in the future. This included:

- Broomfield Park SINC;
- Woodcroft Wildspace SINC; and
- Enfield Loop of the New River SINC.

## Summary of SINC Review

**3.10** It is the council's duty to ensure that the conservation of biodiversity is considered as part of the plan-making process. The primary purpose of the SINC review is to provide an up to date review of existing and potential SINC's within the borough to inform the development of the Blue and Green Strategy and future iterations of the Local Plan. The recommendations detailed in this report will need to be subject to consultation at the borough level with relevant stakeholders prior to submission to the LWSB. This element of the SINC Review will need to be led by Enfield Council.

**3.11** The Blue and Green Strategy offers the opportunity to maximise the benefits for biodiversity by including consideration of priority and notable habitats and species and designated sites at an early stage of the plan making process. The SINC review provides the evidence base to inform the requirements as outlined in the National Planning Policy Framework and the London Plan to protect, enhance and restore sites of biodiversity value and to promote a strategic approach to maintain and enhancing ecological networks so that they more resilient to current and future pressures.

EXTRACT

SINC SURVEY

&

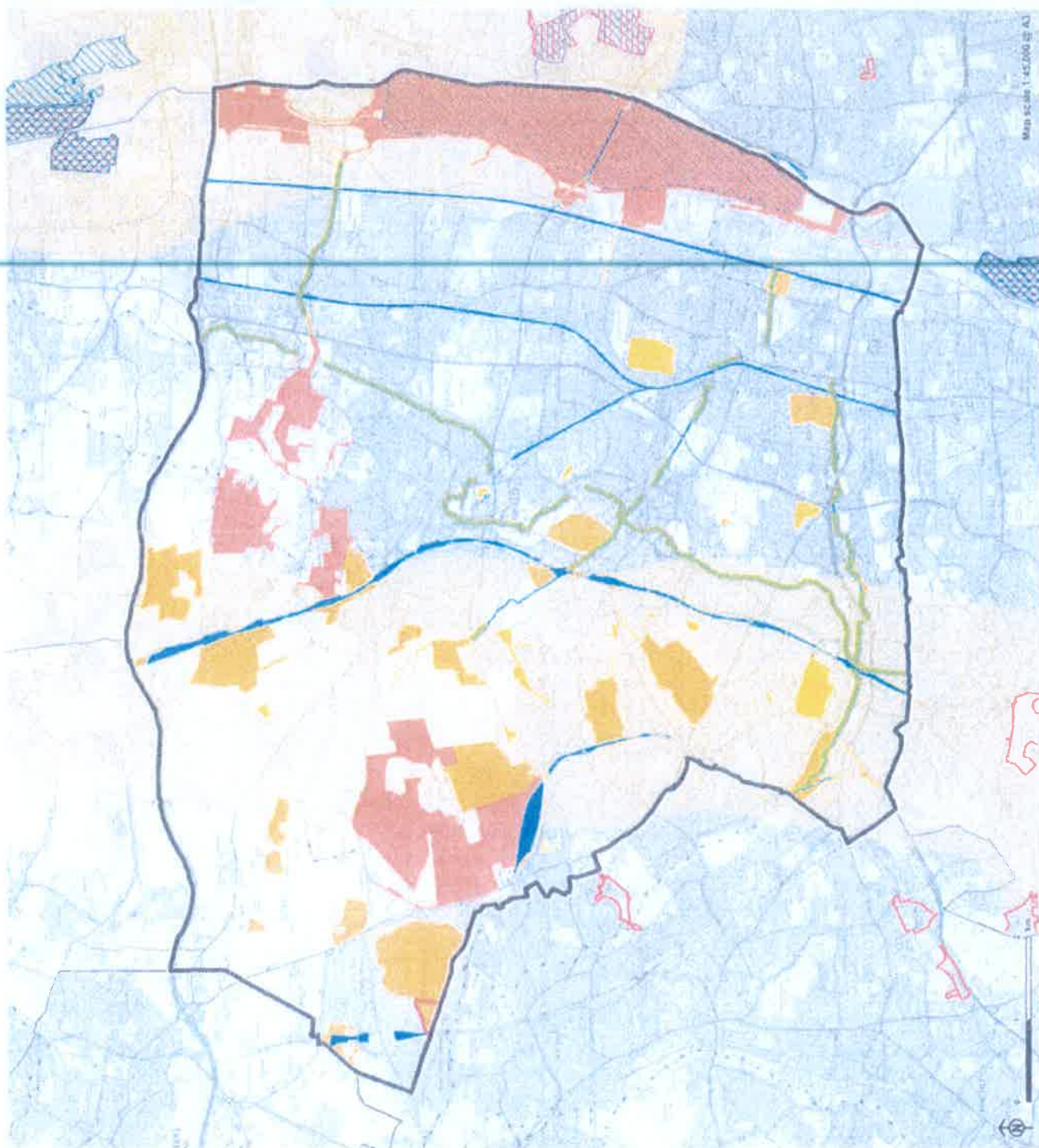
REVIEW.

**Appendix A**

Figure 1.1-1.3: Biodiversity Assets in the Borough and  
Figure 1.2 Areas of Deficiency in  
Access to Nature

Figure 1.11 Blue Infrastructure

- Enfield boundary
  - Other Local Authority boundary
  - Special Area of Conservation
  - Site of Special Scientific Interest
  - Special Protection Area
  - Ramsar
  - B line
  - Wildlife corridor
  - Green Chain Corridor
  - Local Nature Reserve
  - Local
  - Borough
  - Metropolitan
- Site of importance for Nature Conservation (Grade)



Map scale 1:42,000 @ A3

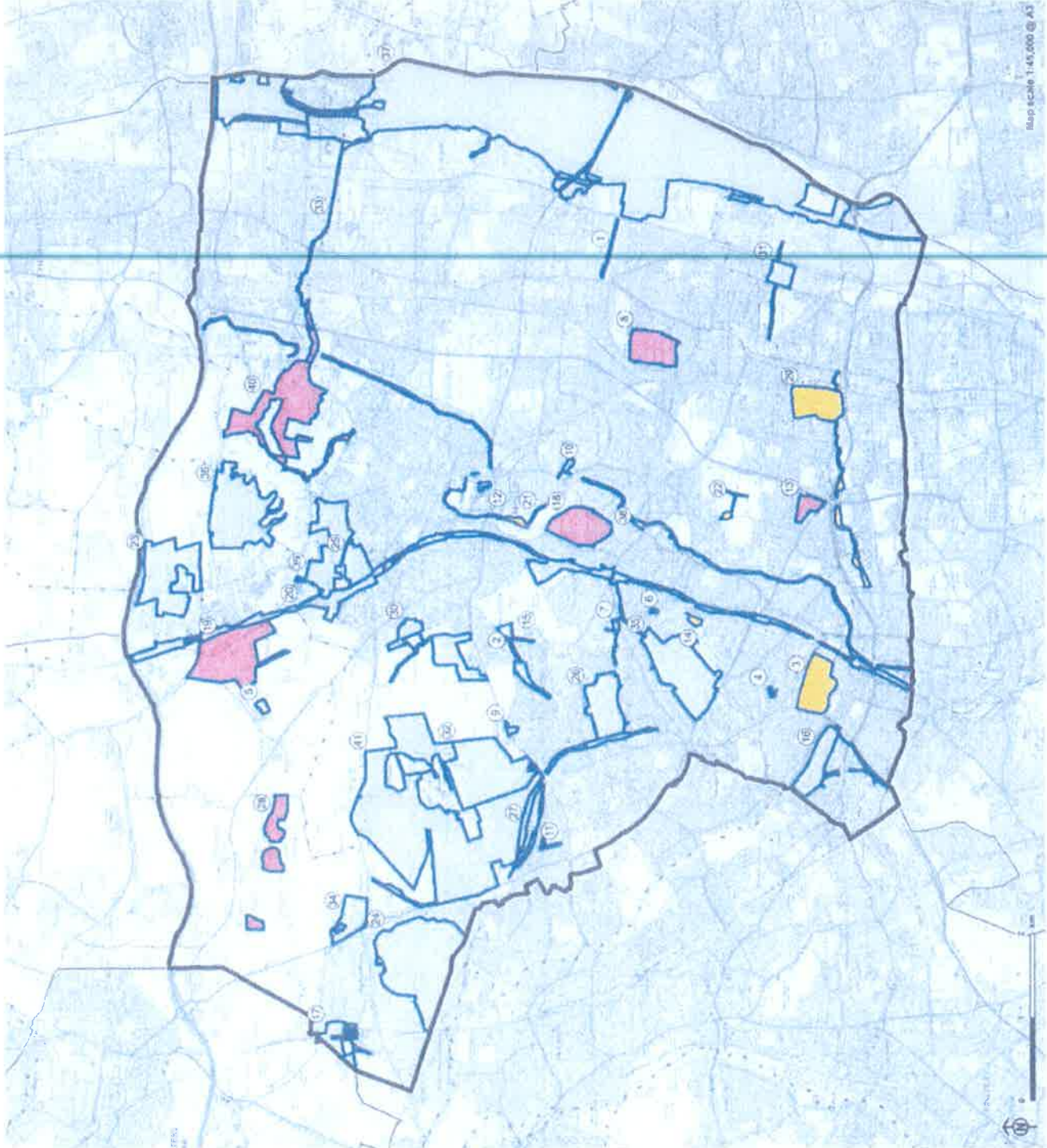


Figure 1.1: SINC Priority Inventory (v1.0) - High Priority

- Enfield boundary
- Other Local Authority boundary
- Site of Importance for Nature Conservation (SINC)

1. Boundary Ditch at Sandhurst Road
2. Boxer's Leap and Lonsdale Drive Woods
3. Broomfield Park
4. Conway Recreation Ground
5. East Lodge Reserve
6. Friends Meeting House Grounds
7. Housdon Road Wood and Housdon Cuffer
8. Jubilee Park
9. Lakeside
10. Riverside Park and Saddler's Mill Stream
11. Southgate School Nature Areas
12. St Andrews Churchyard
13. Tatem Park
14. Woodcroft Wildspace
15. Work's End Lane
16. Armoa Park
17. Broadgates Pasture
18. Bush Hill Golf Course
19. Crows Hill Golf Course
20. Crows Hill to Bowes Park Bushes
21. Enfield Lodge of the Holy Rood
22. Fir's Farm Wood and Hedgerows
23. Glasgow Stud
24. Hadley Wood Golf Course and Covert Way Field
25. Levenside Hill Cemetery
26. Osterwood Park
27. Proximity Line from Cockletons Station to Southgate
28. Plumridge, Vault Hill and Little Beech Wood
29. Pymme's Park and Pymme Brook
30. Royal Enfield Rifle Site and Woodland at Vauxhall Farm
31. Salmon
32. Trent Park Golf Course
33. Turkey Brook
34. West Lodge Park Hotel Grounds
35. Grovelands Park and Picoy Hospital
36. Whiteleaves Wood
37. Lea Valley
38. New River
39. Holy Fields Country Park
40. Forty Hall Park and Estate
41. Trent Park

- Proposed SINC change
- Opportunity
  - Upgrade and Extension of SINC
  - At Risk
  - No change



Map scale 1:45,000 @ A3

## **Appendix C**

### Summary of SINC Review







## Space to Build, Enfield

### January 2019

Enfield RoadWatch, The Enfield Society and CPRE London have conducted a detailed survey of the entire Borough of Enfield, ward by ward, to establish a list of sites which could provide space to build. These are sites which currently make poor use of space and which could be intensified and put to better use. These range from some very large sites to hundreds of 'micro' sites.

- A document has been created for each of the 21 wards in Enfield which lists and provides images of each and every site.
- The sites are also all listed in a spreadsheet.

This report accompanies those documents but also discusses which of the sites would be appropriate for development in the timeframe of the Local Plan.

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F. Next steps	
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## A. Introduction

### A response to Enfield's Draft Local Plan Consultation

CPRE London, The Enfield Society and Enfield RoadWatch share the belief that London's Green Belt remains a vital and relevant part of London's planning policy.

All three organisations were concerned to see that Enfield's Draft Local Plan Consultation suggests that Green Belt in Enfield might need to be reviewed to find space to build and even went as far as saying that the Crews Hill might be an area to look at for development. This is a major concern for us because:

- development of housing at Crews Hill, expanding this settlement, will fail to preserve the openness of the Green Belt
- among other important functions, Enfield's Green Belt helps prevent low-density, car-dependent development which does not make good use of land. And it promotes regeneration and densification in areas where good public transport can avoid the need for car trips
- CPRE evidence has shown that Green Belt developments deliver expensive housing which cannot meet the need for affordable housing in Enfield
- development in Enfield's Green Belt is unnecessary: there are enough low-density, previously-developed sites across the Borough to deliver much needed new housing, even while expanding commercial/industrial space
- Crews Hill is a popular destination and an appropriate plan for the area would be to support the existing nursery businesses and enhance the area for people to enjoy as per Para 141 of the National Planning Policy Framework.<sup>1</sup>

Large areas of Enfield require regeneration: these areas provide a clear alternative and should be considered for development. We have surveyed the whole of Enfield, ward by ward, street by street, so that we can present clear evidence to underpin this statement.

This report puts forward recommendations and proposals for the next version of the Local Plan, drawing from the evidence gathered.

## B. Enfield should not, and does not need to, seek to release Green Belt as part of its Local Plan development process

### A huge opportunity for Enfield residents

Enfield is a wonderful place to live with acres of parks and green spaces, great transport links and opportunities for even better public transport. It can readily attract business and new residents with carefully-planned development, that will also provide an opportunity to address the lower standard of living east of the A10 caused by decades of industrial decline. We support the need to create space for new homes, businesses and amenities in Enfield and believe carefully-planned new development can also improve the lives for existing

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<sup>1</sup> Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

residents in the borough immensely by bringing economic growth along with an improved environment, in particular reducing traffic congestion and air pollution.

We support ambitious housing targets and have conducted detailed research which demonstrates there is space to build at least 37,000 homes on previously developed land (PDL) in Enfield, without the need to build on Green Belt.

On the whole we have made conservative assumptions about density except for the area served by Southbury Station, all of which we believe should be an Opportunity Area, which could be built to high density, within agreed height limits. Also we have not by any means included all developable sites. The total could be higher if different assumptions were made about density and/or more sites included.

#### **But housing targets need to be realistic**

However, the current build rate, which is around 500 to 600 dwellings per year, is a great deal lower than the proposed build rate of 3,500 per year (total 52,500) which is quoted in the consultation as coming from the 2018 NPPF government figures and is based on a formula which has been under consultation. We believe targets should be realistic and that the figure of 3,500 per year is unrealistically high.

#### **The key problem with setting unrealistic targets is that it drives 'over-allocation' of land which cannot then be usefully deployed for other purposes.**

A target of 36,000 over a 15 year period (2,400 per year), which we understand was put forward by the Local Plan Sub-Committee, would be more realistic while still being extremely ambitious. Note that the London Mayor's target for Enfield is lower at 28,140.

#### **Housing targets**

Housing targets must be set at a realistic level taking into account market conditions and the current build rate. A figure of 2,400 per year is ambitious but more realistic than 3,500 per year and so 2,400 per year (total 36,000) is the maximum target which should be adopted. A genuinely realistic target would be nearer to 1,500 to 2000 per year.

Transport improvements must be brought forward to support these targets, in particular rail improvements on the West Anglia main line and improvements to bus provision in the Upper Lee Valley corridor. Relevant bus proposals from page 67 of Lee Valley Transport Study Proposals are set out at Annex 6.

#### **An ambitious vision for Enfield can be achieved without building on Green Belt**

There is no need to review Green Belt in Enfield: there is enough Previously Developed Land (PDL) to accommodate needs - specifically we have identified

- space to build at least 37,000 homes on space which is currently inefficiently used
- additional space which could be intensified for commercial / industrial use.

Green Belt in Enfield continues to meet the five Green Belt purposes as set out in the NPPF. A Green Belt Review conducted by the council in 2013 established this and nothing has changed in the intervening period to question that position. Green Belt should never be considered for development ahead of PDL sites: there are many PDL sites in Enfield which

could be built out within a 5 to 10 year time-frame. No new Green Belt review should be conducted - and it is not needed.

**Building on Enfield's Green Belt would cause a great deal of harm. It would:**

- fail to preserve the openness and permanence of the Green Belt, harming its integrity and amenity value for current and future generations
- encourage low-density, car-dependent development which would add to congestion, noise and air pollution in a Borough which needs to reduce car trips
- be ineffective in addressing Enfield's housing needs which could be better tackled by developing large strategic sites with good public transport links
- entail the loss of good quality agricultural land which could and should in fact be put back to use to create a sustainable local food source for Enfield markets as per the GLA's *Farming in London's Green Belt* report of Dec 2018
- also entail the loss of amenity space for Enfield and London residents, the potential of which is great and enhancements can and should be planned.

**Green Belt**

Proposals to review Green Belt should be abandoned. No Green Belt review needs to go ahead. More appropriate and sustainable alternative sites are available. The council should plan positively to create masterplans for the extensive, available alternatives to develop previously developed land in Enfield. No Green Belt sites should be considered for development.

**A positive vision for Crews Hill should be created – as a centre for horticulture, which recognises the major potential for employment and the major opportunity for Enfield's economy – see Annex 7 for more**

The draft Local Plan should pay closer attention to the value of agriculture and horticulture in the borough and reference Enfield's long-standing and valuable farming industry. Growing food locally has become even more critical in light of environmental, economic and other challenges.

Rather than displacing a number of viable Crews Hill businesses, the Local Plan should create a positive plan to support the retail garden centres and develop the area to provide London with vegetables, plants and flowers so that it is again a hub for food production.

There are sound economic reasons for retaining horticulture in Enfield.

- UK households spent around £7.5 billion on garden goods in 2017, equivalent to £1 in every £100 of household spending.
- The retail sale of ornamental horticulture goods directly added around £1.9 billion to UK GDP in 2017. Over half was accounted for by garden centres. The Southeast has the largest market, accounting for nearly 20% of total spending on ornamental horticulture.
- In 2017, garden centres supported 84,800 jobs, 2.9% of the UK's retail workforce.
- Crews Hill is already highly valued by locals and visitors from a wide catchment well beyond Enfield, for whom it is a much-loved destination: re-creating this economic value would be virtually impossible.

**Housing is the wrong approach for Crews Hill** The rationale to consider the area for residential development seems to centre around the fact that there is a rail station there. However, train service at Crews Hill is currently 2 trains per hour, which is not enough to sustain high-density housing. Low-density housing will not contribute enough towards the borough's housing target to warrant the loss of Green Belt and horticulture, the garden centres and much more. Housing development at Crews Hill would be car-dependent, creating more car journeys and pollution at a time when Enfield needs to be reducing both.

#### **A Positive Vision for Crews Hill – a centre for employment**

Garden centres support 2.9% of the UK's retail workforce. The new Local Plan should include similar policies to those contained in the 2014 DMD, which would protect and improve Crews Hill, in addition to recognising the value of agriculture in general. The Council should seek to support, not displace, horticulture businesses, promote local food growing in the area, work with TfL to improve the W10 bus service for visitors, workers and local residents and crack down more consistently on inappropriate activities in the area.

### **C. Masterplanning key opportunity areas**

#### **The masterplanning of strategic sites is central to meeting housing needs and tackling congestion and air pollution**

Masterplanning is critical to attracting developer investment, in particular for at least two major sites – Southbury and Edmonton Green.

Large sites can become new neighbourhoods with a district centre, where people can live, work, shop and go out in the evenings and where children can walk to school.

For large sites, well-planned mixed-use development - i.e. incorporating residential units, commercial space, attractive retail/shops/cafes space, as well as community facilities - is vital also to attracting new business for example to occupy new office space.

Masterplanning also ensures sub-optimal, piecemeal development is avoided. Some recent planning decisions and activities in Enfield demonstrate why taking decisions outside of a masterplanning process can lead to sub-optimal outcomes, for example:

- Permission was given to Beavertown Brewery to occupy a site which could have been developed for mixed residential and commercial use.
- Proposals are being discussed with Colosseum and Asda sites at the A10 retail park without reference to a masterplan, setting Enfield residents up for sub-optimal outcomes and compromising what could be delivered elsewhere in the area in future.
- The lease for the Edmonton Green shopping centre was sold without a masterplan which could have directed investors. The car park at Edmonton Green has permission for very low density development (48 dwelling per hectare) but it could / should have been developed at much higher density as part of a comprehensive masterplan.

Masterplanning also enables affordable housing to be incorporated in largescale developments more effectively.

### Affordable housing

Enfield is dominated by relatively low density, suburban housing with car-parking. Large 'opportunity' sites with good public transport can and should be used to create an alternative i.e. large-scale high density, car-free / car-lite developments which are affordable for young people / people on lower incomes who are also more likely to rely on public transport and are less able to afford a car. Low-density, car-dependent development in Green Belt will not meet these needs.

Given that the current build rate is much lower than required (average of 500 to 600 per year vs need for 2,400 per year), a sensible approach would be to focus the council's limited capacity on bringing forward specific large sites which can deliver large numbers of homes including affordable homes, relatively quickly.

### Capacity within Enfield for masterplanning

Enfield and the GLA must work together to ensure Enfield has adequate capacity to establish masterplans for, at a minimum, Southbury/Ponders End and Edmonton Green/Edmonton Futures Housing Zone. Other areas in Enfield also need masterplans to ensure economic, social and environmental/transport issues are planned effectively. Edmonton is a particularly deprived area which deserves better. Southbury is a huge opportunity for Enfield and is a space which could host a really attractive new district centre which can transform the area for all Enfield residents.

### Southbury / Ponders End – 17,500 new homes

Our key proposal is that the council moves urgently to masterplan major development at and around Southbury Station including a new district centre away from the Great Cambridge Road and community facilities, employment space, shops and restaurants. This should include the following sites:

	SOUTHBURY AREA	Hectares		Units
1	Enfield Retail Park / Colosseum Retail Park 14.84ha. The Colosseum part is 4.5ha (all undesignated) 400dph	14.84	Develop for mixed use	5936
2	South of Southbury Road inc Morrisons (undesignated) 300dph (higher than Camden comparator because location could cope with massing	5.73	Develop for mixed use	1719
3	Asda section of Great Cambridge Road and Martinbridge Trading Estate (GCRMTE) Part A (SIL) 360dph	6.39	Change use to mixed	2300
4	Section of GCRMTE Part A which could be mixed-use north of Southbury Road / east of the Colosseum and Enfield retail parks and South of Crow Road (SIL) 360dph	10.50	Change use to mixed	3780
5	Remainder of GCRMTE Part A should remain as SIL but intensified (SIL)	16.50	Intensify SIL	0
6	GCRMTE Part B – should remain as SIL but intensified (SIL)	17.20	Intensify SIL	0
7	The Southbury Leisure Centre car park excluding leisure centre and school 1.68ha. Could build over parking. Step down height so estimate 100dph. School could be moved to less polluted site enabling development of that section too.	1.68	Develop mixed use	168
8	Tesco Extra on Southbury Road - 1.83ha =216dph. Could build over parking.	1.83	Develop mixed use	396

9	Queensway sites 3.24 - very close to Southbury. Should be part of the masterplan. Could go high but maybe stepping down from top density. Estimate 300dph = <b>(LSIS)</b>	3.24	Change use to mixed	972
<b>TOTAL = 15271</b>				
<b>PONDERS END AREA</b>				
1	Redburn Industrial / Meridian Business Parks <b>(SIL)</b> should be considered for mixed use because of their location. Some should be retained for SIL rather than mixed-use. 18.3ha could generate 5,500 homes at 300dph. Estimate roughly half that		Change to mixed use	2500
2	South Brimsdown (Ponders End Industrial Park) - no figure is included because it has been permitted for the Beavertown Brewery. However, there maybe opportunity in the future to allocate some of the Southern end of Brimsdown for mixed use		?	-
<b>TOTAL = 17771</b>				

### Southbury / Ponders End opportunity area

(See more detailed issues and ideas for a Southbury masterplan at Annex 4)

Southbury should be designated a Mayoral Housing Zone with the Upper Lea Valley Opportunity Area extended to encompass it. Enfield should establish capacity and work with the GLA to create a Masterplan for the Southbury area incorporating the areas proposed above, as soon as possible, and should avoid piecemeal development in the area. The Colosseum Park development should not go ahead unless and until the masterplan is in place – though clearly this is a huge opportunity for early gains so masterplanners should work with the developers to ensure it is ready to go once the masterplan is ready.

Ponders End should also be designated a Mayoral Housing Zone and/or Opportunity Area, and connected to the Southbury Area Masterplan, so that services, amenities, etc are planned in tandem, given the proximity of the areas. The area around Ponders End Station has huge potential to deliver housing in mixed-used developments at the southern end of the Brimsdown Estate and on the Redburn and Meridian estates.

### Key opportunity: Edmonton Futures / Edmonton Green – 10,000 new homes?

A masterplan should be created for both Edmonton Green and the Edmonton Futures Housing Zone. There is vast potential here but it is impossible to say how many homes could be created because of the lack of clarity over what regeneration of these areas might entail.

Edmonton Green is very close to transport, can support travel to work in the City of London (where office space is expanding dramatically) and can and should be considered for high density development for example like that in the new Tottenham stadium area but with height restrictions. The largest site at 0.9ha is the Asda at Edmonton Green. It needs to be part of a masterplan for the whole shopping centre (8.4ha). This does not appear to be happening. 82 units in 9 storeys are already planned in the Monmouth Road, North Mall car park, which is 1.7ha i.e. very low density of 48dph. With such good public transport, the entire site should be able to handle at least 3,000 homes.

Edmonton Futures is a wider area which includes estate regeneration schemes already due to deliver 2000+ additional homes.



### Edmonton Green / Edmonton Futures Mayoral Housing Zone opportunity area

The Edmonton Futures Mayoral Housing Zone should be extended to incorporate Edmonton Green and these areas should be masterplanned in tandem with support from GLA. This is a particularly deprived part of the borough which suffered from the riots but missed out on regeneration like that in White Hart Lane. The area is in desperate need of a masterplan and there is huge potential to transform the area for existing residents and to attract new business.

The Eastern Enfield Group of The Enfield Society has worked to establish ideas for a masterplan (see Annex 1) and would be able and willing to help continue this work.

## D. Transport – improvements to rail network and high density, car-free development

**Car free development can protect existing residents from additional congestion and air pollution but also provides a more affordable alternative to the dominant housing type in Enfield (suburban / relatively low-density with car parking)**

To support the Mayor's Transport Strategy, Enfield will need to seek to reduce the total trips made by car and must avoid adding in new trips and so will need to enable car-free / car-lite development and avoid new car-dependent development.

Land can be built to higher density where there is effective public transport (both for homes as well as the necessary community infrastructure and commercial and industrial space) so better use can be made of available land by focussing on improving transport in strategic locations.

While protecting existing residents from the potential rise in traffic usually associated with major development, high-density car-free homes will provide a more affordable alternative to the dominant suburban housing type in Enfield.

### Car-free development as a starting point

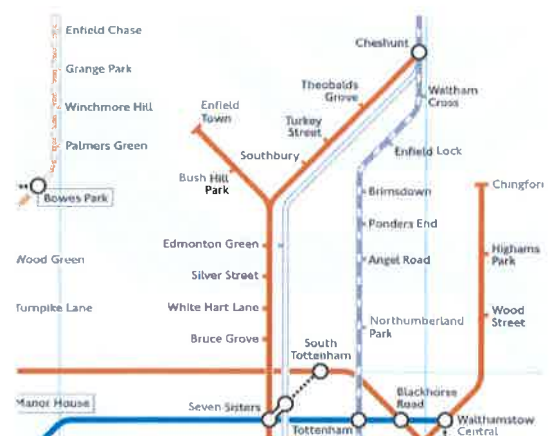
The starting point for all development in Enfield should that it is car-free. This can be achieved because most major sites have good enough public transport or improvements can be planned.

**Masterplanning new homes alongside transport i.e. improving transport in strategic places – is a major opportunity for Enfield because it is achievable and affordable**

Master-planning: transport improvements can unlock sites in Enfield. But at the same time opportunities are being missed where transport is already good: master planning can also avoid this continuing in future and ensure opportunities are taken not missed.

### London Overground to Cheshunt/Enfield Town

Currently there are only 2 trains per hour north of Edmonton Green on the Cheshunt branch, though more



on the Enfield Town Branch. TfL are proposing now to increase trains to Enfield Town however there was an option in the original consultation to increase trains on the Southbury branch to 3-4 trains per hour. This would be transformational for the areas around the stations on this branch, most notably the Southbury station area. The Eastern Enfield Group of The Enfield Society has analysed existing rail services and has made recommendations for practical improvements (see Annex 2). A summary follows:

East branch – stations at Southbury/Turkey St/new station Carterhatch Lane

- Major opportunity at **Southbury** which needs to be central to the LP but currently is not. This would involve increasing trains on the Southbury line
- This would also unlock the **Turkey Street** station area where there is potential for regeneration schemes on low density estates (these would be additional to the sites we have identified in our survey)
- A new station stop at **Carterhatch Lane** (between Southbury and Turkey St) would unlock potential for regeneration on nearby estates and the Hertford Road area (again these would be additional to the sites in our survey)

West branch – stations at Bush Hill Park/Enfield Town

- Unlock **Enfield Town** and the significant site adjacent to station

South of Edmonton Green: Silver St / Edmonton Green (already 4 trains per hour)

- **Edmonton Green** – opportunity here is being missed. There is already good transport but, for example, development is being permitted at very low density and without an area masterplan

### **West Anglia main Line from Liverpool St**

The proposed upgrades to this line have, lamentably, not materialised, compromising delivery at Meridian Water and beyond. There were proposals to four track this line as far as Brimsdown (beyond which it becomes more complex because of a level crossing) which would create opportunities for high density at Angel Road, a new station at Pickett's Lock, Ponders End and Brimsdown. The Eastern Enfield Group of The Enfield Society has analysed existing rail services and has made recommendations for practical improvements (Annex 3).

A summary follows:

- **Angel Road** unlocks Meridian Water sites but also some sites north of the station.
- **Ponders End** – opportunities being missed here: a major site suitable for mixed use (the Ponders End Industrial Estate which is a south facing site with good transport links on the south east of the very large Brimsdown industrial area) is now proposed to be with Beavertown Brewery. A masterplan for sites surrounding Ponders End is critical to avoid missing further major opportunities.
- A new station at **Pickett's Lock** could unlock development there. In 1995, Enfield Council commissioned a study by the Peter Davidson Consultancy in conjunction with the masterplanning exercise for Picketts Lock which considered the business case for a new railway station on the existing line. This should be revisited.
- **Brimsgate** station can unlock some of the SIL for mixed-use.

### **Improvements to London Overground and rail services**

#### **London Overground to Enfield Town / Cheshunt**

TfL should increase trains on the Southbury Loop north of Edmonton Green to 4 trains per hour at peak. Both the Southbury Loop and the Enfield Town branch should be upgraded to 3 trains per hour off peak and at weekends. That would allow a clockwork timetable of 6 trains per hour from Edmonton Green to Liverpool Street. There is a strong business case for the Southbury option, which would also unlock development at Turkey St.

Ultimately, a new station should be planned between Southbury and Turkey Street at Carterhatch Lane, to open that area up.

#### **West Anglia Line**

Enfield should work with other affected boroughs, as well as TfL and the GLA, to reinstate the plan to quad track the West Anglia line from Stratford to Brimsdown as a priority. This would facilitate up to 8 trains per hour with some platform work at Stratford.

Quad-tracking is also the stimulus for a new station at Pickett's Lock, which could also be a Crossrail 2 station, serving new housing west of the tracks. The Upper Lee Valley OAPF envisages walking and cycling bridges over the railway at Goodwin and Charlton Roads. The 1995 business case for a new station at Pickett's Lock should be updated to deliver the new station between the two bridges.

## **E. Space to Build in Enfield – survey results**

Enfield RoadWatch, CPRE London and The Enfield Society have conducted a detailed survey of the entire Borough of Enfield ward by ward, to establish a list of sites which could provide space to build. This was a TWO STAGE PROCESS:

STAGE 1 involved identifying sites which currently make poor use of space and which could be intensified and put to better use. These ranged from some very large sites to hundreds of 'micro' sites. A document has been created for each of the 21 wards in Enfield which lists and provides images of each and every site. The sites are also listed in a spreadsheet and categorised according to size and type to allow for analysis.

STAGE 2 involved identifying which of these sites would be appropriate for development in the timeframe of the Local Plan: we recognise that not all the sites identified can be developed during the timeframe of the Local Plan. At this stage, we also estimated the number of new residential units which could be accommodated on these sites.

STAGE 3 (a) involved identifying sites we felt we could not include in the Stage 2 list BUT which could also deliver thousands of additional new homes

STAGE 3 (b) involved identifying sites which could be used for retaining, improving and increasing space for employment

### STAGE 1 RESULTS - Number of sites, their size and type

In researching *Space to Build in Enfield* we have looked for spaces which could be better used i.e. built higher using air space. These include surface car parks, low density / low-rise retail or industrial spaces, garages and other low-rise buildings in areas where it would be appropriate to increase height.

We assume that surface car parking is a poor use of space which could be better deployed either by incorporating parking within a development (for example building over car parking space), moving parking to a site nearby to free up a site for development or, where appropriate, eliminating parking.

The research found a total of 510 sites identified as making poor use of space ranging in size as shown in figure 1.

**Figure 1: Number of sites of different sizes identified as making poor use of space.**

	Large site (anything over 1.0h)	Medium site 0.26 – 1h	Small but significant site (0.1 to 0.25h)	Micro site (less than 0.1h)	TOTAL
Number of sites	30	30	140	310	510
Total hectares	431	13	21	15	480ha

The sites ranged in type as shown in Figure 2.

**Figure 2: Number of sites of different types identified as making poor use of space**

	Low rise industrial / retail	Supermarket (some with surface car park)	Surface carparking	Garages	Yard / commercial site	Low rise – storey could be added	Other
Number of sites	23	13	152	166	39	36	83
Total hectares	412	18	15	13	4	3	16

### STAGE 2 results – sites which could be developed in the timeframe of the Local Plan

We did not assume that all the sites identified as making poor use of space would in fact be developable in the timeframe of the Local Plan. So, at Stage 2 of the research, we identified a number of specific large sites which could be brought forward and deliver largescale mixed-use residential and commercial development.

In considering which large sites to include, we looked at Public Transport Accessibility Levels and also potential to improve transport as part of a masterplan. Many of the larger sites we have included are focussed around the areas discussed elsewhere in this report as being appropriate for masterplanning. Related transport issues are also addressed elsewhere.

In terms of small sites, we assume that only around 30% of the small, medium and micro sites identified at Stage 1 might ultimately be developed.

We assert that these small and large sites are developable and provide a much more sustainable alternative to building on Green Belt.

Number of homes which can be accommodated on Stage 2 sites. We have naturally needed to make assumptions about the number of dwellings per hectare (dph) for sites and have, as far as possible, indicated the reason for the assumptions.

- Assumptions have been made about possible dph based on similar examples or, in the case of the Southbury retail areas, the Colosseum Retail Park prospectus, which proposes up to 1,800 homes on 4.5ha i.e. 400dph.
- For supermarket sites, the Morrisons at Chalk Farm Road, Camden has been used as a model, where a supermarket and 700 homes were sited on 3.24ha i.e. 216dph. This has been applied to supermarket sites except Morrisons and Sainsburys at Southbury because these latter can be part of major high density developments. Other sites closer to residential and/or low-rise areas have been estimated at lower dph targets, as shown.

The table below lists the major previously developed sites in Enfield which we believe present an opportunity to repurpose as mixed use or for residential development.

**Figure 3 – sites in Enfield which currently make poor use of space and which could be repurposed as mixed use or used for residential development within the time frame of the Local Plan**

<b>Enfield's supermarket sites.</b> A good comparator is Morrisons at Camden Goods Yard, a 3.24ha site with 700 flats. We have used this density [216dph] assumption for most of Enfield supermarket sites except where indicated	
Southbury site 2 Morrisons site at Southbury is 5.73ha. A slightly lower density is proposed than for the Colosseum site across the road because retail / commercial space will need to be accommodated. Assume 300dph	1719
Southbury site 8 Tesco Extra on Southbury Road - 1.83ha @216dph	396
Tesco/ Royal Mail at Enfield Town Station - 1.55ha @216dph	335
Asda, Chase Side - 1.34ha @216dph	290
Sainsburys, Green Lane - 2.3ha @216dph	497
Lidl, Unity Road [too residential for high rise] - 0.71 = 216dph	153
Morrisons, Palmers Green. Step down dph slightly. 1.87ha @ 166dph	310
<b>Other large sites – proposed for mixed-use development</b>	
Southbury site 1 Enfield Retail Park / Colosseum Retail Park 14.84ha. The Colosseum part is 4.5ha (all undesignated)	5936
Southbury site 7 The Southbury Leisure Centre car park excluding the leisure centre and the school is 1.68ha. It would need to be stepping down in height so estimate 100dph.	168
Total for known estate regeneration schemes – Alma, Joyce Avenue/ Snells Park, New Avenue, Ladderswood	3384
Other known major/minor developments i.e. Meridian Water, Chase Farm, Trent Park	10762
Cockfosters station, 1ha assume 100dph	100
Abra Wholesale, Picketts Lock. Some housing adjacent. Fairly isolated at present so assume 2.5ha @ 100dph assuming new station at Picketts Lock.	250
<b>Industrial sites.</b> NOTE The London Plan allows for consideration of industrial sites for change to mixed-use / intensification. The approach we propose is to change some of Enfield's SIL to mixed-use, retaining at least as much commercial/industrial (C&I) space but adding in residential too. We also propose a number of low-density / poorly-used C&I sites elsewhere are intensified so overall more C&I space is created (more of which below).	
Southbury site 3 ASDA on Southbury Road (6.59ha @ 360dph) (SIL)	2372
Southbury site 4 Section of GCRMTE Part A which could be mixed-use (north of	3780

Southbury Road / east of the Colosseum and Enfield retail parks and south of Crown Road 10.5ha (SIL) 360dph	
Claverings (Draft Local Plan suggests mixed on this site) 3.87ha. Without a new Picketts Lock Station, it is suburban so est 120dph = 464 (could be planned with spaces as per Bexley so car parking can eventually be replaced with residential blocks once PTALs rise)	464
Alma Road estate 4.8ha also mentioned in Local Plan. Only PTAL2	576
Regent's Ave estate at the corner of the N. Circular and Green Lanes, next to Palmers Green bus garage. Regent's Ave is urban but small. 0.59ha @200dph	118
Montagu Industrial Area South B is adjacent to Meridian and in the Edmonton Futures zone, so that area makes sense for mixed-use development. The Meridian densities was originally 220dph, so using that. 1.87ha @ 220 =	411
Southbury site 9 Queensway sites 3.24 - very close to Southbury. Should be part of the masterplan. Could go high but maybe stepping down from top density. Estimate 300dph	972
Ponders End Site 1 Redburn Industrial and Meridian Business Parks (SIL) should be considered for mixed use because of their location. Some should be retained as SIL. 18.3ha could generate 5,500 homes at 300dph. Estimate roughly half that.	2500
<b>MEDIUM SITES (the larger of the small sites we identified)</b>	
175 Bowes Road - .5 mile to Arnos Grove tube. 180 homes @ 216dph	180
Lidl at Silver Street. Low rise area but only 0.4 miles to Silver Street Station. Estimating 150dph. 115 homes	115
Car park/ garages off Lodge Drive 0.2 miles to Palmers Green Stn. 70 homes at 100dph	70
Blackhorse Tower, Cockfosters - This should be developed as a CAR FREE housing development. It could provide 200+ homes, next to Cockfosters Station, also benefitting the local shops. Would require introduction of CPZ	200
Ponders End Youth Centre, South Street. Some redevelopment already happening. New school next door. Tower blocks nearby. Community facilities should be retained but additional layers could be added. 0.2 miles to Ponders End Station. 70dph = 35	35
Sainsburys, Florey Square [not included before] Could add two floors to store itself and stay in keeping with surroundings. Going by minimum space standards that could be 30 flats per floor, but there would be light and single-aspect issues. Just estimating 32.	32
M&S, Winchmore Hill Road. A good site only 0.2 miles from the underground	36
Oakwood Station car park. Not yet on TfL list but may get there. The front is listed, so nothing can be seen towering over the station. Maybe a row of townhouses facing Prince George Avenue? 6 could be fitted in or a 2-storey block of 12 units instead.	12
Arnos Grove car park. On TfL list. It could take higher block/s of flats. 200dph. = 80	80
<b>Other medium, small and micro sites</b>	
According to our research, other medium, small and micros sites (we have located more than 400 in Enfield), amount to 39.76ha in size. Assume these can only take infill @ 100dph and only 30% of them are developed	1193
<b>TOTAL</b>	<b>37446</b>

The total new homes possible within the areas of Previously Developed Land we have so far analysed is **37,446**.

### **A proactive approach to promoting appropriate sites for development, especially mixed-use development**

There are many sites which could be developed to make better use of space in Enfield, for example supermarket sites with surface car parking and poorly-used industrial or commercial sites in need of regeneration. ***We have listed the sites we believe are appropriate for mixed-use or residential development. Along with smaller sites, these***

**could accommodate upwards of 37,000 new homes at a conservative estimate, according to our survey.**

Enfield should create a policy designed to proactively promote the development of the larger sites listed above. The policy could state that the borough will engage with owners and developers who wish to consider development of their site and that the borough would encourage pre-application discussions to establish parameters for a particular site. Enfield could create a panel of developers and architects to assist with this process.

**Small and ‘micro’ sites**

Our survey shows that there are a large number of small (0.1 to 0.25ha) and ‘micro’ (under 0.1ha) sites which, collectively, could create a lot of space to build. Including some of the smaller ‘medium’ (0.25 – 1ha) sites we identified, combined these sites total nearly 40 hectares.

Enfield should create a policy designed to proactively promote development of these infill sites and issue guidance to ensure it is appropriate and sympathetic given that many of these sites will be close to people’s homes.

There should be a presumption in favour of development of ‘infill’ sites defined as sites under 0.25h providing proposals accord with guidance and – for the larger of the small sites – providing pre-application discussions are held to ensure appropriate applications are submitted.

Enfield could create a panel of architects to set out examples of appropriate small-scale development and more generally assist owners / developers of small sites to submit appropriate planning applications.

**STAGE 3 (a) Sites we have not included BUT which could deliver thousands of new homes additional to those on the sites we have identified above**

By no means are all sites in Enfield which *could be* developed included in our list. There are important areas / sites which we have not included because it is less clear how development might be approached at this stage. However at least one of these – Edmonton Green – could deliver largescale residential development. This is discussed earlier in the paper. The reason for not including these is simply that it is not clear how the sites are likely to be developed so it is very difficult to judge numbers.

Some sites (or parts thereof) are already listed elsewhere as being appropriate for development. In Brimsdown, for example, a section at the lower end is listed in Upper Lee Valley Area Action Plan as being appropriate for mixed use. Enfield Town is part of a masterplan. And Edmonton Green / Futures are the subject of various planning documents though these do not present detailed proposals for new housing numbers.

<b>Important sites not included</b>	Potential for new housing
Edmonton Green / Edmonton Futures	?
Enfield Town	?
Brimsdown – southern end (SIL)	?
Estate regeneration at Turkey Street	?
Estate regeneration at Carterhatch Lane	?

### **Additional important sites**

We have by no means listed all opportunities for space to build in Enfield. We have not, for example, listed Edmonton Town/Futures or Brimsdown, though these have already been identified as areas appropriate for residential or mixed-use development.

Our survey demonstrates that there are opportunity sites, like those listed above, which could and should be subject to detailed masterplans in future once the key Southbury / Ponders End and Edmonton Green / Futures areas have been planned. These include Brimsdown, but also sites at Carterhatch Lane and Turkey Street.

### **STAGE 3 (b) Retaining, improving and increasing space for employment**

Parts of Enfield's SIL is host to businesses which are not listed as appropriate for SIL (see Annex 5 for more detail): for example, the trampoline park, MacDonalds restaurant, retail outlets etc. This creates an opportunity to relocate and / or redesignate some employment land designations so overall it makes more sense.

At the same time, retail could and should be redirected to town centres so that genuine SIL uses are encouraged and (genuine) SIL space increased.

Additionally, many industrial sites in Enfield, some SIL (Strategic Industrial Land) and some designated as LSIS (Local Strategic Industrial Site) could be intensified to increase the total commercial and industrial space. The London Plan gives examples of this type of intensification.

We have proposed that some SIL in Enfield is changed to mixed-use. This should mean retaining the same amount of commercial space but adding in residential, by increasing the height of the development, so no SIL should in fact be lost. Nonetheless, there should be a policy to increase the available SIL in the borough by intensifying the sites which are inappropriate for mixed-use development. These sites are listed here. Some are extremely low-density like Freezy Water and Innova and could be much better used. Road transport is an issue at the latter sites and Enfield should lobby for the M25 junction improvement which enables a dedicated left-hand turn from the A10 at Junction 25. Buses could be improved by extending the LV1 bus.

SIL and LSIS which could be intensified to increase employment space in the Borough
Brimsdown <b>SIL</b> – much of this is not being used for industrial use but has retail and even drive through McDonalds – so could be intensified and used more effectively
Montagu North from Gibbs Road <b>SIL</b>
Eley Estate <b>SIL</b>
Aztec 406 <b>SIL</b>
Freezywater Industrial Park <b>SIL</b>
Innova Business Park <b>SIL</b>
GCRMTA Part A north of Crown Road <b>SIL</b>
GCRMTA Part B <b>SIL</b>
Commercial Road and North Middlesex Industrial Estate <b>LSIS</b>
Langhedge Lane Industrial Estate <b>LSIS</b>



### **Intensifying industrial estates**

Enfield should create a policy to increase the available SIL in the borough by intensifying the industrial sites which are *not* appropriate for mixed-use development. Some are extremely low-density like Freezy Water and Innova and could be much better used. This would require some transport improvement e.g. LV1 bus extension and the road improvements previously planned (as below). Areas in the Brimsdown estate, for example, are poorly used and in fact contain retail which would be better placed in town centres.

A separate masterplan should be created for all the SIL, LSIS and employment land in the borough to increase the overall employment space and to optimise the locations of different types e.g. to ensure retail is focused on town centres; so modern office space could be created at a new town centre at Southbury, etc. This should easily be able to demonstrate no loss of employment if some SIL is released. As long as jobs are re-provided at the same or higher number elsewhere, which we believe can be done without difficulty, this can justify the change to mixed-use of some of the borough's SIL.

### **Road improvement at M25 junction 25**

Enfield should also lobby for a change to the proposed works at junction 25 to ensure a dedicated left-hand turn lane from the A10 north onto the M25 is included (originally proposed as an option – and justified because of the significant economic benefits this relatively simple change would make). Works are not scheduled to start until 2020.

## **F. Next steps**

The proposals in this report (in shaded boxes throughout) will form the basis of our responses to the Enfield Local Plan consultation. We will also promote the proposals and continue to seek a genuinely sustainable future for Enfield.

## ANNEX 1 - Edmonton Green Masterplan issues and ideas (these were compiled by the Eastern Enfield Group of The Enfield Society)

- Masterplanning: The existing shopping centre is inwards-looking and there are opportunities to Masterplan the site to re-connect it with adjoining residential areas to create a more legible and walkable space with a greater sense of place. Opportunities for this to the south will be made more interesting by the site adjoining the Edmonton Futures Mayoral Housing Zone and hopefully there can be a joint Masterplanning exercise of a similar quality to the one produced previously for Meridian Water.
- Salmons Brook: This river is culverted through the site. Revealing it would allow a green wedge through the shopping area, which would provide a splendid natural feature and wildlife, much like what has been achieved in the extension to the High Street at Hemel Hempstead. This could provide a real structure and a breath of life to the site with walking and cycling routes along the river  
[https://c1.staticflickr.com/5/4439/37328755361\\_c904e3a239\\_b.jpg](https://c1.staticflickr.com/5/4439/37328755361_c904e3a239_b.jpg)
- Historic Edmonton: The Enfield Society holds photos of Edmonton Green as it once was and members are available to give you presentations about the history of the area. It is hoped that these are used as inspiration for the high-street frontage and Hertford Road / Fore Street environs.
- Railway arches: While conversion of the railway arches adjacent to the rail station into retail may be impossible because of the embankments within the arches, the shops that used be in front of the arches could be re-instated to re-frame and activate the area while the Green in front could be enhanced and made available for an occasional market, such as a monthly farmers market for example. This would create an exciting entry to Edmonton Green that would complement the main shopping centre. Edmonton Green would benefit from a market similar to the one at Tottenham Green.
- Church Street Conservation Area: It is hoped that S.106 money can be provided as part of a wider shopping centre redevelopment to enhance the Church Street Conservation Area. In particular, there is a Georgian Girls School that is presently vacant and on Historic England's At Risk Register, with risk of collapse.  
<https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/50040>
- It is hoped that a masterplan for Edmonton Green could include provision for a Townscape Heritage scheme for Church Street Conservation Area to enhance shop fronts, signage, dilapidated listed buildings and other buildings that have been inappropriately altered in the past.
- Rail / Bus interchange: It is unfortunate that the railway station no longer has a southbound bus stop. The one in front of the leisure centre was removed after 2004 when articulated buses were introduced, but these are no longer used so a southbound bus stop could be re-introduced. With minimal investment the loading bay here could be converted into a bus stop. The existing corresponding northbound bus stop at the rail station is heavily used. This could be re-thought as part of a major redevelopment.
- Rail opportunities: TfL have produced draft timetables and business plans for an additional 2 trains per hour at peak and off peak. They have not yet committed to these upgrades but the Council hopefully can work with TfL to bring them to fruition. The best option presented is for 2 additional trains per hour to Cheshunt during the peak. This would double services on the branch, raising them from 2 to 4 trains per hour. Enfield Town already has 4 trains per hour at peak. The best off-peak and weekend option is for

1 additional train per hour from Enfield Town and Cheshunt to Liverpool Street. This would provide a 50% service boost, with each branch rising from 2 trains per hour with half hourly service to 3 trains per hour with 20 minute frequency throughout evenings and weekends. This would also create a clockwork 6 trains per hour from Edmonton Green to Liverpool Street through Tottenham.

- Boosting the peak service from Cheshunt will be transformative for Edmonton Green because residents north of Edmonton Green will have much more frequent service to the shopping centre. Also the increasingly affluent residents of Tottenham would have a train to the shopping centre every 10 minutes instead of every 15 minutes.
- For the draft timetables and business plans for these vital proposed upgrades, please follow this link:  
<https://www.dropbox.com/sh/sw2xbdjqbagc3or/AACQEOTZe09yUfPTCkrIIVAYa?dl=0>
- Bus Station issues: The bus station works very well for northbound buses, but more than half of the southbound buses stop on Hertford Road, outside the bus station. This provides a poor environment for interchange, gives shoppers limited cover from the elements and limited space to walk at peak times when the area becomes overcrowded. Widening the bus station concourse would allow a few extra stops adjacent to the bus stop office and the entrance and exit for southbound buses could be amended to route all buses into the bus station.
- Buses north of Edmonton Green: A significant number of buses terminate at Edmonton Green so services are much better south of the shopping centre than to the north. However, the catchment for the shopping centre by bus is primarily to the north. The situation has worsened over time with twice as much overcrowding on buses north of Edmonton Green than south of it. This situation can be remedied and should be included in a masterplan.
- Congestion on Hertford Road could be alleviated by extending the 144 and 149 to Ponders End and the 259 to Enfield Highway.
- With these bus route extensions, the existing 349 bus has no obvious role. It could however be given a new lease of life, to protect capacity in Tottenham, by diverting off Hertford Road to run via Nightingale Road and Ponders End Station to boost frequencies on these poorly served but heavily populated roads that form a large catchment for the shopping centre but at present has poor links to it. The 349 should also be extended from Stamford Hill in the south to Clapton or Hackney Downs to plug a missing link between Edmonton, Tottenham and Hackney.
- There is also a need for a direct link between Edmonton Green and Enfield Retail Park because thousands of new homes are planned there, so it should have a direct bus link to Edmonton Green Shopping Centre. This could be achieved by extending the 349 or 144 into the retail park or by diverting the 191 along Crown Road.
- The W8 is planned to extend to Meridian Water, which will be great. As a result, the W6 is planned to be extended to the Lee Valley Leisure Centre, but it should not stop there. The W6 could extend from the Lee Valley Leisure Centre to Chingford. This would provide a desperately needed direct and fast link from Chingford to Edmonton Green Shopping Centre, opening it up to an affluent residential area with high disposable income.

## ANNEX 2 – Analysis and Recommendations for London Overground service to Cheshunt and Enfield Town (compiled by the Eastern Enfield Group of The Enfield Society, who can provide additional information on request)

- Currently there are only 2 trains per hour (tph) north of Edmonton Green on the Southbury Loop for Cheshunt. The Enfield Town branch benefits from 4 tph at peak times but both branches languish at a rural 2 tph during the off peak and at weekends.
- TfL's preferred option for additional future services is for two additional peak and off-peak services to Enfield Town. This is for operational reasons only because Enfield Town is a shorter branch with a three-platform terminus. Future enhancement should however focus on the proposals that best support regeneration.
- This proposal would miss the opportunity to boost the Southbury Loop to TfL's minimum 'turn up and go' standard of 4 trains per hour. It would also result in a sporadic service due to imbalance between the branches, failing to provide turn up and go benefits to the majority of passengers including at Edmonton Green, which has more passengers than the entire Enfield Town branch.
- TfL's own business case analysis favours the additional peak services being allocated to the Southbury Branch to bring it to 4 tph to equalise it with the Enfield Town Branch.
- TfL's business case analysis also shows that return on investment would be vastly higher if the off-peak boost is 1 train per hour for both branches, raising them both by 50% to 3tph with 20 minutes between services. This would result in a clockwork metro service of 6tph with 10 minutes between services between Edmonton Green and Liverpool Street, boosting regeneration potential throughout northeast London.
- There should be no operational barrier to delivering 4 trains per hour to the Southbury Loop despite Cheshunt providing a single platform terminus. There is space at Cheshunt to construct a Platform 4 adjacent to the existing station carpark to provide a two-platform terminus to facilitate a more robust service.
- Existing trains could be brought into service and re-timetabled to provide the enhanced service, which would act as a catalyst for residential and business development in the area.

### Recommendations:

- The preferred option is 4 trains per hour at peak and 3 trains per hour during the off peak and at weekends for both the Enfield Town Branch and Southbury Loop which could stimulate substantial housing development in Edmonton and North East Enfield.
- The proposed 8 trains per hour peak and 6 trains per hour off peak service would stimulate regeneration in Edmonton Green and Edmonton Heartlands. This proposal also affects capacity in Hackney and Broxbourne so Enfield should work with the other affected Councils to encourage TfL and Network Rail to deliver these proposals.
- Reinstatement of the station at **Carterhatch Lane** for Enfield Highway and Forty Hill would unlock substantial potential for regeneration on adjacent estates and at the district centre of Enfield Highway. This would also substantially reduce road traffic on the congested Hertford Road between Enfield Highway and Edmonton Green and the station would have convenient interchange with arterial bus routes. Carterhatch Lane Station is the only station on this route that was not re-opened when the branch was re-opened for passengers in the 1960s.

### ANNEX 3 – Recommendations for a new Picketts Lock Station (provided by the Eastern Enfield Group of The Enfield Society, who can provide more information on request)

- A new station at Pickett's Lock would fill a gap that is double the distance of any other stretch between Crossrail 2 stations in London. Broxbourne Council is already lobbying for a new station at Turnford on this line to unlock major new housing development there.
- A station here could unlock substantial development and estate renewal in existing residential and industrial sites including the Council estate at Bounces Road, Claverings Industrial Estate and sites east of the track around Picketts Lock Lane, also making development to the north of Meridian Water more viable. These areas have some of the lowest possible PTAL levels at present.
- A station at Picketts Lock would also provide the more than 60,000 residents of the N9 postcode access to services to Stratford and potentially Crossrail 2.
- In 1995, Enfield Council commissioned a study by the Peter Davidson Consultancy to consider the business case of a new railway station for Picketts Lock in conjunction with a masterplanning exercise that proposed options including an artificial ski slope and a 42,000 seat stadium at the existing athletics centre. Ambitions at this site appear to be moving towards fruition now with The Wave proposing to invest £40m in an artificial surfing lake just east of the potential sports stadium location.
- The station was not viable at that time of the 1995 study, because the existing mainline does not have spare capacity for a high frequency service. In light of the potential for up to 8 trains per hour on a classic quad track alignment to Stratford and other possible enhancements from Crossrail 2, that study should now be re-visited.
- The assessment should consider a station in-between the walking and cycling bridges at Goodwin and Charlton Road, as proposed in pages 144-147 of the Upper Lea Valley Opportunity Area Planning Framework "Opening Up the Lea Valley".

#### ANNEX 4 - Southbury Masterplan – issues and ideas (provided by the Eastern Enfield Group of The Enfield Society, who can provide more information on request)

There is potential to reconsider existing retail provision at Southbury in connection with Enfield Town, Edmonton Green and other district and local centres.

- Strategic re-allocation of existing warehouse retail could invigorate existing town and district centres, reducing reliance on car-dependent, out-of-town shopping and facilitate higher residential densities in Southbury.
- A sequential test should be applied to any new retail to ensure that retailers such as Next, who recently moved to Southbury, consider locations like Enfield Town and Edmonton Green first.
- If retail is to be retained, it could be concentrated around a new town centre near to Southbury Station including a closer look at Enfield Bus Garage and the Tesco's car park to ensure that retail is located near public transportation.

Decisions should be made within a wider masterplan that considers the entire brownfield area, with regards to future sites for schools, healthcare and other amenities that will be required as various sites begin to come forward. Decisions should also be made about future open spaces, parks and areas for nature and walking / cycling routes through the site to provide amenity for future residents.

A Masterplan should seek to re-connect severed elements of the site, for example:

- Extending Dearsley Road westwards to better connect Baird and Crown Road
- Provide a walking / cycling crossing of the A10 at its junction with Dearsley Road to enhance access for residents to playing fields and leisure facilities west of the A10
- Lincoln Way could be re-connected to Southbury Station and the wider Southbury area through the ASDA site
- Martinbridge Industrial Estate could be re-connected to the Southbury area with new road connections if the De Mandeville site comes forward
- Brick Lane and Broadfield Square could be re-connected to Southbury with connecting roads and walking or cycling routes to re-connect the wider Enfield Highway area to the soon-to-be-regenerated Southbury area
- There is potential for a walking / cycling bridge over the railway from Broadlands Avenue via the gap between 108 and 110 Broadlands Avenue, to connect Crown Road with the A1010 via Broadlands Close

Bus provision will likely have to be boosted. Some east to west routes could be diverted along the A10, Crown and Baird Roads to better connect the new residential areas with Enfield Town. The 349 bus could be extended into the site to create a faster direct connection from Southbury to Edmonton Green.

## Annex 5 – examples of inappropriate and low-density use of SIL in Enfield

GLA guidance states that appropriate uses for SIL would be: general and light industrial uses, logistics, waste management and environmental industries (such as renewable energy generation), utilities, wholesale markets and some transport functions.

This list from an older report is similar: logistics, waste management, recycling, environmental industries including renewable energy generation, transport functions, utilities, wholesale markets and some creative industries.

Some examples of inappropriate use of SIL in Enfield are:

### **Brimsdown**

- McDonald's, Mollison Ave in Brimsdown Industrial Estate [0.29ha]
- Matalan Discount Fashion and Homeware Retailer, Mollison Ave, Brimsdown [1.23ha]
- Dreams Enfield, bedroom furniture, Mollison Avenue, Brimsdown [1.52ha]

### **Southbury Retail and SIL – very low density.**

- Toys-R-Us empty site in the Retail Park next to CarCraft empty site in the Great Cambridge Road SIL

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### **Montagu North**

- Large DIY retail shop and banqueting facility [0.79ha]

### **Great Cambridge Road Industrial Estate, off Lincoln Road**

- Trampoline Park in industrial unit

## Annex 6 - Upper Lee Valley bus provision

The existing Upper Lee Valley corridor has very poor bus provision. The Lee Valley Transport Study sought to address this but we understand is on hold due to TfL funding issues.

Arguably new housing cannot be delivered without it. Relevant proposals from page 67 of the report were as follows:

- LV1 from Brimsdown to Tottenham Hale, via Meridian Way/Watermead Way with a frequency of 5 buses per hour
- LV2 from Tottenham Hale to Walthamstow, via Watermead Way, Angel Road, North Circular, Chingford Road and Hoe St with a frequency of 5 buses per hour
- (LV1 and LV2 could be combined into a single route and the proposed LV1 should extend to Waltham Cross via Innova Park to connect the Upper Lea Valley with Hertfordshire)
- 476 extension from Northumberland Park to Meridian Water, via Willoughby Lane. Boost from 7.5 to between 8 and 9 buses per hour.
- 377 extension from Southbury to Chingford, along Nags Head Road, Lea Valley Road, and Station Road. Boost from 2 to 3 or 4 buses per hour.
- 491: Boost from 3 to 5 buses per hour

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In order to facilitate increased bus provision along the A1055 a new bus lane is required on the southbound lane, from Stonebridge Lock to Burdock Road to by-pass chronic congestion at peak times. There is also need to implement existing proposals for a northern entrance and exit to Tottenham Hale bus station to reduce running time.

There is scope for the 192 and LV1 to run 24hrs a day on Friday and Saturday nights to provide interchange with the Night Tube at Tottenham Hale.

There are further proposals to route the 444 and 34 through Meridian Water, but these require substantial road construction through the site and will occur at a later stage.



## ANNEX 7 – A positive vision for Crews Hill should be created – as a centre for horticulture, which recognises the major potential for employment and the major opportunity for Enfield’s economy

**The draft Local Plan should pay closer attention to the value of agriculture and horticulture in the borough and reference Enfield’s long-standing and valuable farming industry.** (The 2014 DMD included several policies to promote and protect agriculture and states on p121: 13.4.1 )

There is a long history of agriculture and horticulture in Enfield, which has played an important role in the development of the borough. The food sector continues to be an important contributor to Enfield’s economy, with a range of small-scale producers, wholesalers and large companies generating significant income and providing many jobs. There is potential for better communication and future growth across the supply chain. This policy will help to implement the Enfield and the Mayors Food Strategies which seek to develop and maintain a thriving local food economy and promote food production in appropriate areas.

**Growing food locally has become even more critical in light of environmental, economic and other challenges.** The recent London Assembly report Farming in the Green Belt [December 2018] makes a convincing case for encouraging and facilitating local food growth. Among the many benefits it states: “Food produced near to its consumers has to travel less, reducing transport emissions and requiring less packaging. It enables the supply of fresher food and more fruit and vegetables, promoting a healthier diet. It also provides employment.”

**Crews Hill can be developed to provide London with vegetables, plants and flowers and could again be a hub for food production in conjunction with the retail garden centres.** *There are sound economic reasons for retaining horticulture in Enfield.* A recent report by Oxford Economics The Economic Impact of Ornamental Horticulture and Landscaping in the UK<sup>2</sup> found:

- We estimate that UK households spent around £7.5 billion on garden goods in 2017. This spending, made up of routine purchases of supplies and equipment for gardening, as well as “bigger ticket” items such as sheds and greenhouses, is equivalent to £1 in every £100 of household spending
- the retail sale of ornamental horticulture goods directly added around £1.9 billion to UK GDP in 2017. Over half of this was accounted for by garden centres. Additionally, the Southeast was shown to have the largest market, accounting for nearly 20% of the total spending on ornamental horticulture.
- In 2017, garden centres directly supported 84,800 jobs, 2.9% of the UK’s retail workforce.

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<sup>2</sup> <https://www.oxfordeconomics.com/recent-releases/3b5ce883-cc72-4cf9-910e-be267fe93f46>

### **Housing is the wrong approach for Crews Hill**

Instead of promoting Crews Hill for local food production and recognising its economic importance for horticultural sales, the draft Local Plan suggests replacing some/all of the garden centres with housing.

The rationale seems to centre around the fact that there is a station there. However, train service at Crews Hill is currently 2tph, which is not enough to sustain high-density housing. Low-density housing will not contribute enough towards the borough's housing target to warrant the loss of Green Belt, horticulture, the garden centres and much more. Housing development at Crews Hill would be car-dependent, creating more car journeys and pollution at a time when Enfield needs to be reducing both.

**Crews Hill is already highly valued by locals and visitors, for whom it is a much-loved destination. Suggestions that it might disappear provoked the many comments on social media, including:**

- "Why ruin the lovely area of Crews Hill? I spent many happy hours there with my dear mum and son. I used to spend a lot of money too. I feel sorry for the owners. Taking their livelihoods away and jobs. We must fight to keep Crews Hill open and not put housing there."
- "OMG not another lovely place going to be lost to houses!! I sincerely hope this does not happen and that all the garden centres are safe. I love going over there and so do a lot of other people."
- "This is the worst news ever. I have been going to Crews Hill for numerous years now. I love going there in the summer for my flowers and also a day out. I like going there at Christmas, for all the decorations and Santa. Please oh please re-think this. It's Devastating!!"

**The new Local Plan should include similar policies to those contained in the 2014 DMD, which would protect and improve Crews Hill, in addition to recognising the value of agriculture in general.** The Council should seek to promote local food growing in the area, work with TfL to improve the W10 bus service for visitors, workers and local residents, and crack down more consistently on inappropriate activities in the area.