



Response to Draft Local Plan

10th September 2021





In our support for the draft policy, we are keen to work with other key landowners involved in the wider allocation and also the Council to ensure the placemaking area is masterplanned to a high standard, ensuring the highest levels of sustainability and quality are present in the design of the development.

### **Chapter 3 Place**

#### Strategic Policy SP PL10: Chase Park

We strongly support the proposal set out in this policy. In response to the questions posed, we believe the vision for Chase Park is appropriate for the future and will make a meaningful contribution towards the wider spatial strategy. The masterplanning approach and guiding principles set out in the policy will help to ensure that the vision for Chase Park is designed, enhanced and delivered effectively to meet the aspirations of the placemaking policy.

The Chase Park Placemaking Area is proposed as an extension to the urban area forming a new community, consisting of roughly 3,000 dwellings. Several key visions and criteria are set out in SP PL10 of the draft Local Plan. These include masterplanning the proposal to be shaped by and complement the natural features, such as the brooks, woodlands and green spaces that are critical to the character of the area.

Overall, the allocation seeks to make the most of the significant development potential of the land, owing to its sustainability and the scope for a strategic scale development that would provide key services and facilities to support the residential element. The area already benefits from high levels of existing infrastructure that would be upgraded as part of the Placemaking proposal, including improved access to public transport and the proximity to the main east-west route through the Borough to Enfield Town. Therefore, the placemaking policy is a crucial part of the wider strategic spatial strategy set out in the Local Plan and should be supported.

Our site has been included within the Chase Park Placemaking Area detailed in Strategic Policy SP PL10. The site is included within the 'Indicative location for housing-led areas in Green Belt' as depicted in the draft Proposals Map. In our support for the draft policy, we are keen to work with other key landowners involved in the wider allocation and also the Council to ensure the placemaking area is masterplanned to ensure the highest levels of sustainability and quality are present in the design of the development. We would also note that the relatively low number of key landowners involved in the process is a bonus that will make the site more deliverable and therefore help to overcome the potential issues that large, strategic-scale allocations can sometimes face. With the positive and proactive cooperation proposed by the Council, that we are happy to engage with, the Chase Park Placemaking Area should make a meaningful and well-planned contribution towards the wider spatial strategy.

Although the site will be masterplanned to ensure an holistic and comprehensive approach is taken for the whole wider area, it is important to maintain the independence of the three sites and how they will be delivered. Due to variances in ownership, size and proposed



infrastructure network” seems appropriate to ensure that new development does not reduce access to these networks and should help to contribute towards the wider aim.

In response to the Chapter 6 questions, such as how best to protect and enhance the blue and green network in the face of development pressures, the methods set out in policies BG1 to BG9 will likely be effective. Many elements of these policies are picked up in the placemaking policies for the key placemaking areas. SP PL10 frequently refers to Chase Park’s proximity to key blue and green networks, and how the placemaking area should improve access to these features, such as Trent Park and the National London Park City initiative in northwest Enfield. The placemaking areas are particularly well-positioned to enhance access to these networks for the wider Borough and so we believe that ensuring this potential is realised through the masterplanning of these areas is important to meeting the aims set out in Chapter 6.

Strategic Policy SP BG4: Green Belt and Metropolitan Open Land

We agree with the overall stance taken in this policy of the draft plan; the Green Belt and MOL should be protected from inappropriate development and enhanced. It also duly recognises the role these two designations can play in relation to wider blue and green infrastructure which is important to achieving the wider spatial strategy of connecting up these Borough-wide networks.

However, we suggest that the evidence base behind the Green Belt could be improved and therefore strengthen the relevant policies in the draft Local Plan. The Council have published a Green Belt and MOL Assessment as part of the evidence base underpinning the Local Plan. Appendix B is the Green Belt Harm Proformas for the parcels of land that were assessed as part of the study. This included the land parcel labelled EN9, shown in the figure below, which contains the site at Trent Park Equestrian Centre within a wider plot of land.



Figure 2: Green Belt parcel EN9.



Although the assessment indicates the parcel makes a strong contribution overall to the five Green Belt purposes, it does not appropriately consider the smaller scale site at Trent Park Equestrian Centre. Furthermore, it describes the buildings at the equestrian centre as “*a cluster of agricultural buildings located along the southern edge*” and so does not appropriately consider these as Previously Developed Land (PDL), but rather agricultural use appropriate within the countryside. These shortcomings of the assessment arguably provide an inaccurate assessment of the Green Belt strength of the site since the wider area has a more rural and countryside character which is not reflective of the Equestrian Centre. The latter relates more closely to the urban area than the rest of parcel EN9, which is a critical factor used in the assessment. It also does not give consideration to the contained nature of the site at the smaller scale, with the strong tree boundary to the north and development abutting the other boundaries. Therefore, we suggest that the Green Belt performance of the site at Trent Park Equestrian Centre is not as strong as indicated in the initial Green Belt assessment undertaken by the Council.

It should be noted that the Green Belt assessment did analyse smaller land parcels, but Trent Park Equestrian Centre was not fully assessed at this smaller scale despite being identified (ref LP1153). The wider Chase Park area was assessed as a whole, with the promoted sites aggregated into the larger parcel for the assessment. The study states “*the release of site LP1153 has not been assessed in isolation*” because the eastern boundary of the smaller area is not as strong as when it is aggregated with the wider Chase Park area. This again suggests that the individual merits of the site have not been considered in appropriate detail.

We would suggest that further Green Belt assessments include greater detail in assessing sub-parcels at a smaller scale, to ensure that appropriate assessments are made of sites promoted for development. This will also strengthen the arguments justifying the site allocations, as site specific assessments will provide a clear indication of the Green Belt strength rather than in a larger, aggregated land parcel.

In previous submissions to the Council, we have outlined the PDL status that covers the whole site at Trent Park Equestrian Centre and the implications this has on the planning merits of the site.

The site at Trent Park Equestrian Centre includes both the equine use and residential dwellings. As such, the site can be considered as either Use Class D2 or Sui Generis. Both potential uses are clearly defined as PDL when assessed against the definition provided in the NPPF and are not included within the list of exceptions to PDL. Therefore, the PDL status of the site is clearly established and confirmed.

Local Plans should consider and allocate the most suitable sites for development. Where development pressures are so great as to require the release of Green Belt land, it is important to ensure sites allocated for development are the most appropriate. This is specifically addressed in Paragraph 142 of the NPPF: “Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.” This point is crucial for Local Plans, as demonstrated by the recent St Albans Local Plan

examination. The Inspectors, in their Post Hearing letter (14th April 2020) specifically references this paragraph of the NPPF and the Plan's failure to adequately prioritise Green Belt release on these criteria.

The draft Local Plan for Enfield has established the exceptional circumstances to justify the release of Green Belt land to meet the development needs of the Borough. Following Paragraph 142 of the NPPF, the site at Trent Park Equestrian Centre should be a priority site for release given that it is both PDL and also the most sustainable site in terms of access to public transport.

## **Chapter 8: Homes for all**

Overall, we support the general steps taken in Chapter 8 to ensuring that the housing needs of the Borough are planned for and met. The allocations are clearly justified based on the key evidence relating to housing need and the available land to address this.

It is evident that the Enfield is facing a housing crisis that needs to be tackled immediately. Therefore, the Draft Local Plan has made this issue a top priority and adopted a 'Medium Growth' strategy which will largely focus new housing delivery within Enfield's urban areas. However, in order to meet the Borough's housing requirement some Green Belt release will have to take place. Without any Green Belt release the Council have estimated that only approximately 17,000 homes could be delivered up to 2039 which would not be enough to address the present housing crisis in terms of numbers and affordability.

As a consequence of this, there may be a risk of unplanned, speculative Green Belt proposals within Enfield that would put increasing pressure on existing services and facilities. Many of these developments could take place without fully understanding of the needs and requirements of these local communities, since the extensive masterplanning process that is proposed in the draft Local Plan would not take place. Therefore, providing a minimum of deliverable 25,000 new homes (preferred option) will help guard against speculative Green Belt proposals. With this approach, the Council will ensure to make the best use of land within the Borough, ensuring development is planned and implemented in the most appropriate way and in the areas of best potential.

### Strategic Policy SP H1: Housing Development sites

We support the site allocations put forward in SP H1 of the draft Local Plan. The evidence provided clearly demonstrates that the allocated sites would meet the required housing supply necessary for the plan period. The previous discussion also highlighted the exceptional circumstances that justify Green Belt release. In this sense, we support the Green Belt allocations proposed in this policy and condone the placemaking areas as the most appropriate method to release Green Belt land to meet the housing need without compromising the wider strength and quality of the Enfield Green Belt as a whole.

### Strategic Policy SP H2: Affordable housing



We also support the policy set out regarding affordable housing. Our proposal at Trent Park Equestrian Centre will be policy compliant with respect to affordable housing and this will help to make a significant contribution towards the housing affordability issues that are evidenced within the draft Local Plan.

#### Policy DM H5: Supported and specialist housing

We strongly support the Council's intention to ensure a sufficient choice and supply of SHOP units over the plan period. It is imperative that the more vulnerable groups of Enfield's demographic have access to suitable accommodation for their needs and the policy clearly sets out that the Council intends to achieve this.

However, we would recommend some changes to the policy to ensure that sufficient provision of SHOP units is achieved. The draft policy currently fails to provide a clear singular target which will be used to monitor and assess the supply over the plan period. The discussion section after the policy wording indicates that 1,242 SHOP units and 755 residential care units are figures provided in the evidence base, but this is also at odds with the London Plan annual benchmark of 195 SHOP units per annum for Enfield. In order to improve the strength of this policy, we would recommend including the London Plan target clearly within the policy wording to demonstrate that there is a transparent level of need to which the Council will be working. The importance of this point is illustrated by the fact that only 130 SHOP units have received planning permission since 2017, far below the required amount based on the London Plan target. There is clearly a critical need for SHOP units to be provided within the Borough and the draft policy DM H5 could be improved to help address this.

In relation to our site, the policy outlines that there should be a range of SHOP accommodation to suit different financial circumstances and to allow people to live independently as long as possible. The two SHOP elements of our scheme clearly contribute towards these criteria with a significant proportion of affordable units to be provided in the Anchor Hanover scheme. In this sense, the proposal clearly would make a meaningful and significant contribution to the evidenced SHOP need within the Borough.

One of the criteria for specialist housing developments, set out in Policy DM H5, is that developments must "offer easy access to community facilities, is accessible to public transport, workplaces, shops and services appropriate to the needs of the intended occupiers." This criteria is vitally important as it ensures residents, who may have lower mobility levels than the wider public, are still able to access key day-to-day services and facilities. However, this requirement does mean that suitable sites for specialist housing will be rarer and less frequent. Therefore, when opportunities such as the proposal at Trent Park Equestrian Centre are available they should be viewed very positively by the Council and supported. Ensuring an adequate supply of suitable sites will be challenging but is something the Local Plan should take extra steps to prepare.

## **Chapter 13 Movement and Connectivity**

Chapter 13 includes important policies relating to sustainable transport, connections and active travel that underpin the draft Local Plan's focus on achieving sustainable development. We support the policies and the aims they promote within the Local Plan, and therefore agree with the wording and approaches as a whole. With the ever-growing pressure to combat climate change, promoting sustainable and active lifestyles is vitally important for all aspects of the Local Plan.

#### Strategic Policy SP T1: Promoting sustainable transport

Draft Strategic Policy SP T1 supports new development that promotes sustainable modes of travel, reduces traffic, improves safety and environmental quality and supports business. New development is also expected to be car-free (or offer a low level of parking provision) and support complementary measures. We feel this is crucial for the Local Plan to promote sustainable development and new housing and employment land should only be developed in sustainable locations. Therefore, this policy seems positively worded and seeks to achieve key aims of the Local Plan.

#### Policy DM T2: Making active travel the natural choice

Draft Policy DM T2 will be expected to reflect the 'healthy streets approach' (set out in the Transport for London's healthy streets toolkit). Development should be prioritised that encourages active modes of transport and increases cycling and walking for shorter journeys (under 2km). Proposals under this policy are expected to promote road safety and safer cycling and pedestrian movement which can be achieved through improved sustainable access and routes to local services. There will be a significant opportunity to contribute towards improving the active transport networks around the Borough through the various placemaking areas identified in the Local Plan. It is important that a strategic and holistic view is taken to ensure that the improvements made are well-designed and provide meaningful benefits for residents.

Turning to sustainability and the Chase Park Placemaking Area, the Sustainability Movement and Connectivity place-making principles outlined in SP PL10 indicates that "*Development must maximise opportunities for sustainable and active travel*" and that "*the range of...services and facilities within reach of Chase Park provides an opportunity for it to be... a place that facilitates active and sustainable lifestyles.*"

Principle 15 of the draft allocation states that development should be delivered to provide easy access to existing local centres at Oakwood, Enfield Chase and the major centre at Enfield Town. The site, owing to its location in the southwest corner of the Chase Park area, benefits from the greatest existing levels of access to the services and facilities identified in the draft policy, in particular Oakwood local centre. Within 50m southwest of the site a parade of shops is located along Bramley Road. These include a post office, pharmacy, community library, Tesco Express, launderette and other services. These facilities provide key services within walking distance, such that day-to-day needs can be sustainably met for any potential development. Therefore the site is developable in the short term with clear sustainability benefits already present.

The site also benefits from access to bus stops and a major cycle route located along Bramley Road, immediately adjacent to the site. Oakwood underground station, with services along the Piccadilly Line, is within 350m. This provides strong access to a variety of transport options, with multiple public transport connections within walking distance of the site.

In a previous submission, we assessed all Green Belt sites promoted to the Local Plan based on the Public Transport Access Level (PTAL) rating to assess the comparative merit of the site at Trent Park Equestrian. This assessment showed that the site was the most sustainable Green Belt site being promoted in terms of access to public transport. The PTAL rating for the site is 3, with the land immediately to the west being PTAL zone 4. No other Green Belt sites being promoted to the Local Plan were higher than a PTAL 2 rating. This means the site has the highest level of access to public transport connections of the Green Belt land that is being promoted for development in the Plan process.

Overall, the site's location and proximity to services suggest that most needs can be met within walking distance of the site. Furthermore, the site has direct access to countryside walks for leisure. The wide range of public transport, local amenities and facilities demonstrates the sustainability of the site. Therefore, the site is clearly suitable for residential development with the potential to make a significant contribution to Enfield's housing need without compromising the key sustainability factor of the wider spatial strategy and vision for the Borough.

It has already been demonstrated that the site is within walking distance of a vast selection of shops, services and public transport connections. Therefore, it can clearly be considered to exceed the draft policies (T1 and T2) pertaining to transport and sustainability. Overall, the site is highly sustainable and so should be positively viewed in terms of its potential to deliver a substantive contribution towards Enfield's housing need. We would strongly suggest that the site could act as an exemplar of sustainable Green Belt sites that are ideally situated for residential development.

## **Conclusion**

Overall, we strongly support the steps taken in the draft Local Plan in addressing the significant development needs of Enfield in a sustainable and positive manner. We have addressed some key policies which we support and also indicated where improvements could be made in this response. We have also included detailed discussion of the Chase Park Placemaking Area and our site, Trent Park Equestrian Centre. We support the Council in its decision to deliver in the region of 25,000 new homes over the plan period and believe the allocations, policies and justification set out in the draft Local Plan largely demonstrate the spatial strategy will achieve sustainable development across Enfield.

This statement has established that the creation of the Chase Park Placemaking Area will provide a unique opportunity for the Borough to deliver a significant portion of its housing need whilst creating a sustainable community that will be of benefit to both the existing and future residents of the area. The proposal will respect the topography of the exiting landscape

and deliver environmental benefits such as flood water management, biodiversity net gain and improving public access to the nearby countryside, such as Trent Park.

The redevelopment of Trent Park Equestrian Centre, a PDL site, provides a spatial opportunity to minimise Green Belt harm within the area. It also has the highest PTAL rating of all Green Belt sites promoted to the Local Plan thus far, and represents the most sustainable Green Belt option in terms of access to public transport, services and facilities. In line with Paragraph 142 of the NPPF, where it is exceptional circumstances exist to justify Green Belt release, land that is PDL and/or has good access to public transport should be prioritised. The site meets both of these criteria and so should be considered a top candidate for allocation. Therefore, we support the council's draft plan in including the site within the site allocations.

The proposal would make a significant contribution to the 25,000 net additional homes to be delivered across the Borough and the 3,000 dwelling target given to Chase Park as specified in the Draft Local Plan. The scheme, which includes specialist housing for older people, would provide for a spectrum of residents. The proximity to Oakwood tube station and its connections to the Underground is ideal for commuters whilst the provision of SHOP units will meet a specialist need within the Borough. Therefore, the site contributes towards addressing a range of the identified housing need.

The proposed development, in principle, would demonstrably be a meaningful addition to the new Chase Park Placemaking Area, helping make a significant contribution to established need for housing in the Borough. Furthermore, the sustainability and low requirements for new on site infrastructure mean the site would be able to deliver housing in the short-term. Therefore, it is considered that the site should be included as an allocation in the emerging Local Plan.



Lansdown