

Enfield Local Plan

Crews Hill Topic Paper

March 2024

www.enfield.gov.uk/enfieldlocalplan



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Appendix: List of Meetings with Stakeholders on the Placemaking Study

1. Introduction

- 1.1 The Council has prepared a new Enfield Local Plan which will set out how the communities and places across the borough will develop between 2019 and 2041. The Council's current development plan will be replaced by the new Local Plan.
- 1.2 The draft Enfield Local Plan sets out the vision for the borough to address the challenges and opportunities it faces over the new plan period (2019-2041). To achieve this vision the Plan sets out a number of strategic objectives, strategic policies and more detailed policies to direct future development. The borough of Enfield is set to go through a period of growth, change and development with a focus on main town centres, transport corridors & stations, housing estate renewal and regeneration programmes in order to increase its housing supply to meet identified local needs.
- 1.3 The Local Plan makes provision for approximately 34,700 homes to meet future needs focused on four placemaking areas of Meridian Water, Southbury, Crews Hill and Chase Park. Crews Hill and Chase Park are located in the north of the Borough. They are unique in their capacity to accommodate a high proportion of new family housing as part of two large-scale strategic areas for future growth. Whilst they will function as standalone communities there is an inter-relationship between the two and opportunities for wider benefits due to their location and scale. They are located close to the Gordon Hill line and together bring a critical mass to assist with service improvements. Located within the rural transformation area there are opportunities for the two areas to play a key role in the Council's wider plans for rewilding and nature recovery and improving access to the countryside and meeting the strategic objectives set out in chapter 2 of the Plan under "A Deeply Green Place".

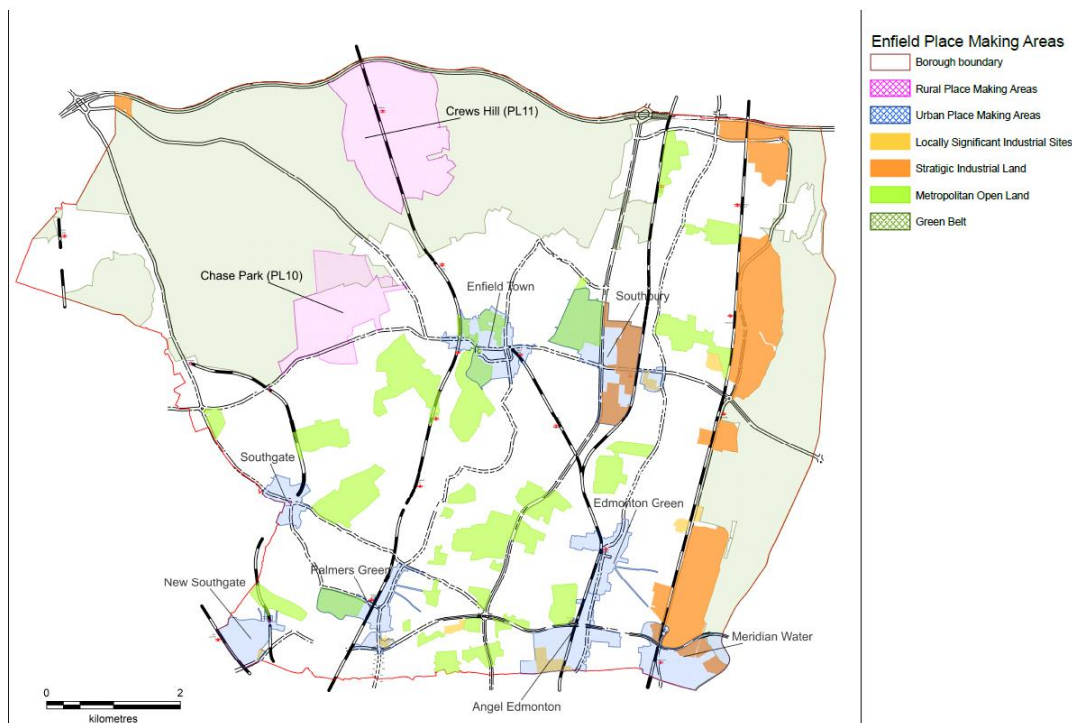


Figure 1 Map illustrating all of the proposed placemaking areas across the borough

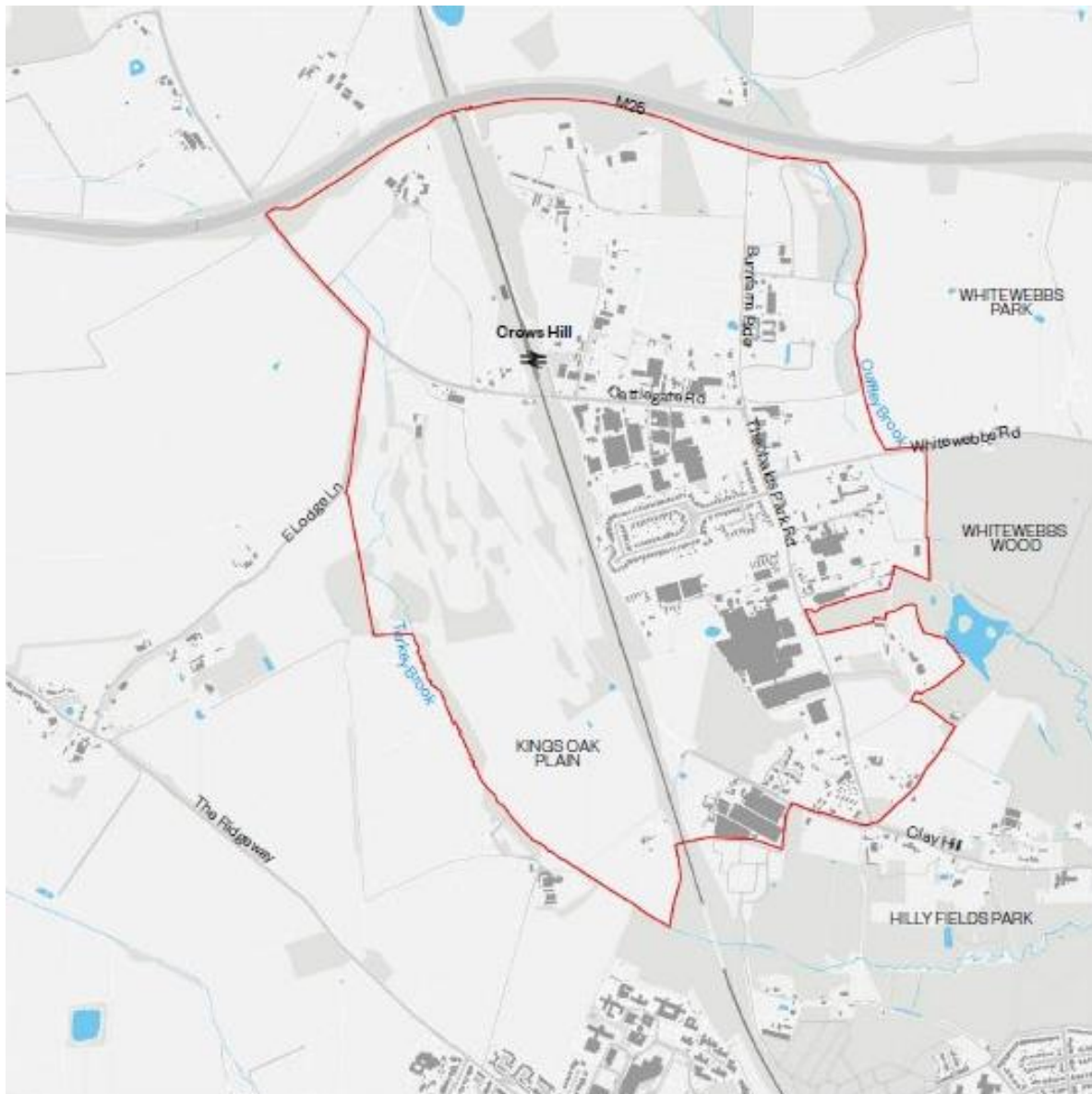


Figure 2 Plan illustrating extent of the Crews Hill Placemaking area

- 1.4 This topic paper relates to Crews Hill, an area where there is a small residential community and cluster of businesses including garden centres and associated uses in close proximity to an existing train station which is underutilised. The proposals within the plan propose expansion and redevelopment here to form a sustainable rural gateway settlement providing access to the countryside and surrounding mosaic of green and blue spaces and networks. This area represents a significant opportunity for the Council to deliver the ambitious vision for a new sustainable neighbourhood of around 5,500 homes (with an estimated 3,350 within the plan period) in this northern part of the Borough. The creation of a significantly expanded neighbourhood at Crews Hill provides the opportunity to deliver a significant number of affordable family homes to meet identified need and will also enable delivery of

services, facilities and related infrastructure to support both existing and new communities here.

Purpose, Scope and Content of the Topic Paper

- 1.5 The purpose of this topic paper is to provide the background to the preparation of the allocation at Crews Hill and it sets out the approach taken to:
- consideration of policy options in terms of national policy and guidance and other relevant policies and strategies
 - the wider Local Plan evidence base of particular relevance to the Crews Hill area.
 - feedback from engagement and consultation
 - the site baseline context;
 - the evolution of the spatial strategy
 - consideration of the approach to key issues/opportunities – physical, environmental, movement and connectivity and social matters
 - next steps to planning and delivery
- 1.6 This Topic Paper acts as an overview of work undertaken and will signpost the reader to other documentation for further detail and information. It is one of a suite of Topic Papers prepared by the Council. It should be read alongside the Crews Hill Placemaking Study. To help inform and define the placemaking area, the associated areas of Green Belt release, potential development capacities and infrastructure requirements as well as the overarching vision for the site, the Council commissioned a Crews Hill Placemaking Study to be prepared. The study is a key part of the background evidence and it explored the potential spatial options and concepts to deliver the vision, objectives and overall policy requirements. The study also considered the overall potential scale, density and typologies of development for delivery within and beyond the local plan period (i.e. beyond 2041) and to ensure that the proposed level of growth could be successfully accommodated on site. The study included a baseline transport analysis, baseline heritage assessment, baseline landscape sensitivity and baseline ecology study.

2. Planning Policy Context

National Planning Policy (2023)

- 2.1 The December 2023 National Planning Policy Framework (NPPF) sets out the Government's planning policies for England with sustainable development at the heart of the planning process.
- 2.2 The NPPF (Dec 2023) confirms it is a plan led system, emphasising the importance of "Preparing and maintaining up-to-date plans" (paragraph 1). It states that plan making should contain strategic policies that should:
 - Promote a sustainable pattern of development that seeks to: meet the needs of the area; align growth and infrastructure; improve the environment; mitigate and adapt to the effects of climate change.
 - Should as a minimum, provide objectively assessed needs for housing and other uses, as well as any needs that cannot be met within the neighbouring areas (paragraph 11).
- 2.3 Paragraph 74 of the NPPF recognises that the provision of large number of homes can often be achieved through planning for large scale development, provided they are well located and designed and supported by the necessary infrastructure. The paragraph goes on to say that planning authorities should:
 - Consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and scope for environmental gains;
 - Ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment);
 - Set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles) and;
 - Make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation.
- 2.4 The NPPF (Dec 2023) requires Local Planning Authorities to plan for the Objectively Assessed Housing Need for their areas. This is to be done using the "Standard Method". This is currently 3,239 homes per annum. However, Planning Practice Guidance states that the responsibility for overall distribution of housing need in London lies with the Mayor, as opposed to individual boroughs, so there is no policy assumption that this level of need will be met within the individual boroughs.

The London Plan (2021)

- 2.5 The London Plan 2021 was adopted in March 2021 and is the Spatial Development Strategy for Greater London, which provides the framework to address the key planning issues facing London and promotes the Mayor's vision for Good Growth over the period 2019-2041. This 'Good Growth' approach underpins each of the policy areas within the London Plan. The Plan sets out the following six objectives to

improve the health and quality of life for all Londoners, to reduce inequalities and to make the city a better place to live, work and visit:

- GG1: Building strong and inclusive communities, promotes inclusive growth by planning with communities, both new and existing to erode inequalities.
- GG2: Making best use of land, facilitate sustainable growth while protecting and enhancing Green Belt, directing growth towards the most accessible and well-connected places, making the most of existing and future public transport, walking and cycling networks.
- GG3: Creating a healthy city, there is an urgent need to reduce London's health inequalities. Mental and physical health of Londoners is, to a large extent, determined by the environment in which they live.
- GG4: Delivering the homes Londoners need, creating mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including specialist housing and support the strategic target of 50 percent of all homes being genuinely affordable.
- GG5: Growing a good economy, to conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners.
- GG6: Increasing efficiency and resilience, successful cities must adapt to a changing world, a responsible city must limit its impact on climate change while adapting to the consequences of the environmental changes that human behaviour is already creating.

2.6 The London Plan sets out housing targets for each of the London Boroughs. Whilst the plan covers the period 2019 to 2041, it only includes detailed housing targets for the first ten years of the Plan. This is because it is based on capacity of land suitable for residential development and intensification in the 2017 Strategic Housing Land Availability Assessment which did not attempt to identify capacity beyond 2029. It then directs local authorities to include the relevant borough level targets within their local plans.

2.7 Policy H1 provides a target for Enfield of 12,460 homes between 2019/20 and 2028/29. Policy H1 says boroughs should prepare delivery focused Development Plans, optimise the potential for housing delivery on all suitable and available brownfield sites, and establish ambitious and achievable build out rates. The Plan states that if a target for housing provision is needed beyond 2029 then boroughs should draw on the 2017 SHLAA findings and any local evidence of identified capacity. It is important to note that the London Plan housing targets do not meet objectively assessed housing need as calculated using the standard method, and the examiner noted at the London Plan examination that a review would be required to commence upon adoption of the London Plan to ascertain how this gap can be met.

Correspondence between Secretary of State and Mayor of London

2.8 On 18 December 2023 Rt Hon Michael Gove wrote to Sadiq Khan due to the fact that housing delivery in London is not only short of need as calculated by the standard method (by 63,500 homes) but also short of the London Plan housing target by 15,000 homes per annum. In his letter Gove set out that *“Due to the significant shortfall in housing supply and under delivery of housing in our capital, I have concluded that it may be necessary to take further action now, as a matter of urgency, to make sure London is delivering the homes our capital needs.”* Since then, an expert panel was appointed to review potential barriers to housebuilding in the London Plan. Their report was published on the 15th January 2024 ([London Plan Review \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1212122/london-plan-review-report-15-jan-2024.pdf)) and confirms an undersupply of housing against targets. The Government response is to encourage further brownfield development. It is within this context that LB Enfield have been preparing their emerging Local Plan.

3. Enfield Local Plan

3.1 The Plan has evolved over a number of years and has been through the following stages:

- Preliminary consultation on the Local Plan (2015)
- Regulation 18 Issues and Options consultation (2018)
- Regulation 18 Draft Plan: Main Issues and Preferred Approaches (2021)

Response to consultations

3.2 The Council undertook a consultation exercise in 2015 (preliminary consultation) and sought views on options for meeting future development needs. One of the options it included was considering development within the Green Belt. There was a preference for developing industrial land (87%), followed by developing at town centres (60%), developing at transport hubs and growth areas (37%), developing at existing Green Belt settlements (12%), and to continue with the existing local plan (11%). Protection of Green Belt land and open spaces received high levels of support, partly balanced by some views which supported development on some green spaces.

3.3 The Enfield Conversation in 2017 engaged a wider mix of residents beyond those traditionally engaged in the plan making process and provided residents with an informed position on the challenges of how to secure more housing and the trade-offs involved. The feedback indicated that some residents were willing to consider some Green Belt land for development, recognising that not all Green Belt is open countryside and especially if this meant quality family homes at lower densities can be delivered. Other feedback preferred accepting higher densities, especially around town centres and transport hubs, where they can have better access to open space, and preferred the Green Belt to be protected from new development.

3.4 These consultations helped the Council to prepare a full Draft “Issues & Options” Local Plan for (Regulation 18) consultation in 2018. This version suggested the need to revisit Green Belt boundaries in line with the NPPF to promote sustainable patterns of development to meet growth. The option stated that “the existing settlement around Crews Hill station has the greatest potential to act as a hub for sustainable growth. The surrounding area has good access to Crews Hill station, which could provide a highly accessible location for an expanded residential neighbourhood, reducing reliance on the private car”.

3.5 The key general points of relevance to Crews Hill raised in response to the 2018 consultation were:

- Objection to release of Green Belt to meet housing needs and impact of development on Metropolitan Open Land, although some respondents felt it was justified to provide more affordable housing
- Current infrastructure inadequate and so insufficient capacity to support new development, especially public transport, hospitals, and schools

- The canals and waterways represent a significant, under-exploited, opportunity
- Concern on impact of high-density development and tall buildings, especially on heritage assets

3.6 In June 2021, the London Borough of Enfield published a further draft Local Plan (Regulation 18). This took forward the outcome of the previous consultation together with additional evidence that the Council had gathered, including a placemaking study to consider the context and opportunities at Crews Hill¹. This iteration of the plan included a specific Chapter on 'Place', introducing a small number of key strategic 'Placemaking Areas' and associated policies. The Crews Hill Placemaking Area was included within the document for consultation. The draft plan included a concept plan and vision for the area. The draft policy set out key principles to guide future development.

3.7 The Council received 7,267 responses to the consultation overall. Details about the comments made are included in the Regulation 18 Consultation Statement (April 2023²). Many responses raised similar general issues to the 2018 consultation. The responses from key stakeholders most pertinent to the proposed Green Belt release at Crews Hill were:

- The GLA highlighted the need to justify exceptional circumstances for Green Belt release given the likely harm is very high and the area has a low PTAL (Public Transport Accessibility Level) score
- Transport for London expressed concern over the low PTAL score, challenge of providing sufficient sustainable transport modes, and the risk of creating a car dependent place
- The site landowners and developers support the principle of the allocation but specified a desire for the final policy to be informed by a masterplan which should identify the scale of land to be released and what infrastructure is necessary
- Local groups and MPs raised concerns about impact on the local economy from redevelopment of the garden centres, and also highlighted the historic importance of Enfield Chase
- Hertfordshire County Council supported the allocation and expressed an interest in participating in masterplanning work, particularly in relation to education, but that Hertfordshire would be unable to accommodate any increase in demand for school places
- Welwyn Hatfield Borough Council opposed the allocation on concerns over the level of harm that will result to the Green Belt.

¹ https://www.enfield.gov.uk/_data/assets/pdf_file/0018/11907/Crews-Hill-Topic-Paper-LBE-2021-Planning.pdf

² https://www.enfield.gov.uk/_data/assets/pdf_file/0012/53103/Enfield-local-plan-reg-18-consultation-statement-Apr-23-Planning.pdf

- LB Barnet supported the overall spatial strategy and cross boundary east-west links for active travel and public transport.
- Need for affordable housing to support Enfield as a place for future opportunity
- Provision of housing to address the local needs
- New housing needs to be properly supported by infrastructure
- Concerns were raised about developing homes in relation to Green Belt release, emphasising Green Belt should be a last resort.
- Need for improved east west movement in Enfield and active travel and car free development
- Concerns regarding community spaces which should be planned into new developments from the outset

3.8 Further engagement work has since taken place with statutory consultees and key stakeholders since publication of the 2021 Draft Plan, and additional evidence has been prepared by the Council. Specific engagement in relation to the Crews Hill Placemaking Area is detailed in the Placemaking Study and referenced below.

4. Site Selection

- 4.1 Potential for development within the Crews Hill Placemaking Area has been considered throughout the process of preparing the New Enfield Local Plan. The Site Selection topic paper (2024) sets out the full detail on the methodology that has been used to select sites.
- 4.2 Table 3.1 below provides an overview of the approach to selecting sites at Crews Hill, and the overall position at each stage of the process. More details on the approach, the key considerations and activities at each stage is explained fully in the Site Allocation Topic Paper (2024).

Table 3.1 Crews Hill Site Selection & Assessment Process

Calls for sites	Sites have been put forward within the Placemaking Area for consideration at multiple stages of preparing the Local Plan
Stage 1: Identification and initial sift of sites	<p>The Council has considered sites in the Crews Hill area against absolute and non-absolute constraints. The size and capacity of sites was a further consideration to ensure that sites could make a contribution towards a place-based approach to development in the area.</p> <p>A 'Strategic Housing Land Availability Assessment' (SHLAA) was initially prepared in 2020. This identified the majority of land around Crews Hill as being 'potentially developable'. Some constraints were identified, primarily in relation to the river valley flood zones.</p> <p>The Council then prepared the 'Housing and Economic Land Availability Assessment' (HELAA) in 2021 which also identified the majority of the sites as being 'potentially developable'.</p>
Stage 2: Promoting a Sustainable Pattern of Development	<p>All sites were considered on a sequential approach directing growth to specific locations, based on the overall hierarchy which to firstly prioritise land in the urban area, then to prioritise land in the most accessible Green Belt locations (with a Brownfield first approach), then to prioritise land in the least accessible Green Belt locations (with Brownfield first).</p> <p>Crews Hill is considered to be an accessible green belt site, which contains a blend of brownfield and greenfield land. It was considered to have potential to create a new sustainable community, to enhance and enable a range of local services and facilities to be provided. The area benefits from a direct rail connection to central London and out towards Hertfordshire.</p> <p>In terms of prioritisation this led to the site being considered as having potential for allocation, subject to alignment with the emerging spatial strategy.</p>

<p>Stage 3: Detailed Planning Assessment (Consideration of technical constraints & consideration of other non-absolute constraints).</p>	<p>This stage concentrated on non-absolute constraints, how each site performed against them and whether constraints could be overcome. Rather than assessing sites against a range of quantitative standards, each site was considered qualitatively against each constraint.</p> <p>Whilst some localised constraints exist, sites at Crews Hill were not considered to be sufficiently constrained for them not to move forward through the process. Due to the scale of development in this location, and the need for any growth of this scale to be supported by further guidance if taken forward, it was considered that there would be opportunity for technical constraints to be overcome through careful planning and design.</p>
<p>Stage 4: Integrated Impact Assessment (to identify any significant negative effects that may require mitigation if site is put forward for allocation)</p>	<p>The decision-making on which sites to take forward for potential allocation was fully informed by the overall outcomes of the IIA testing as a qualitative assessment, as well as by other evidence that emerged through or outside of the site assessment process. The Crews Hill broad location (BL1) was initially tested through the IIA process. The IIA findings for site options (Appendix F) identified that sites within the Crews Hill area could deliver a range of positive effects, such as towards housing, access to recreation, supporting access to services and facilities, as well as employment provision. It was also identified that there could be the potential for a range of negative effects on a number of objectives, such as biodiversity, heritage, landscape/townscape and others.</p> <p>Through an iterative process of policy development a range of mitigation has been established as part of the development of appropriate policies for the area. The IIA findings for policy SP PL11, are set out in a policy-off and policy-on basis to enable a comparison. Table 5.11 of the IIA, indicates that a far greater range of objectives could result in positive effects, with only two objectives concluded as likely to have negative, and two others as mixed or uncertain effects.</p>
<p>Stage 5: Testing Deliverability</p>	<p>This stage considered whether or not each site was deliverable and the timescales and phasing of delivery. The starting point was the assessment of achievability contained within the HELAA.</p> <p>A large number of sites at Crews Hill are being actively promoted by landowners & developers. The Council are working via a 'Developer Forum' to bring the interested parties and work towards establishing appropriate approaches to phasing and to achieve comprehensive development. The Councils viability evidence demonstrated that development in the area could be viable.</p>

	Discussions will be ongoing with developers and landowners via the Developer Forum, with a key emphasis on securing a comprehensive approach.
Stage 6: Overall Conclusion & identification of preferred site allocations	<p>The final stage of the process drew conclusions and makes recommendations about the suitability of each site for inclusion in the New Local Plan.</p> <p>Overall, the Crews Hill Placemaking Area and the various sites within it were considered appropriate to move forward, with the placemaking and site allocations policies including appropriate requirements to mitigate impacts, ensure a comprehensive approach is adopted, and ensure deliverability.</p>

- 4.3 Overall, it is considered that development in this location provides a unique opportunity to deliver a strategic scale growth that will provide for a significant proportion of the Borough’s housing needs.
- 4.4 The area is capable of delivering a good proportion of affordable and family homes in a sustainable location – to help contribute towards meeting a specific need that is not readily achievable within the urban areas, whilst utilising a mixture of previously developed land and lower quality greenfield land in a location well connected to public transport.
- 4.5 The scale of development will be sufficient to support essential facilities that are required to make a small self-sufficient settlement including new retail and community facilities, and the potential for new primary schools and a secondary school.
- 4.6 Change and new development in the area can take advantage of Crews Hill Railway Station which provides direct access into London and out across Hertfordshire. The station is currently under-utilised and provides a significant opportunity for enhancing the sustainability of the proposals. The expansion of the existing bus network, linking into the railway station will also enhance the existing network to provide a comprehensive public transport network for all existing and future residents. A comprehensive approach to redevelopment also provides the opportunity to create a network of active travel routes and corridors, linking new centres of activity with travel nodes including the station.
- 4.7 Crews Hill has been identified in the Plan as it provides a unique opportunity to deliver a strategic scale new settlement served by new and improved sustainable transport connections and can provide for a significant proportion of the Borough’s housing needs, both within this Plan period and beyond.

5. Baseline (incl planning history)

Local Context and Character

- 4.1 Crews Hill lies within the rural north of the Borough, it sits on higher ground surrounded on all sides by valleys. There is an existing population of approximately 550 (Census 2011).
- 4.2 Existing development within Crews Hill comprises predominantly of horticultural uses, garden centres and nurseries, storage of building supplies with some residential properties, which have materialised generally in a fragmented way (see Figure 3).

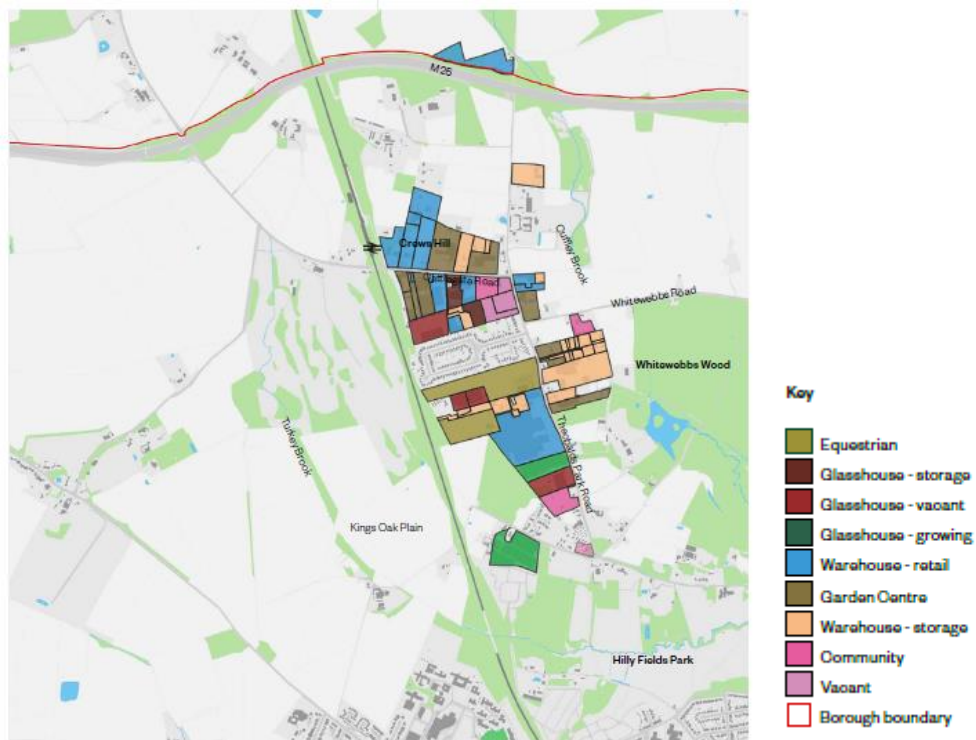


Figure 3 Map illustrating non-residential land uses at Crews Hill

Landscape and Topography

- 4.3 The Crews Hill area sits on higher ground on a ridge that is broadly aligned north to south. The railway line, roads and existing development within the area all run along the ridge of the land which forms 'Crews Hill'. Due to the valleys, there are views to the east, west and south from different locations around the area.
- 4.4 The fields drain into the Turkey and Cuffley Brooks. The railway cuts sharply through the landscape in places. The M25 is generally elevated. Areas to the east of the railway are flatter and provide large sites accommodating agriculture (grazing land), horticultural and industrial activities.

4.5 Due to topography, access and surrounding landscape character, the Crews Hill area is distinct from other built form in the north of the Borough. The Turkey Brook valley running from west to east reinforces the separation of the area with much of the space in and around the valley accessible to the public (Hilly Fields) and incorporating Cycle route 12.

Land use and planning history

- 4.6 There are a mix of land uses in the area with a significant use being commercial as shown in figure 1 above. The uses can be categorised into four groups:
- Residential – The housing is minimal and exists as isolated groups of houses. These include the post-war suburban development on Rosewood Drive and linked residential cul-de-sacs, and the group of houses that define the linear settlement of Clay Hill, to the south of the area.
 - Agricultural – comprising private farms and their associated buildings, including farmsteads, outbuildings and sheds.
 - Commercial – comprising public or commercial land, such as warehousing, isolated car garages, garden centres and plant nurseries.
 - Managed landscapes – comprising public parks that have been designed and landscaped to varying degrees, including Lavender Hill Cemetery and Hilly Fields Park.
- 4.7 The commercial uses are contained within linear plots aligned north to south along Cattlegate Road and East to West along Theobalds Park Road. These are a mix of equestrian, glasshouse, warehousing and garden centres. Residential uses are focused on Rosewood Drive which is also aligned east west from Theobalds Park Road. Other uses include the golf course and grazing land.
- 4.8 Development within the main built-up area along Cattlegate Road and Theobalds Park Road has mostly been to support or enhance the existing garden centres and other commercial uses typical to the area. There has been some diversification of the type of business in the area. Applications for change of business to a similar or lighter intensity of industry have generally been approved, whereas applications for heavier industrial use have been resisted.
- 4.9 Within the residential area at Rosewood Drive development has mostly consisted of householder applications, which tend to be permitted where there is not significant impact, such as single storey extensions.
- 4.10 The northern edge of the area, south of the M25, has been subject to unlawful development which has impacted the openness of the Green Belt. Applications for further development in this area have been refused to avoid additional impact due to the Green Belt designation.
- 4.11 West of the railway there has been little development due to the Green Belt designation of the area and the existing Crews Hill Golf Course.
- 4.12 The North London Waste Plan identifies an existing waste site at Crews Hill. The site is located at Kingswood Nursery, Theobalds Park Road and is 0.3ha in size.

Policy 1 in the Waste Plan safeguards all existing waste management sites, of which this is one, for waste use. The spatial framework and policy take this into account and does not rely on the site for other uses. The design of future development will need to take the existing waste site into account, particularly with regards to amenity. Any potential change to the use of this site will need to be in accordance with the policy requirements in the Waste Plan. (See Figure 4).

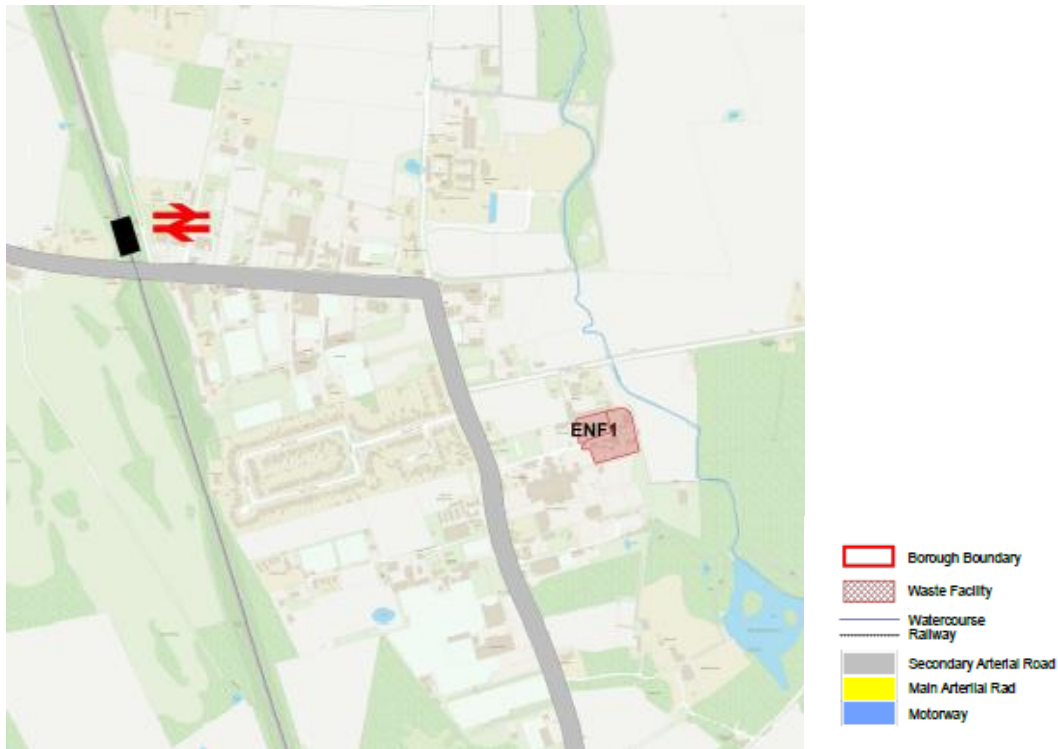


Figure 4 Designated and Protected sites for Waste Management at Crews Hill

Utilities

Gas

- 4.13 There is gas infrastructure within the site to which appropriate easements will need to be applied. National Grid guidance indicates that the easement distance applicable to the LHP gas pipelines is 6m (3m either side of the pipeline). No excavation, planting of substantial shrubs and trees, or construction of buildings are permitted over the gas mains or within their easements. An additional adjoining 3m is typically applied to the easement either side of the pipeline to allow for future maintenance access (i.e. 12m in total).
- 4.14 Cadent asset record plans document the presence of Low Pressure (LP) gas main networks being routed beneath the vast majority of public highways within and bounding the site. Cadent and National Grid asset record plans also indicate the presence of two strategic Local High Pressure (LHP) gas pipelines that operate at, or above, a pressure of 7 bar:
- 4.15 Romford – Stagg Hill North Orbital LHP Gas Pipeline traverses the southern extent of the Site in an east-west direction.

- 4.16 LHP Gas Pipeline is routed in a south westerly direction beneath the M25 motorway, a short distance outside of the northeastern boundary of the site.

Electricity

- 4.17 There is likely to be a requirement for secondary distribution substations on site alongside substation kiosks. There are High Voltage and Low Voltage networks routed beneath the majority of public highways within and bounding the area. There are numerous substations serving rail, commercial and residential premises off Cattlegate Road and Theobalds Park Road.
- 4.18 Underground HV cables and pole-mounted LV overhead lines are routed parallel to, and between, Cattlegate Road and Turkey Brook towards northwestern extent of the Site. HV and LV cables are routed beneath the northern verge of A1005 Ridgeway flanking the southern boundary of the site, linking to Rectory Farm Substation, around the southeastern site perimeter to Wildwoods Substation adjacent to the southeastern corner of the site. Overhead lines are routed east-west to the north of Whitewebbs Road adjacent to the eastern site boundary.
- 4.19 Underground LV cables are routed northwards to Owls Hall towards the north of the site. Some of these cables may need to be rerouted. Further detailed masterplanning work will be required to ascertain whether this is required. Should this be required it this is not expected to be an impediment to development
- 4.20 Extra High Voltage overhead lines route east to west at the northern portion of the site. These are not proposed to be rerouted or put underground. There are no prescribed minimum distances but the placemaking study has followed the National Grid design guidelines³.

Water and sewerage

- 4.21 There will be a need for new potable water connections (serving primarily the land west of the railway line) and off-site upgrades.
- 4.22 It is likely that there will need to be at least one new foul sewer connection to serve the land west of the railway line, pumping stations on site, and off-site upgrades. There are no significant diversions or modifications anticipated.

Heat network

- 4.23 There are existing heat networks within Enfield which is currently being extended to Enfield Town⁴. Energetik (an arm's length Council wholly owned company which seeks to bring about positive environmental and social outcomes) have confirmed that the proposed scale of development would make the inclusion of a network viable and that they have interest in expanding to the site.

³ [ASoP A4 AW\(27.05.03\) \(nationalgrid.com\)](https://www.nationalgrid.com/uk/energy/infrastructure/ASoP-A4-AW(27.05.03))

⁴ <https://energetik.london/how-it-works/enfield/#>

Land Ownership

4.24 There is fragmented land ownership (see

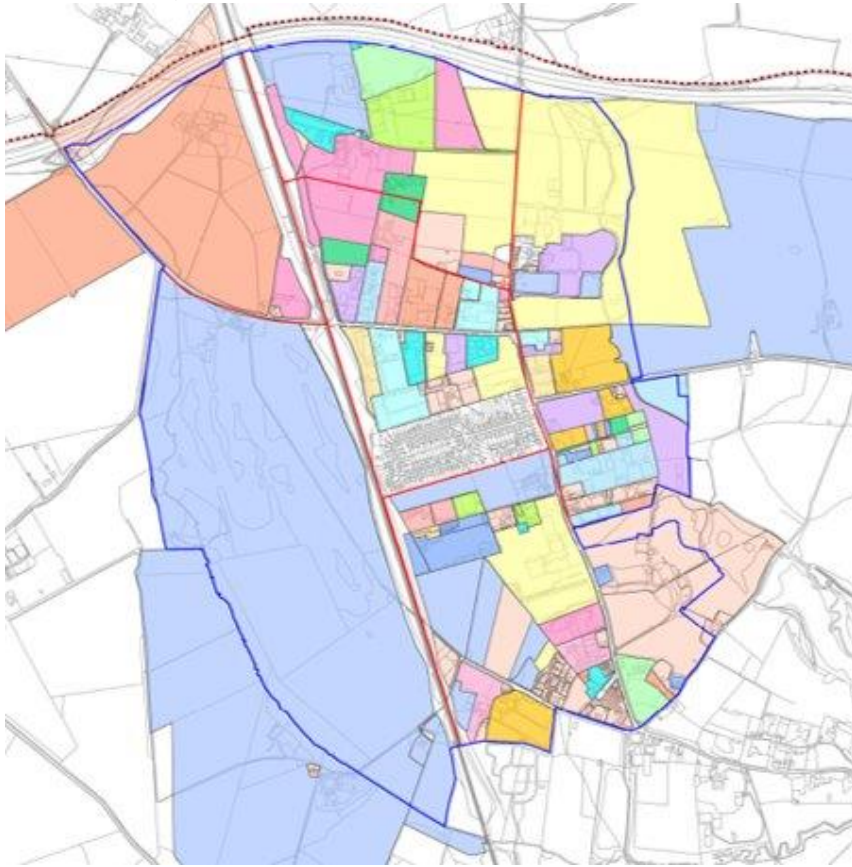


Figure 5) and the diversity of interests is challenging, particularly with regards to the coordinated delivery of an integrated and coherent place over time.

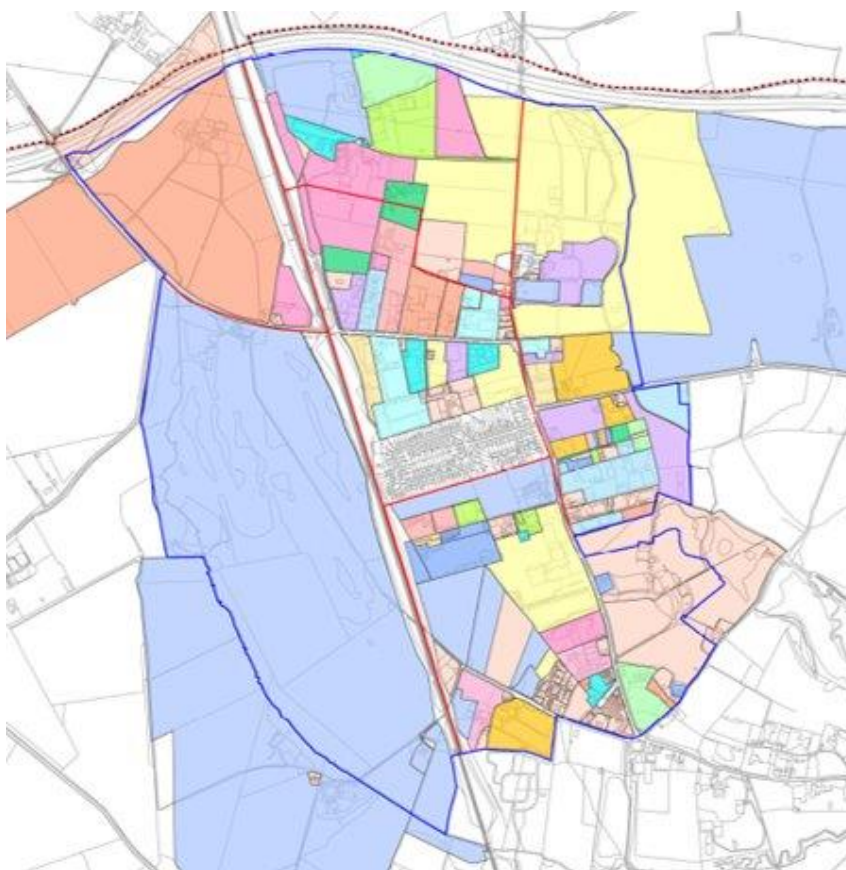


Figure 5 Plan illustrating number and complexity of land ownerships at Crews Hill

- 4.25 The multiple land ownerships reflect that the allocation is utilising brownfield land within the Green Belt. It also presents an opportunity for delivery to be accelerated with multiple outlets whilst being carefully managed in terms of establishing coherent placemaking.

Further evidence base

- 4.26 Since preparation of the regulation 18 Local Plan, further evidence base studies have been undertaken and these have also informed the preparation of the Placemaking Study and Spatial Framework. These include but are not limited to the following:
- Green Belt Assessment.
 - Landscape Sensitivity Assessment.
 - Ecology and Biodiversity.
 - Integrated Impact Assessment.

Green Belt assessment and Exceptional Circumstances

- 5.1 The Council has undertaken an assessment of Green Belt and Metropolitan Open Land (LUC, 2024). 3059ha or 37.3% of the Borough is Green Belt. The majority is in

the north-western part of the Borough between the built-up area and the M25 and the remainder lies in the East of the Borough adjacent to Lee Valley Regional Park.

- 5.2 The LUC study found that the lowest contributing Green Belt (to the five Green Belt purposes) within the borough “is either inappropriately developed Green Belt land where there is a distinct lack of openness, or particularly contained pockets of Green Belt associated with the inset urban area of Greater London and isolated from the wider open countryside”. The study states that “notable developed and isolated areas included: inappropriate developments associated with the commercial and industrial estates adjacent to the inset urban area of Crews Hill”.
- 5.3 The Exceptional Circumstances Topic Paper 2023 brings together all of the evidence on Green Belt issues and sets out both the strategic level case for exceptional circumstances to justify the Green Belt boundaries, as well as the sites specific reasons for Chase Park specifically. The strategic reasons for Green Belt release include:
- Appropriate growth and spatial option having considered other reasonable alternatives.
 - The release of land would bring forward a strategic allocation in the Green Belt in a sustainable location that accords with a rigorous site selection process and the spatial strategy of inclusive growth
- 5.4 In line with paragraph 147 of the NPPF (Dec 2023), the Plan sets out compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. There are specific enhancement projects proposed in areas of remaining Green Belt which are set out below:
- Making 23 hectares of land publicly accessible as a natural burial site at Sloeman’s Farm
 - Restoration of 50 ha of council owned former Whitewebbs golf course into publicly accessible parkland and wildflower meadows and creation of habitat bank at Whitewebbs Wood
 - Making at least 60 hectares of land publicly accessible around Rectory Farm
 - Reforesting at least 60 hectares of land with 135,000 trees
 - London Loop Path – converting a 3.3km footpath from Lavendar Hill to Hadley Road to a 3m wide bound gravel path
 - Creating 50 ponds and wetland scrapes to provide valuable habitats and nature recovery
 - Improvements to the brook corridors/Salmons Brook Restoration Project; including additional crossings of the brook corridors; additional footways, cycle paths and amenities
 - Facilitating improved access to the wider countryside and rural area in the northern part of Enfield
 - Improved countryside management.

- Further foot and cycle paths and other amenity features
- Rectory Farm Visitors Centre to include mountain biking trail centre, wild swimming lake, art trail, performance space and play features

Landscape Sensitivity

5.5 As part of the work to inform the Placemaking Study, the landscape opportunity and constraints were considered which informed the initial thinking for the placemaking study. A landscape sensitivity assessment was undertaken that further informed the placemaking study directing development to the areas of least sensitivity. The area of lowest sensitivity was the area along Cattlegate Road to the East of the railway line where there is existing built form. The areas of highest sensitivity were on the golf course and land to the south of it, and land to the east of Theobalds Park Road.

Ecology and biodiversity

- 5.6 Evidence on ecology at Crews Hill has identified, at a macro level, opportunities for linking with off-site habitats and the need to provide buffer zones to offsite habitats such as Whitewebbs Wood. It was also recognised that the site sits outside the 6.2km zone from the Epping Forest SAC therefore is not required to provide SANGS, although it is noted that Crews Hill could be a good location for SANGS to mitigate impacts of other developments on the SAC.
- 5.7 Furthermore, survey work was undertaken on 2 of the SINCS that are within the placemaking area. Development provides an opportunity to improve the condition and function of the SINCS. The study concluded that some development could be undertaken within the Golf Course SINC and Glasgow Stud SINC provided a mitigation hierarchy was followed. The placemaking study has been informed by this and sought to balance optimising development potential with protecting ecological value.

Integrated Impact Assessment

- 5.8 The previous two regulation 18 versions of the Local Plan have been accompanied by an Integrated Impact Assessment. The assessment incorporates the requirements of Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA). It aids the preparation of the plan by identifying positive and negative effects of the policies and any measures to mitigate against adverse effects. The 2023 IIA identified 18 objectives against which the plan could be assessed. Overall, a range of impacts from mixed significant positive to mixed significant negative effects were expected. It concluded that the site would generally make a very positive contribution to the following objectives:
- Climate Change Mitigation.
 - Housing.
 - Health and wellbeing.
 - Services and Facilities.

- Economy.
- Sustainable Transport.

6. Evolution of Proposals

Selecting the site

- 6.1 The proposed strategy for future development has been informed by the engagement with key stakeholders, the wider community, national and local policy and various studies and evidence.
- 6.2 The Council has determined that ‘exceptional circumstances’ exist to release land from the Green Belt for development. The related Exceptional Circumstances topic paper⁵ provides the relevant detail on the contribution this land makes to the purposes of the Green Belt and the potential harm arising from its release. In doing so, it also sets out clearly the exceptional circumstances which facilitate the release of the land, principally meeting identified housing need for family housing, in accordance with the requirements of the NPPF (Dec 2023), paragraph 145, and the potential to provide suitable mitigation and compensatory measures.
- 6.3 Work on site selection is summarised above in section 4 and detailed within the Site Allocation Topic Paper⁶, in accordance with a clear methodology and directing growth to the most suitable locations. Having identified opportunities for large scale development at Crews Hill, work has taken place to define the extent of development, the scale of development and the type of development in response to identified need and the opportunity to develop a high quality, sustainable place.
- 6.4 The Council has evaluated a full range of potential options to meet local housing needs and has concluded that developable and deliverable sites within the urban area will not fully meet the Council’s housing and employment needs. In particular, these sites are unable to provide the amount of affordable family housing needed due to site capacity and viability. Therefore, land beyond the existing urban area is required to meet specific housing needs, particularly the provision of affordable family housing. As a result, the Council considers that some sites will need to be released from the Green Belt, where this can be done in a sustainable way and where wider impacts can be minimised or mitigated and wider opportunities and benefits realised.
- 6.5 Delivery of strategic sites in the northern part of the Borough can present a significant opportunity for the delivery of new infrastructure, services and community facilities. This includes on-site provision to meet day to day needs along with strategic improvements including enhanced public transport, and sustainable movement and active travel, improved ecology/Biodiversity Net Gain, access to and improvement of quality landscapes, the wider countryside, as well as community facilities.
- 6.6 The Crews Hill area has been selected as a suitable strategic site allocation to help deliver the overall growth strategy given its potential to create a sustainable location given the existing station and bus services, and its high proportion of brownfield land within the Green Belt close to existing residential communities. Its location provides the opportunity to enable better use of the existing underutilised railway station. It can

⁵ Exceptional Circumstances Topic paper can be accessed here:
<https://www.enfield.gov.uk/services/planning/evidence-base>

⁶ https://www.enfield.gov.uk/__data/assets/pdf_file/0008/12140/Growth-topic-paper-LBE-2021-Planning.pdf

also enable a sufficient scale of development and capacity to support existing and new on-site infrastructure and placemaking objectives, that can deliver affordable family housing. The development of the Placemaking Area will provide improved access to natural green space and Enfield's wider rural landscape, including Enfield Chase and the London Loop. It will focus upon active and sustainable travel, enabling improvements to the existing footpath/cycleway and highway network, along with wider contributions and capacity for public transport improvements to the rail line.

- 6.7 To help inform and define the placemaking area, the associated areas of Green Belt release, potential development capacities and infrastructure requirements as well as the overarching vision for the site, the Council commissioned a Crews Hill Placemaking Study to be prepared. The study is a key part of the background evidence for Crews Hill and it explored the potential spatial options and concepts to deliver the vision, objectives and overall policy requirements. The study considered the overall potential scale, density and typologies of development for delivery within and beyond the local plan period (i.e. beyond 2041) and to ensure that the proposed level of growth could be successfully accommodated on site.

The Vision

- 6.8 The original vision for the site was set out in the Regulation 18 Plan. The additional placemaking work which has been informed by a wide range of evidence has informed further refinements to the original vision, which has been amended as follows:

The comprehensive redevelopment of the Crews Hill Placemaking Area will create a distinctive and sustainable new neighbourhood in North London, comprising of approximately 5,500 homes in total, together with a mix of other uses providing local services and facilities and benefitting from enhanced transport connectivity and access to green infrastructure.

Crews Hill will become an important place of arrival into the borough's rural transformation area, providing access to re-wilded landscapes, sustainable ecotourism, sport and recreation for the Borough's residents and visitors from further afield. Building on the area's horticultural and agricultural history, Crews Hill will accommodate new development within a healthy and inclusive environment supported by access to green space and nature. Development here will facilitate sustainable connections to the rest of the Borough and wider region along an east-west green corridor following the route of the London Loop.

Crews Hill will help to meet Enfield's development needs (in particular the need for more family and affordable housing). It will also provide wider benefits for Enfield's residents and visitors through enhanced connections to the assets of Enfield's rural transformation area. New housing and neighbourhoods integrated with the area's agricultural fabric, will create a vibrant and unique new identity for the area. Existing and new residents will benefit from an enhanced range of local services and facilities to address their needs, including

new and improved access to schools, employment opportunities and to open spaces across the wider rural area.

Defining the placemaking boundary

- 6.9 The Draft Local Plan (June 2021) identified Crews Hill as an opportunity for an expanded sustainable residential community and included a high-level concept plan with a suggested development extent. The initial Crews Hill Placemaking Study (May 2021) sets out how this was arrived at, using the existing context and landscape as a starting point, considering the opportunities around access, movement and accessibility to facilities and services to inform a high-level concept framework.
- 6.10 The 2021 work has been reviewed and refined to take account of new evidence and more detailed analysis, including engagement with landowners/developers. The most recent Crews Hill Placemaking Study (2023) details the considerations that were made to define the extent of the Placemaking Area boundary, and the approach to green and blue infrastructure, sustainable movement and connectivity, urban form and density, land use and heritage.

Establishing the appropriate scale of settlement

- 6.11 In relation to selecting an appropriate size and scale of site, one of the primary considerations has been ensuring a critical mass of on-site population to provide and support essential services and facilities. This will contribute to more sustainable lifestyles, including active travel and health and well-being, and in turn will ensure that a sense of community can be truly fostered within the area. Of particular significance has been an appropriate threshold to ensure provision of primary education on site and a key driver has been that the community should provide for families, particularly children through to adulthood. Sustainable access to existing secondary school catchments and other community infrastructure can also form a sensible basic building block when designing the size of a new community. Secondary school catchments are another useful consideration when designing the size of a new community. This infers that the number of homes should as a minimum be in the range 4,000-5,000 homes, therefore capable of generating the need for a (minimum) 8 form entry secondary school. This will enable the settlement to be a self-sufficient community that can enable sustainable travel.
- 6.12 Development at Crews Hill is intended to act as a self-sufficient sustainable settlement distinct from the surrounding context. Given that development of a certain scale is required to deliver new services (including potential provision of secondary school), in terms of the planning balance this has been considered together with the impacts on the Green Belt and landscape sensitivity, amongst other factors to determine the appropriate extent.
- 6.13 Another important factor has been the ability of proposals to maximise the number of larger homes, suitable for families whilst at the same time promoting higher density development in close proximity to the railway station.
- 6.14 Opportunities provided by developing at scale are varied and numerous. Such opportunities for Crews Hill include but are not limited to the following:

- Planning for large-scale, long-term development provides the opportunity to ensure that **well planned development**, incorporating all necessary services, facilities and a blend of uses incorporated from the outset, as opposed to piecemeal, uncoordinated and/or sprawling development.
- By virtue of their scale, and if carefully designed to produce integrated, 'holistic' settlements, they can encourage and accommodate **highly sustainable patterns of living**.
- Strategic public transport interventions can be more viable as this scale of growth can help ensure sufficient patronage. This can assist with lowering trip generation in a relatively large, well planned development. Crews Hill has been designed to be **self-contained** with regards to local services, and particularly given the train station at the heart of the area. Trip generation is likely to be less in a relatively large development, as Crews Hill has been designed to be reasonably self-contained with regards to local services, and particularly given the proximity to a range of public transport options connecting to places of employment.
- A **sustainable and healthy environment** can be designed in from the outset, for example to encourage a walkable environment, and provision of well-designed and accessible recreation facilities and attractive parklands.
- Major development provides opportunities to fully **integrate and enhance considerable green infrastructure and environmental assets**.
- Major planned developments provide an opportunity to **design-in the greenest of technologies**, in ways that are not possible in smaller infill or incremental schemes. This could include aspects such as sustainable urban drainage systems (SUDS), approaches to public transport systems and local energy generation and supply systems.
- Infrastructure costs are often a key challenge in delivering new development. Large scale development here will involve areas of greenfield/agricultural land with relatively low values, providing the **opportunity to fund infrastructure**, alongside affordable homes, from the uplift in land value. Large scale development in the Crews Hill area will involve areas of greenfield/agricultural land with relatively low values, providing the opportunity to fund infrastructure from the uplift in value.
- A sense of **community cohesion** can be fostered by creating a sufficient critical mass of population and social mix. This will generate sufficient demand to create successful 'hubs' of activity that support a full range of services and facilities locally within the community (including community facilities, education, retail, social meeting places and commercial uses). This can help with creating a sense of belonging and a safe and inclusive environment.
- Scale provides greater scope to create assets that can be passed over to local communities, promoting a greater sense of belonging with **active long-term stewardship and community empowerment**.

Stakeholder Engagement

- 6.15 In addition to the evidence gathering and wider engagement on the Local Plan, the preparation of the Placemaking Study was informed by engagement with technical specialists from the Councils teams as well as a number of the Councils appointed consultants. External stakeholders were also engaged, such as Natural England and Historic England as well as the promoters and landowners. The purpose of the engagement was to identify key issues, opportunities and constraints, and to enable a collaborative approach to preparing the spatial framework. A summary is included in the appendix.
- 6.16 In addition, the Enfield Design Review Panel were engaged to consider key design matters and work through key issues, opportunities and constraints.
- 6.17 The community has been engaged on the principle of development in this location through the formal plan-making process at regulation-18 (2021). This involvement will continue through the regulation-19 process. The importance of community engagement in the planning of a large-scale new settlement or urban extension such as this is recognised. More in-depth community engagement will be undertaken as part of any future site wide master planning of the site (which could involve preparation of an SPD or similar), prior to and in combination with the submission of future planning applications. By involving the local community in the process as plans for the area progress, their unique insights and experiences can be tapped into, leveraging local knowledge into the area's history, culture, and environment, guiding decisions on everything from layout and landscaping to infrastructure and amenities.

Developer Forum for Crews Hill

- 6.18 The Council has established a developer forum which has brought together the various landowners and promoters in the Placemaking Area. They have been engaged in the process of the consideration of the evidence relating to the Crews Hill Placemaking Area. A collaborative approach has been adopted, in accordance with agreed Terms of Reference and all parties have signed a Planning Performance Agreement, the purpose of which is to enable parties to contribute to the preparation of the draft policy, related evidence base studies and Spatial Framework that relate to the potential allocation of the Crews Hill Placemaking area. The Council envisages that this forum will continue to work together on the production of a future site wide SPD. Eight meetings of the Crews Hill Developer Forum have been held since 2021 as follows:

Crews Hill Developer Forum Schedule		
#	Date	Purpose
1	September 2021	Introductory session
2	January 2023	Reconvening forum to outline overall ELP next steps
3	May 2023	Introducing consultant team for site specific evidence
4	July 2023	Progress update on evidence + landowner update
5	October 2023	Progress update on evidence + landowner update
6	December 2023	Introduction to Delivery, Implementation and Equalisation Approach

7	January 2024	Exploring Delivery, Implementation and Equalisation Approach Options
8	February 2024	Refining Delivery, Implementation and Equalisation Approach Options

7. Placemaking area Principles

7.1 The purpose of the Placemaking Study, including the illustrative Spatial Framework is to help inform and define the placemaking area, the associated areas of Green Belt release, potential development capacities and infrastructure requirements as well as providing a spatial representation of the vision and objectives for the site. The illustrative Spatial Framework also provides useful information on the overall potential scale, density and typologies of development for delivery within and beyond the local plan period (i.e. beyond 2041) and to ensure that the proposed level of growth could be successfully accommodated on site.

Green infrastructure and open space

7.2 The requirements for the following types of open space and green space at Crews Hill have been calculated and the spatial framework shows how they may be accommodated.

7.3 The calculations use the quantity standards from the [London Borough of Enfield Parks and Open Spaces Strategy 2010 – 2020](#) (table 2) and set out the hectares required for each type of open space per 1000 of the population.

7.4 The population estimates for Crews Hill have been calculated using the [GLA Population Yield Calculator](#), based on a split of market, intermediate and social housing taken from the Enfield Local Plan draft policy requirements.

7.5 Policy PL11, informed by the spatial framework, sets out an approach to providing open space in a way that also improves biodiversity, creates a sense of place and supports an active travel network.

7.6 The vision for Crews Hill is that it will be an important gateway to the Rural north which will be transformed into the leading outdoor countryside destination in North London. Crews Hill will also deliver additional green infrastructure that will contribute to the Rural Transformation area.

Transport and Movement

Public Transport

7.7 The Local Plan has been based on a vision of a place where residents will have good access to sustainable transport options. Proposals for Crews Hill will seek to achieve a high modal share of all trips to be made by cycle, foot or public transport by 2041. It has done this by taking an ambitious and comprehensive approach to movement, uses and residential densities.

7.8 The site is served by four Great Northern Service trains per hour to Crews Hill station in peak periods and two trains off peak. Moorgate can be reached within 40 minutes and transfers at Finsbury Park and Highbury and Islington provide access across central London. Most of the area is within a 5- to 10-minute walk of Crews Hill railway station, although realising this catchment will require local infrastructure provisions and pedestrian improvements.

- 7.9 Increased service provision is possible to six to seven trains per hour (tph) with signalling improvements. Govia Thameslink Railway has confirmed that this would be demand led and will be linked to other development proposals elsewhere on the line, such as in Hertfordshire. There are proposals for at least 7,500 homes within 2km of stations in Hertfordshire which indicate improvements in train services are likely to be required over time.
- 7.10 Improvements to the station itself would be required and this has been included in the infrastructure requirements for the site. This is expected to include a second entrance, wider staircases, lifts, and improvements to the subways and concourses.
- 7.11 The 456 bus service serves the Crews Hill area and terminates at Rosewood Avenue. There is not presently a rail to bus interchange at Crews Hill railway station. Services are currently once every half hour and finish at 20.05. Several key destinations can be reached by bus, including Enfield Town, Enfield Chase, and North Middlesex Hospital. Moreover, connections are available to other bus services within the local area, particularly when connecting via Enfield Town.
- 7.12 It is proposed that bus services are extended and routes are provided in coordination with the proposed highway network, so that residents are typically within a 5-minute walk of a bus stop. Higher quality and more frequent buses would connect residents south to destinations including Enfield Town, and bus routes to key destinations within Hertford are also proposed.
- 7.13 The PTAL (Public Transport Accessibility Level) is low at present consisting of areas of 1b, 1a and 0. However, these are considered to be out of date as they do not take account of the recent increase in rail service provision at Crews Hill from 2tph to 4tph. Through a combination of increased rail frequencies, more comprehensive bus coverage, and better pedestrian links to public transport nodes, the majority of the site could be uplifted to PTAL 3, 2 and 1b. Higher PTAL levels would subsequently be associated with higher densities, and lower car parking maximums in accordance with the London Plan.

Active Travel

- 7.14 Dedicated Cycle infrastructure in the vicinity of the site is limited. However, there are some key routes in the vicinity. National Cycle Network Route 12 runs from Peterborough to Enfield and passes by the south of the site in an East-West direction. This consists of on street and traffic free sections, and shares portions with the London Loop/Enfield Loop. Elsewhere in Enfield there has been significant buildout of the cycle network in recent years, including TfL's cycleway 20 which runs from Enfield Town south to Palmer's Green, and is a key radial into Central London.
- 7.15 Within the area and its vicinity are several public rights of way including footpaths and bridleways, and there are connections to many leisure routes. There is an Enfield Green Loop around the Borough, which is mostly in place and passes by the southern end of the site, where it is shared with the London Loop. Furthermore, there are current Council plans for improved east-west links, including from Rectory Farm to Hillyfields, and from Salmon's Brook to Turkey Brook.

7.16 A comprehensive active travel network is proposed as part of the development, to improve pedestrian and cycle provision. This would include new connections, including across the railway, and links along Turkey Brook and Cuffley Brook. Improved links south to Enfield Town would also be developed. Additionally, generous cycle parking would be provided in accordance with London Plan standards.

Vehicular Movement and Connections

7.17 The site is bordered to the north by the M25 with junctions being located approximately 4km to the east and to the west of the area. The main highway through the site is Cattlegate Road that runs east-west past Crews Hill station and links to areas of Hertfordshire to the north. It then turns into Theobalds Park Road which runs south to Enfield Town.

7.18 Vehicle access to the various land parcels would be via the existing key highways in the area. Additionally, a new east-west link, provided via Owls Hall Farm to enable the bus loop, would provide vehicular access to plots to the north. Various new junctions would be created along Cattlegate Road and Theobalds Park Road and are expected to be priority junctions with a major road central treatment. It is expected that a number of local junctions would be upgraded to accommodate increased traffic volumes. In particular the key junctions of Northaw Road/ Cattlegate Road, Theobald's Road/Whitewebbs Road, Cattlegate Road/East Lodge Lane, and East Lodge Lane/The Ridgeway would be upgraded to accommodate increased traffic volumes. These are shown on the plan on page 89 of the Placemaking study.

7.19 Car parking would be proposed to be in keeping with the maximums in accordance with the London Plan. For residential usage, dependant on the mix, this is expected to be roughly ~1 car parking space/unit, which could translate to approximately ~.4 cars/person. A key spatial move is that all homes must have convenient access to car clubs.

Climate Change

7.20 The spatial strategy for Enfield sets the strategic direction for the plan by identifying how growth will be distributed across the Borough over the Plan period. Aligned with the London Plan's goals to promote good growth in London by building strong inclusive communities, making the best use of land, creating a healthy city, delivering homes, growing a good economy and increasing efficiency and climate change resilience, it is imperative that the Borough's future growth is pursued and planned in the most sustainable way. The plan will require development to be designed to lead to low carbon lifestyles by creating mixed use resilient communities which maximise opportunities for active travel and the use of public transport. The Crews Hill policy ensures the delivery of key infrastructure, provisions of energy efficient homes, connection to local heat network as well as requirements on open space and biodiversity. The proposals will create opportunities for further environmental improvements in the area, linked to the rural transformation programme.

Flood risk and drainage

- 7.21 The majority of the site is in flood zone 1 with areas of flood zone 2, 3a and 3b defined narrowly alongside the Cuffley Brook and Turkey Brook (see SFRA, SA27). The illustrative spatial framework demonstrates how the development of the site can avoid built development in the higher flood risk area of the site. The illustrative framework avoids built development in these areas and seeks to utilise them as multi-functional green corridors.
- 7.22 There is also potential to improve flood management across the site (and minimise flood risk further downstream) and incorporate the watercourses and flood zones as part of the overall green and blue infrastructure provision.
- 7.23 The development of the site will enable opportunities to further deliver the Councils programme of naturalisation and restoration of the river corridors along Salmons Brook, Turkey Brook and Pymmes Park through wetland creation and flood risk alleviation.
- 7.24 The identified flood risk areas can be incorporated as part of public open space. Measures could be introduced to provide strategic benefits at a borough-wide scale which can help with mitigating and reducing the risks of flooding further downstream on the eastern side of the borough.

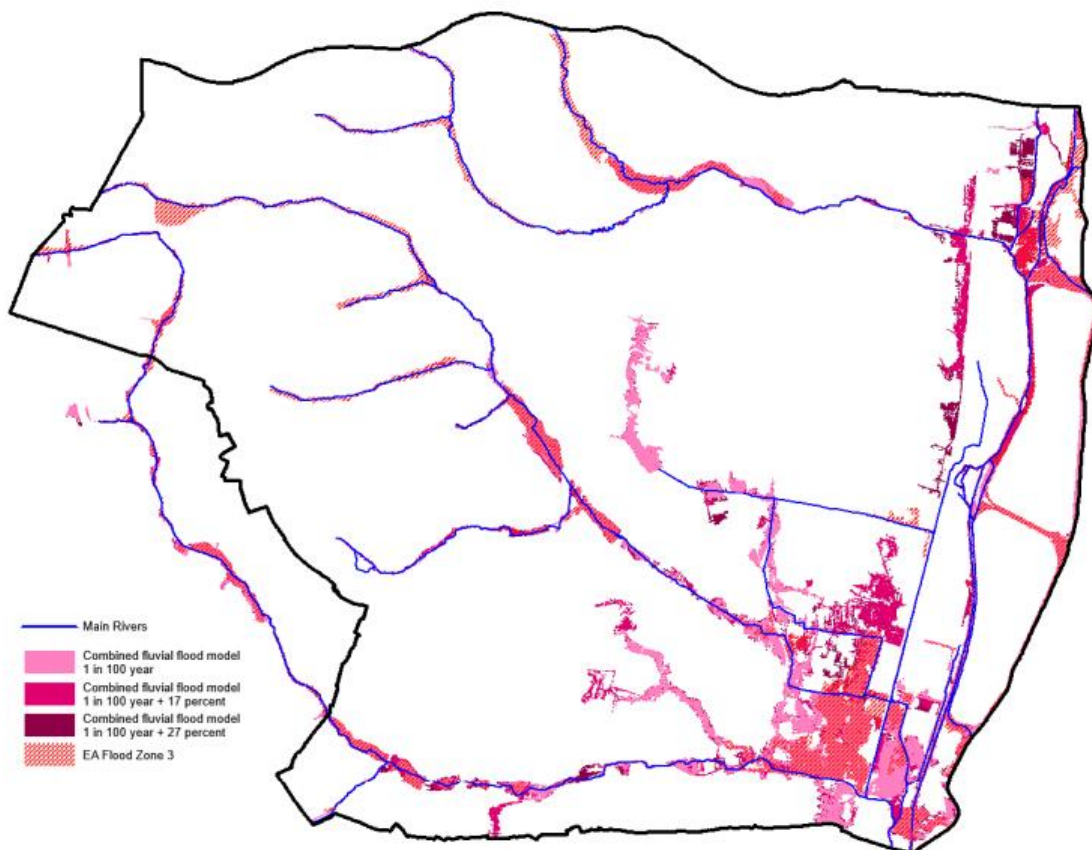


Figure 3.3 Fluvial combined flood model (1 in 100 year) & (1 in 100 year + 17%) & (1 in 100 year + 27%) output overlaid on EA Flood Zone 3

Figure 6 Map outlining areas of highest flood risk in LB Enfield

Air quality and noise

- 7.25 Air quality assessments previously undertaken by Enfield Council identified that the Government's air quality objective for annual mean nitrogen dioxide and daily mean PM10 were not being met by the specified dates. As a consequence, the Council designated an Air Quality Management Area (AQMA) across the whole of the Borough and produced an Air Quality Action Plan in recognition of the legal requirement to work towards air quality objectives within the borough.
- 7.26 Most of the air pollution in the Enfield AQMA is caused by road traffic. Increased walking, cycling and public transport use and low traffic neighbourhoods are key parts of the action plan to reduce air pollution and should be integral to the masterplanning and design of the site.
- 7.27 To reduce the impact of noise that arises from the M25, the policy requires a buffer of green and open uses along the M25. The Policy also requires other mitigation measures such as bunding or setbacks to protect sensitive uses as well as requiring the design of homes and their layout to mitigate the impact.

Historic environment and heritage

- 7.28 A key contributor to the Crews Hill placemaking area's local distinctiveness is its horticultural heritage, which has characterised its use throughout the twentieth century and remains today. During the inter-war period, large agricultural fields at Crews Hill were turned over for commercial food and plant production. The area, specifically Theobalds Park Road, quickly became known as a 'horticultural golden mile'. The only non-commercial development was the creation of a Golf Course to the west of the railway line. Following the second World War there was an intensification of the commercial uses and a decline in agricultural uses. Many fields were taken over by plant nurseries, which often enlarged their plots by purchasing former farm land. There are only four designated heritage assets within the placemaking area. These are isolated, detached properties that were mostly former farmsteads. These assets contribute to the area's historic character, along with nearby non-designated heritage assets, the historic road pattern (which largely remains today), and the retention of post-enclosure agricultural field boundaries. In addition, the placemaking area contains part of the Clay Hill Conservation Area. While most of the 20 assets – including those non designated – have been assessed as having minimal heritage value, eight are of moderate to high heritage value.
- 7.29 The placemaking study details the heritage considerations and the opportunities and constraints these presents. It proposes a layout to minimise the impact on heritage assets, and seeks to enhance their setting where possible, for example, in aligning the bus route to avoid the assets of Owls Hall Farm and the Paddocks.
- 7.30 The policy requires a development layout that reflects the historic environment and the individual allocations identify key heritage assets and require future development to incorporate and minimise impact on these. Future stages of masterplanning and consideration of planning applications will be informed by further heritage work.

Health and well-being

- 7.31 The Council has identified a number of priorities for the future health and well-being of communities within the borough. The proposed approach at Crews Hill will enable healthy and active movement, both on site through walkable neighbourhoods, as well as providing high quality external spaces and routes which are safe, secure and well-shaded and which connect into wider strategic routes and open spaces. As proposals for the area are developed, it will be necessary to discuss with health stakeholders and providers the potential for on-site health facilities.
- 7.32 The proposals for Crews Hill have also considered its current and historic horticultural activities, and proposes to re-provide such uses to also include spaces for local food growing to further encourage healthy lifestyles.

Land Use: Housing

- 7.33 The Local Housing Need Assessment 2020 (LHNA) for the London Borough of Enfield which was completed for the Local Plan Reg 18 publication 2021 identified there is a significant identified need for affordable housing and extra care housing. In particular, there is an identified need for affordable family housing (3+ bedrooms) which are difficult to deliver on more urban, brownfield sites due to viability issues.
- 7.34 The proposals for the Crews Hill Placemaking Area in the Local Plan have sought to maximise the number of larger homes. It identifies that 5500 homes could be delivered, 50% of which would be affordable housing and places an emphasis on providing new family housing. The Placemaking Study demonstrates that the delivery of larger homes can be achieved has an impact on the densities that can be achieved and the proposals seek to balance this against other objectives such as sustainable transport.

Land use: Education

- 7.35 School place planning is a dynamic process based upon a range of factors. As a result, the Councils strategy is regularly refreshed. By taking this approach the Council will manage the provision of sufficient spaces to meet demand over the plan period.
- 7.36 The amount of new housing development planned for the Borough is a key factor in planning school places, along with evidence of demography, family sizes and spatial proximity of existing services and facilities. Current analysis identifies that there would be insufficient local places within primary and secondary schools to meet the expected demand from development at Crews Hill. There is therefore a specific requirement for at least one two-form-entry (2FE) primary school (including SEN facilities) during the plan period and a second may also be needed towards the end of the plan. Equally, a secondary school will be required at the end of the plan period.
- 7.37 The strategic allocations across the Crews Hill Placemaking Area have identified locations for schools to minimise travel by locating them close to public transport corridors, particularly easy, safe and quick walking, cycling and bus connections. They are also located in areas that bring activity and footfall to create a sense of place and support the viability of other non-residential land uses.

Land Use: Community facilities

- 7.38 The comprehensive redevelopment of Crews Hill will enable the provision of local centres that can incorporate a range of local services and facilities located on public transport routes to help minimise the need to travel. The creation of local centres should be in accordance with the hierarchy of Town Centres outlined in policy. These centres should serve neighbourhood retail, food and drink, business and service and community needs. The centre along Cattlegate Road is anticipated to be larger, serving the whole of the wider area whereas more localised centres elsewhere would be smaller scale local parades, meeting local neighbourhood needs.
- 7.39 The Council has identified a lack of flexible community space in the northwest of the Borough. The provision of additional community space would be helpful in meeting future needs. Ideally, it should be able to accommodate the following uses:
- Faith groups
 - Community groups
 - Multi-functional spaces which can be sectioned/divided
 - Dance/movement/activity
- 7.40 The provision of community spaces should be accessible, ideally located close to other services and facilities and be able to accommodate a mix of community uses and as such be multi-functional flexible spaces. The preference would also be to accommodate meeting rooms and workspace, where practical.

Land Use: Employment

- 7.41 The proposals require the creation of a mixed and inclusive community providing diversity of employment opportunities. It requires the retention or relocation of existing uses which provide employment opportunities. The new mixed-use centres provide opportunities for new jobs as well as incorporating new employment uses such as co-working spaces.
- 7.42 The proposals require the integration of the horticulture and food producing industries into new neighbourhoods. These industries will help to underpin the future unique identity of Crews Hill.
- 7.43 There will also be opportunities arising as the visitor economy grows in this part of the Borough as it becomes an important gateway for people accessing the countryside in the Rural North.

8. Approach to Delivery and Implementation

8.1 In order to achieve the placemaking vision and policy objectives a delivery and implementation strategy will be required. The Council and landowners are working collaboratively to devise a robust and realistic strategy that can enable a cohesive and comprehensive approach. This requires a focus around a range of issues such as land availability and assembly, infrastructure provision. The broad location has been divided into six smaller parcels, to aid with deliverability (see below).

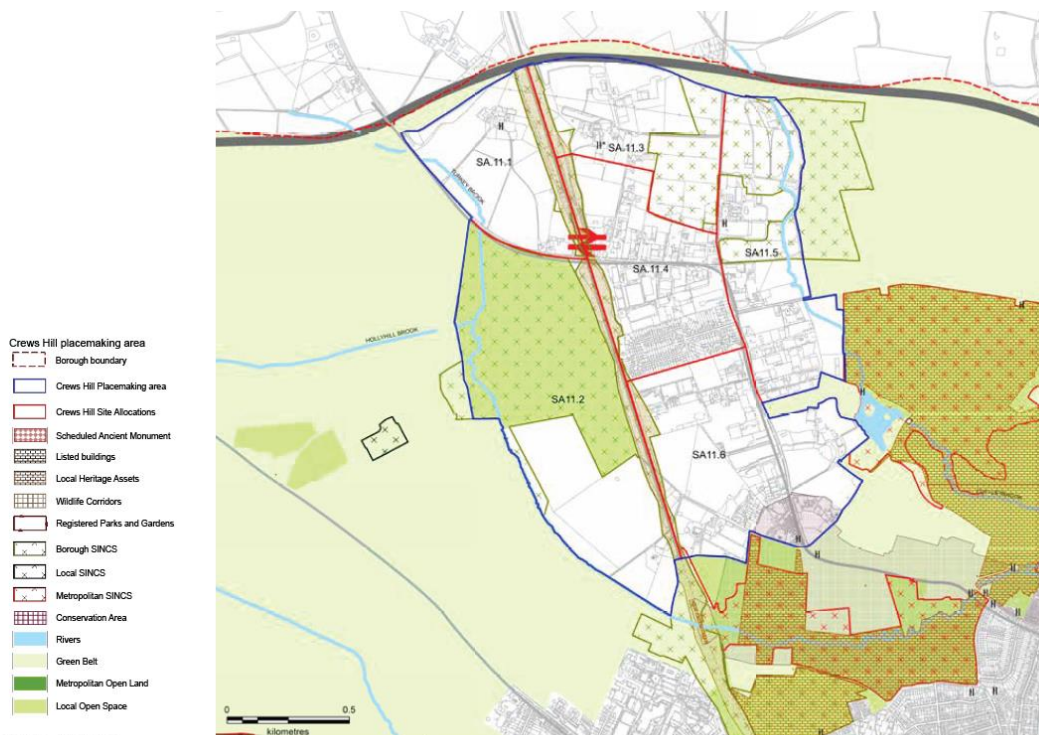


Figure 3.13: Crews Hill Policy Map Extract

Figure 7 Extract of Site Allocation parcels from Policy PL11

Land Availability

- 8.2 The site allocations identified in the Local Plan have been considered both available and deliverable. In accordance with the PPG, sites have been considered to be available for development when there is confidence that there are no legal or ownership problems such as unresolved multiple ownerships, ransom strip tenancies and operational requirements. Availability of a site is key to whether development of the site will take place within the plan period. Where the availability of a site is in doubt, or other constraints exist to prevent it becoming available then, it is realistic to not include as an option. Information used to assess the availability of a site was gathered from a variety of sources to establish 'availability'.
- 8.3 Responses to the Council's Call for Sites form from landowners has demonstrated that there is sufficient land suitable, deliverable and available now to bring forward an appropriate level of development to support a new community. The land that currently is not available has been assumed to be delivered post plan period, however, if it were made available sooner, then it could be developed earlier.

8.4 As the Plan has evolved there is increasing interest and commitment from other landowners in the area to make their land available for development. The Placemaking Study has shown that the principal infrastructure requirements can be delivered on land that is available now.

Working with Landowners

8.5 The Council has facilitated a ‘Crews Hill Developer Forum’ which has brought together the various landowners and promoters in the area. They have been engaged in the process of the consideration of the evidence relating to the Crews Hill Placemaking Area. A partnership approach has been adopted and these parties have been involved in the preparation of related evidence base studies that relate to the development potential of the Crews Hill placemaking area. In addition, the parties have agreed Terms of Reference for how the Forum will function. It is envisaged that this forum will continue to work together into the future to develop collaboratively a detailed SPD for the area and then in future planning applications.

8.6 A key landowner in the area is the Council, and it will work pro-actively and collaboratively with others to deliver the proposals. If needed, the Council has the ability to utilise its Compulsory Purchase Powers to ensure a comprehensive development occurs.

Coordinating a comprehensively planned approach

8.7 The Council have also recognised that it will be important to ensure that a comprehensive approach to development in the area is secured. A Spatial Framework has been prepared by the Council to show how a comprehensive and sustainable pattern of development could come forward. Policies in the Local Plan require this comprehensive approach and set out that the preparation of a further ‘Supplementary Planning Document’ will be required.

Infrastructure Provision and Delivery

8.8 A range of infrastructure will be required in order to meet the needs of future residents, to mitigate the impacts of the development and to ensure it becomes a sustainable place. The table below sets out the high-level infrastructure requirements required for Crews Hill.

Category	Requirement	Phasing
Education	2 x 2FE Primary Schools	1no Primary School to be delivered within the plan period.
	Secondary School	Towards the end of the plan period
Transport	<ul style="list-style-type: none"> – Improved bus services into Gordon Hill, Enfield Town and Hertfordshire – New bus routes ensuring appropriate catchment of new residential areas – Improved rail frequencies from Crews Hill Station in Central London and 	<ul style="list-style-type: none"> – Extension to 456 bus to be delivered from earliest phase of development (initially with temporary turnaround provision). Increased frequencies and potential new bus routes phased based on buildout of development and road bridge connection at Owls

Category	Requirement	Phasing
	Improvements to Crews Hill station, including a second entrance, widened staircases, and lifts – Road bridge for public transport connection at Owls Hall Farm - Pedestrian and cycle bridge connection to the existing Golf Course	Hall Farm, also in consultation with TfL. – Improvements to Crews Hill station with likely trigger of 2000-3000 homes (TBC) – Improvements to rail frequency beyond 4tph based on wider demand on Hertford Loop Line, and further discussion with GTR on timetable changes – Provision of new crossings of railway based on buildout of development, along with associated access requirements and bus route provision
Green Space	Public Parks - 37.5ha	Further masterplanning and the preparation of planning applications will confirm the proposed locations for the green space at different spatial scales. Delivery of green space will take place in phases as development occurs.
	Childrens Play – 12.23ha	
	Play Pitches – 11.92ha	
	Natural Space – 15.29ha	
	Allotments – 10.24ha	
Community	Flexible Community spaces required to meet lack of provision in the west of the borough.	– To be included within non-residential component of local centres. – Local centres should be provided early in phases within the plan period
Health	Local health provision will to be required. Spaces for food growing should be provided to encourage healthy lifestyles	To be included within non-residential component of local centres.

8.9 The identified infrastructure provision will be crucial to the delivery of a sustainable and successful place and will require careful co-ordination and management across the plan period and in relation to the future delivery strategy, planning process and phasing of delivery for the Placemaking Area.

8.10 The policy includes the infrastructure requirements. A more detailed approach to the delivery of infrastructure requirements and provision across the area will be considered through subsequent stages of the planning process, including through updates to the Infrastructure Delivery Plan and potentially set out in a future SPD or Supplementary Plan.

Viability

- 8.11 The new Local Plan will set out the contributions expected from development, including the quantum and mix of affordable housing as well as other infrastructure such as education, health, transport, digital, water and green infrastructure. As part of its preparation, the new Local Plan has been tested to ensure it remains viable and deliverable in line with tests set out in the National Planning Policy Framework (NPPF, 2023) and National Planning Practice Guidance (PPG) and the revised Community Infrastructure Levy Regulations. This includes:
- 8.12 The Whole Plan Viability Assessment (HDH Planning, 2024) identified a suitable range of typologies and areas of lower, medium and higher value. The report indicated that the Crews Hill Placemaking Area falls within a higher value area within the Borough and that the proposed development has a positive residual value taking account of housing needs, including affordable housing requirements, infrastructure requirements, transport and green infrastructure and relevant mitigation measures.
- 8.13 The report concluded that in the higher value area (the western and northern areas of the Borough) the greenfield sites are likely to be able to bear both higher levels of affordable housing and substantial levels of developer contributions. Based upon the high-level range of assumptions and scenarios, the report advised that the Council can be confident that development that is planned for in this area will be deliverable and forthcoming.
- 8.14 Further viability assessment work will be undertaken as proposals evolve and move forward through the planning process.

Planning strategy

- 8.15 The Council intends to provide further guidance for those submitting planning applications through a Supplementary Planning Document. This will provide advice on a site wide planning strategy for bringing forward development across the Placemaking Area through the planning process. This SPD will take forward the design concept set out in the illustrative Spatial Framework, to establish an overall coordinated approach to the area, the distribution of land uses, additional design guidance including the approach to design codes, as well as phasing of development and more detailed approach to infrastructure requirements and provision across the CHPA as a whole. The SPD will be produced by the Council in partnership with the developers, landowners, key stakeholders and in consultation with the local community.
- 8.16 The policy requires a strategic and comprehensive approach to development. An SPD will establish an overall coordinated approach to the distribution of land uses, design guidance, phasing and infrastructure requirements. It will help put in place mechanism to secure the delivery of infrastructure and give confidence to the market to bring forward development sites.
- 8.17 There is also an intention to progress work with the landowners/developers including establishing a Memorandum of Understanding, Statements of Common Ground and using future PPA's to cover the entire planning process through to determination of planning applications.

Phasing

- 8.18 Development in the area must come forward through a strategic and comprehensive approach, ensuring the coordination of development between sites and with the delivery of infrastructure and services. As the proposals are refined and developed, phasing of individual parts of the placemaking area will be greater understood. It is envisaged that phasing will be linked to delivery of public transport infrastructure that raises PTAL.
- 8.19 The phasing of development and housing delivery has been considered, taking into account national and local evidence comprising historic delivery, completions and build out rates in Enfield Borough in order to inform judgement and considering the infrastructure delivery requirements. The SPD or Supplementary Document will provide more guidance on this and planning applications will need to demonstrate that they will contribute to the ultimate delivery of comprehensive and joined up development across the Placemaking Area.

Delivery Timescales

- 8.20 The following timetable and lead-in times are expected to delivery of the first dwelling for occupation on the land, subject to the outcome of the Local Plan Examination:
- 2024/25 - Preparation of SPD (to be progressed in tandem with examination)
 - 2024/25 – Submission of first outline planning application
 - 2025/26 – Determination of the outline planning application
 - 2025/26 Local Plan Adoption
 - 2026/27 – First reserved matters approved & discharge of associated ‘prior to start on site’ conditions
 - 2027/28 – Start works on-site
 - 2028/29– First dwellings completed / occupation
- 8.21 The delivery of Crews Hill in the later part of the Plan period, after 2027/28, contributes to the council’s proposed stepped housing requirement. A stepped housing requirement is appropriate where there is to be a significant change in the level of housing requirement between policies and where strategic sites will have a phased delivery and are likely to be delivered later in the plan period. The site is not required to support delivery against London Plan targets in the period 2019/20 to 2027/28, but a small amount of early delivery is expected in this period based on existing consents in the area and suitable progress in preparing and adopting an SPD and related equalisation agreement and tariff arrangement. Early delivery is feasible due to the lack of immediate physical infrastructure constraints on delivery in key component areas within the broad location.

9. Summary & Next Steps

- 9.1 The proposals for Crews Hill have evolved over time, starting with exploring the option of development at existing settlements in the Green Belt. Drawing from evidence that has been gathered, policy testing and evaluation of the sustainability credentials, informed by stakeholder views, has led to the conclusion that the area is capable of delivering future development to meet local needs in an appropriate way. This is captured in the final allocation and policy for Crews Hill and subsequent stages through the planning process will develop the detail of the proposals.
- 9.2 The illustrative spatial framework, which forms part of the evidence base, has been informed by various evidence base studies and technical testing to fully consider the impacts and the potential for development in this location. This has been fully considered as part of the Placemaking Study, including the testing of sustainability credentials and the potential to deliver significant community benefits and meet local needs. This would include the provision of a new local centre, local parades, retail and community space, improved access to open space, improved public transport and active travel facilities and future connectivity to a local heat network.
- 9.3 The Placemaking Study has informed the definition of land uses within the placemaking area, the associated areas of Green Belt release and compensation, potential development capacities and forms, infrastructure requirements, as well as providing an illustrative Spatial Framework that accords with the vision and objectives for the place.
- 9.4 The continued engagement with landowners/developers has confirmed that there is support for the delivery of the proposals and the opportunity to provide new infrastructure and community benefits, enable sustainable lifestyles, access to the wider benefits of rural Enfield and contribute to the overall quality of the environment all as part of a new sustainable urban extension of Enfield that will contribute to meeting the identified needs of the Borough.
- 9.5 The development will provide new homes and infrastructure, services and facilities that will meet identified needs, specifically the provision of affordable family homes at scale. The policy sets out the strategic requirements and principles and the subsequent stages of the planning process, including the formulation of a site wide masterplan, which will further develop the proposals, phase infrastructure requirements and delivery strategy.

Collaborative Working

- 9.6 The Council has established an effective approach to working collaboratively with the relevant landowners/developers for Crews Hill placemaking area. This has been formulated via a Developer Forum, which has also enabled the agreement of a Memorandum of Understanding, key principles and related Planning Performance Agreements. In turn, these have helped facilitate the evidence base and test the spatial assumptions.
- 9.7 The Council and the landowners/developers are fully committed to continue this approach through the relevant stages of the planning process to delivery.

Next Steps

- 9.8 The formulation of a site wide masterplan and site wide IDP will help explore the potential for achieving and delivering on the policy requirements and expectations; add further detail to the qualities of place and establish a strategy for delivery and future governance. It will also enable further engagement with the local community and other key stakeholders.

Appendix– List of meetings with stakeholders on Placemaking Study

Meeting date	Meeting topic	Attendees
09/05/2023	Chase Park and Crews Hill: Community Infrastructure	Hyas Associates London Borough of Enfield Energetik Igloo Planning (IDP)
29/06/2023	Chase Park and Crews Hill: Education	London Borough of Enfield Hyas Associates Alan Baxter We Made That
25/05/2023	Chase Park and Crews Hill: Adult Social Care	London Borough of Enfield Hyas Associates
11/05/23	Chase Park and Crews Hill: Transport	London Borough of Enfield Hyas Associates Alan Baxter We Made That WSP
17/05/2023	Chase Park and Crews Hill: Placemaking and Urban Design	London Borough of Enfield Alan Baxter We Made That Hyas Associates
23/05/2023	Chase Park and Crews Hill: Housing	London Borough of Enfield Hyas Associates
22/05/2023	Chase Park and Crews Hill: Green Space	London Borough of Enfield We Made That Tyler Grange ABA Hyas
19/05/2023	Crews Hill: Property Services	London Borough of Enfield Hyas Associates
19/05/2023	Crews Hill and Chase Park: Historic England	Alan Baxter We Made That Hyas Associates Historic England
02/06/2023	Crews Hill and Chase Park: Natural England	Natural England Tyler Grange Alan Baxter Hyas Associates
08/09/2023	Crews Hill and Chase Park: Network Rail	Network Rail London Borough of Enfield We Made That Alan Baxter

Statutory Consultees			
19/05/2023	Crews Hill and Chase Park: Historic England	Local Plan: Placemaking Areas	Alan Baxter We Made That Hyas Associates Historic England
02/06/2023	Crews Hill and Chase Park: Natural England	Local Plan: Placemaking Areas	Natural England Tyler Grange Alan Baxter Hyas Associates
08/09/2023	Crews Hill and Chase Park: Network Rail	Local Plan: Placemaking Areas	Network Rail London Borough of Enfield We Made That Alan Baxter