

**LONDON BOROUGH OF ENFIELD****PLANNING COMMITTEE****Date:** 07 December 2021**Report of:**

Head of Planning  
Vincent Lacovara

**Contact Officer:**

Andy Higham  
Dino Ustic  
David Gittens

**Ward:**

Chase

**Application Number:** 21/02088/FUL**Category:** Major**LOCATION:** Holly Hill Farm, 305 The Ridgeway, Enfield, EN2 8AN**PROPOSAL:** Extension to existing scheme for land re-profiling for agricultural land restoration.**Applicant Name & Address:**

Ms Avril Nevin  
Golf Environmental (UK) Ltd  
Stockley Park Golf Club  
Uxbridge  
UB11 1AQ  
Middx

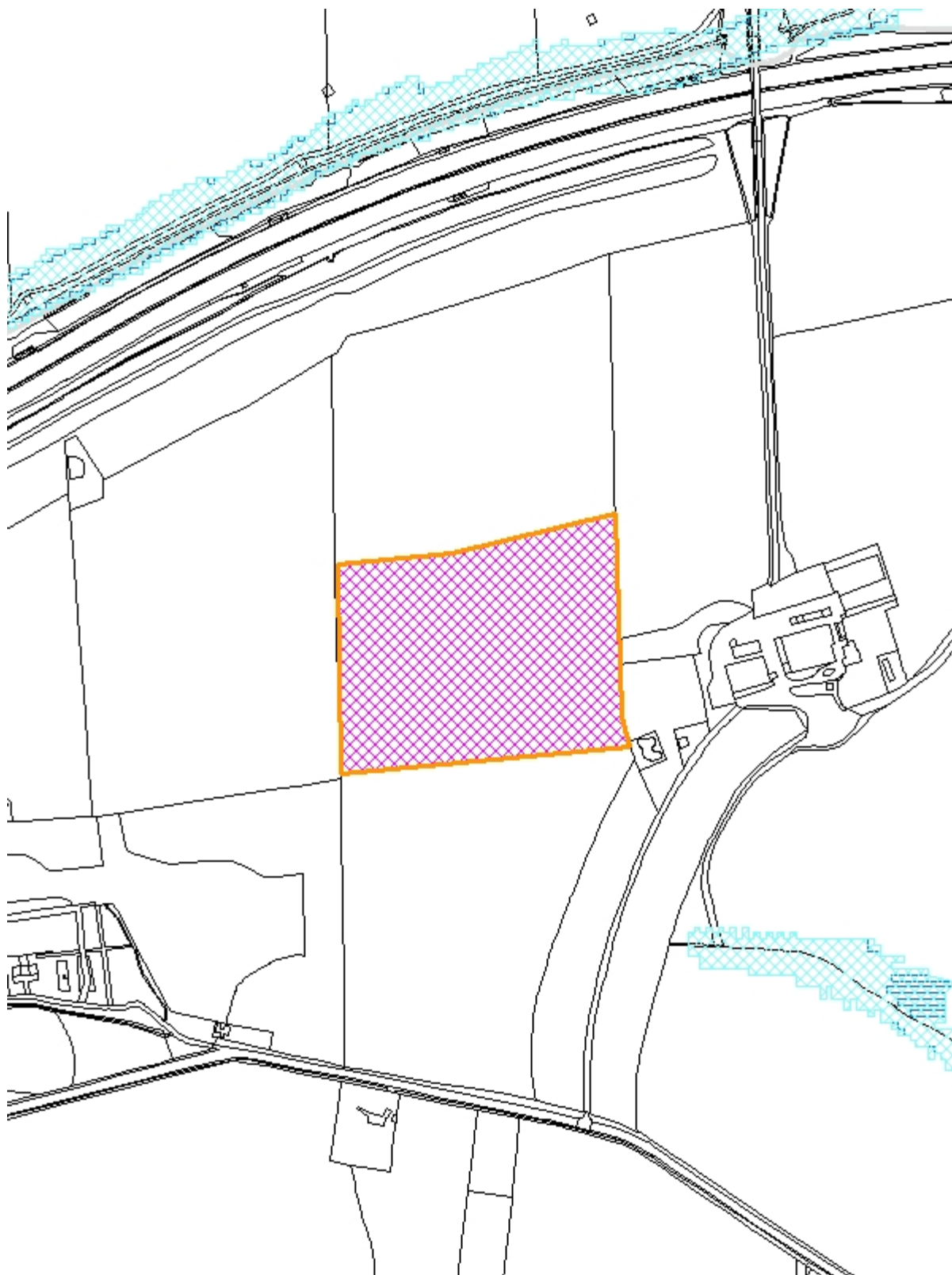
**Agent Name & Address:**

Mrs Suzi Coyne  
Suzi Coyne Planning  
60 Blenheim Drive  
OXFORD  
OX2 8DQ  
United Kingdom

**RECOMMENDATION:**

That the Head of Development Management / the Planning Decisions Manager be authorised to **GRANT** planning permission subject to conditions.

Ref: 21/02088/FUL    **LOCATION:** Holly Hill Farm , 305 The Ridgeway, Enfield, EN2 8AN



**1. Note for Members**

- 1.1 The application has been brought to Planning Committee because the application is categorised as a major scheme and the fact the Council is land owner.

**2. Recommendation**

- 2.1 That the Head of Development Management / the Planning Decisions Manager be authorised to **GRANT** planning permission subject to conditions:

1. Approved Plans and documents
2. Detail of drainage features
3. Written Scheme of Investigation – post investigation assessment and subsequent analysis
4. Vehicles in excess of 7.5 tonnes delivery times  
06:00 to 07:30 Monday to Friday, 09:00 to 18:30 Monday to Friday,  
06:30 to 13:30 Saturday (excluding school holidays)
5. Maximum of 30 construction vehicle movements per hour at all times
6. Banksman on site at all times to manage HGVs entering and exiting the site
7. No traffic southbound towards Enfield
8. Material to be in accordance with an approved Environmental Permit
9. Verification report to be submitted on the suitability of the soil
10. In accordance with submitted transport statement
11. Landscape Strategy / Replacement Planting / Tree Protection
12. Tree Protection in accordance with Arboricultural Report
13. Temporary access road and access from the Ridgeway to be removed once the construction works on site ceases
14. Temporary diversion of public footpath to be maintained during construction and removed once the construction works cease
15. Development in accordance with the Ecology Impact Assessment
16. Agricultural Use Only

- 1.2 That the Head of Development Management/Planning Decisions Manager be granted delegated authority to agree the final wording of the conditions to cover the matters in the Recommendation section of this report.

## **2. Executive Summary**

- 2.1 This report seeks approval for an extension to an existing scheme (approved under ref: 19/02850/FUL) for land re-profiling for agricultural land restoration. and improved visual and acoustic screening to the M25 and construction of an irrigation lagoon at Holly Hill Farm. This was granted planning permission by Planning Committee on 29.11.2019 and followed the principles established by an earlier permission granted in 2017. There have been no material change in circumstances in the interim with the adoption of the London Plan (2021) and revisions to the NPPF (2021) which do not alter the strategic policy framework in relation to this proposed development.
- 2.2 The reasons for recommending approval are:
- i) In the absence of any material change in circumstances, the principle of the development has already been established by the planning permissions granted under ref: 17/00477/FUL and 19/02850/FUL.
  - ii) The proposal will increase the productivity of agricultural land and overcome long standing drainage and soil quality issues on the site consistent with Policy DMD85.
  - iii) The scheme would be an appropriate form of development within the Green Belt that would not impact on the sites open and rural character having regard to Policy G2 of the London Plan, Policy CP33 of the Core Strategy and Policy DMD82 as well as the NPPF.
  - iv) The scheme would provide a visual and acoustic screen from the M25, and there would be no impact on the adjacent M25 with regard to structural stability or drainage matters consistent with Policies CP30 and 32 of the Core Strategy and Policy DMD 68
  - v) The soft landscaping and biodiversity will be greatly enhanced across the site having regard to Policies G6 and G7 of the London Plan, Policy 36 of the Core Strategy and Policies DMD78 and DMD79.
  - vi) The development would not impact on neighbouring residential amenity, the highway network or the safety of highway users having regard to Policy D1 of the London Plan, Policy CP30 of the Core Strategy and Policy DMD 48

## **3. Site and Surroundings**

- 3.1 The application site comprises part of an agricultural holding located on the northern side of The Ridgeway known as Holly Hill Farm. There is an existing bund, approximately 3 – 5 metres above the height of the field, along the northern boundary with the M25 covered by a mixture of grasses. The site slopes steeply down from the south to the north of the site. There are a number of large veteran trees and hedgerows across the site. A public right of way runs along the eastern part of the site and there is an existing access track that runs north to south on the western side of the site. The site has been used for arable crop production.
- 3.2 The site is bounded by the M25 to the north while to the south of the site is St John's Senior School and North Lodge Farm. The site lies within the Metropolitan Green Belt, and Flood Zone 1 and within an area designated as an Area of Special Character and a site of archaeological interest.

- 3.3 Works have commenced on site in connection with the construction of a bund that was granted planning permission under reference 17/00477/FUL and more recently, application ref 19/02850/FUL. A temporary access and access road with spur roads and soil management area (SMA) were granted under the original permission on a temporary basis to enable the bund to be constructed: these works have been implemented and material imported around the site.
- 3.4 The application boundary has been amended from that of planning permission ref: 19/02850/FUL to include the area to the south of the approved scheme. This application is therefore being made to regularise the current position given the variations to the previous application and for the land reprofiling to be extended to the additional field.

#### **4. Proposal**

- 4.1 The proposal seeks to extend the existing permitted scheme (19/02850/FUL) for land re-profiling for agricultural land restoration at Holly Hill Farm.
- 4.2 The application site area is 4.12 ha and includes 0.38 ha of land within the area already permitted by the planning permission granted under ref:19/02850/FUL. This overlap between the two applications relates to the existing access road that has been constructed to facilitate the project. The re-profiling of the additional field would involve approximately 59,000 cubic metres of material.
- 4.3 Land levels will increase in height by between approx. 1 to 8 metres across the site with the largest increase in levels being from the north of the site to the southern boundary. The increase in the ground levels would not exceed the existing highest point on the site. The works will generally be set back away to the west elevation of the proposed irrigation lagoon by approximately 30 metres. New trees, hedgerows, wet grassland and wildflower areas would be planted. New culverts and swales are also proposed as part of the scheme.
- 4.4 The purpose of the scheme differs from that approved under reference no. 19/02850/FUL in that it comprises ground modelling for agricultural restoration purposes to improve the quality of the land. It should also be noted that the technical design of the scheme differs from ref 17/00477/FUL to ensure the ground modelling works addressed Highways England concerns the concerns about the structural integrity of the M25, where not repeated.
- 4.5 The scheme also captures works that have already taken place on site and which differ from the original permission: namely, the siting, length, width, bunding and height of the temporary access road and the size and bunding of the temporary Soil Management Area (SMA). Although these were not built in accordance with the approved plans, the current arrangements are acceptable.

#### **5. Relevant Planning History**

- 5.1 There is an extensive planning history on the site but the most relevant applications are as follows:

- 5.2 20/00763/CND - Details submitted pursuant to reference 19/02850/FUL: drainage (2) in respect of land reprofiling for agricultural land restoration and improved visual and acoustic screening to the M25 and construction of an irrigation lagoon. Granted on 21.08.2020.
- 5.3 19/02850/FUL - Land reprofiling for agricultural land restoration and improved visual and acoustic screening to the M25 and construction of an irrigation lagoon. Granted with conditions on 29.11.2019. Works commenced on site.
- 5.4 17/00477/FUL - Construction of soil bund screen to motorway boundary together with creation of irrigation storage lagoon and attenuation basin. – Granted subject to conditions on 04.12.2017. Works commenced on site.
- 5.5 17/00769/SO - Environmental Impact Assessment Screening Opinion Request under part 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011, as amended 2015 in relation to Construction of soil bund screen to motorway boundary together with creation of irrigation storage lagoon. Screening Opinion – EIA not required - Decision issued 7 March 2017

## **6. Consultation**

### Public Response:

- 6.1 Consultation letters were sent to 16 neighbouring properties. In addition, a press notice was published in the local newspaper and a site notice displayed at the site. No responses were received.

### External Consultees:

- 6.2 *Environment Agency (EA)*: Although no objection was raised in connection with the previous application, the EA have advised in connection with this application that the consultation falls outside their remit and they will not be providing any comment.
- 6.3 *Highways England*: No objection subject to conditions relating to building in accordance with the approved plans and the submitted M25 bund monitoring strategy.
- 6.4 *Historic England*: Following revisions to the originally submitted Written Scheme of Investigation (WSI) to ensure it accords with relevant standards and guidance, no objection is raised.

### Internal Consultees:

- 6.5 *Traffic & Transportation*: No objection subject to conditions relating to parking, access and deliveries.
- 6.6 *Tree Officer*: No objection subject to the tree protection being undertaken in accordance with the submitted details.
- 6.7 *SuDS Officer*: No objection subject to a condition requiring detailed design of all drainage features.

- 6.8 *Environmental Health Officer*: No objection subject to a verification report condition to demonstrate that the soil imported is suitable for use on agricultural land.

## **7. Relevant Policies**

### **7.1 London Plan (2021)**

The London Plan is the overall strategic plan for London setting out an integrated economic, environmental, transport and social framework for the development of London for the next 20-25 years. The following policies of the London Plan are considered particularly relevant:

Policy SI 2 Minimising greenhouse gas emissions  
Policy SI 5 Water infrastructure  
Policy SI 7 Reducing waste and supporting the circular economy  
Policy SI 8 Waste capacity and new waste self-sufficiency  
Policy SI 13 Sustainable drainage  
Policy D1 London's form, character and capacity for growth  
Policy D14 Noise  
Policy HC1 Heritage conservation and growth  
Policy G2 London's Green Belt  
Policy G4 Open Space  
Policy G6 Biodiversity and access to nature  
Policy G7 Trees and woodland

### **7.2 Local Plan - Overview**

Enfield's Local Plan comprises the Core Strategy, Development Management Document, Policies Map and various Area Action Plans as well as other supporting policy documents. Together with the London Plan, it forms the statutory development policies for the Borough and sets out planning policies to steer development according to the level it aligns with the NPPF. Whilst many of the policies do align with the NPPF and the London Plan, it is noted that these documents do in places supersede the Local Plan in terms of some detail and as such the proposal is reviewed against the most relevant and up-to-date policies within the Development Plan.

### **7.3 Core Strategy (2010)**

The Core Strategy was adopted in November 2010 and sets out a spatial planning framework for the development of the Borough through to 2025. The document provides the broad strategy for the scale and distribution of development and supporting infrastructure, with the intention of guiding patterns of development and ensuring development within the Borough is sustainable.

CP24: The road network  
CP30:  
CP31: Built and landscape heritage  
CP32: Pollution  
CP33: Green Belt and countryside  
CP36: Biodiversity

#### 7.4 Development Management Document (2014)

The Council's Development Management Document (DMD) provides further detail and standard based policies by which planning applications should be determined. Policies in the DMD support the delivery of the Core Strategy.

The following local plan Development Management Document policies are considered particularly relevant:

DMD44 Preserving and Enhancing Heritage Assets  
DMD47 New Roads, Access and Servicing  
DMD 48 Transport Implications of New Development  
DMD59 Avoiding and Reducing Flood Risk  
DMD60 Assessing Flood Risk  
DMD61 Managing Surface Water  
DMD68 Noise  
DMD78 Nature conservation  
DMD79 Ecological enhancements  
DMD81 Landscaping  
DMD82 Protecting the Green Belt  
DMD84 Areas of Special Character  
DMD85 Land for Food and Other Agricultural Uses

#### 7.5 Other Material Considerations

- National Planning Policy Framework (NPPF) 2019
- National Planning Practice Guidelines (NPPG)
- Enfield Characterisation Study (2011)

### 8. **Assessment**

8.1 The main issues arising from this proposal for Members to consider are:

1. Principle of Development
2. Green Belt
3. Impact on Adjoining Occupiers
4. Impact on Character
5. Contamination
6. Highway Issues
7. Impact on M25
8. Drainage
9. Trees, Landscape and Biodiversity
10. Environmental Issues

#### Principle of Development

8.2 The principle of the providing a bund was established through the original planning permission ref. no. 17/00477/FUL. This was on the basis that the proposal improved drainage across the site, created a natural barrier to the M25 thus reducing noise and created a visual improvement through the introduction of landscaping on the site. The proposal also sought to increase the yield of the farm, reduced overheads and enhanced the businesses viability of its operation – this remains applicable to the current proposal. It is worth noting that more recently the principle was reaffirmed under ref. no.

19/02850/FUL. This current planning application is for an extension to existing scheme for land re-profiling for agricultural land restoration and it is noted that there notwithstanding the adoption of the London Plan (2021) and revisions to the NPPF since that decision, there is no material change in policy that would affect the assessment of the proposal and its acceptability.

- 8.3 The new proposal will result in the re-profiling of the land to provide additional level areas that are more beneficial for farming practices. The new application site is smaller than the previously approved scheme and the proposal will involve the re-profiling of the land across the site rather than building a bund to the extent previously approved. An Agricultural Improvement Report was submitted with the application. The report sets out that significant gradients in areas can inhibit certain arable agricultural practices due to the practicalities of machinery moving across the terrain. This matter is dependable on the machinery employed to work the land and the cropping choice. However, the scheme would reduce these limitations with the improvements to the grading of the land across the site.
- 8.4 The site is currently affected by waterlogging and flooding which is due to the existing bund formation constructed during the M25 widening scheme. This impacts on the ability to manage the land and to grow crops. As a result, the productive agricultural use of the site has been limited. The development seeks to protect and improve the long-term quality of the farmland as the proposal has been designed to manage surface water runoff and improve drainage on the site. The changes to the land would also reduce the visual and acoustic pollution from the M25. The planning statement sets out that the proposal would increase the yield of the farm, reduce overheads and enhance the businesses viability. The construction of a water storage lagoon will give the farmer security and flexibility in the irrigation of crops. Being able to store water in the winter months when it is plentiful and using it during the summer months. Improvements to the drainage characteristics of the farmland will improve the growing conditions, lengthen the growing season and protect the soil resource for the future.

#### Green Belt

- 8.5 The site is located within the Metropolitan Green Belt. The National Planning Policy Framework (NPPF) (paragraph 79) states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The NPPF confirms that inappropriate development is harmful to the Green Belt and should only be approved in very special circumstances and substantial weight must be given to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of its inappropriateness, and any other harm, is clearly outweighed by other considerations.
- 8.6 It also confirms that certain forms of development, such as engineering operations, are not inappropriate in the Green Belt providing that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. The NPPF also confirms that in order to promote a strong rural economy, local plans should, amongst other considerations, “promote the development and diversification of agriculture and other land-based rural businesses”. It is considered that the proposed

works would be classed as engineering operations and thus, it is considered the proposal would present appropriate development.

8.7 The principles set out in the NPPF are reflected in Policy G2 of The London Plan (2021) and Policy DMD82 of the Development Management Document. Policy G2 of The London Plan (2021) states that the strongest protection should be given to London's Green Belt, in accordance with national guidance.

8.8 The issues to be considered are therefore:

1. Whether the proposal will assist in keeping the land open.
2. Should it be considered that it does not assist in keeping the land permanently open, whether very special circumstances exist to outweigh any identified harm.

8.9 It is recognised that there is an existing bund on the site. Due to the nature and scale of the proposal it is considered that the final scheme would keep the land open but at a higher level across the site. The SMA and the access road impact on the openness of the Green Belt, however the temporary nature of these features is acknowledged. They will not prejudice the continued use of the land for an appropriate Green Belt use once the works are completed as they will be removed. In this regard therefore, the development is considered acceptable in terms of its effect on the green belt.

#### Impact on Character

8.10 Policy CP30 of the Core Strategy requires new development to be of a high-quality design and in keeping with the character of the surrounding area. Policy DMD37 sets out criteria for achieving high quality and design led development.

8.11 Although areas of the site would increase in height by up to 8 metres the ground levels will not exceed the existing highest point on the site. The greatest increase in heights would be due to the infilling of existing valleys. Proposed trees and plants are proposed to be sited across the site. It is considered that the open and rural character of the area would remain.

8.12 The site falls within the farmland ridge and valleys landscape character – Turkey Brook Valley which has characteristics such as mature, well managed hedgerows with intermittent mature hedgerow trees and undulating landscapes. Visual impact assessments from a range of locations across the site have been provided to help understand the impact of the proposal. With the proposed land levels and the soft landscaping proposed across the site, in line with Policy DMD37, it is not considered that the proposed development would be inappropriate to its context or fail to have appropriate regard to its surroundings or the character of the surrounding area.

#### Impact on Adjoining Occupiers

8.13 The construction of the proposal could result in disruption to neighbouring sites. Given the nature of the proposal and its siting adjacent to the neighbouring sites to the south west– St John's Senior School and North Lodge, Farm it is

not considered that the proposed development would result in any demonstrable amenity harm to these properties or their occupants.

#### Contamination

- 8.14 The material to be brought in and used to implement the scheme must be suitable for use on agricultural land. Under the previously approved scheme ref no. 19/02850/FUL the spur roads from the main access road had been constructed at a raised height to prevent contamination.
- 8.15 The existing scheme is subject to compliance with the Earthworks Specification dated August 2019 which ensures that all material used for implementing the development is suitable for use on agricultural land. Further, the permission is subject to a condition requiring submission of a verification report to demonstrate the material's suitability. Reprofiting of the proposed extension area would be implemented fully in accordance with the existing approved Earthworks Specification and the submission of the required verification report would include the new extension area.
- 8.16 As such, the application proposal would comply with ELP Policy CP32, DMD Policies 64 and 65, and NPPF paragraphs 170 and 178 which aim to ensure that potential polluting emissions from development proposals are suitably controlled.
- 8.17 Environmental Health do not object to the application as there is unlikely to be any negative environmental impact. In particular there are no concerns regarding air quality or noise.
- 8.18 The Environment Agency (EA) have advised that the application falls out of the scope of the EA however previously suggested an informative condition would be necessary as any development using waste or other material for engineering works may require an Environmental Permit, unless it is exempt from the need for a permit. Waste transported to and from the development must only be carried by a registered waste carrier. The suggested condition and informative will ensure that the scheme does not lead to contamination.

#### Highway Issues

- 8.19 The main highway issues for this scheme relate to the transfer of ground material onto the Ridgeway, the safety of traffic using the Ridgeway during construction works and the safety of pedestrians and cyclists using the public footpaths. A Transport Statement and Construction Management Plan is submitted with the application.
- 8.20 A temporary access road is required to ensure the safety of the users of the nearby public right of way. Following the implementation of the scheme the access road will be removed. There is a car park to the front of the site to accommodate staff and visitors, and there is a wheel washing system in place that vehicles go through upon exiting the site. Deliveries from the site will take place from the west of the site, from the M25. The site will be open from 6:00 and 18:30 however a condition would be attached restricting the delivery times of HGVs. To ensure there is no significant impact on the highway network and highway users several conditions will be attached to any decision.

- 8.21 Transportation have confirmed that they do not have any concerns with the scheme subject to conditions. Subsequently, the proposal will not impact on highway safety or the operation of the local road network.

#### Impact on the M25

- 8.22 Highways England is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.
- 8.23 Highways England (HE) have been consulted on the scheme due to the potential impact that the development might have on the M25. HE raise no objection to the scheme on the basis that the proposal will not materially affect the safety, reliability and/or operation of the Strategic Road Network (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF 2021, particularly paragraphs 108 and 109) in this location and its vicinity.

#### Trees, Landscape and Biodiversity

- 8.24 Policy DMD80 of the DMD states that all development including subsidiary or enabling works that involve the loss of or harm to trees covered by Tree Preservation Orders, or trees of significant amenity or biodiversity value will be refused.
- 8.25 Policy DMD81 states that development must provide high quality landscaping that enhances the local environment. The National Planning Policy Framework has been updated to include policies surrounding veteran trees so that they are now recognised as hugely valuable to heritage, culture and ecosystem service provision. The relevant part of the NPPF is paragraph 175, these trees are considered sacrosanct and all development should be refused except for nationally important projects. Veteran trees are trees that are of exceptional interest biologically, aesthetically or culturally because of its age, size or condition. They are irreplaceable and are of exceptional ecological value.
- 8.26 An Arboricultural Impact Assessment and Method Statement have been submitted with the application. The report states that there are 18 individual trees across the site and 5 tree groups of these 17 are B grade trees of moderate quality, 4 are C grade trees of low quality and value and 1 U grade tree (located offsite) which are trees usually for removal (unless otherwise stated), with a life expectancy of less than 10 years. The findings of the report set out that there are no A grade trees. A Grade trees are of high quality and value with a life expectancy of more than 40 years.
- 8.27 It is however noted that there are oak trees with a life expectancy listed within the report that have a life expectancy of more than 40 years, some of which are veteran trees. However, the report states that some of the trees have significant deadwood throughout the crown and leaves have been stripped by the Oak Processionary Moth. It is proposed to remove and replace three B grade trees (Hornbeam and 2x Common Oak), part of mixed species native hedge (to be replaced) and 1 tree (Common Ash) both under grade C. No veteran trees are proposed to be removed.

- 8.28 There are no incursions into the RPAs of the retained trees. Veteran trees have been afforded a 15m exclusion zone where tree protective fencing has been linked between trees to improve the tree protection in these areas. The report states that the proposed drainage outlets and changes in soil levels will be outside of the RPAs of retained trees. All works will be carried out in accordance with BS 3998:2010 'Recommendations for Tree Work' (as amended) and to current arboricultural best practice. Tree protective fencing in accordance with BS5837:2012 will be required to ensure that the RPAs of the retained trees are safeguarded.
- 8.29 Although trees will be lost, new trees, hedgerows, wet grassland and wildflower areas will be planted. This will include ten heavy standard common oak trees with a 14 – 16cm girth to the north east of the site and along two hedgerows. The Tree Officer was consulted on the proposal and has raised no objection on the basis that the loss of trees is acceptable given the proposed mitigation of new soft landscaping.
- 8.30 Through Policy 36 of the Core Strategy the Council commits to 'protect, enhance, restore or add to biodiversity interests within the Borough'. This is reaffirmed in Policies DMD78 to DMD81. The National Planning Policy Framework (NPPF) recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including the establishing of coherent ecological networks that are more resilient to current and future pressures. Paragraph 175 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should therefore be encouraged.
- 8.31 Biodiversity improvements will be achieved through the planting of trees and hedgerows across the site. Significant soft landscaping is proposed across the site and it is considered that a high-quality landscaping scheme will enhance the local environment and character of the site.

#### Drainage

- 8.32 The NPPF requires site specific Flood Risk Assessments (FRAs) be carried out for developments proposed in flood risk areas. The site is located within an area of low risk of flooding, flood zone 1. The risk of surface water flooding across the site is low but is higher along the site's drainage features. Currently surface water is managed naturally via infiltration and/or overland flow into a network of drains/ditches that leads to culverts to convey water towards and across the M25 ultimately reaching the Turkey Brook, a tributary of the River Lee located along the northern edge of the M25. However, the existing drainage design, due to the bund and low soil permeability, has led to poor land drainage at the bottom of the hill between the existing bund and the fields ultimately leading to waterlogged soils and a reduction in available space for growing crops.
- 8.33 The scheme would incorporate ditches/swales and culverts to ensure appropriate and sustainable drainage of the land, as well as providing for attenuation areas to allow for climate change increases in rainfall. It has been explained that the lagoon would store water and give the farmer security and flexibility in crop irrigation by being able to store water in the winter months and

used in the drier summer months. The proposal would improve the drainage characteristics of the land, thereby enhancing growing conditions and lengthening the growing season. The scheme would increase the farm's productivity and decrease overheads by reducing the reliance on chemicals to promote yields and from the farm having its own irrigation water supply. The development would therefore help retain the land in agricultural use and secure the long term of viability of the farm business.

### Archaeology

- 8.34 Historic England have reviewed the submission. Under the 17/00477/FUL and 19/02850/FUL planning permissions a condition was attached requiring the development to be undertaken in accordance with the approved written scheme of investigation and the programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material was required to be submitted on completion for review and sign off by the LPA – this will be applicable to the revised scheme.

### Ecology

- 8.35 Policy DMD 85 Land for food and Other Agricultural Uses is a pertinent policy to consider with regard to the submission. The use of land for growing food, including commercial and community food growing, will be supported throughout the borough. Development on agricultural land will be permitted if the all of the following criteria are met:

- a. The proposal delivers diverse and sustainable farming enterprises without harming the quality or character of the countryside;
- b. The proposal, when implemented, ensures good environmental practice, including long term biodiversity benefits;
- c. The proposal safeguards high quality agricultural land from irreversible development;
- d. Proposals in relation to renewable energy sources do not over-farm the land to the detriment of the local character and ecology; and
- e. The type and volume of traffic generated would not result in danger or inconvenience on the public highway or harm the rural character of local roads.

- 8.36 An Ecology Impact Assessment has been submitted with the application. The proposal would not be contrary to parts a-e of Policy DMD 85 and the site would not have any impact to habitats and species of wildlife to warrant protection measures. The LPA consider a condition to be appropriate requiring the development to be undertaken in accordance with the approved Ecology Impact Assessment.

## **9.0 CIL**

- 9.1 The development would not be CIL liable as there is no increase in floor space.

## **10.0 Public Sector Equalities Duty**

- 10.1 In this instance it is considered the proposal would not disadvantage people who share one of the different nine protected characteristics as defined by

the Equality Act 2010 compared to those who do not have those characteristics.

## **11.0 Conclusion**

- 11.1 The proposed development would help overcome existing drainage issues on the site thereby improving the overall agricultural quality of the land . This would be consistent with the objectives of the NPPF (2021) and Policies CP30 and 32 and Policy DMD 68. The proposal would also generate additional income for the farm while also enhancing the ecological and biodiversity of the land. Subject to further information and details that can be secured through conditions, the proposed development is considered to be an appropriate form of development within the Green Belt and would not result in any demonstrable harm to the open and rural character of the site, the highway network or the wider area.
- 11.2 The proposal is therefore considered acceptable for the following reasons:
- i) In the absence of any material change in circumstances or policy taking into account the adoption of the London Plan (2021) and revisions to the NPPF (2021), the principle of the development has already been established by the planning permissions granted under ref: 17/00477/FUL and 19/02850/FUL.
  - ii) The proposal will increase the productivity of agricultural land and overcome long standing drainage and soil quality issues on the site consistent with Policy DMD85.
  - iii) The scheme would be an appropriate form of development within the Green Belt that would not impact on the sites open and rural character having regard to Policy G2 of the London Plan, Policy CP33 of the Core Strategy and DMD82 as well as the NPPF.
  - iv) The scheme would provide a visual and acoustic screen from the M25, and there would be no impact on the adjacent M25 with regard to structural stability or drainage matters consistent with Policies CP30 and 32 and Policy DMD 68
  - v) The soft landscaping and biodiversity will be greatly enhanced across the site having regard to Policies G6 and G7 of the London Plan, Policy 36 of the Core Strategy and Policies DMD78 and DMD79.
  - vi) The development would not impact on neighbouring residential amenity, the highway network or the safety of highway users having regard to Policy D1 of the London Plan, Policy CP30 of the Core Strategy and Policy DMD 48



- LEGEND**
- Application site
  - Permission 19/02850/FUL area
  - Existing contours
  - Footpath diversion
  - Ditch/drain
  - Trees/hedgerow

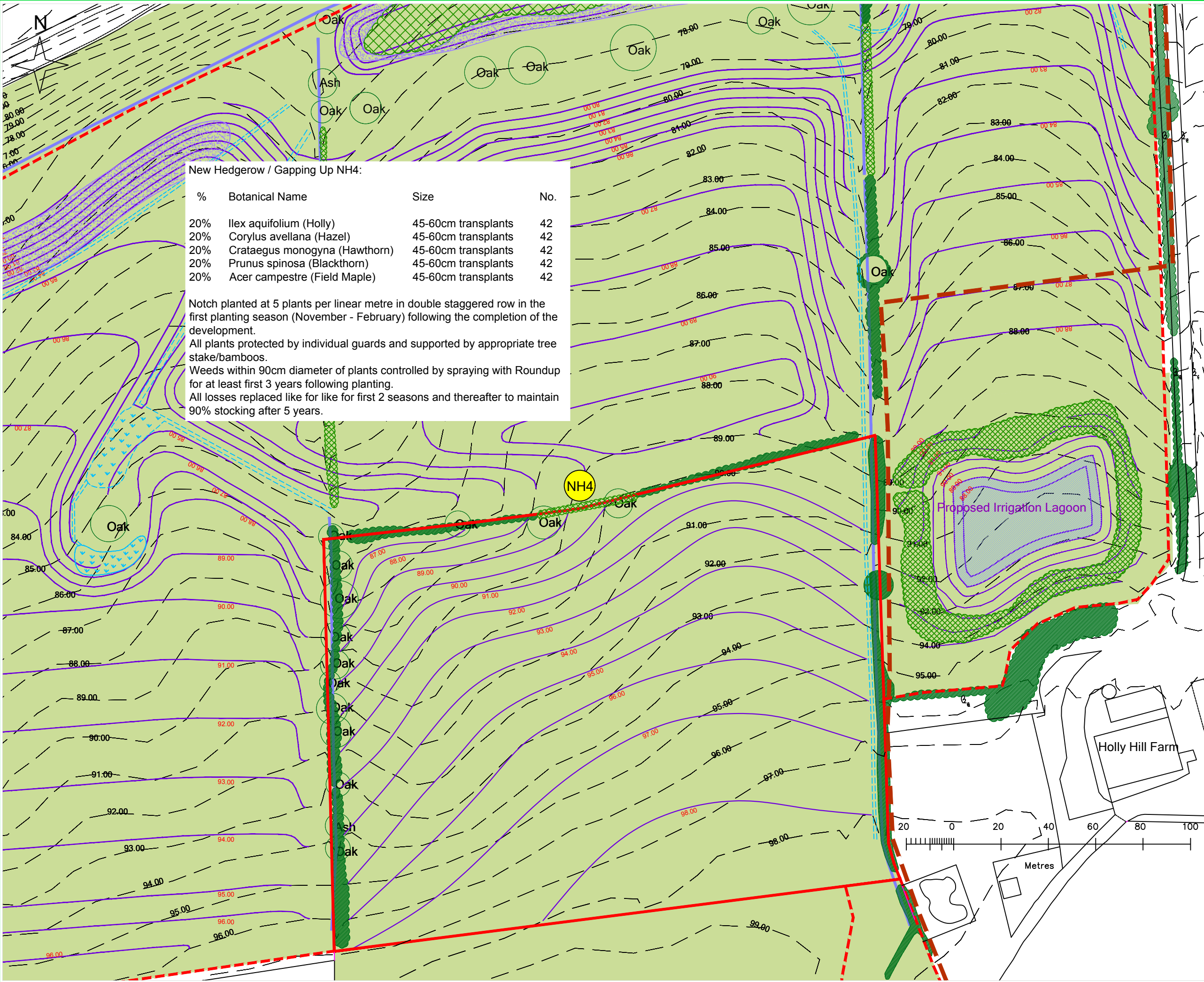
Rev	Description	Date
© Crown copyright. All rights reserved. Licence number AL100036712.		
Client: Golf Environmental (UK) Ltd		
Project: Extension to Agricultural Restoration Scheme, Holly Hill Farm, Enfield		
Title: Existing Site + Enabling Works		
Drawn By:	Suzi Coyne	
Date:	May 2021	
Scale:	1:1500 @ A3	
Drawing No.:	297NFHH/2	

**Suzi Coyne Planning**

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New Hedgerow / Gapping Up NH4:

%	Botanical Name	Size	No.
20%	Ilex aquifolium (Holly)	45-60cm transplants	42
20%	Corylus avellana (Hazel)	45-60cm transplants	42
20%	Crataegus monogyna (Hawthorn)	45-60cm transplants	42
20%	Prunus spinosa (Blackthorn)	45-60cm transplants	42
20%	Acer campestre (Field Maple)	45-60cm transplants	42

Notch planted at 5 plants per linear metre in double staggered row in the first planting season (November - February) following the completion of the development.  
All plants protected by individual guards and supported by appropriate tree stake/bamboos.  
Weeds within 90cm diameter of plants controlled by spraying with Roundup for at least first 3 years following planting.  
All losses replaced like for like for first 2 seasons and thereafter to maintain 90% stocking after 5 years.

- LEGEND**
- Application site
  - Permission 19/02850/FUL area
  - Existing contours
  - Proposed contours
  - Existing ditch/proposed culvert
  - Trees/hedgerow retained
  - Proposed swale
  - Proposed planting
  - Footpath

Rev	Description	Date
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<b>Client:</b> Golf Environmental (UK) Ltd		
<b>Project:</b> Extension to Agricultural Restoration Scheme, Holly Hill Farm, Enfield		
<b>Title:</b> Proposed Landform		
<b>Drawn By:</b>	Suzi Coyne	
<b>Date:</b>	May 2021	
<b>Scale:</b>	1:1500 @ A3	
<b>Drawing No.:</b>	297NFHH/3	

**Suzi Coyne Planning**

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