Enfield’s Planning Statement for Trent Park Campus
Adopted July 2012
Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0 Introduction</td>
<td>2</td>
</tr>
<tr>
<td>2.0 Planning Context</td>
<td>3</td>
</tr>
<tr>
<td>3.0 Overarching Principles</td>
<td>5</td>
</tr>
<tr>
<td>4.0 Parameters for Future Development Options</td>
<td>8</td>
</tr>
<tr>
<td>5.0 Planning Process</td>
<td>8</td>
</tr>
</tbody>
</table>
1.0 Introduction

1.1 The purpose of this planning statement is to set out the Council’s views on the future of Middlesex University’s Trent Park Campus, due to be vacated by the University in summer 2012. It provides the basis for considering future land use options.

1.2 The Statement is needed because the University’s timetable for disposal of the site did not allow for the preparation of a planning brief to be prepared jointly with the Council which would be consulted upon. Instead, the University’s marketing agents, Jones Lang LaSalle, published alongside the sales particulars a planning and development brief prepared for them by planning consultants Tibbalds. Their brief has not been endorsed or adopted by the Council, whose only involvement in its production was to ensure it was factually correct.

1.3 The Council will expect any future owner (s) to accord with Core Policy 33 and will require, in advance of a planning application, a comprehensive master plan for the Campus. Bringing forward a comprehensive master plan or planning brief in partnership with the Council will secure the community and heritage value of this important site.

1.4 Middlesex University have undertaken the first stage of informal bidding (Expressions of Interest). This Statement will therefore help inform prospective purchasers of the site, a site that sits within one the Borough’s most valued historic parkland settings, and where a multitude of planning constraints must be respected in the course of developing new proposals.

1.5 The Council’s foremost priority is to secure an appropriate long term use for the site that delivers the protection and enhancement of both the site’s built and landscape heritage. Strategic Objective 6 of the Core Strategy places an economic development responsibility on the Council to secure a higher wage, quality and high value employment generating uses.

1.6 The Council will also need to be satisfied of the future security arrangements for this part of the Trent Park estate, once the University vacate the site and as soon as new owner (s) takes ownership.
2.0 Planning Policy Context

2.1 Policy issues provide the framework when considering more technical issues related to the site’s physical assets as well as limitations, transport, accessibility and the potential of different uses. The University’s Planning & Development Brief includes a thorough review of relevant planning policy. This Statement therefore focuses on the overarching principles and how these define the issues that need to be considered by both the Council and the eventual owner(s). The principles have been set out in section 3 and the will help identify the parameters for future development that are set out in section 4.

2.2 The most recent adopted development plan policies are set out in Enfield’s Core Strategy, adopted in November 2010. The Proposals Map to the Core Strategy designates the Trent Park Campus as being:
1. a Major Developed Site in the Green Belt;
2. within the Trent Park Conservation Area;
3. within an Area of Special Character;
4. within an Area of Special Advertisement Control; and
5. the northernmost woodland section of the campus sits within the wider Metropolitan Sites of Important Nature Conservation.

2.3 Core Policy 33 of the adopted Core Strategy reiterates a strong commitment by the Council to work with partners (including land owners, agencies, public organisations and the community) to pro-actively preserve and enhance all of the Borough’s heritage assets and lists a number of actions it will take. Core Policy 33 of the Core Strategy addresses green belt matters. The University’s Trent Park Campus is classed as a Major Development Site (MDS) in the green belt, so relevant national policy must be followed. Core policy 33 clearly states the Council’s intention to work with partners to prepare planning briefs or master plans in order to guide appropriate future development that preserves and enhances the character of the green belt.

2.4 The core principles of previous National Planning Policy Guidance Note 2 (PPG2) Green Belt Protection have found reiteration within the new National Planning Policy Framework, (NPPF). The NPPF advocates that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The new NPPF does introduce perhaps even stronger protection for the Green Belt stating in paragraph 88 that ‘substantial weight should be given to any harm to the Green Belt’.

2.5 The NPPF does introduce a change to previous guidance, stating that the construction of new buildings are not inappropriate where they involve “limited infilling or the partial or complete redevelopment of previously developed sites (excluding temporary buildings), whether redundant or in continuing use, which would not have a greater impact on the openness of the green belt and the purpose of including land within it than the existing use”. However in the case on the Trent Park Campus, previous planning applications by the University have evidenced the site’s limited opportunities for infilling. The NPPF is also very clear on protecting and enhancing valued landscapes, the historic environment and promoting the viable uses of heritage assets and their conservation.
2.6 Enfield’s 2011 Characterisation Study provides for a comprehensive account of Trent Park’s landscape setting in a local context, and concluded the estate can be distinguished by two Areas of Special Character:

1c. The Merryhills Brook Valley: a landscape of undulating fields and the Trent Park Golf Course; and
2a. The Enfield Chase/ Trent Park: an area of undulating woodland and parkland containing Trent Country Park and part of Middlesex University.

2.7 The London Plan seeks to encourage and give positive consideration to new educational facilities, (Policy 3.18). Furthermore the London Plan in Policy 4.10: New and Emerging Economic Sectors, places emphasis on boroughs giving strong support to higher and further educational institutions and other relevant innovation and research agencies. The Council’s Core Strategy and S106 SPD would require both the loss of an education and employment generating use to be heavily justified. Consideration will need to be balanced and in the context of securing an alternative land use, and the long term heritage need to secure the an appropriate occupier that continues to protect, enhance and leave the site open to public access that as has been enjoyed under the University’s ownership.

2.8 Emerging policy in the Council’s Draft Development Management Document 2012 due for public consultation in May 2012 will provide for detailed polices that will provide local criteria for assessing: Preserving and enhancing Heritage Assets; Previously Developed sites in the Green Belt; Loss of Community Facilities (including educational institutions) and; Loss of employment capacity. These emerging policies are based on up to date evidence base work and, along with relevant adopted polices have been set out in Appendix 1 for information purposes.
3.0 **Overarching Principles**

3.1 Set out in this section are the four overarching principles that will govern the Council’s planning and economic considerations.

1a. **Heritage Value**

3.2 The Council’s requirement for heritage led redevelopment to preserve and enhance the Borough’s heritage is an important distinction from a requirement to preserve or enhance. This reflects the Council’s belief that heritage assets almost always present opportunities to increase the value, quality and unique character of a development. In addition, the Campus and gardens are listed at grade II in English Heritage’s non-statutory Register of Parks and Gardens of Special Historic Interest, and accommodate two Grade II listed buildings and several listed buildings and features. Redevelopment opportunities should aim to:

- Conserve and improve the heritage value of the Mansion and its setting.
- Repair and enhance the structures, features and statues that characterise the Mansion and Park, with priority given to those heritage assets that are At Risk.
- Restore key landscape features both structures and designed landscape.
- Explore appropriate uses for the Mansion and associated buildings, including potential demolition of inappropriate recent buildings to ensure long term conservation and enhancement.
- Improve management, maintenance and security of the Mansion and the Park as a whole.
- Increase the range of park visitors and audiences.
- Improve greater understanding and accessibility to the heritage value of the Mansion and Park.

3.3 For further detailed information and guidance the Council has produced:

- The Trent Park Conservation Area Character Appraisal (2006)
- The Trent Park Conservation Area Management Proposals (2007)

3.4 The Council seeks to improve the setting of the Mansion and of the Long Garden. The 2006 Character Appraisal identifies those buildings that impair and are intrusive to the respective settings of both. With regard to the Mansion, these are the 1960/70’s buildings named Bevan, Jebb and the students union block. Regarding the Long Garden, the music school obstructs important vistas, it also has a negative impact and its removal is encouraged.

3.5 A key heritage asset is the Mansion Terrace which is on English Heritage’s at Risk Register. The Terrace is a major cost item; estimated repair costs by the Council are in the region of £1.2m. The temporary shoring and storage of loose stonework was secured with the University in 2007. The Council would as a priority seek to secure full repairs through any new development opportunities and will seek to do this through legal agreement such as a S106 agreement.
3.6 The statues of Samson defeating Philistine and of Hercules and Autaeus are also still listed on English Heritage’s at Risk Register. However the statues were removed from the site in 2011 and have undergone repair off site, due to be returned on site in 2012. The Council has advised English Heritage that they should now be removed from the Register when it is next updated.

3.7 The Council’s governing aspiration for the future of the campus is the ability of any future occupier to continue to protect its future preservation and continued improvement without detriment to its historic character.

3.8 Coupled with the heritage element is the continued expectation to secure public access to the heritage assets for future enjoyment. The University currently offers permissive public access arrangements throughout the grounds, albeit with restrictions in place overnight. The Council would look positively at any future uses that would continue such arrangement, and would also wish to extend opportunities by way of negotiating managed access arrangements to some of the key assets such as the Orangery, Lido, Mansion and daffodil lawn, possibly through potential annual ‘open house’ events. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways, links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure, and ensure compliance with the Council’s planning polices.

1b Heritage Landscape Value

3.9 The Campus is within a designated parkland setting and is considered to be a designated landscape of national importance and the impact of the development on this historic parkland must be assessed where appropriate. Although extensively altered by the site’s expansion to provide additional student facilities, many of the landscape features laid out by owners during the eighteenth, nineteenth and twentieth centuries survive.

3.10 To help provide greater understanding of the significance of the Park, English Heritage has funded a high level study of historic landscape issues. This has been prepared by the Garden History Society and is incorporated as key evidence for this Planning Statement, future master planning work, and eventual planning proposals.$^{1}$

2. Major Developed Site with the Green Belt

3.11 The Trent Park Campus is essentially a landscape in which buildings are set and, historically, the two elements have been designed to be interdependent and complementary. Previous planning applications have shown that it would be possible for development to be moved around the site but this would have to be subject to its impact on the environmental and visual appearance of the site, connectivity with the rest of the borough and physical relationships with the rest of the Parkland and wider Green Belt.

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$^{1}$ THE DESIGNED LANDSCAPE AT TRENT PARK, Analysis, interpretation and guidance for new development Prepared for English Heritage by Barbara Simms on behalf of The Garden History Society; June 2012.
3.12 Substantial weight will be given to any harm any future proposed development would have on the Green Belt. The construction of additional new buildings is limited to volume and footprint, and the alteration and extension of existing buildings will be a complex balance ensuring the sense of openness of Green Belt is enhanced with minimal visual impact.

3. Community Facilities

3.13 Current and emerging local policy place strong protection on community facilities and the London Plan is clear on safeguarding land in educational use for future educational provision. The site has worked well as an educational institution and would continue to do so. Further, the London Plan encourages higher education institutions (HEI) and further education establishments to work with boroughs to plan future developments.

3.14 The Council has itself considered the site for its own education needs and whilst there is a need for primary and secondary places, it is not in this location; therefore there is no immediate local authority need for continuing educational use of the current nature. However, the Council would need to see it demonstrated that every effort is made to identify alternative education provision, whether this is through private education, HEIs, FEs, or other education models.

4. Employment

3.15 The Council holds a strong commitment to protecting jobs, and while the employment element of the Campus has its origins in educational use, the current use is also viewed as employment premises. Core Policy 13 seeks to protect Enfield’s employment offer. Therefore the Council will expect every opportunity to be explored that provides for employment generating uses. Whilst proposals may need to go through the sequential test this will be balanced against the need to secure the long term appropriate future use of this heritage asset and the listed buildings it accommodates.

3.16 The loss of employment would need to be mitigated against, as set out in the Council’s Section 106 Supplementary Planning Document.
4.0 Parameters for Future Development Options

4.1 Most of the land surrounding the University’s campus is identified as Trent Park Country Park, owned, managed and maintained by the Council for its public enjoyment. As publicly accessible parkland of intrinsic historic value and as designated Green Belt countryside the Council’s priority is to protect its enjoyment whilst recognizing the central educational Campus now needs to respond to a new change in circumstance.

4.2 The site has a zero rating in terms of Public Transport Accessibility Levels (PTAL), circa 1.2km from the nearest bus stop. The Council would be concerned if any substitute use materially increased the traffic impact on the surrounding area. The operations of Middlesex University and the current use of the site has functioned to a tolerable level which also included the running of a shuttle bus service down Snakes Lane. Any new owner (s) should be mindful that there is no prospect of the public transport accessibility being improved to address the remoteness of the site then certain uses would inevitably cause difficulties. The Council is likely to require the continuation of a shuttle service and / or off-site highway improvements as it does not consider a Transport Assessment or Travel Plan would overcome the issues associated with an unsustainable location.

4.3 Whilst there are challenges created by policy, none appear insurmountable within the context of a deliverable replacement offer. As a starting point, the Council would wish to consider the future of the Trent Park Campus as a single entity; potential proposals should seek to address heritage led regeneration, community, leisure and economic opportunities appropriate for a MDS in the Green Belt.

4.4 The Council is seeking to secure sensitive development that brings with it economic value to the Borough. Institutional / headquarter type uses would benefit from a high profile site location. The loss of an education use will need to be justified and balanced against any alternative land uses. Non-residential institutional (Class D1) serving uses such as technical / specialist colleges or Research and Development institutions are also considered to offer the sensitivity required for this site.

4.5 The loss of the economic value of the University’s presence as an employment generating use is also a planning policy consideration. The Council would be encouraged by proposals that can offer the appropriate scale of economic and high wage employment generating activity. The Council is open to discussing a variation as well as a combination of compatible land uses that may allow for this. For example it may include a mixture of Class D1, (non-residential institutions such as health, education, museum, public worship or religious instruction); Class D2, Assembly and Leisure such as places for recreation, halls); and possible B1, offices, headquarter, financial or research and development) type uses.

4.6 The Council also recognises the site has the potential to attract high quality leisure and recreation uses that could both generate employment and be sympathetic to character and the rural landscape, whilst also according to Green Belt polices. Such leisure and recreation uses would ultimately be seeking to take advantage of the location and the heritage assets to market their USP. This might include hotel, spa and retreat type ventures with some conferencing that aims to capture the value of heritage and landscape.
4.7 The Council is supportive of raising the profile of Trent Park as a resource to be enjoyed by the wider public as well as a high profile site for the appropriate uses. The Council continues to be supportive of creating new leisure and economic opportunities that raise the profile and increase the diversity and use of Trent Park.

4.8 Council policy and the NPPF on Green Belt and sustainable development would not support a residential-led scheme as an appropriate use in this location. However, in terms of viability and balancing the need to find an appropriate long term use, the Council will discuss options that might include institutional residential, or residential as ancillary, that might act as an enabler, and these would not be dismissed at this stage. Any specialist housing models would need to be considered on their merits.

5.0 Planning Process

5.1 The Council will expect any future owner(s) to accord with Core Policy 33 and seek in advance of a planning application a comprehensive master plan for the Campus site. Bringing forward a comprehensive master plan or planning brief in partnership with the Council continues to be Council policy for this Major Developed Site in the Green Belt.

5.2 The assessment of the visual effects of development on the surrounding area and landscape together is expected, together with an assessment of any physical effects of the development, such as changes in topography. This should assist developers demonstrate compliance with Core Strategy and draft Development Management Document strategic objectives and policies.

5.3 Any planning application or pre-application advice at the site will be treated on its merits, and prospective applicants are strongly advised to seek formal pre-application advice from the Council’s Development Management Department prior to submission of any development proposals. Both English Heritage and Natural England are identified as key partners in the management of change at Trent Park. A process of pre-application discussions will enable the basic framework for the nature, scale, and disposition of development, access arrangements to be examined and the principles of development to be at officer level only. There is a pre-application fee that would apply; fees applicable are set out on the Council’s website.