

Enfield Local Plan - R18 June 2021 Consultation Main issues and preferred approaches

Some observations and comments having read the draft plan:

The repeated tone within the Leader's introduction, "...will be ..." is welcomed, setting an expectation and intent to deliver what is otherwise purely on paper.

1.28 / Table 1.1

The section could benefit from an explanation as to why certain policies are deemed strategic whereas other are not.

2.1.11

Climate change driven changes to the jet stream have two main scenarios for the UK of which there seems to be no defined scientific consensus / expectation:

1. Continuation of bringing westerlies to the country, and hence increased flooding; or
2. Increased "blocking" by static air over the country resulting in the jet stream being deflected north and south, driving even hotter summers but also extended, severe winters.

An amendment to the section is therefore suggested:

In looking to the future, the Borough faces challenges. Man-made climate change is transforming the Borough, raising real risks of flooding and overheating, as well as a possibility of more severe winters.

At the residential level, the current expectation of enhanced insulation to reduce required heating usage will be in line with actions to mitigate severe winters but outside of that contingencies to keep the borough moving and supplied come much more to the fore as required planning activity.

Figure 2.2

Would be more appropriately headed, "Challenges and Opportunities in Enfield".

Section 2.2 Questions

Plans are inevitably about balance. There appears to be some degree of risk that the plan, in being heavily focused on Enfield as a unit, misses opportunities from the borough being typically 30-45 minutes easy travel from two of the largest and most dynamic commercial hubs in the world. In form this may be no more than offering an attractive location for workers to reside, but in a post Covid world could offer satellite facilities to central firms yet still offering them fast access to the main hub.

Such opportunity would be made more obvious to many more potential investors and residents were TfL able to include key N-S rail routes accessing the borough onto their London wide transport map – Hertford and Welwyn over ground lines.

A brand would ideally touch everything within an organisation, every contact, every communication, everything material. Intangible and yet hugely valuable when managed successfully, they can run as far as the nation state – eg Espania, Cool Britannia.

I would see such an approach as an opportunity for the borough.

Vision

Such things would ideally be clear, brief and in particular motivational. I have no issue with the employment floor space intent but would never dream of including such an issue in a vision statement.

In a similar vein, “Across the borough, we will use biophilic design principles to ensure that opportunities are maximised to knit new development into improved blue-green networks” seems unlikely to be the key to unlocking residents pride and action in their borough. Most may well wonder what it actually means.

Simple and clear is good.

Table 2.1 Strategic Objectives

I would prefer to see a single SO in this area focused on housing rather than the present # 3, #4 and part #1. Specify the volume and variability objectives plus the other add-ons covered in a single section.

Not dissimilarly, the active travel section forming the second sentence of #5 appears to be more suited to inclusion in #6 than its current location.

It is unclear why the safeguarding of key externalities are linked only to the NLWP – and therefore presumably new waste sites or changes to existing waste sites or build close to same, rather than in the generality: air plus water quality and control of noise and pollution should be core drivers across the borough for all developments - as well as applying to the status quo. This area would benefit from broadening and strengthening.

Re SO 10. See comments under 2.1.11 and the potential for a need to better manage cold risk – both in developments as well as the wider borough infrastructure – as well as heat risk.

SP SS1 / 4

The absence of Palmers Green district centre as an area for growth is noted despite its inclusion elsewhere as being a focus area for growth and investment eg SO19. Ironing out such differences should help enhance the ELP's robustness and coherence.

SP SS1 / 9

Noting the intent and that bus services to J24 from the borough along the two main access routes are far from ideal, the intent may provide an excellent opportunity to provide safe cycling access on one or both of the Ridgeway (A1005) and /or Cockfosters Road (A111).

Table 2.1 Strategic Objectives / 5

“To make walking and cycling the natural choice by embedding the healthy streets approach into new developments.”

It is unclear why such a step is implied as being limited to new developments.

2.4.4

“Unique challenges” said to apply to the borough would be usefully specified.

2.4.5

Housing, specifically its location, is an inevitable hot-button topic. The use of brownfield land and other NPPF / London Plan requirements and guidance could be usefully exhibited in a cumulative land use / availability table with its total increasing as more and perhaps less attractive options are added, inevitably ending with fresh green belt use. The land size, housing estimate, driver (eg NPPF, London Plan element) being noted all would add to readability and ease of understanding where the trade-offs lie.

Such a table could assist with understanding, eg Enfield Dispatch August 2021 has an advert (Enfield RaodWatch) indicating that there is enough brownfield land to meet realist housing and infrastructure needs. Exhibiting sites brought forward vs housing and SIL/ LSIS requirements (of LBE / Mayor / HMG) would help show where any break points or incremental densification opportunities occur.

Table 2.2 Option 1 (also Option 3)

Unclear how other land uses will not be met or only be partly met when less land is presumably being employed for housing. Clarifying exactly what is the resulting would assist understanding / readability.

Table 2.2

As an additional option in the vein of #'s 5,6 and 7 as an alternative to green belt development, the option of high density vertical buildings, predominately centred around transport hubs / town centres, would appear to be a worthwhile addition to the analysis. Unattractive perhaps and already subject to pushback in parts of the borough when explored but certainly an option

3.2.4 Southbury Placemaking Vision

With its location not so far off bang in the centre of the borough I struggle with a vision which describes the area's role as a gateway to Enfield.

Figure 3.3

I would have hoped to have seen a clear walking and cycle route option running to from Enfield Town as part of the map. (That may be a function of the map, the series trying to include too many layers to be easily legible. Movement and fixed items could be shown on two separate maps, as a minimum, which would greatly enhance readability.)

3.2.6

The implication of the paragraph is that connectivity to the east and west will be enhanced but via motorised transport. Rather the opportunity should be exploited to maximise all possible active travel means to their fullest potential.

Southgate Placemaking Vision

The wording “hangs” at the end. It is not clear what further is intended.

Figure 3.7: Southgate placemaking vision

The figure is not clear but seems to suggest the absence of a cycle route from the area roughly at and North West the gates of Grovelands Park (thick darker purple) into the district centre. The dashed purple line in such a place appears to be an enhanced walking route. Neglecting cycling opportunity on the specific section (Bourne Avenue junction with The Bourne to Southgate Circus) should be considered a missed opportunity, linking eg Meadway and Lakes Conservation area and Palmers Green DC with a safe cycle route to Southgate via the Fox Lane area LTN.

3.7.6 / 2

Greater play could be afforded to the locations relatively close links to the DC’s of Southgate and Palmers Green, including large residential areas associated with both within reach of New Southgate and in particular the Piccadilly line tube. Walking and cycle route maximisation / enhancement running through and round Arnos Park as well as enhancement to the A406 cycle route would assist in this and so the vision of a gateway which is connected to the rest of the Borough.

4.1

Climate change has the potential for the severe and enduring changes highlighted and could well be existential for mankind. What follows, “Climate change is an issue of social justice.” risks losing the sheer import of the risk. A small amendment is therefore suggested to “Climate change is also an issue of social justice.”

4.2

Suggest adding a footnote defining carbon neutral

4.3

Suggest adding a footnote defining net zero carbon development

4.1 SP SE1

While heat and flood related risks are addressed, the climate change driven potential for harsher UK winters is given no weight. That could be a costly oversight in the effective running of the borough and health of its residents should that scenario come to pass.

The SP, focussed as it is on development, excludes any reference to the promotion of active travel as a result to the same. That appears to be an omission worthy of correction.

The SP is development focused in form but is headed up in the general and so an additional response is suggested:

- By linking with initiatives on health and wellbeing to seek to reduce the carbon intensity of food consumed within the borough

4.8 DM SE8 (or alternatively 4.10 DM SE10)

Previous years have seen the installation of considerable areas of hard landscaping, primarily for car parking purposes, on the boroughs private gardens. An addition is suggested to acknowledge and provide the intent to reverse this process with its flood risk mitigating benefits:

- The council will work with partners and residents where innovative solutions can be found to turn private gardens away from (non SuDS compliant) car parking facility and back to horticultural space.

4.8 DM SE8 / 4.9 DM SE9

The focus in both cases is on new development but there is a risk to existing infrastructure and residents (as is covered in the plan, primarily the lower lying area to the east of the borough). Water is no respecter of administrative boundaries and so the Duty to Cooperate is imperative in such a case.

The confluence of Enfield, Haringey and Barnet boroughs has long been an area where such cooperation, and management, is required but has historically been absent.

The CFC Consulting report, enclosed here for information, formed part of submission documentation to the NLWP R18 and highlights some of these issues for Enfield.

This Local Plan would seem to be the ideal opportunity to work with adjacent boroughs to mitigate such (ever increasing) risk.

5.2 SP SC2 / 2

The list would seem to exclude the option of eg a cinema chain opening and offering a new community space on its upper floor (eg Picture House Crouch End) or a community space at the rear of a existing / redeveloped site (eg Fox public house Palmers Green).

Wording to acknowledge the attractiveness' of such initiatives despite the general requirements of the policy would be appropriate.

6.8 Policy DM BG8: Urban greening and biophilic principles / 5

Where trees on existing streets are to be removed a presumption in favour of like for like replacement appears appropriate – the borough benefits from many old trees of considerable scale yet trends are towards smaller specimens of much shorter lifespans. Efforts to maintain the historic appearance, as well as enhanced shading of such species warrants support.

6.8 Policy DM BG8: Urban greening and biophilic principles

A commitment to developing further green spaces via parklets could be added as a powerful pointer as a principle #6.

6.8 Policy DM BG8: Urban greening and biophilic principles

A considerable extent of the overall urban space is allocated to roadways and / or car parking space. A principle to cap the present share and seek to reduce its overall weight in future would represent a powerful principle #7.

6.8 DM BG8 /2a

Southgate is not typically listed as an area experiencing high levels of deprivation.

6.8.5

“Works to protected trees (e.g. TPOs) or trees situated within a conservation area) “

The removal of the inner parenthesis to produce

“Works to protected trees (e.g. TPOs or trees situated within a conservation area)”, thus categorising CA trees within the protected size limit would avoid the risk of eg the hundreds of sycamore seedlings I can remove on a typical early summer weekend from my CA garden first requiring PP.

6.9 Policy DM BG9: Allotments and community food production

The stableyard of Broomfield Park, and ex food growing area could represent a useful addition to the stated shortfall of same in the Palmers Green area.

7.5 DM DE5 / 2

If not already included, shorter distance local views well worthy of protection include:

- Priory Hospital looking over Grovelands Park and lake
- Christchurch Southgate from the Walker cricket ground
- The Arnos Park Pymmes Brook floodplain looking towards the Piccadilly Line viaduct

Table 8.5 / Chapter 8 Comments

The chosen option is supported but by definition this segment of population are not (necessarily) static and so in particular tied to an individual borough and its administrative boundaries. Planning to the boroughs perceived “normal” element – 21 is implied – and appears appropriate, as would be clustering to follow the “normal” element of sites, eg one of 21, or four sites of 5, or whatever the norm is shown to be. Given the inevitable transient implication placing such sites more towards the boroughs boundaries than central could be considered, as could providing an incremental element

of say 20% of pitches to allow for the additional and occasional cross borough boundary movements into Enfield.

Table 10.1

Aldermans Hill is highlighted as a Small Local Centre distinct from the District Centre of Palmers Green. Retail in both is admittedly separated by the rail station and Job Centre but on every local measure, actual and perception is seen as one and the same continuum. This is further evidenced by the local business association (GLBA) spanning both and one and the councils own large Palmers Green Town Centre welcome signs being based at the western end of the Aldermans Hill run.

Any consideration of the town centre would inevitably look to Aldermans Hill as an element of the overall mix overall casting some doubt on the usefulness of the small breakaway part as indicated in the table.

13.1 SP T1 2a

To the list of rail / tube transport infrastructure improvements should be added a non-peak daytime frequency on the Hertford North and Welwyn overground lines of at least 4 trains per hour, an equivalent frequency all day Saturday and at least three on Sundays.

13.1.5

An integrated approach should be followed from the micro as well as the macro development. One type of example can be found on (traffic heavy A Road) The Bourne at its junction with Hillfield Park / Burford Gardens. On installation, mid carriageway islands were not built for pedestrians and certainly not to accommodate wheelchair / prams. Later work to the verges of the A Road installed high kerbs either side of the islands making standard pedestrian crossing fraught with trip danger.

Minor modifications at the time of installation to both would have substantially increased the active travel experience and safety across an otherwise community splitting corridor.

Each and every planned spend should be assessed for active travel impact and optimisation. Such an approach fits with DM T2 (13.2 Making active travel the natural choice).

15.1 SP D1 Other Priorities

The listed other priorities are all supported but an addition to allow for resource to be focused towards support for the borough's youth, a generation increasingly highlighted as suffering relatively and who have borne much of the covid related restriction in support of other community members (mainly the older / elderly) deserve a lift. Through that we all also benefit, thus add an additional category

- x. Various youth support

SA 42 Fords Grove

Heritage considerations would seem to incorrectly refer to Palmers Green

Table B1 KPI's / 25

A 2041 target is beyond the plan horizon. Intermediate monitoring to help ensure the correct direction of travel seems appropriate, eg a strengthened target along the lines of:

- Continuous improvement towards meeting the Mayor's target of 80% by 2041.

END

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