



Better Streets for Enfield - response to Enfield Local Plan September 2021

Dear Enfield Council

Response to the Draft Local Plan Reg 18 Consultation 2021

Thank you for the opportunity to respond to this important consultation. This response is sent on behalf of both Better Streets for Enfield and the Enfield Cycling Campaign. Our response is structured by the chapters in the Local Plan where applicable.

The comments provided in this response to the consultation are our own views.

Section 2 'Good growth in Enfield'

1. We believe that the statement that the borough is 'permeated' by walking and cycling routes is an exaggeration (p13 para 2.1.4), and would prefer the statement 'thanks to the Healthy Streets and Cycle Enfield programmes, the borough is becoming more permeable to walkers and cyclists. However, some significant gaps still exist in the network.
2. After "High streets can be transformed into multifunctional hubs" add "which are not dominated by passing traffic but are pleasant and green places for people to mingle" (p15 para 2.1.7).
3. We support most of this para 2.2.1 on p17, especially the bullet point about "safe and attractive routes for pedestrians and cyclists". However, we are opposed to building on Green Belt land so would replace the fourth bullet point by "How to strike the right balance between building new housing in areas which are already densely populated and those of a more "suburban" character?"
4. Vision: We agree with all the paragraphs setting out the Vision and with everything in Table 2.1 (p18 para 2.3.1). However, we would like some points to be strengthened:
 - a. Strategic Objective 5 should also include an objective for all housing and all workplaces, not just new developments, to be connected by safe and pleasant walkable and cyclable routes.
 - b. Strategic Objective 6: We would like a stronger statement to include "an integral network of active travel routes throughout the borough".
 - c. Strategic objective 12: It is completely unclear what is meant by "a major green infrastructure corridor in the north of the borough" – a clearer description is required.
5. We disagree with including Crews Hill and Chase Park in the placemaking areas. This is incompatible with the previous paragraph's mention of protecting and enhancing Enfield's valued characteristics and assets (p.22 SP SS1). We object to paras 7 and 8, which contradict para 13. In particular, we believe that development of Chase Park would increase the amount of



driving. It is remote from rail stations and from any significant clusters of shops and businesses. Residents would use cars to access shops in Enfield Town, adding to congestion on Windmill Hill in particular. Currently there is no cycling route of acceptable quality between 'Chase Park' and Enfield Town.

Section 3 'Places'

1. We object to the following policies, all of which propose the dedesignation of Green Belt for housing and other purposes.
 - a. SP PL10, pages 80-87, and Figure 3.11;
 - b. SP PL9, pages 77-80 and Concept Plan Figure 3.10;
 - c. SA45: Land Between Camlet Way and Crescent Way, Hadley Wood, page 364
 - d. SA54, page 374
 - e. SA52 page 372, which would remove part of Rammey Marsh
 - f. SA62 page 38

2. Our reasons are
 - a. The impact on the environment and character of the borough, including the loss of Crews Hill.
 - b. Using Green Belt means that housing is built in areas with a lower level of access both to public transport and active travel measures such as cycle lanes in place elsewhere. There is real potential for new areas which become car dependent and to contribute to pollution in existing areas.
 - c. It would represent a significant step away from concepts such as the '15 minute city' and would make the modal shift required towards active travel much harder to achieve. We would like to see more robust policies about discouraging motorised transport, encouraging car sharing and hiring and improving public transport infrastructure.
 - d. The areas of the Green Belt identified make a significant contribution to the physical and mental well-being of Enfield residents. An example of this is Vicarage Farm which is crossed by the Merryhills Way footpath.
 - e. We note the house building targets set for Enfield, the overcrowding issue referred to in this section and the anticipated 50,000 increase in population by 2039. The pandemic has led to many demographic changes in and around Enfield, and the full impact is yet to be known. Brexit is also leading to demographic changes. Although we support the ambition to meet Enfield's housing needs, we query whether the figure of 25,000 additional houses expressed in the plan is still relevant.
 - f. Furthermore there is little about planning for reuse. The priority to 'reuse and retrofit existing buildings wherever possible before considering the design of new buildings' in policy SE3 is not supported by planned actions elsewhere. It is not clear in the report

- which brownfield sites have been rejected as unsuitable, or the process which has been gone through in order for building on the green belt to be considered the best option.
- g. It is pleasing to see references to local waterways, such as Salmons Brook and Pymmes Brook as assets and a desire to make the most of them.
3. We would like to see both a stronger commitment to and a higher profile for active travel, and reducing car journeys, with targets set.
 - a. There are targets about 'whole life cycle carbon' and a clear link to the climate plan, but a lack of metrics in the report as a whole.
 - b. The phrase 'low traffic neighbourhood' does not appear in this section, or indeed anywhere else in the document. We would like to see a strong commitment to this in general, as well as in the design of any new developments.
 - c. There's only one proposal (on p45) for a new cycle lane.

Section 4 'Sustainable Enfield'

1. This section mainly covers sustainable planning and development policies but excludes transport and leisure policies which are covered in other sections. We generally support the policies listed in this section and have made comments on transport related issues where they are listed in other sections of the document.

Section 5 'Addressing inequality and helping health and wellbeing'

1. It is good to see the life expectancy gap across the borough picked up of seven years between Cockfosters and Upper Edmonton. Active travel can support the closing of this gap and we'd like life expectancy to feature more highly in the local literature on the subject.
2. We would like the council to consider its position on e-scooters once the current trial is concluded. This has the potential to remove a lot of cars from the road and improve health. A lot of journeys to local workplaces could be cut with these, including those where working from home is not an option such as schools and hospitals.
3. In terms of any new school, housing development and so on the language could be strengthened further. If, for example, a new primary school has bike routes to it and so on it is helpful but is somewhat mitigated against if there is a car park space for every member of staff. 'Access to' active travel and public transport is not quite the same as the new priority established in the proposed highway code (pedestrians>bicycles>public transport>private transport). We would like to see these priorities throughout.
4. On the same point we would like to see much more detail on how bus journeys can be shorter and therefore offer more capacity. Often this can include removing car parking spaces to facilitate a bus lane. Those priorities could come into action through local planning.

Section 6 Blue and green strategy

1. We welcome the commitment to preserving and enhancing the natural realm, and are encouraged by the aim to maximise urban greening. We note the reference to sustainable drainage systems such as rain gardens which have been a feature of projects undertaken by Cycle Enfield.
2. We agree with the emphasis on joined up green links for walking and cycling, and new crossings to reduce severance.
3. We support the creation of a 'green loop' which is both a walking and cycling route. We observe that this largely exists already as a walking route, so look forward to it being made accessible by bike, including non-standard and adapted cycles.
4. We are particularly encouraged by the commitment to new crossings/bridges over the A10, A406 and Lee Valley line to improve access to the Lee Valley. We would like it to be clearer that these are intended to be crossing for walkers, cyclists (and wildlife), not motor traffic.
5. We would like the principle of crossings to reduce east-west severance to be extended particularly to railway lines in the Borough.

Section 10 Town centres and high streets

1. We agree with the proposals to support town centres and to limit out-of-town development, especially that which is car-based.
2. We agree with managing streets and spaces to facilitate pedestrian and cycle movement, improve links to surrounding areas and reduce traffic flows along key routes;
3. We would ask for:
 - a. a clear, specific commitment to separated protected cycle lanes and improved walking infrastructure, with cyclists and walkers given priority routes over vehicles in town centres
 - b. more cycle parking with significant provision in large centres and some provision in all centres listed – cycle parking should be secure and under cover
 - c. a reduction in the amount of car parking available to visitors to encourage active travel
 - d. clear signposting for walkers and cyclists

11 Rural Enfield

1. We agree with stated Policy DM RE2: Improving access to the countryside and green corridors.
2. We support the suggestion that development proposals should avoid a significant increase in the number of trips requiring the private car and facilitate the use of sustainable transport, including walking and cycling.

3. We support the proposal that Sustainable Travel Plans will be required to demonstrate how the traffic impacts of the development have been considered and mitigated;
4. We would ask for:
 - a. a clear, specific commitment to protected cycle lanes and improved walking infrastructure in rural areas
 - b. more cycle parking in rural areas – cycle parking should be secure and under cover
 - c. a reduction in the amount of car parking available to visitors in rural areas to encourage active travel
 - d. clear signposting for walkers and cyclists

12 Culture, leisure and recreation

1. We support:
 - a. the proposal that new arts, culture and entertainment uses will be directed to Enfield Town, the four District Centres and Meridian Water in line with the town centre hierarchy, as well as other locations of excellent accessibility via public transport, walking and cycling.
 - b. the idea that proposed development for visitor accommodation in rural areas should, where possible and relevant to its function and location and facilitate the use of sustainable transport, including walking and cycling.
 - c. the plan to maximise opportunities for walking, cycling and use of public transport
2. We ask that
 - a. sustainable tourism and in particular walking and cycling activities are encouraged and supported
 - b. all cultural, leisure and recreation facilities (extant and planned) have ample secure and covered cycle parking
 - c. car parking at these venues is minimised

Section 13: Movement and connectivity

1. We agree that choosing to walk, cycle or take public transport requires investment in these modes. They commit to the Mayor of London's Transport Strategy objectives to deliver a transport network that improves the health and wellbeing of all Londoners and to achieve an 80% mode share for active and sustainable travel by 2041. There is little to disagree with this so we support all in this section.
2. There is a sentence that alludes to the idea of the 15 (or 20) minute neighbourhood - where most facilities should be available within a 15 minute walk or cycle ride "... minimising need to



travel through good design and location". We would ask to have this spelled out in more detail and how this could be achieved (note it may be spelled out in another section).

Thank you for reading our response

Better Streets for Enfield and the Enfield Cycling Campaign

September 2021