

## **Response to Draft Enfield Local Plan**

### **From an Enfield Design Review Panel member and local resident**

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I am not commenting on all the draft plan, but focusing on four aspects: the London National Park approach, Green Belt release, intensification areas and tall and large buildings.

#### **London National Park**

This seems like a very positive move forward, introducing and promoting new and important functions for green belt and other open spaces. These appear to include supporting better biodiversity, reducing air and water pollution, carbon capture, water management to prevent flooding and better public access to allow people to use and enjoy open areas. Personally, I support these functions and congratulate LB Enfield for taking this approach. National Green Belt policy is not as forward thinking or proactive, relating to the separation of settlements as the main which is a limited and negative function. In my view the NPPF and London Plan should take the same approach as Enfield in this regard.

#### **Green Belt Release**

I am afraid I am much less positive on this issue. It is very unfortunate that we have a planning system which is housing target led, with targets being set in a non-contextual and in many cases unrealistic way where their application is likely to contradict other planning objectives.

To this end I understand the dilemma LB Enfield find themselves in, but I fail to understand the logic behind the way they are interpreting and pushed forward targets. Personally, as a planner for the last 30+ years, I am not convinced that a predict and provide housing approach is sensible, or delivers what is needed in a sustainable way. I am also surprised that forthcoming updated census information has not been waited for before putting forward targets for 20 plus years, based on almost 10-year-old census data.

It is not at all clear that other options for housing delivery than green belt release have been adequately assessed before the current proposals put forward. Such criteria could have looked at highway frontage to sites (how much new highway would need to be constructed for the same number of homes and so how much green belt land would be needed) access to services and facilities within realistic walking and cycling distances and capacity of those services and facilities, landscape quality and character, particularly as viewed from public areas, how sites contribute to the cohesion of the green belt as a whole, including over LPA boundaries, the potential for sites to add to the NPC approach and include public access, flood risk and biodiversity on the sites and so on. Such an approach, for example, might show that linear development along existing roads at the end of the green belt would be a better approach than building on deep fields.

It appears that this kind of evaluation has not been done, and only proximity to a station and the fact a land-owner wants to develop have been considered for most release sites.

Such an approach does not appear to be good planning (to say the least). Green belt land is outside urban areas and generally not well connected or serviced. The draft plan does not include polices or a robust approach to ensure the isolation of such areas is countered and it is my view that the draft plan's approach will lead to suburban, car dependant sprawl – even if at higher densities that surrounding sprawl. In fact, increasing densities in these types of areas simply means more residents will be car dependant or isolated. Access to a suburban train line IS NOT enough for everyday access needed. These services respond mainly to traditional outer to inner city commuter journeys and nothing else. It is naive to assume that 2 trains or so an hour off peak along just one line, in areas with no or almost no local facilities/services will reduce the need for car trips much.

With the Enfield Chase release proposal, the situation is even worse than at Hadley Wood and Crews Hill as the stations are a very significant walk away from the very large area put forward for housing. In my view this is the worst, and the most short-sighted and inappropriate green belt release proposal. It will damage landscape, public access (the land is used for walking now) and is wholly isolated from facilities new residents' would need day to day.

Removing land from the green belt means a massive uplift in land value. It is also a big move in terms of turning over planning policy. If, and it is a big if, there is justification for green belt release, then in my view very high standards of development should be applied, much higher than on non-green belt land. Such standards could include:

- A very significant proportion of the land becoming part of the National Park City (could be a new land use definition), not built on and having public access and improved SuDs, biodiversity, community food growing space ect. At least 50% of privately owned green belt land being released moving to a National Park City status would seem appropriate
- That the new National Park City land is located to link to other NPC areas and public rights of way, including areas outside the LPAs boundary.
- That development is of the highest sustainability standards. Potentially using the national 'county house clause' appraisal techniques. This would mean if land is lost to the green belt and built upon it furthers innovation and practice in sustainable building
- Real and practical approaches to ensuring access to services and facilities are built into requirements for development on green belt release land. These could include requiring designs that support hybrid working including and home working support hubs. Other requirments could include providing mixed use buildings, shared responsive mobility systems and so on.
- The national biodiversity plus 10% requirement is increased to for example +25% ensuring habitats are integrated throughout the schemes.

Such an approach takes the idea of asking for higher % affordable homes on green belt release sites to the next level. It represents a much more balanced and appropriate way forward. Affordable housing is an important issue, but just one of many relevant planning objectives that should be taken forward.

Unfortunately, the 'placemaking strategies' mentioned in the draft local plan have very little information alongside them and it is not clear that they are any more than very simplistic indicative layouts. In my view these are simply not sufficient. And of course, Hadley wood release does not even have mention of a placemaking strategy to show that anything but bog standard, unimaginative and land hungry residential development would result.

There is a serious discord between policies on responding to local context, promotion and improvement of natural systems and habitats, National Park City etc. and the implication of delivering the housing targets the council has chosen to take forward.

In particular, the green belt release proposals seem totally at odds with the National Park City approach and the very significant work and improvements the council have already undertaken along Salmon's Brook and in other areas. It seems a nonsense, and inconsistent policy approach, to spend a lot to improve one part of the green belt and build over a neighbouring part.

The situation is not helped by the way the green belt release areas seem to have been chosen and how they are presented and managed in the draft plan. It appears that the council has simply included proposals from private land-owners, and have not undertaken a systematic assessment of which areas of green belt would be least destructive and most useful to release.

There is no mention of green belt assessment criteria and a proper survey to look at sites against this.

So thinking through it logically the draft plan does not make a clear case that:

- first, the housing targets it is working to are realistic and appropriate,
- that all sites that could contribute to housing growth have been properly assessed, including large brownfield schemes such as Meridian Water and,
- lastly IF green belt land is needed for housing that a proper assessment of the best sites to release has been undertaken.
- And IF release of sites is justified, that adequate policies managing how this land is used are in place

### **Intensification areas**

In my view the draft plans approach to intensification areas, with 800m circles drawn on a plan around neither a station or the edge of a town centre is unsophisticated, old fashioned and inappropriate. This simplistic mapping of accessibility might be appropriate for crude housing land availability assessments (although I dispute this), but it is not a good way to plan. I point you to the LB Bromley's approach where they have used as the foot falls, not crow flies, 800m distances. They have also decided that access to a station without a town centre, or a town centre without good public transport access means a 800m sized intensification zones is not appropriate

Whatever the London plan says about such intensification areas, local authorities should be interpreting and applying the policy in an appropriate way for their area. I do not think Enfield is doing this. Considering the suburban nature of much of the borough, where it is likely there is a station without town centre, a more sophisticated approach should be taken to ensure denser development is not being promoted where people will be car dependant or isolated.

As the plan as a long timeline Enfield might like to look at ways to improve the sustainability of existing neighbourhoods in so far that access to local services on foot is increased through changes of use and the promotion of mixed-use development. The impact of a variety of uses, rather than their existence could be a good way of planning such areas to help them intensify properly. At the same time opportunities to improve local movement opportunities through the improvement or addition of walking (and cycling) routes should be investigating.

Policies in the draft plan that look to contextually and holistically improve, connect, diversify and where appropriate intensify neighbourhoods would be a much more appropriate policy approach than using crude 800m circles as proposed at the moment.

### **Tall and large buildings**

I understand that the London Plan inspector made it clear that boroughs should not use their own definition of a tall building and set this at 21m. This causes a problem for areas like Enfield where much of the borough is 2 to 4 (up to 12m?) storeys high as it means both the London Plan and Enfield tall building policies would not be applied to buildings below 21m but significantly above the hight of surrounding buildings.

As one of the primary purposes of tall building policies is to set heightened performance and assessment criteria for buildings that could have a significant impact on their surroundings, I suggest Enfield include a new Large Building policy that sets appropriate performance and assessment criteria for buildings under 21m but significantly above their surroundings.

Such a policy could draw from the new National Model Design Code and discuss roof lines, building lines, visual continuity and character, views, aesthetic quality etc. It could also look at access, microclimate and servicing issues that would be more significant than for developments of a similar height to their surroundings.