

05/09/2021

London Borough of Enfield Draft Local Plan

Regulation 18 stage: 'Main Issues and Preferred Approaches'

I am writing on behalf of the Planning & Conservation Working Group of the London Historic Parks and Gardens Trust (that currently trades as London Gardens Trust – LGT). The LGT is affiliated to The Gardens Trust (GT), which is a statutory consultee in respect of planning proposals affecting sites included in the Historic England Register of Parks and Gardens of Special Historic Interest. The LGT is the county gardens trust for Greater London and makes observations on behalf of the GT in respect of registered sites, and may also comment on planning matters affecting other parks, gardens and green open spaces, especially when included in the LGT's Inventory of Historic Spaces (see <https://londongardenstrust.org/conservation/inventory/>) and/or when included in the Greater London Historic Environment Register (GLHER).

1 Objection to the preferred option

1.1 Green Belt

Loss of Green Belt –Green Belt land in Enfield is not in the gift of Enfield residents to pass over to developers. It forms strategic green infrastructure for the whole of London.

Enfield Council is the local custodian of much of the Green Belt, having inherited it via Middlesex County Council & later the GLC.

MCC purchased the estates of Enfield Chase in the 1930s to create a green girdle which in 1947 became the Green Belt.

The land was purchased with public money as a public resource to be safeguarded through public ownership for public benefit.

1.2 Enfield Chase

Enfield Chase is a historic landscape of national importance.

In April 2011 the London Parks & Gardens Trust held a study day on the subject of 'Enfield Chase: from Hunters to Commuters'. The papers can be read here:

<https://londongardenstrust.org/conservation/publications/enfield-chase/>

We object to the development of parcels of land which will sever the visual and landscape connection between the historic estates of the Enfield countryside.

1.3 Lee Valley

We object to the loss of open space needed to create new parks for residents of Meridian Water and eastern Enfield

2 POLICY SP DE4

Clarify that the whole policy applies to designated and non designated heritage assets.

3 POLICY SP DE4 2d

Clarify / Confirm the objective to remove heritage assets from the Heritage at Risk Register is by safeguarding their future and ensuring they remain designated heritage assets.

4 POLICY SP DE4 3

Clarify - All new development should contribute to the character and appearance of adjacent heritage assets (both designated and non designated). This is especially important in the context of parks and open spaces.

5 Para 7.4.1

*“Long-term aspirations for management of the Borough’s heritage are contained in Making Places: Enfield Heritage Strategy Supplementary Planning Document15.”
The introduction to the draft plan states that it will replace all SPD but this policy relies on the Heritage Strategy SPD.*

6 POLICY DM DE5

This DM policy should also apply to views of and from designed landscapes including parks and open spaces. Developments can potentially impact on designed views into, as well as from the landscape and its setting, adversely affecting their landscape character and defined significance.

Para 7.5.3 should be part of the policy.

7 POLICY DM DE6

The policy should cover the impacts of tall buildings on the design of the open space, the experience of being within the space and on views from within looking out and from outside looking in. Such impacts could be loss of tranquillity, daylight, outlook, air quality, micro-climatic effects, overshadowing and amenity.

8 POLICY DM DE10

This policy is worded as a strategic policy; it does not provide certainty to developers for the preparation of development proposals and does not provide decision takers with the detail to assess an application.

Proposals affecting the layout, design, character, use and function of both designated and non designated historic parks and gardens should retain and enhance their significance and should not prejudice their future restoration.

Features such as original planting layout, garden buildings, statuary, railings, steps and fountains should be identified and protected.

The impact of development on views from and towards historic open spaces should be carefully managed to maintain the character and enjoyment of these spaces.

Consents for temporary development and events in open spaces should ensure subsequent restoration.

9 POLICY DM DE11 3

Support

In addition, housing development which benefits from its proximity to a public open space should contribute to its ongoing maintenance.

Development close to or adjacent to a greenspace should contribute to:

- *additional maintenance costs arising from increased footfall*
- *additional facilities to cater for the additional users eg playspace, seating, planting*
- *landscape improvements to mitigate adverse impacts on the park arising from the development.*

10 General comment on the draft Local Plan

In general, policy has been placed in the supporting text rather than the policy statement. This means it will not have the status of the adopted plan and will carry limited weight in the determination of planning applications by the council or by the planning inspectorate.

