

# ENFIELD LOCAL PLAN CONSULTATION

## Policies for Conservation Areas

### **Submission from:**

Policy DM DE10 seeks to conserve and enhance heritage assets:

Development proposals will be required to:

- a. conserve and enhance the significance of heritage assets, and put them to viable uses consistent with their conservation;
- b. utilise the Borough's heritage resource to realise wider social, cultural, economic and environmental benefits for affected communities;
- c. make a positive contribution to local character and distinctiveness;
- d. draw on the contribution made by the historic environment to the character and identity of a place; and
- e. demonstrate the value of embodied carbon within existing heritage assets as part of a 'whole house' approach.

I am concerned that this policy does not provide the strong policies that Council Officers say are necessary to provide the right level of protection for the characteristics of each Conservation Area. A number of planning applications have been approved for key features such as windows, doors and porches in Conservation Areas even though the design is at odds with the original design of these features. It is therefore important that policy DM DE10 allows the Council to require that replacement features accurately follow the original design.

### **Background**

I discussed an application for replacement windows that had been granted in the Lakes Estate with two officers, Jennie Rebaire and Bridget Pereira, in February 2020. They acknowledged that, although approved, the application would be detrimental to the area. Whilst the windows followed a similar overall pattern, the timber sections were chunky and lacked some of the original detail.

There are plenty of examples elsewhere when the Council has insisted on wooden windows but because they have chunky frames and original details are missing, they still have the same problem as seen with uPVC windows.

The primary reason they gave for approval despite these reservations was the risk of appeals against refusal. They said the existing policies were not strong enough to insist that applicants should replicate the original design.

As a result of this concern, applications were being approved if they made some beneficial changes to the individual property or were 'like-for-like', even if they harmed the character of the Conservation Area as a whole.

The new policy differs in wording to the previous policy but does it give the Council the powers that it needs?

### **Policy needs**

The Officers stated that a good policy would be one that allowed them to refuse permission if:

- they make an improvement to the individual property but do not make an improvement for the area as a whole
- the proposal is for 'like-for-like' replacements of the existing feature where that feature is an earlier replacement that does not replicate the original design
- the applicant asserts that the feature matches the original design 'as closely as possible'.

Does DM DE10 meet these tests?

### **Planning Process**

A good policy also requires a good process, and these improvements could be made:

- Requirements. In the guidance to applicants, explain to applicants that they must provide additional detail for applications in Conservation Areas. The drawings should show the measurements for all visible components of the item, such that it would be possible to make an accurate mock-up of the feature. This can then be compared with examples of the original design. For example, for windows the drawings should include the width of each of the timber sections and any glazing bars, the shape of horns on sliding sash windows, the shape of any curved sections and so on.
- Validation. Applications would be validated against these requirements and would be rejected if it does not meet the requirements.

# Green Belt Boundary Changes

## **Submission from:**

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5 September 2021

I object to the changes proposed for the Green Belt boundary:

- The Green Belt is national policy; it is not for Enfield to make changes to the Green Belt to suit local preferences.
- The London Plan has set targets for housing but rather than suggesting that the Green Belt can be used to meet these targets, it has strong policies to support the Green Belt.

## **National and London Policy**

The National Planning Policy Framework of July 2021 (NPPF) para 139 defines the purposes of Green Belt as:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The London Plan also adds that the Green Belt can provide multiple beneficial functions, such as combating the urban heat island effect and growing food (8.2.1). And it emphasises the NPPF statement above (139 c) by saying that Green Belt “provides the vital function of containing the further expansion of built development”.

And these days we can also add that the Green Belt helps to mitigate the effects of climate change; benefits our ecology and wildlife; and reduces ‘food miles’.

It is not for Enfield to cut across the NPPF and London Plan and think that it can take the easy option to meet housing targets.

I cannot see how Enfield could establish that there are ‘exceptional circumstances’ that justify stealing from the Green Belt. The need for additional housing is not limited to Enfield and if it were considered acceptable to meet this need from the Green Belt it would no longer be ‘exceptional’. Instead, it would mean a change in national policy and legislation. There has been no such change.

## **Housing**

The London Plan asks Boroughs to consider brownfield sites and intensification of developments to meet the targets; there is no hint that Boroughs could use Green Belt or other open land to meet the housing targets.

The targets in the London Plan vary very widely Borough by Borough. The targets are not random figures or based on a formula such as a percentage of existing stock, but have been based on an assessment of what is possible using brownfield sites, intensification of developments and existing development sites.

Specifically, in 4.1.7 the London Plan identifies the constraints and opportunities that have led to the variations across the Boroughs. Opportunities include, for example, large brownfield sites, but the constraints include protection of Green Belt, Metropolitan Open Land and other protected open spaces.

The need for new housing cannot justify either ignoring or downplaying the impact on other policy areas. Building on the Green Belt would raise major challenges on to meet other important policy areas. The Green Belt has poor transport links, so it would be costly and challenging to meet sustainability and environmental standards. New transport infrastructure would be required that will allow people to get to work, shops and leisure facilities by public transport and it would need to be sufficiently good that people *actually* use it rather than their cars. Using Green Belt land would challenge biodiversity where the UK has failed to reach 17 out of 20 UN biodiversity targets in the past 20 years (RSPB). The list of challenges goes on and I see no evidence that Enfield has either established that they cannot meet the housing targets without using the Green Belt or that they have considered the infrastructure and mitigation required if they were to use the Green Belt.

### **Enfield's explanation**

In a recent letter to households the Council sort to justify the use of the Green Belt for housing saying that the plan proposed to use 'just 7% of Green Belt land'. This is not an argument about percentages. It's surely self-evident that if 7% is acceptable now then another 7% can be taken again and again until the Green Belt disappears. The only justification for changes to the Green Belt boundaries are 'exceptional circumstances'. This is a high bar to meet and requires a clear assessment of the benefits and harms to both the Green Belt and housing.

You say that if the Green Belt is not used then the alternative is tall buildings in 'inappropriate' locations. I don't know that tall buildings would be the only other option, but in making this assertion you seem to be saying that these 'inappropriate' locations are sacrosanct but that the Green Belt is not. Why is this?

In the draft plan and in a recent newsletter to residents, it is also said that not using the Green Belt could mean that the plan is 'unsound' if this meant that the housing targets could not be met. This is scaremongering. I hope and trust that a plan that steals from the Green Belt to meet the housing targets would also be considered unsound for going against national policy.