



4th September 2021

Enfield Draft Local Plan

Bush Hill Park Residents' Association

Our Association has been representing the residents of Bush Hill Park for [over eighty years](#). We currently have more than 460 members.

We are an active group looking to help residents and businesses solve problems and help improve living conditions, community facilities and services within Bush Hill Park.

The BHPRA represents its members with a wide range of organisations. These bodies respond more readily to an Association with hundreds of members, as opposed to individuals. We routinely work with local Councillors, LBE Council staff, the Metropolitan Police, TfL and local businesses.

When necessary, we can galvanise support for a campaign through our membership. In recent months even with lockdown, we have been proactive with planning issues, particularly around the telecoms mast in the centre of the Conservation Area. We were also involved in the proposed planning applications for buildings on the Tennis Courts in Abbey Road and objecting to several inappropriate developments across the Ward.

Even though our focus has been upon Bush Hill Park, in recent years we have become actively involved within the wider Borough. This includes involvement and support of "Let's talk Enfield", The Enfield Society, the developers of Colosseum Park and the regeneration of Palace Gardens. Our management Committee are represented on Enfield Transport User Group. and as a result, we have joined with two other community associations to agitate for a significant improvement in the service on the Enfield to Liverpool Street Line.

Erosion of the Green Belt

Policy SP PL8 page 72 et seq

Enfield has a high proportion of Green belt land which gives it its rural feel. This is clearly under threat from this proposed Draft Local Plan.

We **object** to the proposed building on Enfield's Green Belt. The Draft Local Plan is contradictory in its treatment of the Green Belt. Page 72 says "The open character of this area (as shown on the Policies Map and key diagram) will be protected and enhanced in line with the Green Belt and Metropolitan Open Land". How can this be true when the Plan is proposing large-scale development, such as at Chase Park (Strategic Policy SP PL 10, page 84)?

Residential Development

Policy DM DE13 (1) (c) page 175

The proposed tower blocks in and around Enfield would seem to have little car parking facility and little mention of electric car charging point availability. Undoubtedly, some of the residents in the new housing will have cars and if no provision is made for this then there will undoubtedly be disturbance to existing occupiers as new occupiers try to find parking space as close as possible to where they live, together with extra noise as cars are driven around to find those parking spaces. Also, there seems to be little mention of electric car charging points in the proposed tower blocks, which seems to go against sustainable requirements. Outside rush hours, trains from Enfield Town Station run only twice an hour, which is hardly an increased incentive to use them.

Around 15% - 20% of people live in flats, but there is no or little mention of help with providing electric car charging points for existing flats and there seems to be no legislation requiring developers to provide electric car charging points for newly developed flats, which seems to be somewhat of a mistake, in our view.

Policy DM DE15, page 179 et seq

As a Residents' Association we are pleased to see the inclusion of this policy. We have seen a number of attempts to build on rear gardens within our locale and we note the inclusion of point 7.15 (1) (a) (i). We **approve** of this policy.

Over Development

Policy SP H1, page 183 et seq

We note this sets out the Council's proposed house building targets for the duration of the Plan. These targets appear very optimistic given the Council's recent track record (just 429 houses constructed since April 2019). The Plan's proposal to construct 30,192 up until 2039 (around 1800 per annum) is well above the target from the London Plan of 1,246 per annum [London Plan, Table 4.1 Ten Year targets, page 163]. We **object** to the Council's planning target being above that required by the London Plan.

Policy DM DE6 (Tall buildings), page 156 et seq

We support the proposal of a tall buildings policy. We note that the para 7.6.2 of Draft Plan explains that Figure 7.4 (page 158) was based "on a rigorous assessment of townscape, character and the sustainability of the location for higher density development". The Draft Local Plan includes no reference to the assessment, though on page 309 it is noted in Appendix A. This overly complicated presentation of the facts is unhelpful and could lead residents to the view that the Council is concealing the "evidence".

A search of the Enfield Council web-site for the "Appropriate locations for tall buildings (LBE) 2021" finds the evidence base documents on search results page 2. There are two evidence base documents for tall buildings: *Character of Growth Scale Tall Buildings Definition Map - Rev-A (2021) (PDF)* & *Character of Growth Scale Tall Buildings App Locations - Rev-A (2021) (PDF)*

The first of these documents is a map of the Borough showing areas covered by the London Plan which limits tall buildings to 7 storeys (21m).

The second document is a map showing the proposed maximum building heights. This map appears to be the same as Figure 7.4 which appears on page 158 of the Draft Plan.

It is clear that there is no presentation of the “rigorous assessment” that was used to create Figure 7.4. If the assessment was truly “rigorous” the Council should have confidence to present the details to the public for scrutiny as part of this consultation. The fact that it has chosen not to publish, despite the apparent availability indicated in Appendix A, is a failure of process.

We therefore **object** to this policy as it is currently presented.

Local Developments within Plan

Policy SP H1, page 183 et seq

Sites SA6, SA8, SA10, SA12, SA19, SA20, SA22, SA32 (Existing Food Retail)

We note that Policy SP H1 proposes housing development at almost all the major food retailers within the London Borough of Enfield. Our analysis of the Draft Plan shows the following housing numbers estimated from these sites:

| Site | Current use | Housing estimate |
|--------|----------------------------|--|
| SA6 | Tesco, Southbury Road | 350 |
| SA8 | Sainsbury's, Crown Road | 1041 |
| SA10 | Morrison's Southbury Road | 892 |
| SA12 | Tesco Ponders End | 350 |
| SA19 | IKEA & Tesco, Glover Drive | 5000 (but site larger than the stores) |
| SA20 | ASAD Southgate | 165 |
| SA22 | M&S Food, Southgate | 150 |
| SA32 | Sainsbury's Green Lanes | 299 |
| Totals | | 3247 (not including Tesco/IKEA Glover Drive) |

Whilst the trend to online food retail has accelerated through the pandemic, to convert all these sites to housing/mixed use, with the attendant reduction in car parking, is sub optimal. The substantial amount of housing proposed for these sites suggests a likely large reduction in car parking space. We **object** to the implementation of these policies areas if they will reduce car parking for food retail.

Site SA1 (St Anne's School)

We note that up to 236 houses are planned for this site. We **object** to this proposal. Schools are an important part of the Borough's infrastructure and this particular school has a good provision of playing fields, something else which is increasingly being eroded in the Borough.

Site SA37 (Main Avenue)

It is curious that this area, redeveloped in the 1970s, is now marked for further development. The Local Plan does not give any specifics about the type of housing that could be provided, but as a Residents' Association we fear that densification will be used. We would object to any additional height being added to the site as this would be out-of-character for the otherwise mostly late victorian area.

Sites SA59 (Firs Farm Recreation Ground) & SA61 (Church Street Recreation Ground)

We note that these sites are designated for a change of use to burial. We **object** to this on the grounds that recreation is an important contribution to a healthy life-style and reduces the costs to the local health system. Additionally, these proposals appear contrary to Policy DM CL5 (page 280) which (point 2) states *Development proposals that result in the loss of sports and recreational buildings and land will be resisted unless: a. an assessment has been undertaken which has clearly shown the facilities to be surplus to requirements; or b. the loss resulting from the proposed development would be replaced by equivalent or better provision in a suitable location;*

or c. the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Affordable Housing

Policy DM H2, page 194 et seq

We note that this draft policy sets an aim for 50% “genuinely affordable” over the Plan period. Whilst this is laudable, it is likely to be unrealistic. Currently the Council seeks 40% affordable, but this is often missed. We **recommend** a more realistic figure is set, then enforced through the planning process.

Policy DM H3, page 199 et seq

The BHPRA supports the inclusion of this policy. We welcome the following proposed points:

[2] Self contained units will be required to meet (or where possible) exceed the internal space standards of the London Plan. However, this particular policy is void unless the Council passes an Article 4 Direction covering the conversion of commercial premises to residential use.

[Table 8.4] showing the preference for 2 and 3 bedroom accommodation.

Consultation

We note that this consultation has been poorly advertised by the Council, with almost no public engagement. A limited poster campaign and two weak public forums have been observed. This Council is regarded by many in the Borough as a reluctant party in Consultations and the evidence to date from this one seems to support that view.

We call upon the Council to publish **in full** all the submissions to the Consultation within a period of **three months** from the closing date to demonstrate good faith with its constituents.