

## ENFIELD PLAN LOCAL DRAFT – RESPONSE

### GRANGE PARK CONSERVATION AREA STUDY GROUP

**A number of indicators suggest that the housing need is less than that proposed** of 30,000 homes across the borough by 2039, more than 6,000 of which will be in the Green Belt and countryside, in either the London Plan or the draft Enfield Local Plan.

The Local Plan proposes to allow development of housing, warehousing and industry on areas of exceptionally fine open Green Belt countryside, as well as proposing tall buildings in several locations across the Borough.

A recent report by London Councils suggests that the best way to provide more affordable housing is to acknowledge market failures and for public provision to be accelerated.

The London Plan states at paragraph 8.2.2 that the Mayor may support development on “unsightly and derelict” parts of the Green Belt, but the draft Enfield Local Plan proposes development on high quality countryside.

In proposing to release such sites, the Council appears to have pre-empted the Mayor’s own assessment of the Metropolitan Green Belt.

**The Grange Park Conservation Area Study Group (Study Group)**, has concerns that the Spatial Strategy (Policy SS1) affords too much weight to the protection of Strategic Industrial Locations (Strategic Policy E3) and too little weight to the contribution of Green Belt countryside and historic landscapes such as **Enfield Chase to the history and character of the borough**. The Secretary of State directed the Mayor to provide boroughs in the difficult position of facing the release of Green Belt or Metropolitan Open Land with a greater freedom to consider the use of Industrial Land in order to meet necessary housing needs”.

Additionally the evidence base lacks detail on **the impacts of tall buildings on Conservation Areas**, which is of particular interest and concern to this group. Examples include 13 storeys at Palace Gardens and 23 storeys at Edmonton Green, as well as at other Conservation Areas including Southgate. A Heritage Impact Assessment, including modelling of the impacts from relevant vantage points should have been presented for public comment at the Regulation 18 stage of consultation.

We question the robustness of the proforma format used to present the site allocations in Appendix C. At the very least the proformas should specify which DM policies are particularly relevant in each case and explain why. High level masterplans or (where high-rise development is proposed) massing models should be available for each site and subject to proper scrutiny as part of the plan-making process.

We doubt that **the level of infrastructure required to support the very high levels of growth** proposed can be delivered without further harm to the character of the borough. The Regulation 19 (pre-submission) consultation should be of 12 week duration in order to allow for scrutiny of that complex evidence. The Council should not determine any planning applications on the basis of the draft Local Plan until after examination and adopted by the Council as the new statutory development plan.

The Study Group has concerns regarding **Strategic Policy PL8: Rural Enfield**, which attempts to justify the development in Green Belt countryside elsewhere, as the National Park City Foundation has observed in a letter of objection to the Leader of Enfield Council. The vision of the rural area as a “leading destination in a National Park City” appears to be part of a convoluted argument that development on The Chase is necessary in order to fund ‘attractions’ such as visitor centres and sculpture parks.

The Study Group objects to **Strategic Policy PL9: Crews Hill** (in particular development on Crews Hill Golf Course), which would result in development on some high quality Green Belt countryside within Enfield Chase, and would result in traffic pressure on the Conservation Areas and at the rural East Lodge Lane and at the remote hamlet of Botany Bay.

The Study Group objects to **Strategic Policy PL10: Chase Park**. The proposed development would cause high or very high harm to open Green Belt countryside; it would cause irreversible harm to the coherence and integrity of Enfield Chase Heritage Area, severing the link between Trent Park and Old Park and adversely affecting the setting of both; it would end the visual separation between Oakwood and Enfield Town provided by the experience of passing through open countryside on the A110; it would spoil the openness of the popular Merryhills Way.

The Study Group objects to the Site allocation **SA45 Hadley Wood and SA54 Land east of Junction 24**. These two sites are both strongly performing Green Belt countryside and part of Enfield Chase. The proposed industrial and employment site on the Ridgeway at SA54: East of Junction 24 would destroy an attractive green gateway to the borough.

The Council does not appear to have given any consideration to the **Areas of Special Character** in selecting its preferred development sites. Development on the above sites would cause severe harm to the Enfield Chase Heritage Area of Special Character (AoSC). A review of the AoSC undertaken by the Council in 2013 is available on request.

**A heritage impact assessment** should have been undertaken to inform the selection of development sites and the form and extent of development. This should involve appreciation of the nature of historic landscapes and their collective contribution to understanding of the historic environment.

### **Alternative development locations**

With regard to suitable alternative development locations we support those highlighted by The Enfield Society in their submission, pages 48 & 49, including:

- Harbet road, Meridian Water East Bank
- Blackhorse Lane masterplan
- Brimsdown – Ariel real estate
- Southbury, already mentioned in the Local Plan
- Some of the Green Belt “grey areas” identified by The Enfield Society
- Finally, we acknowledge that not all Green Belt within the borough is high-quality countryside. If some Green Belt needs to be released, ‘grey’ areas of Green Belt could be brought forward, subject to master planning and a proper strategy for the relocation or compensation of existing affected users.

## **Conclusion**

The Study Group welcomes the opportunity to comment on the Local Plan and supports the need for additional housing and the attempts to create a greener more sustainable Borough for all residents. However, as presented we are concerned that, rather than 'place-making', the proposed developments in the countryside would significantly erode the character of the borough, reduce access to the countryside, and would cause harm to assets of very high significance. It is therefore imperative that the Council should revisit the spatial strategy by working with community groups, land owners and developers to identify how the additional housing that is required can be built without sacrificing open countryside.

As an alternative, we believe that there are also opportunities to release or introduce mixed-use intensification of some strategic industrial land, for example in the Brimsdown area and around Meridian Water. The Society recognises the importance of strategic industrial land, but in some cases better use can be made of sites allowing a rationalisation of land use. As the Secretary of State said in his letter to the Mayor dated 20th December 2020 – "I am issuing a further Direction in relation to Direction DR4, specifically regarding updated para 6.4.8. This is a modest amendment to my previous direction which will provide boroughs in the difficult position of facing the release of Green Belt or Metropolitan Open Land with a greater freedom to consider the use of Industrial Land to meet housing needs.

Many thanks

8<sup>th</sup> September 2021