



Enfield Town Residents Association

Submission on the Enfield Draft Local Plan

Overview

Our general comments on the document are as follows.

The documentation regarding the Draft Local Plan (*hereafter referred to as 'the Plan'*) is unnecessarily verbose, extremely imprecise, lacking in meaningful definitions, indeed to the extent that it is inaccurate and verging on being untruthful in places. This criticism applies equally to the *Future Enfield* flyer sent out to publicise the consultation

No evidence is provided for the various claims for benefits of the proposal made throughout either document.

Overall the Plan and the Consultation structure and questions presents unreasonable and unnecessary obstacles to an ordinary person seeking to make sense of the document and the Consultation process. The draft Plan would have benefitted from assessment against the Plain English Guidelines. Had this been done, it would probably have been subject to complete re-writing.

Our comments on specific parts of the Plan are as follows:

Green Belt

Policy SP PL8 commencing page 72 and onwards

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*". Yet the Plan proposes large-scale developments at Crews Hill and Chase Park (Strategic Policy SP PL 10, page 84). Among the Green Belt sites targeted for destruction are:

- Green Belt land in Upper Edmonton
- Eight horticulture nurseries in Crews Hill
- Several large areas of productive farmland

Crews Hill Strategic Policy SP PL9: Crews Hill

The plan states:

8. Development at Crews Hill should improve the functionality and connectivity of the east-west green corridors across the north of the Borough in order to minimise the reliance of the development on vehicular access.

9. Existing east-west links should be improved and all opportunities to create, and make viable, new links across the railway line be explored through strategic land assembly, phasing and more detailed masterplanning work. A greater intensity of development at Crews Hill may be appropriate where it is able to deliver new or improved links across the railway as well as facilitating additional stopping train services at Crews Hill station to enhance the area's sustainability and its role as a gateway to the rural north for visitors and tourists.

10. Notwithstanding the requirement for improvements to walking and cycling, the development will need to address limitations in the capacity of the existing road network, particularly in accessing land to the west of the railway and including the road passing under the railway near Crews Hill station.

As we have noted above, the reality of the Plan is that it proposes the destruction of large areas of productive farmland and eight of the horticulture nurseries in Crews Hill.

What is not stated is the fact that Crews Hill station – referred to as a 'transport hub' in the LBE flyer - is served by a meagre two trains an hour service. The 456 bus service to Crews Hill turns round in the Rosewood Drive estate, some quarter of a mile short of Crews Hill railway station. The single bus serving the area runs only as far as the North Middlesex Hospital.

In the absence of a decent rail service, and with just one bus service going no further than the local hospital, anyone resident in the proposed development will be almost entirely dependent upon use of a car.

These are all reasons not to develop Crews Hill. We therefore strongly object to this proposal

Chase Park Strategic Policy SP PL10: Chase Park

We note, too, the claim within the section of the Plan referred to as 'Chase Park' (more on this point later) in section SP PL 10 that

5. Development must maximise opportunities for sustainable and active travel. The design, form and layout of transport infrastructure must create a place where walking, cycling and use of public transport is the natural choice.

Yet just as for Crews Hill, the proposed developments at Chase Park in reality are situated in an area with extremely poor public transport and all tail and tube stations being a significant walk away from the proposed developments.

Given the failure of initiatives elsewhere in the borough to bring about any significant increase in cycling, together with the poor public transport options in and around Chase Park, along with the development's distance from any retail and social hubs (the Plan itself notes that this area is some 2.5 km (1.5 miles) from Enfield Town), any developments in this location can be readily predicted to result in increased car use – something that other council policies allegedly seek to discourage.

Additionally we note that at no point is there any ***explicit*** reference – as far as can be determined by a word search on the document – to the proposed developments being located in reality on Vicarage Farm. But it is indeed here that the 3,000 new houses are proposed. The location is on the open

Green Belt countryside next to Trent Park either side of the A110 (Enfield Road) between Oakwood and Enfield town (Policy SP PL 10, pages 80-87, and Figure 3.11).

The Environment Agency in 2011 confirmed that the Vicarage Farm/Chase Park area is one of the borough's upland soak-away areas that provides an essential run-off route for water in the event of heavy rainfall. You can hardly be unaware that such events are predicted to increase in both frequency and severity with climate change – something that, again, other LBE policies are allegedly seeking to avert.

The Vicarage Farm soak-away is part of the Salmon's Brook Flood Alleviation Scheme, designed to prevent Salmon's Brook being overwhelmed upstream, and hence leading to flooding in areas around Slades Hill/Enfield Road and beyond.

Intensive building on these natural uplands soak-aways, combined with the additional run off from roads and pavements in the proposed development would overwhelm the tributaries of Salmon's Brook and, in an exceptional rainfall event, could overwhelm the bund on Cheyne Walk Open Space.

Soak-aways and flood plains were designated as such for these reasons and any attempt to build on these areas will have severe consequences for flooding risk. This has been proven many times in this country where development of shopping centres and new housing estates has required the removal of trees and concreting over grass soak-aways has removed these vital areas for soaking up excess rainfall, resulting in flooding as the water has nowhere else to go.

We note that in the [LBE Strategic Flood Assessment](#) you state "*further design work and liaison with LBE Lead Local Flood Authority may be required to understand the implications of surface water flooding to the proposed development.*" ***This should surely have been undertaken PRIOR to proceeding to propose building on this critical site.*** It is hard to believe that, given the statements issued by the Environment Agency previously that this can be an acceptable area for development.

For these many reasons we strongly object to the proposal to build on 'Chase Park'

Housing Development Targets

Policy SP H1, page 183 and onwards

We note this sets out the Council's proposed house building targets for the duration of the Plan. The Plan proposes to construct 30,192 'units' 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].

Given that many, if not the majority, of these developments are intended to be 'units', that is, flats, many in tower blocks, they will fail to meet the identified needs of the borough, which is for **family homes**. Units in high-rise blocks do not provide access to outside amenities in the way that is needed by growing children (*see next point re Tall Buildings*).

LBE's endless and counterintuitive insistence on linking the process of providing essential, additional housing and vital economic development with "walking and cycling" is both annoying and obtuse. In particular, the Council's insistence that virtually every new dwelling will not cater for motor vehicles will almost certainly render the new dwellings undesirable for the majority – leading to their being

repositories only for those individuals who have no other choice. Consequently, they are unlikely to support any surrounding new developments aimed at redeveloping the local economy, therefore rendering any such new developments potentially unviable (as indeed is the likely outcome of your proposed policy to build on existing retail car parking facilities).

ETRA therefore strongly objects to the term 'housing' being used in this section when in fact much of the intended development is 'units' (flats) in tower blocks. These are inappropriate for families with young children and the very antithesis of the 'good quality homes' to which you make much mention in the Plan.

We object to the continuing insistence on developments being 'car-free' when much of the transport in the borough remains sub-optimal (despite claims to the contrary by the Mayor).

We therefore object to and urge rejection of this part of the Plan and to insert, in its place, a commitment to building only family homes in low- to medium-rise developments, and to provide parking so that people who need access to cars are able to live here.

We wish you to note, too ETRA's robust rejection of the Council's planning target being above that required by the London Plan.

Tall Buildings

Policy DM DE6 (Tall buildings), page 156 and onwards

The Plan sets out LBE's intention to encourage more tall buildings across the borough. Indeed, it is seen as essential to meeting the so-called 'housing' targets.

We note that the LBE flyer to advertise the Local Plan states the intention is to develop '*a Local Plan that will stop skyscrapers in inappropriate locations*'. Yet the proposed Tall building development sites include sensitive locations such as the town centre conservation area (see pages 156-60, Figure 7.3, Figure 7.4 and Policy DE6, and SA2 Palace Gardens Shopping centre page 321). T

If these are not 'inappropriate locations', then what is?

Whilst the document refers to 'Tall Buildings' in general, the intention is for these to mostly be designated as 'residential', although few would choose to live in these warehouses in the sky.

ETRA has repeatedly stated its opposition to high-rise, high-density developments due to their proven negative impact on their residents and in particular on children forced to live in such conditions.

Our views have been recently supported by the findings of the London Assembly's Planning & Regeneration Committee. A letter from Andrew Boff, Chair of that Committee, has outlined the key findings from the Committee's recent investigation into housing typologies, focussing on housing density and the development of tall buildings for residential use in London. He said - in a letter sent to all councillors across London - that:

Our key finding is that the Committee does not believe that tall buildings are the answer to London's housing needs and should not be encouraged outside of a few designated and carefully managed areas [emphasis added]

As part of their investigation to form the basis for their response to the 'Good Quality Homes for All Londoners' Supplementary Planning Guidance (SPG) public consultation which closed in January 2021, the Committee focused on the 'tower' housing type. Amongst their findings were that:

- energy use is higher in tall buildings: the taller the building, the higher the amount of energy required per useable square metre. Tall buildings suffer more from heat loss for the same amount of insulation as lower buildings because of the higher wind speeds. The Committee found evidence demonstrating that tall buildings are less sustainable than those in other configurations and the long term and lifetime costs associated with tall buildings should be carefully considered in any development proposals. ***The Committee particularly believes the development of towers should only happen after robust evidence has been presented about how their social impacts will be mitigated.***
- while higher densities may seemingly make more effective use of land, ***tall buildings will not produce the high-quality homes and neighbourhoods that London needs: "... in general families are disadvantaged if they are living in tall buildings. The sociability that children are able to gain in terms of opportunities for play, for meeting others and so forth within tall buildings is often not great.***" One member pointed to the fact that "*direct access to external space for families is absolutely crucial to the successful and healthy functioning of that household and that becomes incredibly difficult with tall buildings.*" A high-density, medium- to low-rise model can work more easily for families, enabling communal or individual gardens at lower storeys that are closer to individual family homes than tall buildings allow: "*The opportunities with social spaces for children and children of all ages to gather in small groups is really important.*"
- They also noted that 'tall buildings tend to contain a majority of mainly studios and one-beds, and a proportion of two bedroom flats, resulting in a lack of family-sized housing and ***poor use of space***. The Committee has long advocated for more family-sized housing to be built in London but believes that ***family homes in tall buildings are only appropriate with certain design measures in place, for example access to amenity such as play space and suitable positioning within a development.*** The Committee is of the view that ***families should not be housed above the fifth floor in public housing, and that consideration should be given to design of access and surveillance of children's play space and amenity space for children in relation to tall buildings.***

Overall, the Committee concluded that high density housing should be achieved by approaches that are more suitable for families, more in keeping with London's traditional form, and are less intrusive on the skyline.

ETRA concurs with the conclusions of the London Assembly Planning & Regeneration Committee.

It is difficult to believe that our officers in Planning are unaware of the facts assembled by that Committee regarding high-rise developments. It is even less palatable to think that they are fully aware of these facts but nonetheless are willing to approve and inflict them on residents.

ETRA remains implacably opposed to all high-rise developments at all locations across the borough and objects to these proposals.

Local Tall Building Developments Proposed within Plan

SA2 - Enfield Town Palace Gardens

We particularly object to the tall buildings policy as it relates to proposals for the Palace Gardens precinct. The proposed tall buildings will be entirely out of character with the town and with the surrounding conservation areas and will do nothing to enhance the town – quite the opposite.

The increased demands on local services such as schools, medical services etc from a building of 26 storeys (and the intended additional blocks ranging from 11 to 18 storeys high) will be excessive. The emphasis on a car-free existence is unrealistic. The two rail stations provide a barely adequate service, far from the “metro” style service that would befit a vibrant small suburban town and make such a philosophy even partway realistic.

We therefore strongly object to all of this proposal within the Local Plan.

SA3 - 100 Church Street

Similarly, whilst we note that this development has been subject to some modifications, the proposal has only been ‘tweaked’ at the edges. Reducing the total number of units by just a single storey is not going to make much difference. The units are too small for any meaningful family life, only existence. Once again, a major problem is the lack of car parking for residents.

We therefore strongly object to all of this proposal within the Local Plan.

St Anne’s School, London Road

Site SA1

Proposals contained within the Draft Local Plan include the demolition of the branch of St Anne's School on London Rd and building 326 new homes on the site. These ‘homes’ are intended to be provided within ‘Tall Buildings’ ranging from 7 to 17 storeys, in contravention of the guidance issued by the London Assembly Planning & Regeneration Committee.

The plans involve potentially building new flats on the private road that provides access to Chalkwell Park, yet again with no parking provided. Officers and Councillors should note that Enfield Town station remains served by a paltry 2 trains an hour service except during the two peak hours of service, very far from the excellent Public Transport Access Level claimed by TfL and their developer acolytes.

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.

Should plans to increase the number of accommodation ‘units’ locally through developments in the Town Centre and on the Tesco site come to pass, this will predictably lead to the need for more school spaces within walking distance. Given that LBE policy is allegedly to encourage children to walk and cycle to school, rather than drive, this particular proposal, to build on the school site and its playing field, is surely counter-productive.

ETRA therefore strongly objects to the proposal to build on the St Annes school and playing field sites.

Other Local Developments: Building on Retail and Transport car parks

Policy SP H1, page 183 and onwards

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. Table 8.1 sets out the List of sites to be allocated for housing development along with the anticipated number of 'units' to be provided by these developments.

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)

First, we object to the description of these highly functional and useful spaces as 'Brownfield'. 'Brownfield' implies a location that was previously in use but is no longer required. This is simply not true of these sites. They are valuable areas that support retail in the borough. ***To imply anything less is quite simply nothing other than dishonest.***

It is a fact that surveys conducted by retailers themselves reveal that around 60% of shoppers arrive at retail destinations in the borough by car, in contrast to the less than 30% typically cited by LBE from surveys conducted with interviewers strategically placed next to bus stops and in walkways. The substantial amount of housing proposed for these sites implies that the council intends a large scale reduction in car parking space, if not indeed total removal. This would be disastrous for these retailers.

There is no recognition or acknowledgement in the document of the risk these proposals will bring for potential loss of these popular and well-used supermarkets. There is no recognition, either, that when people park and shop at these large retail outlets they typically also shop at nearby small independent retailers too. Given that the average small business operates on 5 – 10% profit margins, once they lose the trade generated by the presence of these large retail outlets, their profit margins are likely to fall considerably and they, too, risk being lost from the borough. Once they go, people will have to drive further, adding to the already existing traffic problems. It will have a particularly negative impact on vulnerable groups who rely on being able to drive to major retail outlets..

A major concern must surely be that, if implemented, these proposals are likely to lead to the loss of many of our major food retailers from the borough, followed by a decline in the small businesses that surround them.

As a corollary of this, the more retail outlets that are forced out of business by such plans the more delivery vans we will see on our streets, as residents are left with no real shopping options apart from online.

We therefore strongly object to the removal of retail car parking amenities at retailers across the borough.

New Southgate PL7

SA24 - Arnos Grove - 162 homes.

ETRA submitted strong objections to the proposal to build on the Arnos Grove car park, citing in particular the iniquitous way in which LBE Officers had failed to properly consider all equalities issues. We are appalled at the way in which officers now appear to be working at the developers' behest rather than to protect the rights of residents.

Building on the car park makes no sense. It restricts access to public transport and will significantly disadvantage, indeed bar very many of our disabled, elderly and frail residents from using the station. ***It is not an edifying sight to watch LBE officers, employed at public expense, ignoring their obligations under the Equality Act and Public Sector Equality Duty in order it would appear to optimise developers' profits.***

SA31 – Cockfosters tube car park

For all the reasons cited above ETRA has also opposed, and continues to oppose, building on this site.

We note that the number of 'units' has been reduced in the latest iteration of the plans but the differences are marginal and will still give rise to buildings that dominate the area and are at odds with the suburban character of this listed tube station.

We therefore object to the development at Cockfosters underground station for the same reasons as for Arnos Grove.

OUR CONCLUSIONS

We are led to conclude that, in addition to the multiple failings of the Plan itself, the claims made within the Flyer – allegedly intended to encourage participation in the consultation - in fact seem designed to lull residents into a false sense of security.

Specifically, the flyer implied that the Council is taking its responsibilities seriously and is proposing to protect the Green Belt, discourage high rise developments and utilise only redundant land for developments.

However, inspection of the contents of the Draft Local Plan reveal that NONE OF THESE IS TRUE.

Furthermore there is NO indication within that section of the flyer in which you claim that LBE is maximising 'housebuilding' on 'Brownfield' sites you have designated **supermarket and tube station car parks** as 'Brownfield'.

This is a bizarre and inappropriate use of the term 'Brownfield'. We know that the proposed loss of these facilities is causing distress to many of our members and contacts and yet you gloss over this fact. Honest reporting of this point alone in the flyer would likely have prompted many more to

participate in the consultation and object to this proposal that will further discourage retail enterprises within the borough.

We note too the disingenuous use of the word 'housebuilding' in this context, when the reality is that to achieve the identified density of 'units' proposed for these sites means that there is no way in which these developments will comprise anything other than flats. Flats are not houses. Your claim that you intend 'housebuilding' on these sites therefore also comes dangerously close to being an outright lie.

We therefore entirely reject the proposals and the Draft Local Plan itself. We demand in its place a Plan that puts Enfield residents and the protection of our environment front and centre in the revised proposals. Enfield residents deserve nothing less than this.

Enfield Town Residents Association

13.09.21