
Please register and consider the following comments as part of the formal Local Plan development process:

Many points below refer to Enfield town centre, this is because that is where I live and the area with which I am familiar. The same principles may, and if appropriate should, apply elsewhere in the borough.

1. TALL BUILDINGS – POLICY DE6

Whilst tall blocks of flats are a way of providing many dwellings without requiring much land, they are likely to have an enormous impact on both the character of an area and on practicalities such as traffic, parking and public transport.

1.1 Character of the areas affected

Unlike most suburban centres in Greater London, Enfield town centre has managed to retain the character of a town in its own right. This is due in no small part to the fact that more recent development has remained largely in scale with the older parts of the town centre (Tower point and the civic centre are already exceptions which tend to detract from this.) Buildings up to 12 storeys high may well dominate the skyline, create a feeling of being much more hemmed in by concrete and brick, and radically change the character of the town, and are not appropriate. The limit should be lower: 6 storeys would be more appropriate.

Where new buildings are significantly higher than the existing roof lines (i.e. “tall” according to the London Plan definition), then much depends on where they are situated and their relationship to the surrounding streets and pedestrian areas. If they are set back from the street line with lower buildings around them, then they can be taller than would be acceptable if they front directly onto the street. For example, a 6 storey building on the site of the Palace Exchange car park would have far less impact on the town than one directly on Church Street. Much depends on the sightlines by which the building can be seen from public areas. The plan should include principles and criteria for how tall buildings can be located in relation to their surroundings without having a major impact on the “look and feel” of the area around them.

The impact of tall buildings depends as much on how many there are as on their height. A single tall building, suitably located, might be acceptable, whereas a large number of them would almost certainly not be. The plan should include policies that limit, or allow planners to limit, the number of tall buildings in an area, so that allowing one cannot be used as a precedent to argue in favour of the construction of more.

1.2 Definition of areas where tall buildings may be appropriate

The map in figure 7.4 defines areas where tall buildings are deemed appropriate, but also includes 400 metre and 800 metre radius circles where they “might” be appropriate (Paragraph 7.6.2). In the case of Enfield town centre, these circles include Gentleman’s Row, Chase Green and the Town Park. Clearly these are NOT suitable locations for tall buildings. The inclusion of simplistic circled areas is misleading and unhelpful, and could be used by developers to argue in favour of buildings in locations where they are not appropriate. Either the circles should be omitted entirely, or the criteria for defining the circumstances under which tall buildings “might” be appropriate should be spelled out.

1.3 Local views which warrant protection

Paragraph 7.5.2 deals with important local views that warrant protection. Protecting a view involves both avoiding development that gets in the way between the viewer and the landscape (or whatever it is) being viewed and also protecting the character of that landscape itself. The view across the town, and eventually to Epping Forest, from the top of Windmill Hill is identified as important, but would be radically changed by tall buildings in Enfield town centre. The policies for views in section 7.5 therefore conflict with the policies and definitions for tall buildings in section 7.6.

1.4 Impact of tall buildings on parking

It is entirely correct and appropriate for the plan to encourage the use of public transport rather than private vehicles. However, many people will still choose to own cars. Even if, like me, they do not need them for work and do not use them at all for local travel, they may need them for some journeys further afield. The plan should seek to discourage car USE, but must at the same time allow realistically for car ownership.

Although many, if not most, houses built from the 1930s onwards now have some form of off-street parking of their own, most older houses rely on on-street parking. This is particularly true for the many “streets” that have no roadway at all: River View and much of Holly Walk are examples in the town centre, but there are many across the borough. Without adequate parking, large blocks of flats could place an intolerable pressure on parking spaces in areas that already do not have enough space.

The goal of eliminating petrol and diesel vehicles depends massively on adequate provision of charging points, which need to be readily accessible to residents and visitors where they park their cars, when they need them. This will be a big problem for all the thousands of roads that have only on-street parking so that residents do not have access to a charging point that they own or control, and could be made worse by tall buildings with large numbers of flats.

The tall buildings policy should specific provisions to ensure adequate parking with adequate access to battery charging points. More widely, development policies across the borough should seek to promote the provision of electric car charging points, for general public use as well as for users of the developments themselves.

2. GREEN BELT

One of the most contentious parts of the plan will inevitably be the proposal to allow building on green belt land. Section 6.5 deals with protection of the green belt, and places considerable constraints on what might be considered an exception under “very special circumstances” (paragraph 6.5.1). However, other parts of the plan then go on to propose very significant incursions onto the green belt at Chase Park and Crews Hill.

Obviously there is a great need for more housing units in and around London, and some development on green belt land MIGHT be necessary. However, to justify this on the need for housing alone, without explanation of why it is appropriate for these areas but not for anywhere else, risks setting a precedent: the same argument, that there is a need for housing, could be used to justify more use of green belt land in the future. As section 6.5 describes, the green belt is an important restraint on urban sprawl, and if it is permissible to take areas of it solely based on demand for housing, then it is no longer a green belt.

2.1 Chase Park

The area covered by Chase Park is currently open farmland, and if a green belt is to mean anything, then large scale building over this land is not appropriate, although building on the area south of the A110 might be considered as infill in an already urban environment and might be permissible.

2.2 Crews Hill

Some of the green belt areas in Crews Hill, to the east of the railway line, are possibly already degraded by developments (for example, old nurseries or industrial yards), and these could be considered as exceptions where housing development would be appropriate. However, the areas to the west of the railway land are either used for the golf course or are farmland and are important open spaces that are contiguous with other open countryside. The farmland to the north west of the railway station identified in the plan as land for building is no different from the land around it, and there is nothing in the plan to suggest why this land in particular is suitable for development. Also, if the development were to be allowed, there is nothing in the plan to say why the same arguments should not be used to allow further building.

Development at Crews Hill should be restricted to the east of the railway.

2.3 Preventing further incursion onto green belt land

If the plan is to permit any development on green belt land, then it must contain arguments and criteria to say:

- why such development is a “very special circumstance” (para 6.5.1);
- what makes that area of land suitable for development;

- why future expansion of development onto more green belt land is not permissible – why these proposals cannot be used as a precedent.

3. PLACE MAKING - ENFIELD TOWN CENTRE

The phrase “place making” is widely used. There should be an explanation of what it means as a concept.

Section 3.1.10 specifies instances of improvements to open space. The plan should describe the nature of these improvements:

- Enhancements to Town Park and Chase Green – what enhancements?
- Activation of the library green – what does this mean? (Jargon that will be unintelligible to most readers!)

4. DELIVERING A WELL DESIGNED ENVIRONMENT – SCALE OF CHANGE

Figure 7.1 (Scale of change recommendation) appears to show the Gentleman’s Row and Holly Walk areas as being recommended for limited changes. What are these changes?

There must be an area by area explanation of what changes are recommended (possibly a separate, supplementary, document?)

5. CLARITY OF MAPS

The many maps embedded in the document are important and very helpful. However, many are of poor resolution, so that, even when expanded, the underlying street map is so blurred that it is very difficult to relate the wealth of detail to exact areas. Higher resolution versions of these maps should be available for on-line viewing. It would be preferable to have higher quality maps embedded directly in the document, but if this makes electronic files too big then there could be links (URL) to detailed documents, or a supplementary set of documents available from an on-line menu.