

## Feedback on Draft Local Plan (Enfield)

Please find below my feedback on the draft Enfield Plan. I will concentrate later upon some specific areas in my immediate locality. However, there are several overarching points I would make about the Plan, the consultation process itself and some of the key assumptions that inform the “vision” for Enfield. I will deal with these points first:

### Overarching comments:

1. **I object to the processes and methods used for this consultation, overall.** I am writing this feedback as a free text document because am utterly frustrated by the daunting and manipulative consultation process used in the *Let's Talk Enfield* website. Questions on that site for this consultation are either overtly leading – i.e. beginning with the words “do you agree...?” or unnecessarily complex. By this I mean largely generalised questions which require respondents to a) understand what is being asked - e.g. “*will the proposed placemaking policy for Area X adequately deliver the aspirations set out in the vision?*” and b) demonstrate in-depth knowledge of the interrelationships between vision, Plan and proposals for their area. For this reason “*Let's Talk*” is not, by any means, an “inclusive” consultation. Most people will have valid opinions on specific, identified proposals. They are less likely, or willing if able, to take the time to become articulate essay writers with the power to cross-reference. The requirement, in all available guidance, to quote page and paragraph references for all objections further renders difficult the entire process of consultation. These are skills more relevant to the process of university dissertation than to a genuine attempt to collect the views of local residents.
2. **I object to the language used to write the Plan.** The Plan is over-long and unnecessarily lengthened by flowery, optimistic language, much of which is either unintelligible to the average reader or capable of multiple interpretations. A typical example is: “*There are significant opportunities to optimise the provision of new homes and businesses while providing a form of development at a human scale which is responsive to the surrounding context.*” (Quote is from para 7.6.2 under the heading “tall buildings”.) This sentence, aside from its complexity and use of jargon, might conceivably be useful as a list of “things to be taken into account” when siting a tall building. Statements specifying “*this number of tall buildings, of the following height and types, will be built at the following locations and will look like this (etc.)*” are harder to find, however. Are we being consulted on the Council’s decisions? Or are we merely being consulted on the nobility of the Council’s intentions?
3. Linked to the previous two points **I further object to the unhelpful ways in which copies of the Plan have been presented for consultation.** It is virtually impossible to get a paper copy of the Plan (I have seen a price of £87 quoted) into which it might be possible to insert physical bookmarks. The online version is 413 pages long with hyperlinks to specific sections, but the document has no ‘back’ button. This, if you find yourself on Page 250 and want to return to another part of the Plan, perhaps several hundred pages earlier, you must scroll manually backwards, and then forwards again to the place where you left it. This is inordinately time consuming and provides an effective deterrent to residents who wish to take an inclusive view of the Plan, rather than deal only with individual localities item by item, section by section.
4. **In terms of the “vision” underpinning the Plan I object to the continuous and unhelpful insistence, throughout on “active” travel.** The Plan’s endless and counterintuitive insistence on linking the process of providing essential, additional housing and vital economic development with the entirely marginal practices of walking and cycling is both irrelevant and obtuse. In particular, the insistence that virtually every new dwelling will not cater for motor vehicles will almost certainly render these new dwellings undesirable for the majority and, as a knock-on effect, endanger the chances for success of any new economic developments in the area. In imposing these preconditions the Plan effectively artificially limits either the number of potential customers, or the number of potential employees, or both – entirely based on assumptions around personal transport.
5. **Linked to the above point I object to the prioritisation of active travel over the significantly more urgent needs of the local population in terms of their need for reliable employment opportunities and rapid access to essential public services.** Demanding that, for the privilege of living in Enfield, people limit themselves to

“sustainable” transport methods neglects the reality of their everyday lives. Most people travel to a huge variety of different locations for a multiplicity of purposes. Residents are of a wide variety of ages and levels of mobility. Family sizes and ages vary enormously and will change over time. Unless residents’ workplaces, leisure activities, schools, medical facilities, shops, entertainment opportunities, close family and friends (etc. etc. etc.) are all found within a convenient walking or cycling distance from their new home there is no way that most people will be able to avoid using motorised transport. To insist that cars are not an option unnecessarily constrains the range of people and businesses that can reasonably relocate to Enfield. The fact that many of the proposed housing developments are on, or adjacent to Green Belt land exacerbates these difficulties. Already such areas are poorly linked to other parts of the borough by public transport. Creating large new communities in these isolated localities without making provision for private transport will make these new homes undesirable in the eyes of many prospective residents.

6. **I object to the fact that the consultation process makes it impossible to consider the aggregated effect of a variety of similar proposals within the Plan.** For example, Table 8.1 (page 185) of the Plan lists the various sites for development and the broad purposes of the developments. Borough residents shop and travel in localities across the borough as a whole and not just in their own immediate area. **In total, 9 of the proposed developments involve the loss of public car parks in significant retail destinations** (SA6, SA8, SA9, SA10, SA12, SA19, SA20, SA22, SA32). While consultees may choose either to agree or disagree with individual decisions about specific retail car parks in individual locations, there is no opportunity to object to the overall impact, on the borough, of the loss of these facilities aggregated together. Similarly, **a further 8 sites involve locations currently occupied public car parks** (SA11, SA18, SA23, SA24, SA31, SA40, SA41, SA43). **There is no opportunity to object, overall, to the combined loss of these parking facilities.** The consultation requires us to comment separately on the “vision” for each separate locality. This is essentially a process of ‘divide and conquer’. The aggregated loss of these essential components to modern social and economic life, however, will have the inevitable impact of rendering Enfield a less desirable place to live and a less suitable location for establishing economic enterprises, with corresponding impacts on employment opportunities.
7. The purpose of the Plan should be to revive Enfield’s economic fortunes and to remedy as many known deficits and shortfalls as possible in key areas of local provision. A relative lack of walking and cycling opportunities may be of concern to a minority of residents but they pale into insignificance when compared to other, more basic needs across the borough relating to housing, shopping, public services and employment opportunities. **Overall, therefore, and throughout the Plan I object to:**
- The use of Green Belt land for additional housing when significant brownfield sites are available
  - The siting of new, large-scale residential developments in relatively remote localities that will create communities isolated from viable transport links to significant shops, services, schools and places of employment
  - The refusal to contemplate provision for cars and parking in new residential developments
  - The replacement of valuable community resources such as station car parks, supermarket (and other commercial centre) car parks with inappropriate high-rise buildings
  - The over-emphasis on the building of small-scale apartments in high-rise buildings when the shortage of larger family homes is a known Council priority

#### **Specific issues in my own locality:**

1. **Crews Hill:** I object to the development of Green Belt in general but the proposals for Crews Hill are particularly bizarre. As a general example **I object to policies outlined in pages 77-87 relating to Hadley Wood and environs, all of which propose the redesignation of Green Belt land** in this attractive and historic part of the borough for housing and other purposes. In the case of Crews Hill specifically (Section 3.9, ps75-80) the Plan seeks an “expanded community” on Green Belt land which is “positioned to connect east to west with existing connections ... by road, track or footpath .... thus improving east west connectivity”. **I object to the “vision” for this locality and to the absurd and fallacious statements made about ‘connectivity’ for the area.** The notion that building on Crew Hill enables “east west connectivity” is a nonsense. No additional east west transport routes are proposed. The existing roads in the area are only minor routeways. The only (north

south) bus route in the area terminates at Rosewood Drive, well short even of Crews Hill Station. Transport in this area is already inadequate and prone to congestion, even without 3000 additional new homes. Residents in the proposed 3000 new homes (assumed not to be car owners) are presumably to access their jobs, schools, shops and leisure facilities (none of which are mentioned in the plan) solely by tracks and footpaths. Desecrating Green Belt land for the creation of such an unrealistic utopian vision is unjustifiable and **I object to all aspects of the proposals for Crews Hill.**

2. **Enfield Town:** my **initial** comments relate to tall buildings (pages from 156), the Palace Gardens development (page 321) and the sale of St Anne's School. **I object to the tall building policies on pages 156-160 especially insofar as they relate to the Palace Gardens Shopping Centre.** The plan proposes unacceptably tall buildings which are entirely out of character with the surrounding urban landscape and without any form of appropriate transition (as recommended in all relevant policy guidance) between the existing low-rise buildings and the proposed new skyscraper. Not only do I object to this proposal on the grounds of height, **I also object to the creation of a building of this size with no provision whatsoever for cars and parking.** If even a moderate proportion of the new homes created is eventually occupied, the increased demands on local schools, medical and other essential services arising from the imposition of a building of this size on this locality will be excessive.

Similarly, **I object to the proposals to build on the site of St Anne's School with a further 326 new homes,** also in 'tall' buildings, which is also inappropriate. I do not oppose the redevelopment of this site in principle but, given the borough's most significant housing shortfall – i.e. a shortage of family homes – better use of this site could be made using low-rise, less densely-packed accommodation.

3. **Final comments:** It should not be necessary to mention the following references to people who carry out urban planning as a profession. Nevertheless, by way of brief summary:

- The Plan offers no evidence for the various claims made throughout the document (e.g. to support the insistence on walking and cycling or to rebut potential claims about increased congestion). The text is full of assertions and visionary ambitions but none of these is based on a robust analysis of current problems or the impact of potential solutions.
- The Plan, in practice, reneges upon assertions made in the official flyer (signed by the Leader of the Council) aimed at encouraging residents to contribute to the debate. The flyer stated that the Council would protect the Green Belt and discourage high-rise developments. In practice, the Plan demonstrates an almost polar opposite stance.
- The Planning and Regeneration Committee of the London Assembly has explicitly concluded the idea 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"*. In practice and in contrast to the Council Leader's bland platitudes, Enfield's Plan concentrates on high-rise developments in the significant majority of locations.
- In pursuit of the creation of so many high-rise units, the Plan has adopted a housing target that is in excess (by circa 600 units per year) of that suggested for Enfield in The London Plan. This fact alone suggests that many of the proposed high-rise units proposed in the Plan are unnecessary and could be replaced by the (far more important) creation of new family homes with 3 or more bedrooms.

I commend this summary of my objections to those involved in the analysis of consultation responses. I will be copying this document to my local Councillors who, I hope, lobby vociferously for the necessary changes to be made to the Plan.