

FORTY HILL AND CLAY HILL CONSERVATION AREAS
FORTY HILL & BULLS CROSS STUDY GROUP
 Founded 1969

Re Draft Enfield Local Plan Consultation

The Group objects to this document in its current form and is of the opinion that the document is not adequate for consultation. Notwithstanding this, should you be minded to use this document to consult the Group would like to make the following comments:

1) General comments:

- a) Layout and comprehension – the Group finds the document difficult to comprehend mainly due to errors and its size. The plans are not detailed enough and are, in places missing or even have no key.
- b) Errata and errors – there are multiple errors and errata in the document.
- c) The document fails to mention enforcement, in particular the Councils priority, support and vigorous implementation of enforcement where necessary.
- d) The Group questions the level of housing need and the need to supply part of that need from utilising current Green Belt.
- e) The Group objects to the use of “Chase Park” as a reference to potential development on Vicarage Farm.
- f) The Group objects to SA62, a further extension of the THFC facility in Bulls Cross. The displacement of a more inclusive sports use (in addition to those displaced for the existing facility), the loss of green belt land and the out of character nature of the development runs counter to many of the policies in the draft plan. The site information should be red for heritage considerations.

2) In detail:

- a) Table 2.1, Enfield’s strategic objectives should include the proactive conservation of Enfield’s heritage in the built, natural and cultural forms.
- b) SS1 point (2) should not include specific references to sites.
- c) SS1 point (7) is objected to. Green belt is permanent and no special circumstances have been put forward to counter this.
- d) SS1 point (8) is objected to. Green belt is permanent and no special circumstances have been put forward to counter this.
- e) SS1 point (11) reference is made to small sites near ‘Forty Hall’ it is unclear what this refers to.
- f) PL8 (2) there is no definition or reference to criteria or what a “National Park City” is.
- g) PL8 (2e) the Group contests the assumption that there are ‘good’ links to Crews Hill station.
- h) PL8 there should be mention of how the national park area itself will be protected from development.
- i) Section 3.9 PL9 the Group objects to the proposed development. No coherent rationale has been proposed for any development in this area.
- j) Section 3.10 PL10 the Group objects to the proposed development. No coherent rationale has been proposed for any development in this area.
- k) SE2 needs to have a commitment to police and enforce non-compliance of agreed standards throughout the life of the building.

FORTY HILL AND CLAY HILL CONSERVATION AREAS
FORTY HILL & BULLS CROSS STUDY GROUP

Founded 1969

- l) SC2 any new civic building should have a commitment by the applicant to register as an “asset of community value” or equivalent.
- m) BG1 (2) this policy is unclear, although the group would agree Hotspur Way does need improvement as considerable damage has been done to Forty Hill by THFC, it hard to see how rectification of this damage could be secured by the Council.
- n) BG3 the Group is concerned at the adoption of a mitigation policy regarding wildlife habitat.
- o) BG4 should mention respect of heritage (landscape or built) and character.
- p) BG4 the Enfield Chase Area of Special Character (as used in previous plans) should be carried into this policy.
- q) BG5 no mention of visual containment methods – the use of ‘green tunnels’ or bunds of earth restricting views and openness should be resisted.
- r) BG6 any public/ open space should be expected to adopt a charter either the “Public London Charter” (currently in draft form) or another similar charter.
- s) DE1 should contain reference to the “Public London Charter” (above). Reference to “beauty” should be made in terms of design quality.
- t) DE2 (2b) should also include any application (whatever scale) that may have a large impact and/or is in a sensitive area.
- u) DE5 should include the views from the length of the top of Forty Hill, Clay Hill and Whitewebbs Hill, ie not just from pinpoint areas and 360 degrees.
- v) DE6 tall building criteria should include relative land height in their feasibility assessment, ie a ‘tall building built on rising land will have a greater impact than a similar building built from a lower level.
- w) DE6 tall buildings should taper downwards in height towards the urban fringe/ green belt.
- x) DE7 Public realm proposals should include adoption of the “Public London Charter” (currently in draft form).
- y) RE1 vistas and views from and to footpaths (permissive or statutory) should be maintained, visual containment (green or otherwise) should not be permitted.
- z) CL3 any ‘visitor accommodation’ must not compromise any heritage asset, or impact negatively on locality.
- aa) CL4 (1,b,i) Group objects - there appears no need for the Council to ‘contribute’ towards the private training football centre that is already established.
- bb) CL4 (2) should also be subject to D2 and D3 master planning and delivery.
- cc) CL4 (1) the Group would suggest encouragement of diversification and increase mix of sports.
- dd) 12.5.10 new open space should be designated permanent and governed by agreed management plan.
- ee) ENV1 should have reference to Edmonton incinerator and impact to any nearby high rise building and potential pollution spread throughout the Borough and a risk mitigation strategy.
- ff) SA44, should have heritage constraints, in an area of archaeological interest and adjacent to the Forty Hill Conservation Area and Green Belt.

The Group hopes that you will be able to take these points into consideration when reviewing the Draft Local Plan.

Yours sincerely