

Enfield Council

BY EMAIL

Dear Enfield Council,

RE: Response to Draft Local Plan

I wish to raise the following objections to Enfield's Draft Local Plan.

Strategic Policy SP SS1: Spatial Strategy

- The Brimsdown Industrial Estate area should be included as a placemaking area e.g. for mixed-use development.
- Vicarage Farm (rebranded in the Draft Local Plan as 'Chase Park'), should NOT be included as a placemaking area for the following reasons:
 - It is an unsuitable location for a large-scale new housing development due to its poor connectivity to public transport, as has been correctly stated in the council's Transport Assessment.
 - The development would be car-dependent. It would result in several thousand additional vehicles using local roads, which would have a significant negative impact on air quality.
 - Vicarage Farm and the network of footpaths, provides valuable and accessible open greenspace for residents living across Enfield, and notably for residents residing in Town and Highlands ward, both of which were identified in the council's recent Blue & Green Strategy Audit as having a significant deficit of greenspace.

Strategic Policy SP PL1: Enfield Town

I object to SP PL1 (9) 'tall buildings', because:

- Enfield Town is a historic market town and conservation area that will be ruined by the presence of tall buildings (10+ storeys).
- Furthermore, there is clear and compelling evidence that tall tower blocks are an outdated model for delivering mid to high-density mixed-use development and are:
 - often **unnecessary** (research shows that other low-midrise high density housing options can deliver just as much floor space).
 - **more expensive** (tall buildings are associated with higher ongoing service charges than the alternatives).
 - **deliver less affordable housing** (evidence shows that the disproportionately high costs of construction mean that fewer affordable homes get built than alternatives).
 - **harmful to the environment** (research shows that alternative high density housing solutions have a far lower negative impact on the environment)
 - **often undesirable** (research shows most people would rather not live in them, especially over the long-term, given the choice)
 - **harmful to health** (research shows the negative impact that living in tall tower blocks can have on mental and physical health)
 - **often unsuitable for families with children and therefore can struggle to achieve a mixed and balanced community**
 - **often have undesirable impacts on local area** (e.g. high winds, overshadowing, increased heat island effect etc.)

In summary, there are simply far better alternatives to delivering high density housing.

I also object to Strategic Policy SP PL2, 3, 5, 6 and 7 in regard to the tall buildings policies set for these placemaking areas for the same reasons (there are better alternatives).

Strategic Policy SP PL5: Meridian Water

I object to SP PL5 because:

- (Point 1) the land on the “east bank” needs to put forward for mixed-use development as part of this plan, with any loss of SIL off-set by intensification within the site area itself and/or by the creation of new SIL areas e.g. in Southbury. If this does not happen, the main new park and greenspace planned for the area (i.e. at Edmonton Marshes), will be cut-off from the new homes i.e. the homes for Phases 1 and 2 will be on one side of an industrial estate and the greenspace on the other. The council has repeatedly told local residents that 10,000 homes will be delivered at Meridian Water, however, this draft Local Plan would deliver just half of this and offers no guarantee whatsoever that 10,000 homes would ever be built at the site.

- (Point 3) A 30% open public space target as a minimum is inadequate for such a large-scale high-density development and would not deliver the greenspace needed or meet the standards set by the council's recently adopted Blue & Green strategy. Open public space should be measured as a ratio of greenspace to population e.g. 2.15 ha per 1,000 residents not as a percentage of the land developed.
- The Campaign to Protect Rural England's (CPRE) vision for a new substantial park at Meridian Water "Banbury Reservoir Park", which would help reduce the deficit of greenspace in the area and make use of unused and fenced off green belt land has been completely ignored but should be included.

Strategic Policy SP PL8: Rural Enfield – a leading destination in London's National Park City

I object to SP PL8 because:

- The aims of London National Park City have been misunderstood and misrepresented (for more information see - <https://enfielddispatch.co.uk/environmental-charity-slams-councils-misleading-green-belt-rationale/>). This makes it very hard to take anything said within this policy seriously and at face value.
- Other terms are also misunderstood and misused e.g. rewilding
- The "vision" is harmful to the local farming community, reduces the opportunity to grow food locally and would harm the local ecology.

Strategic Policy SP PL10: Chase Park

I object to SP PL10 because:

- It is an area of outstanding beauty, that is accessible to local people living in urban environments.
- Vicarage Farm and the surrounding network of footpaths provides valuable and accessible open greenspace for residents living across Enfield, and notably for residents residing in Town and Highlands ward, both of which were identified in the council's recent Blue & Green Strategy Audit as having a significant deficit of greenspace.
- It is an unsuitable location for a large-scale new housing development due to its poor connectivity to public transport, as was correctly identified in the Transport Assessment.

- The development would result in several thousand additional vehicles using local roads, which would have a significant negative impact on air quality.
- The site supports a variety of priority listed habitats such as deciduous and wet woodland, hedgerows, running water and veteran trees and is part of a wider network of similar habitats, and offers unique habitats within the borough. Therefore, it is considered to be of key importance at a strategic level. Given the rarity of these habitats, and the unique circumstances that allowed these habitats to develop and establish themselves, it is considered that these habitats are irreplaceable if they were to be lost.
- This site is of key importance to local residents given the range of habitats and historic culture associated with it, and it is important at a strategic level as it forms part of a wildlife corridor which extends north into more rural settings.
- The proposed development would expose woodland and veteran trees to disturbance and trampling.
- The historic landscape associated with the valleys of Merryhills Brook and Salmon's Brook and some of the associated hedgerows are irreplaceable but would be obliterated by the development.
- A highly successful business of national significance would be lost (i.e. the Trent Park Equestrian Centre).

Strategic Policy SP H1: Housing development sites

I object to SP H1 for the following reasons:

- The number of homes that could be built on sustainable brownfield sites has been significantly undercounted (see - <https://betterhomes-enfield.org/2021/08/26/enfield-councils-draft-local-plan-undercounts-the-number-of-homes-that-could-be-built-on-brownfield-sites/> and <https://betterhomes-enfield.org/2021/08/26/homes-built-on-small-sites-serious-discrepancies-between-the-london-plan-and-enfield-councils-draft-local-plan/>)

Strategic Policy SP H2: Affordable housing

I object to SP H2 for the following reasons:

- The overall 50% target for affordable housing is logically impossible to achieve given the other sub-targets set for different types of housing i.e. sub targets are set at 50% or below, none are above 50%. Furthermore, some of the strategic sites identified in the plan already have planning

approvals in place and practically all of these will deliver far less than 50% affordable housing i.e. there is already a significant shortfall against the target. This means forthcoming developments would need to deliver far more than 50% affordable housing to make up for the existing shortfall, but this is very unlikely to happen. (The GLA Planning Datahub shows that over the last 10-years, 26% of new homes in Enfield have been affordable, so it seems highly unlikely that 50%+ will suddenly be achieved)

- The targets of 50% affordable housing in all areas of the Green Belt, will not be met and is not supported by the evidence because, amongst other things, significant infrastructure costs have not been accounted for (for more information see - <https://betterhomes-enfield.org/2021/09/05/building-in-green-belt-areas-will-not-deliver-the-affordable-housing-enfield-council-claims/>)
- The policy allows too much of the affordable housing that may be delivered to be shared ownership, which is generally unaffordable to current residents in Enfield and does not reflect local housing needs of existing residents. Controls are needed to ensure a mix of intermediate housing products are delivered and to control the proportion of shared ownership homes delivered.

Policy DM H3: Housing mix and type

I object to DM H3 for the following reasons:

- Enfield needs far more homes with 3+ bedrooms, yet this policy does not put applicants/developers under any pressure to deliver these. Policies are needed that require applicants to show that they have properly assessed the delivery of 3+ bedroom homes and explored appropriate designs that would deliver these. DM H3 as it stands will simply see a continuance of the current issues we experience e.g. applicants come forward with a tower block design and planners say tower blocks are not suitable for families so very few 3+ bed homes are delivered. What is needed is a policy that puts local housing needs (e.g. family housing) at the very start of the design process, not as the end. Policies are required that encourage or mandate a ‘needs first’ approach to design and application process.

Policy DM H4: Small sites and small housing development

Whilst I largely agree with the aims of this policy, it is clear that the Draft Local Plan does not actually properly account for small sites and small housing development (for more information see <https://betterhomes-enfield.org/2021/08/26/homes-built-on-small-sites-serious-discrepancies-between-the-london-plan-and-enfield-councils-draft-local-plan/>). As a result, this policy is just words without meaning.

Policy DM BG10: Burial and crematorium spaces

I object to DM BG10 for the following reasons:

- The following sites; SA59 Firs Farm Recreation Ground (part) and SA61 Church Street recreation ground, should not be used for crematorium space as there are more appropriate sites e.g. in green belt.
- Far more detail and policies are needed about new burial spaces (e.g. SA58 Alma Road Open Space) in regard to accessibility, public access and urban greening.