

Draft Local Plan-**Submission by Councillor Stephanos Ioannou of Southgate ward.*****Introduction and Outset***

This is my response to the Draft Local Plan Reg 18 Consultation 2021.

Thank you for the opportunity to respond to this important consultation. I am very concerned about the numerous examples of projects which will affect the Green Belt land in Enfield. This space is invaluable and once it's gone it won't be coming back. There has obviously been a lot of concerns raised by Enfield residents about these plans and I respectfully add my voice to those valid concerns. I am also concerned with the plans in respect to high-rise developments and how this might be achieved through the council working collaboration with supermarkets to free-up parking space in return for more housing. I believe that overall, the plans are not fit for purpose and that this does not serve well the residents of Enfield and particularly those in Southgate which I represent.

These comments are not just my own, but also the comments residents have also asked me to pass onto the relevant department for their consideration, therefore these comments come from other members and groups in the community.

If I may make a general point first, it is hard for residents to comment on the consultation as a whole because it is presented in the form of a large number of documents with no guidance on how they relate to each other, or on which are principally technical papers and which are statements of proposed policy.

I am used to dealing with complex topics and if I find the papers and the process impenetrable, so probably will many others many others. A consultation presented in such a ragbag fashion is a poor consultation, likely to attract comments only from the truly committed rather than more typical residents.

I am writing to object to a variety of draft policies.

1. I am writing to object to the following Policies: SP PL10, pages 80-87, and Figure 3.11; Policy SP PL9, pages 77-80 and Concept Plan Figure 3.10; Policy SA45: Land Between Camlet Way and Crescent Way, Hadley Wood, page 364; Policy SA54, page 374; and Policy SA62 page 383 and SP CL4 pages 277-279:

All of which propose the redesignation of Green Belt for housing and other purposes. These sites are part of historic Enfield Chase, which is unique in the southeast and played an important role in the development of Enfield. It is a rare and valuable landscape asset, and its loss would cause permanent harm not only to the Green Belt, but also to the very character of the borough.

2. I also object to Policies SA62 page 383 and SP CL4 pages 277-279:

Because they transfer part of Whitewebbs Park, a public amenity, into private management. I reject the Council's analysis that Whitewebbs Golf Course was losing money and call for its reinstatement.

3. I am also objecting to Policy SA52 page 372:

Which would remove part of Ramme Marsh, a wildlife area and public amenity, from the Green Belt.

4. I am also objecting to the tall building policies on pages 156-160, Figure 7.3, Figure 7.4 and Policy DE6, and SA2 Palace Gardens Shopping Centre page 321:

I absolutely abhor the Encouragement for tall buildings, including in 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). A higher quality version of figure 7.4 is also available, showing proposed maximum building heights across the Borough.

There are many reasons to be sceptical of the proposals for more high-rise blocks in the London area, and particularly here in Enfield. I will list just a few:

Security: Unlike a traditional house on a street, a lot of the public space in and around a tower block is not overlooked by residents. Crucially the entrances to tower blocks are often concealed - there are no twitching lace curtains to put off would-be thieves and muggers. The absence of so called "defensible space" means that tower blocks can be frightening places to walk in and out of - the fear of crime in such places is often worse than the reality. And because it is unclear who is responsible for the space around tower blocks, that space is often abused with litter, abandoned cars and graffiti.

Anonymity: The sheer number of people coming in and out of tower blocks means that residents do not question the presence of strangers. In privately run blocks security can be vastly improved by the employment of a porter, but such a luxury is usually out of the reach of cash-strapped councils.

Location: Tower blocks are only really popular when they are located in fashionable areas. For example, while Erno Goldfinger's Trellick Tower in Notting Hill is very popular, Goldfinger's Balfron Tower in unfashionable Tower Hamlets is loathed. And try telling the residents of Park Hill estate in Sheffield that they live in a modern masterpiece.

Families: High-rise living is particularly unsuitable for families because of the absence of outside space. One of the reasons that tower blocks have such a bad reputation is that councils placed so many families in tower blocks against their will. The reputation of tower blocks may begin to change if people have more choice about where they live. Doubts will remain, however, about a building type that is only really suitable for those without children.

5. I am also objecting / supporting mentioned policies on pages 64-65, Figure 3.7:

Objection to (2): should deliver new homes including through high density development that also preserve key views of the station. This may include tall buildings only in acceptable locations as identified in policy DM DE6 Tall buildings and Figure 7.4 (and any updating successor).

There is a clear objective by the council and its administration to see areas like Southgate become concreted over with high-rise developments.

Whilst I recognise the need for additional housing in the borough, I thoroughly object to the suggestion for high rise buildings in places like Southgate.

May I also bring to the attention of officers the recent decision by the planning committee to reject proposals for such high rises at Southgate Office Village, after the community made clear the concerns ranging from character, impact on cultural heritage in the circus area, in addition also to the effect on the skyline. Moreover, there was a

clear communication from Heritage England on the effect it will have from Groveland's park and how the skyline again will be impacted.

I do not need to go more deeper into this case as the planning documents and the reasons for refusal by the committee were clear and published. Given this precedent has been set I would encourage the council to look at such decisions before resurrecting the failures of the past.

I would also like to mention the clear conflict of goals mentioned by the council in this document. To be specific point (2) conflicts with (3D) (3E) (3A).

Referring to point (3D) the type of buildings in Southgate is that of semi detached or detached housing going into the Meadway, Oakwood and Groveland's estates therefore the conflict here regarding high rise buildings is clear.

Referring to point (3E) the exact refusal of Southgate Office Village which its intentions was to promote high rise dense housing was partly because of the lack of existing office space in the area, and the issue that this development would take the last remaining significant office block in Southgate out of action.

Referring to point (3A) I need not to go deep, in that again the department for planning recognise and must respect the Grade II listed status of Southgate Tube and thus must not seek to distort the surrounding area in favour of housing targets. We must show respect for our town centres and Southgate's unique character must be preserved.

Support of point (4) in the Draft Strategic Policy SP for Southgate

Support of point (5) in the Draft Strategic Policy SP for Southgate

Support of point (6) in the Draft Strategic Policy SP for Southgate

Support of point (7) in the Draft Strategic Policy SP for Southgate

Support of explanation point (3.6.3) in the Draft Strategic Policy SP for Southgate

Part Objection of explanation point (3.6.4) in the Draft Strategic Policy SP for Southgate

Officers and those drafting the plan are trying their best to subtly introduce the word high rise into points made in the section for Southgate, once again I reiterate my comments above that the decision for Southgate Office Village sets a major precedent against the plans for high rises in Southgate. This must be respected, and the council should drop this comment.

Major Objection of explanation point (3.6.5) in the Draft Strategic Policy SP for Southgate

May I echo many residents' concerns in having to now contemplate the building on top of supermarkets, therefore worsening their shopping experience in Southgate all together and adding yet another layer of inconvenience.

On a more serious note, there is no guarantee from supermarkets that they would be willing to see such construction on their sites, again due to the impact of customer experience, but also in what respect will the council look to partner with the council on such schemes? Enfield council have clearly struggled in prior development schemes such as Meridian Water for example, hence such foresight is if anything too ambitious when the council cannot even work on schedule for its existing developments. There is no real obligation by supermarkets to work in partnership with local authorities on such causes- hence the council might want to be careful when partnering up with profit seeking groups like supermarkets.

When supermarkets were contemplating their original construction, I am sure their sole purpose was to satisfy shoppers and not the local authority and their goals / targets. Therefore, the intentions of the council to work in partnership is actually a little too ambitious, as the common values of business and citizen satisfaction i.e. ASDA and Enfield Council goals for Southgate in this case are far apart.

Support of explanation point (3.6.6) in the Draft Strategic Policy SP for Southgate

Support of explanation point (3.6.7) in the Draft Strategic Policy SP for Southgate

I would also like to refer to one resident who made the following point in relation to the distribution of a leaflet by the Leader of the Council Nesli Caliskan:

“To be fair, the uncertain nature of the projections is recognised in some of the more technical Local Plan documents, but it is conspicuous by its absence from the headline statements, where these can be found, or from Councillor Caliskan’s “Future Enfield: Enfield homes for Enfield people” leaflet distributed to households a few weeks ago.

However, the discussion of future housing need in the documents is very heavily influenced by the housing targets set by central government and the GLA. The demographic contribution to the future need is of course related to the uncertain household projections discussed above. A large chunk of the targets which government has been trying to set is due to central government’s use of formulae which place great stress on affordability, essentially based on average house prices in an area with average wages of those working in the area, wherever they live. Affordability of rental accommodation is ignored; of course, there is a relationship with house prices, but it is not a simple one.

*This culminates in the statement in Councillor Caliskan’s leaflet that **the government would like us to build 4,397 homes per year**. This appears to be taken from central government calculations consistent with what was probably the most mutant of their formulae in December 2020. However, they dropped this formula in April 2021. The figure of 4,397 was dead in the water at this point and should **not have been used in any documents prepared after this point**, including Councillor Caliskan’s leaflet. Some might think that the purpose of using the figure make anything significantly less seem like a good result or compromise for the borough.*

*This means that it is probably the **worst time possible to be committing to plans for the next twenty years**. There is a real danger that Green Belt is given up or unsuitable tower blocks built because it is assumed that the projected growth is bound to happen. If it doesn’t, we have ruined parts of our borough for nothing.”*

6.I am also objecting to DM BG10 in the Draft Enfield Local Plan. This allocates Firs Farm Wetlands (Site ID SA59) as a site for burial and/or crematorium use. I oppose this policy because:

Firs Farm wetlands is a vitally important community resource, essential to the health and the draft Policy directly contradicts Strategic Policy SP CL4 in the draft Local Plan. This identifies Firs Farm as facilitating and contributing towards developing sport and leisure facilities in Enfield.

The proposal will significantly affect the local Site of Interest for Nature Conservation and reduce the biodiversity and nature conservation interest of Firs Farm wetlands, contrary to several other policies in the draft Local Plan.

The proposal will reduce the effectiveness of the flood alleviation provided by Firs Farm wetlands, which Enfield Council has spent more than £1 million to provide. The proposal will adversely affect the environment and local traffic, and this has not been properly considered in the Integrated Impact Assessment of the draft Local Plan.

The policy introduces uncertainty into the future use of Firs Farm wetlands that jeopardises funding for projects secured by local community groups (e.g. from Thames Water) that have been endorsed and supported by Enfield Council.

I now move over to my recommendations:

1. Does the vision for Southgate set out an appropriate vision for the future of this place? If not, what components do you think should be changed or are missing?

The vision for Southgate from the outset is extremely vague in the areas that bare some positive comments, please see reference to my points above which I agree with. With that said I am surprised to see officers focused on the more significant changes in the area, focusing mainly on high-rises instead of the wider more significant issues which I will mention in more detail below. I believe the below points have been mainly left out or not commented on in enough detail:

- **Cleanliness of Southgate**
There is a serious perception that this council does not take pride in the cleanliness of the local area, this perception must change if we want to attract quality shops and shoppers to our area. In turn with a good high street will come happier residents, and with that I feel that we must look to clean up Southgate once and for all
- **Green in Southgate**
The point about open spaces was very vague, and I feel officers have let down residents and councillors with recent actions such as the implementation of parklets on Chase Side. Many residents feel they take up unnecessary space, congest the pavement, and do not add any green value to our high street. Many residents expressed that they feel planters, hanging baskets, SUD's and even vast flowerpots where the pavement widens outside CYNERGEY BANK would have been more beneficial. Also mentioning the green space outside NANDOS which has been left neglected.
- **Art in Southgate**
As a home to a local college and a high concentration of primary schools in the area there is a unique opportunity for the council to collaborate on cultural projects with schools. For example, street art on walls, and council funded painting schemes that have brought about the colourful zebra recently on Chase Side. Generically speaking anything to brighten up and colour our street is welcome, and this again was left out
- **Congestion in the Southgate Circus area**
Many residents are appalled by the way in which the council has not addressed the issue of congestion in Southgate which has only been getting worse in the last two years. Winchmore Hill Road, Chase Side and Bourne Hill as well as High Street have seen more congestion- note all these key roads have recently experienced even more congestion due to the introduction of the LTN's which have exasperated the issue. I therefore ask the department to look for a solution to make Southgate a pleasant commuter spot for both motorists and those who use public transport and rely on bus routes into our town. May I also ask the department look to suspending the LTN scheme to relieve the area of extreme congestion, and in addition to come up with a new scheme that will stem the flow of traffic on Southgate roundabout.

- Farmers Market in Southgate- Something unique...**
 We must be more creative in our approach and one of the ideas which really stood out from one resident was the idea of closing Minchenden Car Park for a timeframe during the week, maybe even the weekend, and utilising it for farmer use. This will add another element to our town and attract a new type of custom that will be unique like the market in Enfield Town. The space is there, the setup is possible, and the benefits will be better economic activity for our local area
- Parking in Southgate**
 If we are to talk about helping our local shops then we must take the decisive step and give an incentive for local shop owners to give their customers complimentary parking. I am talking about a scheme where council authorised coupons are delegated to shops and provided to drivers who shop local. Half an hour free parking for local shops will dramatically transform the fate of our high street which can get a boost of confidence, and shop owners will feel we are trying to support them post pandemic.

Moreover, the council must seriously look at the way in which delivery companies have been neglecting our high street parking bays along Chase Side. Many shoppers and residents are beginning to desert out centre as the availability of parking, and the way in which delivery drivers on motorbikes dominate the scene have made the centre unattractive to shop. Many shop owners also are talking about packing up and going online because of this reason. We must now instigate a discussion whereby the council must make it mandatory for bikes especially outside McDonalds to sue their loading bays behind the store on Crown Lane to mitigate this negative effect.
- Festivities for Southgate**
 I am not surprised to see the council not meeting the attachment to culture when it comes to festivities. Southgate is home to a large Greek, Cypriot, Turkish, and even Jewish and Chinese community. The council does not make the effort to celebrate the communities which make our area, and I would advise the council to look at celebrating with its communities' events such as Orthodox Easter, Hannukah and even Chinese New Year. With the progression of social media and cultural awareness we must look to celebrate and advertise that Enfield council recognises the contribution made by communities in Southgate. May I add other parts of London, such as Barnet, celebrate Hannukah with a placement on Golders Green Square. Also closer to home is Cockfosters who do the same. This should be pan-borough schemes and all areas should celebrate with other wards.

Conclusion:

Council officers will be reading my comments above, and may I make it clear that these comments although from my document are mostly compiled of views of local residents which I have moulded into a wider viewpoint. Most of the issues mentioned are bread and butter issues where the council if they just kept the place clean, tidy, green, then I am sure in turn the respect by businesses, residents and passers by will be far greater than is currently the case. We must therefore work to resolve the most basic of issues before we progress onto major projects, and I hope officers will listen to the points I believe have been missed out. On a more serious note I am heavily concerned with the views on high rise developments and I hope the departments relevant will note that prior applications have been met with much opposition by local residents and councillors who all voiced heavy views against the development. The plans also for ASDA are concerning as both parties (business and council) do not have shared interest therefore this ambition could just be a la-la land idea in an ideal where that businesses will partner with councils to make genuinely affordable homes.

