

Dear Sir or Madam,

Please find my response to the Enfield Draft Local Plan Consultation in which I set out the areas I object to and the reasons for this.

### **Draft Local Plan – Areas of Objection**

#### **General inaccuracies and misleading information**

The Draft Local Plan is inaccurate and misleading in its current description of places and how they are used. For example, the draft local plan doesn't describe Chase Park/Farm in terms of its own beauty and unique character within Enfield but rather the character of some nearby areas to one side. Chase Park is also not just used by dog walkers but by many, many people who want to exercise, enjoy nature and escape the urban pressures of London. This is more important now than ever with the pandemic, something not acknowledged by the Draft local Plan.

#### **Strategic Policy SP SS1: Spatial strategy**

Stating that 'Option 2C sets out a limited number of sites to be released from the Green Belt' is disingenuous at best since it fails to state that about a quarter to a third of the remaining greenbelt in Enfield borough will be allocated for development. This is best shown in the map below from the HRA report – one which shows the extent of development very differently from the diagrams (such as figure 2.1) presented in the main consultation document. **This constitutes a failure to make the consultation as accessible as possible and therefore is not in line with the government Plan Making guidance** - <https://www.gov.uk/guidance/plan-making> - since the greater clarity of this map is very difficult to find.

SP SS1 doesn't align with the draft local plan's **vision** for Enfield as a green lung of London and enhanced green open spaces and waterways since it will remove a large part of the designated areas of green open space.

The proposed growth option 2c is unsound. The construction of 25,000 new homes between now and 2039 is completely unsustainable in Enfield and is mis-aligned with the latest growth forecasts. SP SS1 is proposing a 20% increase in the number of households in Enfield, four times the population growth forecasted nationally by the ONS.

The ONS 2018 forecasts have the UK population increasing by 5% between 2021 and 2040.

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/nationalpopulationprojections/2018based>

The UK population's growth rate from mid-2018 to mid-2019, at 0.5%, was slower than any year since mid-2004. It then fell further the following year to 0.4% for mid-2019 to mid-2020

- <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/latest>

The Draft Local Plan and evidence base has shown no consideration of the effects of Brexit, Covid 19 or the Levelling Up Agenda. This is clear to see as the council quotes MHCLG's Indicative Local Housing Need Allocation which still allocates over 1/3 of the country's housing growth to London. As the MHCLG spreadsheet states - *all figures presented are based on data available at the date of publication and should not be considered as definitive for local planning decision or plan making as the inputs to the standard method are variable and not fixed.*

The local plan needs to be forward thinking and be looking at head at changes to changing growth forecasts. The government's uncertainty toolkit released in May is indicative of the less certain growth context we now have in the UK. The government is updating, this Autumn, its TEMPRO background growth factors for strategic transport modelling and Enfield Council should consider the implications of any changes that are made.

The evidence base set out by the council is difficult to follow but what is clear, is that the local plan spatial strategy **which is not consistent with the policies of the London Plan** which states that boroughs should:

- a) *allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification*
- b) *encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2*
- c) *enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA.*

2) *optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:*

- a) *sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary*
- b) *mixed-use redevelopment of car parks and low-density retail parks and supermarkets*
- c) *housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses*
- d) *the redevelopment of surplus utilities and public sector owned sites*
- e) *small sites (see Policy H2 Small sites)*
- f) *industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support*

The London Plan does not support using the greenbelt for delivery of housing supply. In fact, the London Plan places the utmost importance on the protection of the greenbelt. The Mayor also has a strong commitment to protect the Green Belt.

The London Plan housing target for Enfield of 12460 dwellings up to 2029 is based upon the 2017 SHLAA which assessed borough housing target allocations with Designated Open Space (Green Belt, MOL and other protected public open space) as a constraint along with other policy constraints. The SHLAA also defines Designated Open Space as unsuitable for development.

Removing the development planned on the greenbelt would still allow for circa 18,000 homes to be built over the plan period, still representing a 14%

growth increase over the plan period.

This **would be** in line with the NPPF *and support the Government's objective of significantly boosting the supply of homes.*

The options of limiting growth to urban areas and brownfield sites has not been sufficiently explored by the Council. The densities being assumed in centres such as Enfield Town, Southbury and New Southgate (prime areas for redevelopment and much greater housing densities ) particularly following the pandemic have not been thoroughly or creatively explored.

Using the London Plan's central high ptal densities, the 1238 units allocated for Enfield Town equate to only 3 hectares of land - about a tenth of the main town centre urban/retail area.

At even the lower *urban* levels of density, the housing allocation at Southbury is only indicating an area of around 15 hectares – but a much larger area is allocated here for mixed-used and residential development, suggesting that greater housing provision could be provided with good design.

And this is before consideration of the fact that much for the Southbury area classed as SIL is actually used for retail. Changing this to mixed use development has not been considered. This applies to other parts of borough such as Brimsdown.

The recent Overground train fleet capacity increase along with the planned 4-tracking provides the strategic transport planning logic to the redevelopment of these retail shed and surface car park heavy areas.

Well-designed, mixed-use development is at the very heart of good growth and its very essence is to provide high density development combined with employment and community/amenity space so that people of all ages and housing needs can be supported. This has not been sufficiently considered in the Draft Local Plan and evidenced by the council in areas such as Enfield Town, Southbury, Edmonton and Brimsdown. Building low density, car dependent homes on the greenbelt is not good growth by any definition as it removes the greenspace that existing and new residents need. It increases traffic congestion and pollution as well as impacting upon adjacent conservation areas. The new infrastructure on the greenbelt will also not serve existing communities across the borough very well.

The policy to build on the greenbelt also conflicts with the climate emergency that Enfield Council declared in July 2019 as it will lead to greater car use rather than the modal shift to public transport that is needed to stop and reverse the effects of climate change. Lastly the policy has not responded to the Mayor of London and Transport for London well who said, in their response to the previous local plan consultation, that there are no exceptional circumstances for developing upon the greenbelt and that Crews Hill is unsuitable for growth.

**To summarise**, the council has not adequately explained the need for more than 17,000 homes over the plan period – especially given the very different growth environment we now have in this country with Brexit and the government's levelling up agenda to focus more growth in the midlands and north of England. Indeed it is not clear where the figure of 17,000 came from and this should be set out clearly.

Secondly, as per paragraph 141 in the NPPF, the council has not adequately demonstrated that exceptional circumstances exist to justify changes to the Green Belt boundaries. It has not examined fully all other reasonable options for meeting its identified need for development eg

- a) making as much use as possible of suitable brownfield sites and underutilised land;
- b) optimising the density of development
- c) discussing with neighbouring authorities whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

### **Impact Assessment**

The IIA has not identified the combined impacts with other development planned in neighbouring local authority areas.

Even without this, the IIA states that the large-scale development proposed through the Enfield local plan has the potential to generate adverse effects during construction. But this vague statement also shows that the council has not undertaken a sufficient assessment of the impacts of just its own plans.

The IIA has not accurately assessed or described the transport impacts of the local plan. The plan is proposing 25,000 homes and the transport appendices state that there will be an increase of 17,755 cars owned in the borough. That equates to 0.7 cars per new dwelling.

This completely contradicts *Policy SP T1: Promoting sustainable transport* and the IIA assessment that the plan having a significant positive effect in relation to **IIA1: Climate change mitigation** *because the policy promotes car free or low level of parking provision schemes in the Borough, which will be supported by further development of local public transport networks and sustainable modes of travel such as well-designed public realm walking and cycling routes including green chains and links.*

As set out above and in the transport assessment technical note 1, the development in the local plan **will not** be providing car free or low levels of parking. This is another example of the consultation material not being clear and accurate. The 0.7 levels of car parking are not at a low level.

At the same time the technical note is suggesting that housing development in Crews Hill and Chase Park will have levels or parking below 0.5 cars per household. The Council has not included this as part of its viability assessment for the development of these rural areas. Developers will not build in these locations with this level of car parking.

As 4.1.32 of the Future Baseline Report states 'the area around the growth site is generally minimum standard and substandard for walking and with no amenities located closer than a 30mins walk from the site, it is expected that future residents will not want to rely on active travel.

With regard to Chase Park/Farm, 4.1.43 states that the proposed growth around Chase Farm is located within World's End where the PTAL score is 1b which is rated "Poor". 4.1.43 continues to state that this area is served by limited public transport, with three stations located at least 30 minutes walking away,

The IAA has made no assessment as to whether the 6000 homes on the Greenbelt sites will be able to be accommodated by the Hertford Loop Railway line that Crews Hill and Gordon Hill stations lie on. Indeed there is no mitigation considered in table 5.1 of the Future Baseline Report. Instead, all the public transport mitigation measures are focused along the West Anglia Mainline corridor, which, as mentioned above, points to the fact that the council:

- a) **has not** considered properly a plan option which limits development to urban and brown field sites well connected to rail links that are having capacity improvements made/planned and

b) **has not** provided a sustainable transport plan for development on the greenbelt.

I look forward to seeing these points set out in the consultation report and the council's response.