



Enfield Draft Local Plan Response

Main Issues and Preferred Approaches

'Regulation 18'
Consultation Response

September 2021



Executive Summary

- i. The **draft Local Plan includes** a draft Proposals Map, and a large number of 'evidence studies', as well as strategic policies, site allocations (the details of which are included in the Site Proformas within Appendix C to the Plan, pages 315-383), and development management policies. The plan includes provision for 30,000 homes across the borough by 2039, more than 6,000 of which will be in the Green Belt and countryside. Seven urban 'place-making areas' around the main urban centres are proposed; and new facilities for sport and recreation. Information about infrastructure provision is lacking from the draft Plan and the Council states that its intention is to publish that as part of the 'Regulation 19 stage' consultation next year.
- ii. The Society **supports** a number of aspects of the plan, including the 'place-making areas' within the existing built-up areas; design policies; and some aspects of the approach to housing, jobs, and some environmental policies.
- iii. The Society has significant concerns about the impact of certain policies in the Plan on the Green Belt countryside of the borough and some Conservation areas. Some of the proposed development, would have **highly damaging impacts on the special character and identity of the borough**. The Council appears to have removed the *Enfield Characterisation Study* from its list of Local Plan evidence studies. According to the 2021 'Character of Growth Study (page 7 "*The 2011 study is a detailed analysis of the borough's character, identifies typologies and explains the history of the urban environment. It is a solid base for this study and does not need to be fully revised.*" We agree. The 2011 Characterisation study identifies a number of harms to the character of Enfield that would result from development in some of the locations that the Council is now proposing. It is concerning that the Council does not appear to have considered that evidence in selecting its preferred sites. The study should be reinstated to the website.
- iv. The London Plan states at paragraph 8.2.2 that the Mayor may support development on 'derelict and unsightly' parts of the Green Belt, but the draft Enfield Local Plan proposes development on high-quality countryside. In proposing to release such sites, the Council appears to have pre-empted the Mayor's own assessment of the Metropolitan Green Belt.
- v. The Society has concerns that the **Spatial Strategy (Policy SS1) affords too much weight to the protection of Strategic Industrial Locations (Strategic Policy E3)** and too little weight to the contribution of Green Belt countryside and historic landscapes such as Enfield Chase to the history and character of the borough. The Secretary of State directed the Mayor to '*provide boroughs in the difficult position of facing the release of Green Belt or Metropolitan Open Land with a greater freedom to consider the use of Industrial Land in order to meet housing needs*'.
- vi. **Alternative options** such as (but not limited to) Harbet Road, Meridian Water East Bank, and Brimsdown, should be brought forward. A number of these sites benefit from the advantage of excellent walking and cycling links, strong

connections the open spaces of the Lee Valley Regional Park, opportunity to address dereliction and improve the quality of the environment, whilst achieving significant net gains to biodiversity. With a draft plan for mixed-use development endorsed by Enfield Council we feel sure that investors will come.

- vii. The Society has concerns regarding **Strategic Policy PL8: Rural Enfield**, which attempts to justify the development in Green Belt countryside elsewhere, as the National Park City Foundation has observed in a letter of objection to the Leader of Enfield Council. The vision of the rural area as a '*leading destination in a national park city*' appears to be part of an elaborate argument that development on the Chase (SP PL9, SP PL10, SA45 and SA54) is necessary in order to fund 'attractions' such as visitor centres and sculpture parks. Our alternative vision is for a wildlife-rich network of small family-run farms, with heritage boards and an expanded network of paths for local people to enjoy. Our vision is realistic and sustainable and is focused on local people rather than people from outside the borough.
- viii. The Society objects to **Strategic Policy PL9: Crews Hill** (in particular development on Crews Hill Golf Course), which would result in development on some high quality Green Belt countryside within Enfield Chase, and would result in traffic pressure on the Conservation Areas and at the rural East Lodge Lane and at the remote hamlet of Botany Bay.
- ix. The Society objects to **Strategic Policy PL10: Chase Park**. The proposed development would cause high or very high harm to open Green Belt countryside; it would cause irreversible harm to the coherence and integrity of Enfield Chase Heritage Area, severing the link between Trent Park and Old Park and adversely affecting the setting of both; it would end the visual separation between Oakwood and Enfield Town provided by the experience of passing through open countryside on the A110; it would spoil the openness of the popular Merryhills Way (a survey of users is provided in Appendix C); and it would worsen an existing deficit in open space provision in postcode areas EN2 7 and EN2 8.
- x. The Society objects to the Site allocation **SA45 Hadley Wood** and **SA54 Land east of Junction 24**. These two sites are both strongly performing Green Belt countryside and part of Enfield Chase. The proposed industrial and employment site on the Ridgeway at SA54: East of Junction 24 would destroy an attractive green gateway to the borough.
- xi. The Council does not appear to have given any consideration to the **Areas of Special Character** in selecting its preferred development sites. Development on the above sites would cause severe harm to the *Enfield Chase Heritage Area of Special Character (AoSC)*. A review of the AoSC undertaken by the Council in 2013 is attached to our submission at Appendix F. Expert testimony and various documents (see our submission on PL10 and Appendix A) confirms that Enfield Chase is of national significance.
- xii. A **heritage impact assessment** should have been undertaken to inform the selection of development sites and the form and extent of development. This

should involve appreciation of the nature of historic landscapes and their collective contribution to understanding of the historic environment.

- xiii. The proposed development has the potential to have **adverse impacts on a number of rural lanes** which form a central part of the borough's identity. These include the visual impact of 'Chase Park' on Hadley Road, cumulative impacts on Whitewebbs Lane, and also on East Lodge Lane/Botany Bay.
- xiv. We are concerned that the Council's **approach to rewilding in Policy BG3: biodiversity net gain, rewilding and offsetting could force the Council's tenant farmers off the land**. A more effective approach to biodiversity enhancement in Enfield Chase would be to work with the tenant farmers to encourage best practice in agri-environmental management, for example in the approach to crop rotation, reduction in the use of chemical fertilisers and pesticides, and allowing field margins to flourish. A further benefit of this approach would be that it would not require financial contributions from developments in the Green Belt countryside.
- xv. A number of indicators suggest that the **housing need** is less than that proposed in either the London Plan or the draft Enfield Local Plan. A recent report by *London Councils* suggests that the best way to provide more affordable housing is to acknowledge market failures and for public provision to be accelerated.
- xvi. The evidence base lacks detail on the **impacts of tall buildings on Conservation Areas**. Examples include 13 storeys at Palace Gardens and 23 storeys at Edmonton Green, as well as at other Conservation Areas including Southgate. A Heritage Impact Assessment, including modelling of the impacts from relevant vantage points should have been presented for public comment at the Regulation 18 stage of consultation.
- xvii. We question the robustness of the proforma format used to present the site allocations in **Appendix C**. At the very least the proformas should specify which DM policies are particularly relevant in each case and explain why. High-level masterplans or (where high-rise development is proposed) massing models should be available for each site and subject to proper scrutiny as part of the plan-making process.
- xviii. We doubt that the level of **infrastructure** required to support the very high levels of growth proposed can be delivered without further harm to the character of the borough. The Regulation 19 (pre-submission) consultation should be of 12 weeks' duration in order to allow for adequate scrutiny of that complex evidence.
- xix. The Council should not determine any planning applications on the basis of the draft Local Plan until after examination and adopted by the Council as the new statutory development plan.

The Housing Topic paper says that mixed use development would 'compromise the integrity' of protected 'Strategic Industrial Land' such as that at **Harbet Road (below)**, despite the clear regeneration opportunities offered by this and other similar sites in the Lee Valley, and potential willing investors in mixed-use development.



(Below)...whereas **Vicarage Farm** ('Chase Park'), is proposed as a suitable location for a housing estate of 3,000 homes.

