

This is my response to the Draft Enfield Local Plan with particular reference to the St Anne's site which is adjacent to Chalkwell Park Avenue and impacts on me, my family, friends and my neighbours directly but feel this and other aspects of the plan has implications for Enfield Town in particular. I am mindful of the Enfield Master Plan in 2017 when we made our concerns about St Anne's site in particular known, the Encaf response, the Enfield Society, Enfield road watch, ETRA, Bushill Pk residents, the London Mayor and our MO's letter plus the conservative opposition report.

The Draft Local Plan contains several misconceptions and inconsistencies, the most significant of which I believe is a wrong assumption that we need high rise homes and that we can afford surrendering designated school space at St Anne's School. The St Anne's Development would provide just 346 homes but we'd lose a designated space for Education and Sports facilities in the context of over 1000 new homes nearby and projected 25,000 new homes generating need for schools. We are also alarmed at building on green space and in particular the high rise homes, less outside space for exercise and no parking. High rise dense population and lack of green space increases anti social behaviour and crime.

I am appalled that in an effort to make St Anne's site more desirable to developers the St Anne's owners of the playing field have unfairly stopped teachers parking on the tarmac by the field already limiting space in the playground and incurring cost for teachers parking in the multi-storey. There can be no other reason but to keep the land clear for future sale pre-empting your proposals before consultation.

In addition, there are several inaccuracies in the text which have already been picked up by other respondents and so I will not reiterate.

As a Plan for the next twenty years, it does not take account of significant changes that are likely to happen over the Plan period as a consequence of Brexit, COVID-19, climate change and changed ways of working which have already seen a major shift in people's choice of lifestyle leading to a redistribution of the population and working life. The building of Metaswitch (now Microsoft) on the Genotin Carpark has a fraction of the occupancy planned and many staff now work from home. I visited the Metaswitch building on open house day recently and despite it opening many months ago staff are now used to home working and a fraction of the 450 have chosen to spend time on the new offices. One long standing staff member was on the tour to see the building for the first time and only intended occasional office working. This change of work pattern isn't reflected and will mean less tall buildings near stations for commuters and more flexible homes with outside space that are pleasant to live and work in.

Enfield residents working from home will use local shops more. Working from the home you live in means people look for dual purpose space which high rise flats will not fulfil.

People want exercise and outside space with schools to walk to so they don't need cars. This meets other policies for health, well being, air quality and climate change. Enfield needs a more holistic joined up strategy and plan. Plans for high rise and no schools in walking distance with no sports grounds is inconsistent with other policies of the Government, Sports UK and council to keep young people healthier.

Population Growth

- Strategic Policy SP SS1: Spatial Strategy, Table 2.2: Spatial Strategy Options [page 26] states that the preferred option is to plan for 25,000 properties. However, the plan has been prepared both before and during the Coronavirus pandemic and therefore does not consider the population shift and services for homes planned have not been projected with new ways of working in mind.
- During the pandemic people moved out of central London and look to more suburban family life rather than high rise in central London or high rise near stations. We have several new families moved into Chalkwell Park Avenue with children attracted by a more country town space with green space and are now very disappointed to see Enfield proposing inner London style buildings which they left to move to leafier surroundings.

In addition, the pandemic has undoubtedly changed the way people think about work and quality of life and there is every reason to believe that the change is both profound and likely to be long term. To meet their expectations LBE need to rethink your strategy.

The projected requirement for 25,000 new homes assumes a population growth well in excess of the national projections of the ONS which assume a 5% increase over the Plan period.

<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 expected so using greenbelt and school space is not required and undesirable.

All of this therefore calls into question whether the proposed 25,000 homes figure is an accurate assessment; the need might well be lower, and this has not been fully explored in the document.

Strategic Policy SP H1 and H4. I challenge the emphasis of providing 25,000 new homes and high rise primarily on large sites (over 125 units) over the next 20 years. I believe that if the Local Plan as Drafted is adopted then the character of Enfield as a mostly green, suburban area will be damaged irrevocably.

Too little attention has been paid to redeveloping "brownfield" sites, large and small which could be adequate and lend itself more to higher rise in some parts .

I think it is regrettable that Meridian Water has not been developed as fast as it could have done and has the potential to create up to 10,000 new homes in the life of this plan. This needs to be accelerated before Enfield Town sites are considered. And when town sites are needed, if at all , St Anne's school site will still be required for school places. Other redevelopments have included school consideration eg Highlands and Chase Farm why not Enfield Town?

Building a more realistic number of homes on Meridian and some other smaller sites, council and RPI led development over the next 20 years would significantly reduce the need to develop on other larger sites, including the Green Belt, envisaged in the Draft Local Plan. But these sites need to be mindful of infrastructure and certainly not remove much needed school designated sites with room for sport and exercise.

#### Affordable Housing

- SP, H2 and H3. We welcome the approach taken to encourage the provision of more affordable housing but building on greenbelt and schools is unlikely to provide affordable homes and any homes built need school places.

There is a widespread problem in recent developments of assumptions that small flats are required near public transport for young professionals and have no open space and are cramped for those having children. The assumption that commuters don't have children is short sighted and takes no account of flexible working at home several days and less time at the office.

As a member of ETCG I recognise that the future shape of the retail sector is changing and Enfield Town centre needs more evening economy restaurants and services, but Enfield benefits from family accommodation very close to the town centre could use more cafes and restaurants, but will not want the historical country town ambience to disappear with high rise dense populations. More local independent businesses and markets will attract those local people to walk into town to shop and enjoy its entertainment.

Advertising what happens now is poor and could be done more obviously and physically than online. Little Park Gardens toilet block could become a kiosk for snacks and coffee but have promotional information on places and events of interest. The public realm money should lead people to these sites and have lots of entertainment advertised. St Andrew's Church plans to be more at the heart of Enfield as a flexible venue going forward .

On the other hand a development the size of Meridian Water involves the creation of a whole new community of potentially more than 10,000 people, which is going to need retail provision. This is not dealt with adequately, or at all, other than by vague references in the document to the location, provision of retail, and other employment uses at Meridian Water. Clear proposals appropriate to this large-scale residential development should be spelt out in the Draft Local Plan.

#### Green Belt release

The Draft Local Plan proposes de-designation of large areas of Enfield's Green Belt  
I totally agree with Enfield Society and Encaf that Greenbelt should not be in scope. Section 24 also requires a London borough to seek confirmation from the London Mayor that they are compliant. The mayor has been clear that he disagrees with the building encroaching on greenbelt. Our MP and the London Mayor have also opposed greenbelt and our MP publicly said he does not want building on school sites like st Anne's that take green space from our young people. I want no building on these green spaces either.

The National Planning Policy Framework (NPPF) at para 141 states "Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.

Chapter 6, paragraph 6.1.6 says Development proposals will be expected to deliver improvements to open spaces, sustainable drainage systems, river corridors, green chain links and ecological networks in line with the principles of environmental gain set out in the government's 25 Year Environmental Plan. It is unacceptable to remove St Anne's Green sports field with wildlife birds and large hedges containing an already declining bird population. Other wildlife like foxes and rare hedgehogs exist in this kind of space. The main reason is for pupils to exercise meeting the Governments health and well being policies, trees to counter pollution and to save gutter losses of wildlife and birds.

#### Climate Change

Enfield Council declared a Climate Change Emergency in 2019. The Green Belt in Enfield, including the sites identified for de-designation, provide part of the environmental infrastructure required to help achieve net zero carbon.

The United Kingdom was the first major country in the world to have written into legislation that it will become carbon neutral by 2050. Removing green belt and open green school fields and trees and hedges is inconsistent with this policy. I fully endorse ENCAF response on this.

#### Mental and Physical wellbeing

For many people, lockdown brought a new appreciation of nature and what it means for our well-being. During the lockdown periods residents utilised the Green Belt parks and green spaces for their exercise. The areas were very well used and Vicarage Farm and Merryhills are popular walks to Trent Park.

When children returned to schools more safe space was required not less. We want St Anne's pupils or future pupils to have outside space for sports and exercise with fresh air accessible to their homes.

In the Coronavirus: Mental Health in the Pandemic Study, among a representative sample of adults in the UK, spending time outdoors has been one of the key factors enabling people to cope with the stress of the Covid-19 Tall Buildings

CPRA oppose tall beings in the historic town of Enfield

The Draft Plan appears to suggest that by building on the Green Belt there will be fewer tall buildings, but tall buildings are being built, encouraged and approved as set out below, including on the council's own development site at Meridian Water.

#### Height 'Appropriate locations'

26 storeys (78m) Meridian Water

23 storeys (69m) Edmonton Green

17 storeys (51m) Enfield Town station

16 storeys (48m) Southbury station, Silver Street, Brimsdown

15 storeys (45m) Cockfosters station

13 storeys (39m) Palace Gardens Enfield, Southgate Circus

11 storeys (33m) Enfield Chase station, Palmers Green, Oakwood station

9 storeys (27m) Arnos Grove

I feel the lessons of Grenfell and those trapped in high rise during Covid has not been learned. For example, when used for social housing without individual outside play and amenity space, leads to poor:

- o living conditions
- o health outcomes
- o educational attainment

Tall buildings placed in low rise areas inevitably impact negatively on the landscape, street scene, homes and lives of those already living there, both visually and environmentally. Where tall buildings are placed in or within sight of conservation areas, listed buildings and the Green Belt there is a significant detrimental impact on the historic legacy from previous generations; this impact is significant and permanent. This plan demonstrates no recognition of the historic landscape and existing conservation areas.

The London Assembly Planning and Regeneration Committee found in its recent COVID-19, Housing Typologies and Design in London review that there is a growing evidence base demonstrating that tall buildings are less sustainable .

Overall, the Planning and Regeneration Committee at the London Assembly believes that high density housing can be achieved by approaches that are more suitable for families, more in keeping with London's traditional form and are less intrusive on the skyline without encroaching on the Green Belt.

The Draft Local Plan, contrary to para 190 of the NPPF, appears to have little or no regard for conservation areas and the historic landscape.

Conservation areas are impacted by the proposals for tall buildings and the Draft Local Plan makes no attempt to justify the "special circumstances" that need to be demonstrated to achieve such changes when they impact upon a conservation area. For example, a tall building in the middle of the Enfield Town Conservation Area would impact on the whole area, listed buildings, church, market square and the character of what remains a market town. This is repeated throughout the plan.

#### Industry

Enfield's industrial corridor is adjacent to and within the Meridian Water area. It would be sensible to finally progress Meridian Water at pace and build on brownfield sites along the River Lee/Meridian Way closer to work and purpose built transport links.

The area along the River Lee/Meridian Way could provide fantastic waterside living for our current and future residents and already has the infrastructure in place. Instead of pursuing the pointless and detrimental policy of de-designation of Green Belt sites and high rise in Enfield Town the Administration should strenuously pursue one that releases non SIL industrial land for mixed use development.

#### Transport assessment across the plan

- The Integrated Impact Assessment has not set out the reality of the proposals on Enfield's roads.
- The transport appendices state that there will be an increase of 17,755 cars owned in the borough if the chosen option of 25,000 homes is agreed. 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.
- Proposals to improve and increase the transport infrastructure in the borough are barely mentioned in terms of roads. The proposed 0.7 cars per household maybe an aspiration but it will not be the reality.

I am also angered by the fact that Enfield Council staff have been working with the Friends of Firs Farm on future improvement projects for the park whilst at the same time, the Council creates a Draft Local Plan that proposes to use part of the site for a crematorium. It was very poor that the Friends Group had to hear of the plans from reading the consultation document.

#### Supermarket Development

SPTC2 states that the Borough's town centres should be developed to make them vibrant and economically successful hubs. At the same time the draft Local Plan identifies a wide range of car park sites in Palmers Green, Winchmore Hill, Southgate etc for housing development. The draft Plan also identifies a number of supermarket car park sites for housing development. It should be obvious that removing car parking from town centres and supermarkets will kill these areas stone dead and shoppers will simply move to other areas outside Enfield where it easier to find parking.

#### Consultation

CPRA notes that consultation was once again held in the summer months with face to face events in August! This pattern of quasi- consultation has happened many times before and in particular in 2017 when the Master Plan divulged plans for building on St Anne's. Even CPRA and my presence on ETCG heading an organisation of known opposition to this we had no earlier notification or literature. We had no reply to our AGM invite and Special Meeting until after it had taken place and a note to say that despite the June- sept period there was no time to address groups such as ours in known opposition to a key site. Only our local councillor from the opposition came .Finally even a Local Plan Drop-In consultation event was not held at our local Town Library.The Administration held a consultation event at all hub libraries except Town Library.

It is telling that residents who live in areas that will be affected by proposals to de-designate sites within the area that the council don't want to hear their views.

When Opposition councillors requested an event at Town Library, the officers also refused.

The Administration has not written direct to residents in our rural areas to inform them of the Local Plan consultation. Residents who live in these locations do not necessarily receive leaflets via paid for door to door delivery due to difficulties accessing properties.

#### Conclusion

In conclusion I oppose the Draft Local Plan. The proposed 25,000 homes option needs to be reassessed considering the impacts of the Pandemic and working and living patterns.

I want to emphasise my opposition to de-designating sites within the Green Belt and in particular the St Annes School Site. Building homes generating future local school need, whatever the demand now is shortsighted and irreversible . It will contradict other policies re use of cars and climate change if schools have to be found out of the locality. We understand that Councillors have been inundated with emails/letters and comments by residents who do not favour building on Enfield's Green Belt and countryside. The proposals to remove green space for homes, industrial units and a crematorium make a mockery of the Labour Administration's response to the climate emergency.our own survey on Nextdoor following approximately 240 responses at last count shows 83% in favour of keeping St Anne's school site and only 17% in favour of building upon it.

The Draft Local Plan appears to suggest that by proposing to build on the Green Belt there will be fewer tall buildings, but tall buildings are being proposed including on the council's own development site at Meridian Water and Enfield Town area amongst others.

Planning applications for tall buildings have not been supported by residents so a major increase in tall buildings would unlikely to be endorsed by the community.

The attraction of Enfield has always been its mix of historic town, proximity to countryside and it's excellent school provision . It is the reason why many people choose to make Enfield their home.

During the pandemic people have appreciated countryside , wildlife , walks and spending time with their families. We have evidence of families leaving more central urban areas from more high rise living to seek lower rise family housing in our more leafy borough with access to green spaces and good schools they can walk their children to.

Even if our local school site is vacated by St Anne's Lower school, we believe that numbers of children in the Town Area will rise as families move out from central locations, which we welcome , but we need to retain this designated space for school purposes.

Finally our polls on this have been consistent and a recent poll showed 83% in favour of retaining the St Annes site.