

## **Enfield Draft Local Plan Response**

I am writing in response to Draft Enfield Local Plan, published in June 2021.

This is not a comprehensive response but is one based on a few specific proposals:

### **Number of houses**

The council had the opportunity to write a plan to accommodate one of three options.

Option 1: Baseline growth by accommodating 17,000 new homes with some other land uses, including limited nature recovery and green and blue infrastructure investment.

Option 2: Medium growth by accommodating 25,000 new homes with a full range of land uses, including extensive nature recovery and green and blue infrastructure investment.

Option 3: High growth by accommodating 55,000 new homes with a full range of land uses including some nature recovery and green and blue infrastructure investment.

The Council proposes to adopt Option 2.

The proposed extra 8,000 as a result of this option has resulted in Green Belt sites and other sites being considered for housing development. These sites, for the reasons set out further below, are in my opinion not acceptable for development.

No clear rationale has been given in the Draft Plan why 25,000 new homes is proposed instead of the more realistic and less damaging 17,000.

The driving force for the Council's decision to adopt Option 2 may be as a result of its failure to deliver the Meridian Water development on time and within budget.

I therefore object to the Council's decision for Option 2 but would support Option 1.

Tesco Superstore, Savoy Parade	350 homes + re-provision of existing floorspace
Sainsburys, Crown Road	1,041 homes + at least 20,865sqm industrial uses and logistical space
Morrisons, Southbury Road	892 homes + non-residential floorspace
Tesco, 288 High St, Ponders End	350 homes + non-residential floorspace
Asda, Southgate	165 homes + non-residential uses
M & S Food, N14 6AQ	150 homes with mixed use floorspace
Sainsburys, Green Lanes	299 homes + at least 13,325 sqm of non-residential floorspace

The Draft Plan does not provide sufficient detail as to how these sites are to be re-developed but raise the following questions and uncertainties:

- Will any car parking remain on site?
- If so, how many existing spaces are there compared with spaces to be lost?
- In nearly all of the above proposals there is no indication as to what retail space will remain. Will the current superstores be reduced to “express” size stores?
- No impact assessments have been produced as to the likely increase in home deliveries should these units be closed.
- No impact assessments have been produced in respect of increased traffic as a result of residents having to drive to the nearest superstore as a result of the closure of their local ones.
- Whilst the report refers to “loss of jobs” and the Council’s financial gain as a result of this, there is no impact assessment as to the effect on the local communities as a result of any job losses. Presumably most of the stores will close during the re-development process.

Without clarification and more information, I would object to the re-development of these sites as proposed.

## **Car Parks**

### **Arnos Grove Station Car Park & Cockfosters Station Car Park**

The proposals for the car parks to effectively close and build 162 and 316 homes respectively will lead to increased parking on the local residential roads that presently do not have any controlled or local resident parking. This begs the question does the local authority intend to expand the local controlled or local resident parking?

This may also lead to more congestion as commuters look to find parking spaces before embarking on their journey via London Underground.

The loss of these car parks will also mean that there will only be one London Underground station in the whole Borough with a car park, Oakwood Station. There appears to be no impact assessment carried out on the effect of these developments on the area surrounding Oakwood car park.

### **Fords Grove Car Park, N21**

The Winchmore Hill CPZ, together with new cycle lanes led to a major decrease in both free and paid parking in in the N21 area.

Fords Grove Car Park is the only available pay and display car park in a two/three mile radius.

The local shops along Green Lanes have already seen their turnover decrease as a result of the loss in parking. Indeed, one major national chain, Pizza Express, deemed their former restaurant unit in Winchmore Hill as one of their unprofitable unit and closed it as part of their CVA.

It is also worth noting that a number of local independent stores regularly close and the units change hands.

The loss of the car park will have an extremely adverse effect on local businesses and put even more parking pressure on local roads such as Farm Road and Fords Grove.

I therefore object to the loss of this car park.

### **Lodge Drive Car Park, N13**

As a result of the new cycle lanes there has been a significant loss of pay and display parking along the N13 stretch of Green Lanes.

Multiple shops have closed and remain unoccupied, this includes Clarks Shoes, Vodafone, Co-op, QS and Boots Opticians. Other stores such as Amy's have also indicated their desire to close their site down.

Many of the local businesses, particularly the cafes, bakeries and restaurants rely on the car park for their customers to use.

The loss of the only pay and display car park in the area will have a huge adverse effect on the local economy and businesses. No impact assessment has been prepared and I object to the close of this car park.

## Green Belt

There are five equal purposes of including land in Green Belts:

1. To check the unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns from merging into one another;
3. To assist in safeguarding the countryside from encroachment;
4. To preserve the setting and special character of historic towns; and
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Indeed, within the Forward of the Draft Plan by the Leader of the Council states:

***“The pandemic has reminded all of us how important our open green spaces are for health and wellbeing. The Local Plan is an opportunity to provide more accessible green spaces for residents across our Borough, including in our more urban areas; this will address existing poverty and inequality.”***

Why then does the Council seek to allow the following?

Land at Crews Hill	Approximately 3,000 homes
Land at Chase Park	Approximately 3,000 homes
Land between Camlet Way and Crescent West, Hadley Wood	160 homes

I must object in the strongest possible terms to the proposal to allow development on these sites.

The lockdown has demonstrated how important Green Belt is to both the mental and physical well-being of **ALL** the local residents of Enfield.

The loss of this land is incalculable. For example, Vicarage Farm’s footpaths are used on a daily basis by many local residents, waking their pet dogs, exercising and families enjoying the open air.

Vicarage Farm also adjoins or is overlooked several hundred properties and its development will remove their green space and scenic landscape.

No justification has been noted in the Draft Plan as to why this particular part of the Green Belt has been selected for development.

Is it because:

- The land is already owned by property developers, namely Lindentree Poperties Limited, incorporated in a tax haven (British Virgin Islands)? or

- Labour Councillor Yusuf believe that ***“there are parts of the green belt are a disgrace”*** or as the Labour Party leader stated ***“If it is OK for there to be density around Edmonton Green station then it is OK for there to be density around other stations”***

The politics of envy has no place in the planning process and should this matter proceed to a judicial review the recordings of the speeches made by the Labour leader and her colleague and indeed other colleagues will no doubt be made available at the hearing. The comments made are preempting potential applications and given developers an indication of the Council’s opinion.

The Draft Plan has also failed to consider the significant impact the two major developments will have on local roads, schools, GP’s, and infrastructure in general. S106 contributions to the Council may help the Local Authorities finances but they never find their way into the community.

Building on the Green Belt is also totally at odd with the Councils own ***“Deeply green place”*** set out in page 20 of the draft plan.

### **Other factors the draft plan has failed to consider**

#### **Private sector development**

The draft plan has totally ignored the fact that the private sector regularly delivers up to 500 new homes/residential unit a year, mostly on existing site be they conversions, extensions, redeveloping single dwelling sites into sites of two or more.

On this basis, the private sector will deliver around 9,000 new residential units by 2039.

Why has this figure not been taken into consideration in selecting Option 2 instead of Option 1?

#### **Change of Permitted Development Rights in respect of High Street retail units**

The Mayor for London has re-affirmed his support for the conversation of empty retail units into new homes.

Nowhere in the Draft Plan is there a reference to this policy nor has there been any investigation or research carried out in respect of the impact this may have in Enfield and the likely number of long-term retail units that can or will be converted into new homes.

If the number is material and Option 1 was selected this would negate the need to develop the Green Belt and other site referred to in this response.

### **Summary**

The total number of new homes objected to in this response is 9,407.

Had the Council selected the achievable and acceptable Option 1 this would only be 1,407 less than the target 17,000.

Thank you for taking the time to consider my response.