

To: Localplan@enfield.gov.uk

Subject: Local Plan consultation response

Dear Enfield Council

Response to the Draft Local Plan Reg 18 Consultation 2021

Thank you for the opportunity to respond to this important consultation.

I am writing to object to the following Policies:

SP PL10, pages 80-87, and Figure 3.11 Land between Hadley Road & Enfield Road EN2, Bramley Road N14;

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; Policy SA52 page 372; and Policy SA62 page 383 and SP CL4 pages 277-279 – all of which propose the de-designation of Green Belt for housing and other purposes;

Policy DM DE5: Strategic and Local Views – Figure 7.2;

Policy DM DE6 Tall Buildings.

1) SP PL10, pages 80-87, and Figure 3.11 Land between Hadley Road & Enfield Road EN2, Bramley Road N14.

Also Policy SP PL9, pages 77-80 and Concept Plan Figure 3.10 Land at Crews Hill. Proposal for 3000 homes.

Vicarage Farm is crossed by the Merryhills Way footpath, much used by Enfield residents and others for exercise and relaxation and the physical and mental health attributes of the footpath would be destroyed by development. The farmland could be put back into productive use growing local food for local people.

Both the farmland and **Crews Hill Golf Course** also serves a purpose as defence against flash flooding. Development of the land would increase the damage of flash flooding elsewhere in the borough.

There is an existing deficit in open space provision in postcode areas EN2 7 & EN2 8. The proposals would serve to increase this deficit.

2) Policy SP PL9, pages 77-80 and Concept Plan Figure 3.10 Land at Crews Hill. Proposal for 3000 homes.

Crews Hill is equally important to the borough and should not be destroyed. Its garden centres and other businesses provide employment and a resource for people from Enfield and beyond. Instead of losing Crews Hill for housing, its horticultural activities should be encouraged and enhanced so that it can once again be a hub for food and plant production.

However there is inadequate infrastructure for such a development:

Rail: There is no planned improvement to the existing rail infrastructure either by Network Rail or TFL.

Roads: The existing narrow B roads are currently very busy serving the existing population. Traffic jams occur when M25 traffic becomes diverted between Junctions 24 & 25 particularly in response motorway accidents.

This indicates this area is unsuitable for the proposed development.

3) Policy SA45: Land Between Camlet Way and Crescent Way, Hadley Wood, page 364; Policy SA54, page 374.

These sites are important parts of the green belt countryside and part of Enfield Chase. Industrialisation would destroy the green gateway to the borough, and reduce existing agricultural land.

4) Policy DM DE5: Strategic and Local Views – Figure 7.2.

The figure 7.2 fails to include the important strategic views of the open countryside on both sides of A110 Enfield Road. They give a clear sense of separation between Enfield Town and Oakwood also the separation of rural and urban areas.

5) Policy DM DE6 Tall Buildings.

The Secretary of State said in his letter to the Mayor dated 20th December 2020 – *“I am issuing a new Direction regarding Policy D9 (Tall Buildings). There is clearly a place for tall buildings in London, especially where there are existing clusters. However, there are some areas where tall buildings don’t reflect the local character..... in my view we should go further and I am issuing a further Direction to strengthen the policy to ensure such developments are only brought forward in appropriate and clearly defined areas, as determined by the boroughs whilst still enabling gentle density across London. I am sure that you share my concern about such proposals and will make the required change which will ensure tall buildings do not come forward in inappropriate areas of the capital”*

Currently there are very few high rise buildings impacting the Enfield Town Conservation Area, and they are well dispersed and cannot be considered to be an existing cluster.

The Enfield draft plan indicates the possible addition more high rise towers (including at Palace Gardens and at Both Enfield Town and Chase stations) impacting this area.

However the London Plan figure indicates a maximum height of 7 or 8 stories within sensitive heritage locations.

Andrew Boff, Chair of the London Assembly's Planning & Regeneration Committee has recently written a letter which outlines key findings from the Committee's recent investigation into housing typologies, focussing on housing density and the development of tall buildings for residential use in London.

He says in his letter to councillors across London that:

Our key finding is that the Committee does not believe that tall buildings are the answer to London's housing needs and should not be encouraged outside of a few designated and carefully managed areas.

As part of their investigation to form the basis for their response to the 'Good Quality Homes for All Londoners' Supplementary Planning Guidance (SPG) public consultation which closed in January 2021, the Committee focused on the 'tower' housing type.

Amongst their findings were that:

- *energy use is higher in tall buildings: the taller the building, the higher the amount of energy required per useable square metre. Tall buildings suffer more from heat loss for the same amount of insulation as lower buildings because of the higher wind speeds.*

The Committee found evidence demonstrating that tall buildings are less sustainable than those in other configurations and the long term and lifetime costs associated with tall buildings should be carefully considered in any development proposals.

The Committee particularly believes the development of towers should only happen after robust evidence has been presented about how their social impacts will be mitigated.

- *while higher densities may seemingly make more effective use of land, tall buildings will not produce the high-quality homes and neighbourhoods that London needs: "... in general families are disadvantaged if they are living in tall buildings. The sociability that children are able to gain in terms of opportunities for play, for meeting others and so forth within tall buildings is often not great."*

One member pointed to the fact that “direct access to external space for families is absolutely crucial to the successful and healthy functioning of that household and that becomes incredibly difficult with tall buildings.” A high-density, medium- to low-rise model can work more easily for families, enabling communal or individual gardens at lower storeys that are closer to individual family homes than tall buildings allow: “The opportunities with social spaces for children and children of all ages to gather in small groups is really important.”

- They also noted that ‘tall buildings tend to contain a majority of mainly studios and one-beds, and a proportion of two bedroom flats, resulting in a lack of family-sized housing and poor use of space. The Committee has long advocated for more family-sized housing to be built in London but believes that family homes in tall buildings are only appropriate with certain design measures in place, for example access to amenity such as play space and suitable positioning within a development. The Committee is of the view that families should not be housed above the fifth floor in public housing, and that consideration should be given to design of access and surveillance of children’s play space and amenity space for children in relation to tall buildings. Overall, it 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.*

While I support housing development and support the ambition to meet Enfield’s housing needs, I strongly object to the proposal to release Green Belt for housing or other purposes. I believe that there are alternatives available to meet housing targets and that the Green Belt is a precious resource that should be protected and preserved for future generations. It is too valuable to lose for all the many environmental, ecological, economic, public health and other reasons that have been identified, especially during the recent pandemic. The Council has a duty of care for the Green Belt, in accordance with the London Plan and the National Planning Policy Framework [NPPF], and any intentions to release parts of it should be taken out of the local plan.

The comments provided in this response to the consultation are my own views.