

## Submission to Consultation on the draft Local Plan

**I strongly object to the proposals set out in the draft Local Plan.** It is of real concern that the proposals within the Plan itself are completely at odds with the claims made in the letter from the Leader publicising the consultation. Far from protecting the borough from skyscrapers, protecting the Green Belt and building focussed primarily on 'brownfield' sites, the Plan instead recommends tall buildings at multiple sites (most of them inappropriate), proposes building on extensive swathes of the Green Belt and adopts a definition of 'brownfield' that defies belief.

**The plan itself** is over long and the language used is vague and over-optimistic. It makes claims for the benefits of the proposals with no evidence for why one might expect these outcomes, which in many cases are counter-intuitive in the extreme. It is an abject failure of communication, being very far from plain English. It veers between technocratic and flowery. One is left with a very strong impression that you have already decided to press ahead regardless of the comments you receive.

### **GREEN BELT: Policy SP PL8 commencing page 72 and onwards**

I strongly object to the proposal to build on the Green Belt.

You claim in the leaflet advertising the draft plan that there would be "uncontrolled development all over our Green Belt" were you not to build on it.

You appear to have forgotten that it is the role of Planning officers to protect the borough from inappropriate developments and the Local Plan sets the framework for their decisions. Additionally the Mayor of London has stated that the Green Belt should not be developed.

There is therefore no reason whatsoever to believe that the Green Belt need be threatened, especially if the Mayor's position had been bolstered by a statement within the Plan saying that the Green Belt will remain protected and that no further developments will be allowed in the areas of the borough designated as Green Belt.

The local Plan is supposed to provide a framework for rejecting uncontrolled and unwanted development. Instead, you have opened the flood gates to inappropriate development.

The proposals to build on certain areas of the green belt are especially objectionable given the lack of ready access to public transport in these areas, and in addition the threat they propose to the flood plains and soakaways so essential for flood control/relief in the borough. To propose building on them is insanity. The creation of new, large-scale residential developments in relatively remote localities will create communities isolated from viable transport links to significant shops, services, schools and places of employment.

It is, additionally, insanity to propose removal of eight horticultural nurseries in Crews Hill along with several large areas of productive farmland. These should be the basis for our future economic developments, especially at a time when attention is focussed on issues of food security and self-sufficiency. To destroy eight horticultural centres is a folly given that this is one of the economic centres of the borough: this strip of garden centres attracts large numbers of locals all year round as well as attracting visitors from much further afield.

You claim that "*The open character of this area (as shown on the Policies Map and key diagram) will be protected and enhanced in line with the Green Belt and Metropolitan Open Land*".

What is contained within the Plan is **NOT** protection and it is **NOT** enhancement. It is vandalism and an attempt to degrade some of the greenest and most treasured areas of our borough. It bears a worrying resemblance to the politics of envy rather than any serious attempt at establishing a sensible framework for future planning decisions.

**I therefore strongly object to the proposals contained within the draft Plan for development of the Green Belt**

**TALL BUILDINGS: Policy DM DE6 (Tall buildings), page 156 and onwards**

The Plan sets out LBE's intention to encourage more tall buildings across the borough. Indeed, it is seen as essential to meeting the so-called 'housing' targets. In reality, the targets are entirely unrealistic and unnecessary: to justify the creation of so many high-rise units, the Plan has adopted a housing target that is in excess (by circa 600 units per year) of that suggested for Enfield in The London Plan. In fact, the projected requirement for 25000 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 and ignores population flight post-Brexit and post-COVID.

These facts suggest that many of the proposed high-rise units proposed in the Plan are unnecessary and could be replaced by the (far more important) creation of new family homes with 3 or more bedrooms. These vastly exaggerated estimates should therefore be revised down in line with both more realistic projections and the realities of the drop in the population of London. If this is done then there will be nothing like the demand for 'units' that you claim.

Once again the LBE flyer advertising the Local Plan gives an entirely misleading picture of your true intentions. It states the intention is to develop '*a Local Plan that will **stop skyscrapers in inappropriate locations***'. Yet the proposed Tall building development sites include the town centre conservation area (see pages 156-60, Figure 7.3, Figure 7.4 and Policy DE6, and SA2 Palace Gardens Shopping centre page 321).

The plan proposes unacceptably tall buildings which are entirely out of character with the surrounding urban landscape and without any form of appropriate transition (as recommended in all relevant policy guidance) between the existing low-rise buildings and the proposed new skyscraper.

LBE has previously commissioned the *Enfield Town Conservation Area Character Assessment*. It is axiomatic that any changes to the Town Centre should be in line with the observations and recommendations of this assessment and recommendations.

In section 2.5.2 the Character Assessment comments, regarding the current buildings, the authors comment: "[that]...The combination of **the bulk of the Palace Exchange development and other large buildings**, and wide roads with fast moving traffic on the London Road/Cecil Road circuit, **imposes a change of scale and character, very much at odds with the compact and traditional nature of the centre** and severs the strong link that the New Town once had with The Town via the route along Sydney Road."

The report continues in the next paragraph (2.5.3) to state that:

**“Many otherwise attractive views out of the town centre *are dominated by three high buildings: Tower Point to the south, the more modestly detailed Civic Centre to the north, and the new nine-storey Southbury Rd development* (outside the Conservation Area, but highly visible within it) which are *out of scale with the unpretentious and primarily two to four storey residential and commercial areas within the Conservation Area*”**

The authors conclude later in the report (paragraph 2.7.8) that

**“A major element detracting from the character of this part of the Conservation Area (and, in fact, a large part of the Conservation Area as a whole) is the presence of Tower Point (Figure 18)”**

Tower Point is 13 storeys. The Character Assessment concludes that this is a dominating feature that is out of scale with the buildings in the Conservation Area.

If a 13 storey building has been assessed and found inappropriate for the Conservation Area (and noting that it is on the outer edge of the area) then how can a 26 storey building in the middle of the town centre bounded by the conservation areas of the New Town and Gentleman’s Row be considered in any way appropriate?

It is clear that this is an entirely inappropriate location for development of skyscrapers. Yet you claim in the letter advertising the proposals that the Plan will provide a way of ‘stopping skyscrapers in inappropriate locations’? THE CLAIM IS ARRANT NONSENSE. Once again the reality of the Plan will be to open the floodgates to skyscrapers in a range of inappropriate locations across the borough.

It is worth noting that at no point do you attempt to define ‘appropriate’ or ‘inappropriate’. In reality one is led to suspect that you intend to inflict these hideous developments wherever you and the developers you now side with over the wishes of residents choose. Selection of the town centre for one such development again makes this appear unpleasantly close to a desire to spoil the views of and from some of our loveliest areas, whilst also seeking to wreck what LBE a year or so ago was calling our number one shopping destination in the borough.

Councillors and, one would hope, officers too, can hardly be ignorant of the conclusions recently circulated by the London Assembly’s Planning & Regeneration Committee. The Committee found in its review ‘COVID-19, Housing Typologies and Design in London’ that there is increasing evidence that tall buildings are less sustainable than those which provide amounts of development in other configurations. It particularly recommended that skyscraper towers should only be agreed provided their negative social impacts can be mitigated. Furthermore the Committee reported that the increase in storeys from six storeys to 20 **doubles** the energy intensity per square metre. In other words they contribute disproportionately to the carbon footprint, when LBE claims (unconvincingly) to be helping the fight against global warming. Overall, the Planning and Regeneration Committee concluded that higher densities of housing could 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. In other words there is NO REASON for continuing with plans for inhuman scale skyscrapers in London as a whole and, by implication, in Enfield

Not only do I object to these proposals on the grounds of height, **I also object to the creation of buildings of this size with no provision whatsoever for cars and parking.**

**For all of these reasons I therefore strongly object to the proposals for any tall buildings in the borough.**

**LOCAL DEVELOPMENTS: New Southgate PL7, SA24 - Arnos Grove, SA31 – Cockfosters tube car park, Southgate PL6, St Annes School, SA32 Sainsbury's Green Lanes N21, Asda, M&S, Tesco**

The proposals to build on the car parks for these stations and supermarkets are truly insane. Has any councillor or officer involved with putting together this part of the Plan any experience of retail whatsoever? Or actually used these stations?

All these stores are immensely popular and their car parks are busy at all times. To designate them as 'Brownfield' is ridiculous. Parking is at a premium currently, and with regard to Sainsbury's in particular, the loss of Ford's Grove car park and its new development, parking will be almost impossible. The impact on small local businesses will be grim. Five years after the cycle lanes were implemented they remain hardly used. The idea that if you remove the car parks people will cycle to these stores is nonsense. The most likely outcome is that popular and well-used supermarkets will flee the borough.

This of course will mean either that people will have to drive further, adding to the already existing traffic problems, or will resort to online ordering and even more delivery trucks on our roads. Again, it makes one wonder quite how you imagine this is going to help global warming.

**I strongly object to this proposal.**

**ALL SECTIONS RELATING TO CAR-FREE DEVELOPMENTS**

You appear incapable of understanding that people may have very sound reasons for requiring a car or other vehicle. People need to get to different destinations not just those conveniently close to bus routes or train stations. It is completely unrealistic to assume people can just 'make do' without access to a car. Even if there is public transport at their starting point, this is not necessarily the case at their intended destination.

Demanding that anyone wishing to live in Enfield should limit themselves to "sustainable" transport methods neglects the reality of their everyday lives. Most people travel to a huge variety of different locations for a multiplicity of purposes. Residents are of a wide variety of ages and levels of mobility. Family sizes and ages vary enormously and will change over time.

Unless residents' workplaces, leisure activities, schools, medical facilities, shops, entertainment opportunities, close family and friends (etc. etc. etc.) are all found within a convenient walking or cycling distance from their new home there is no way that most people will be able to avoid using motorised transport. To insist that cars are not an option unnecessarily constrains the range of people and, perhaps more importantly, **businesses** that can reasonably relocate to Enfield.

That last point is perhaps of most concern: it simply does not seem to have occurred to you that by excluding all parking from residential developments you risk turning the borough into a no-go area for all skilled tradespersons looking for somewhere to live, earn a living and raise a family. How do you expect builders, electricians, plumbers, heating and ventilation engineers, etc etc to go about their everyday working lives without motorised vehicles? It is ludicrous to tell them 'get on your bike'. They all have to transport lots of bulky and heavy and – perhaps most critically – valuable equipment, tools and materials. Whilst contents can be (and, sadly, often are) stolen from cars and vans they would be far more readily prey to thieves if left in a flimsy cargo bike.

Also, if there is no parking space available in these developments, where will maintenance, delivery and repair people park when these 'units' need upgrading, decorating, fridges delivered, etc etc?

Your idiotic, one-dimensional focus on the ‘two wheels good, four wheels bad’ mantra and obsession with ‘car free’ developments will result in the borough being left with no skilled tradespersons to support businesses and residents. The Plan’s endless and counterintuitive insistence on linking the process of providing essential, additional housing and vital economic development with the entirely marginal practices of walking and cycling is both irrelevant and obtuse. In particular, the insistence that virtually every new dwelling will not cater for motor vehicles will almost certainly render these new dwellings undesirable for the majority and, as a knock-on effect, endanger the chances for success of any new economic developments in the area.

## **OTHER COMMENTS**

**I object to the fact that the consultation process fails to consider the aggregated effect of the variety of similar proposals within the Plan and consequently fails to seek residents’ views on the cumulative impact.**

For example, Table 8.1 (page 185) of the Plan lists the various sites for development and the broad purposes of the developments. **In total, nine of the proposed developments involve the loss of public car parks in significant retail destinations (SA6, SA8, SA9, SA10, SA12, SA19, SA20, SA22, SA32).**

Borough residents shop and travel in localities across the borough as a whole and not just in their own immediate area. While respondents may choose to agree or disagree with individual decisions about specific retail car parks in individual locations, there is no opportunity to object to the overall impact, on the borough, of the loss of these facilities aggregated together.

Similarly, **a further 8 sites involve development of locations that area currently public car parks** for various uses (SA11, SA18, SA23, SA24, SA31, SA40, SA41, SA43). **There is no opportunity to object, overall, to the combined loss of these parking facilities.** The consultation requires us to comment separately on the “vision” for each separate locality. There is no consideration – neither by the officers who designed this monstrous ‘vision’ nor by the officers who designed this dogs’ dinner of a consultation – of the impact of the aggregated loss of these essential components to modern social and economic life. The most likely outcome of this cumulative prohibition of independent travel, however, will be to render Enfield a less desirable place to live and a less suitable location for establishing economic enterprises, given the impact on employment opportunities for those residents that remain and on any potential pool of skilled recruits for employers considering moving to the borough.

Lastly, it is difficult to understand how a borough that claims to be trying to act to avert the climate crisis and work towards a borough that treasures its green heritage can have produced this document. The draft Plan is nothing but a vandal’s charter, proposing the concreting over of precious areas of our countryside, reckless encouragement of tower blocks known to create health and development problems for families. There is nowhere in it any mention of any of the positive suggestions submitted in response to the ‘Blue and Green Strategy’. Small wins such as the requirement for swift boxes in any buildings above two storeys would be one such positive act.

This draft should be deleted and started again from scratch. It should be written in plain English and explain how, for each proposed element of the Plan, it will benefit residents or businesses. The plan should be focused on the needs of residents rather than the opportunism of developers. The role of planning officers should be to mitigate against the broad brush requirements of centrally imposed

targets and seek to create a reality that will meet the daily needs and aspirations of the local community. At present the dialogue seems to be exclusively between officers and developers based upon targets that have been imposed by organisations outside the borough.