

20 August 2021

Dear Sir/Madam,

Re: Enfield Local Plan Consultation

I am responding to the email I received on the 2 August 2021 from Helen Murch, Head of Strategic Planning and Design to comment on the draft Enfield Local Plan: 2019-2039.

OBJECTION TO THE PROPOSALS TO DEVELOP THE GREEN BELT – these relate to sites:

8.1 Strategic Policy SP H1: Housing development sites, page 183:

- Crews Hill (PL9) SA27 Land at Crews Hill Housing - 3,000 homes proposed
- Chase Park (PL10) SA28 Land at Chase Park Housing - 3,000 homes proposed
- SA45 Land between Camlet Way and Crescent West, Hadley Housing – 160 homes proposed

Industrial Sites at:

- SA52 (page 372): Land West of Rammey Marsh – industrial and office development.
- SA54 (page 374): Land East of Junction 24 of the M25 at part of New Cottage Farm and Holly Hill Farm within Enfield Chase– new industrial, storage and distribution on current agricultural land.

Sports/Leisure Sites(relating to 12.4 Strategic Policy SP CL4: Promoting sporting excellence, pages 277-279), at:

current agricultural land.

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11. To protect and enhance the River Lee and Turkey Brook, Salmons Brook and Pymmes Brook through de-culverting, naturalisation, restoration and the creation of new wetlands. **To protect the Green Belt and Metropolitan Open Land and local open spaces and encourage improvements to quality and accessibility to meet the needs of a growing population.**

12. **To deliver green infrastructure improvements, including accessible new woodland, rewilded river corridors and new parks and open spaces to support growth.** To facilitate the creation of a major green infrastructure corridor in the north of the borough, supporting Enfield's role as a gateway to London as a National Park City.

17. To strengthen the rural parts of Enfield as a leading destination in the London National Park City – a place for people to come and experience nature, with opportunities to walk and cycle through connected habitats of rewilded corridors and experience the highlights of historic and leisure attractions. **To support the varied qualities of the rural parts of Enfield, including food growing, nature recovery, thriving economic contributor and landscape value.**

B) it will be counter to Policy G2 London's Green Belt, of the London Plan 2021 which emphasises protection of the existing green belt from inappropriate development and enhancement of the existing green belt especially of derelict and unsightly areas (see the extracts from the London Plan reproduced below)

From Pages 314 & 315 of the London Plan 2021:

314 The London Plan 2021 – Chapter 8 Green Infrastructure

Policy G2 London's Green Belt

- A The Green Belt should be protected from inappropriate development:
- 1) development proposals that would harm the Green Belt should be refused except where very special circumstances exist,
 - 2) subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.
- B Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan.

8.2.1 The Mayor strongly supports the **continued protection of London's Green Belt**. The NPPF provides a clear direction for the management of development within the Green Belt and sets out the processes and considerations for defining Green Belt boundaries. London's Green Belt makes up 22 per cent of London's land area and performs multiple beneficial functions for London, such as combating the urban heat island effect, growing food, and providing space for recreation. It also provides the vital function of containing the further expansion of built development. This has helped to drive the re-use and intensification of London's previously developed brownfield land to ensure London makes efficient use of its land and infrastructure, and that inner urban areas benefit from regeneration and investment.

8.2.2 Openness and permanence are essential characteristics of the Green Belt, but, despite being open in character, some parts of the Green Belt do not provide significant benefits to Londoners as they have become derelict and unsightly. This is not, however, an acceptable reason to allow development to take place. These derelict sites may be making positive contributions to biodiversity, flood prevention, and climate resilience. The Mayor will work with boroughs and other strategic partners to enhance access to the Green Belt and to **improve the quality** of these areas in ways that are appropriate within the Green Belt.

C) Much of this development is proposed for Green Belt countryside within the area of the historically important Enfield Chase and which should be conserved and protected – as demonstrated by The Enfield Society’s research: “*Enfield Chase was a royal hunting ground established by the Plantagenet kings in the middle ages. Critically, it was closely connected with Enfield Old Park, which is even older and appears in the Domesday book. Deer were raised in the Old Park and released into the Chase for hunting. It is this connection that the ‘Chase Park’ proposals would destroy.*”

D) while the London Plan’s “statutory” 10 year target for net housing completions (2019/20 to 2028/29) for Enfield is 12,460 homes (and by implication, around 25,000 in the 20 year period to 2039/40) – the plan’s policy emphasis (Policy H1) is for development on town centre and brownfield sites near existing transport and supporting infrastructure and especially smaller sites (see London Plan extracts below). Also Policy D3 (para B), details that higher densities should be sought for sites well connected to jobs, services, amenities and infrastructure, by public transport, walking or cycling. So again, building on the green belt goes against this.

Table 4.1 – 10 year targets for net housing completions (2019/20 – 2028/29)	
Planning Authority	Ten year housing target
Barking & Dagenham	18,440
Barnet	23,640
Bexley	6,850
Brent	23,250
Bromley	7,740
Camden	10,380
City of London	1,460
Croydon	20,790
Ealing	21,570
Enfield	12,460

Policy H1 Increasing housing supply	
A	Table 4.1 sets the ten-year targets for net housing completions that each local planning authority should plan for. Boroughs must include these targets in their Development Plan Documents.
B	To ensure that ten-year housing targets are achieved, boroughs should: <ol style="list-style-type: none"> 1) prepare delivery-focused Development Plans which: <ol style="list-style-type: none"> a) allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification b) encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2 c) enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA. 2) optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity: <ol style="list-style-type: none"> a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station³³ or town centre boundary⁴⁰ b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses d) the redevelopment of surplus utilities and public sector owned sites e) small sites (see Policy H2 Small sites) f) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London’s economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution.

E) Recent projections from the government-funded **Economics Statistics Centre of Excellence**, indicate a **reduction of around 700,000 in London’s population (i.e. 8-9%)**, arising from the UK’s departure from the European Union, and exacerbated by the Covid-19 epidemic.

<https://www.escoe.ac.uk/estimating-the-uk-population-during-the-pandemic/>

The government's forthcoming Levelling Up White Paper, will emphasise growth and development to the regions of the North, Midlands and left behind Coastal Areas.

Consequently, the implication is that London, the South and East of England should be **stabilisation of population** – the corollary of (E), the reduction in London’s population and the government’s Levelling Up agenda for growth other than London and the South East is that the housing targets for Enfield's Local Plan ought to be reset to a more stable basis - **the Option 2 (Baseline) target of 17,000 homes in Table 8.3, page 188, in the next 20 year period (850 per year), with no green belt development and an emphasis on more low rise family houses and medium rise blocks of flats(4 to 8 storey).**

F) Furthermore, there is no statutory requirement that says housing targets have to be met within a council’s boundaries. Consequently, housing schemes like the old Greater London Council's schemes for rehousing households in sponsored "overspill", and "seaside & country homes" with councils in growth areas like the midlands and coastal towns could be something that should be considered. Thus there will be “breathing space” to concentrate resources on dealing with the already very high deprivation to be found in Edmonton (analysis carried out by the Local Government Association indicates that, **within Enfield, Lower Edmonton** is the 4th most deprived of the 21 wards in the Borough. The same analysis estimates that it is among the 20% most deprived wards in England).

G) According to the National Planning Policy Framework (NPPF), the Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas
- to prevent neighbouring towns merging into one another
- to assist in safeguarding the countryside from encroachment
- to preserve the setting and special character of historic towns and
- to assist in urban regeneration, by encouraging the recycling of derelict

and other urban land.1- 1 MHCLG, National Planning Policy Framework, CP 48, February 2019: page 40

The map attached shows how the Local Plan’s proposals to build on the Green belt will (by erosion) comprise the purposes of the green belt.

H) Using existing brownfield sites does not necessarily mean building at ultra high density and ultra high rise blocks of flats.

OBJECTION TO THE TALL BUILDINGS POLICY – DE6: Tall Buildings (pages 156-159 and Figure 7.4)

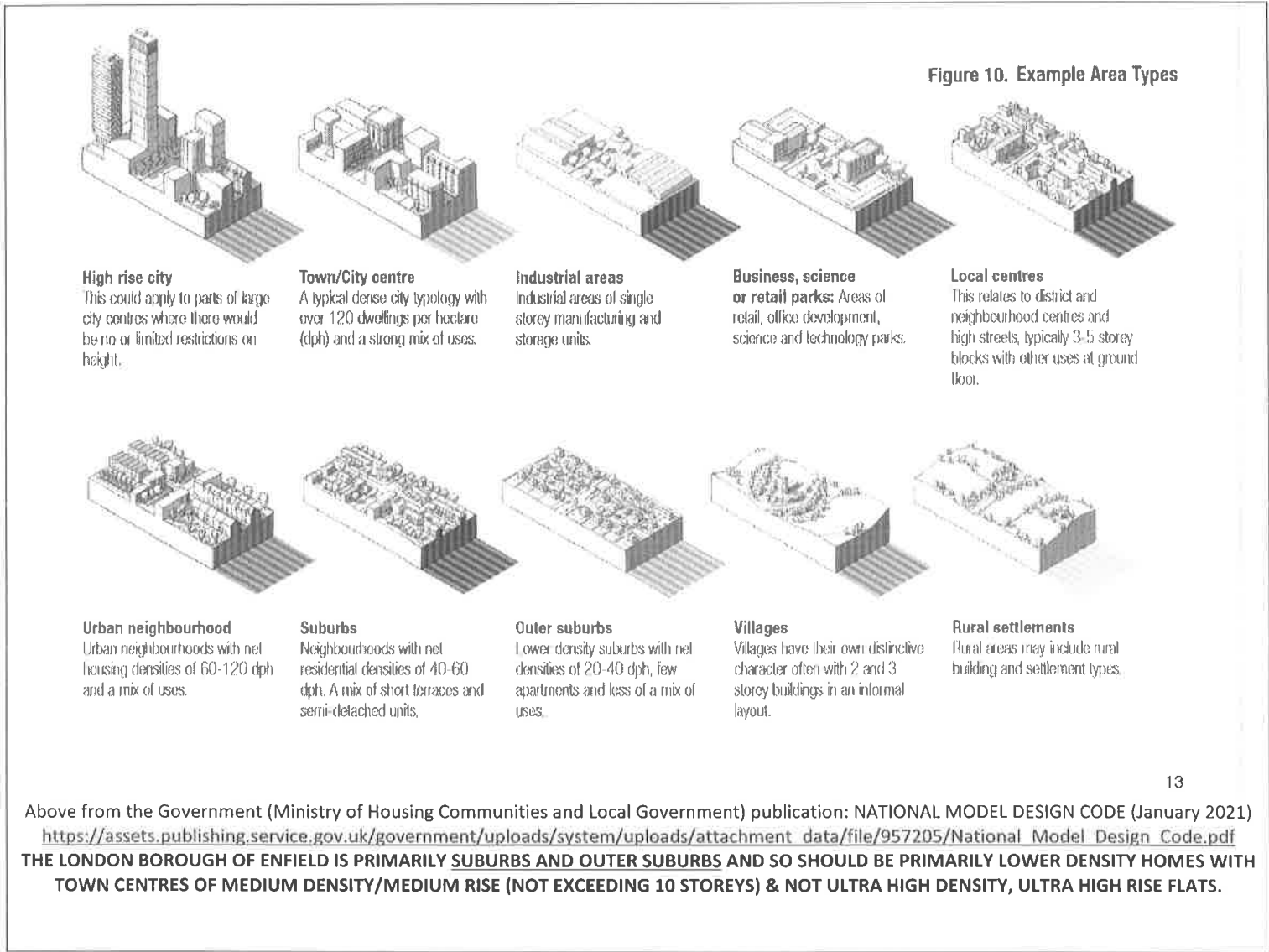
I believe that Enfield already has enough tall buildings (buildings over 21 meters, or about 10 storeys, as per the London Plan definition).

Consequently I disagree with the policy/proposals for allowing further tall buildings in the locations proposed in figure 7.4.

The height of future buildings should be restricted to no more than 21 meters (or about 10 storeys), in the locations in Figure 7.4, and within conservation areas and their vicinity, new building heights should be restricted to current heights.

To date, the experience of tall buildings (especially tall residential buildings) in the UK has not been good. Time and again they have proved to be (a) badly designed (i.e. ugly), (b) very expensive to build, (c) very expensive to manage and maintain, and (d) are not really appropriate to family living or good public health (tall buildings especially in the UK, requires dwellings to be protected against the constant inclement weather of a maritime climate and so limited exposure to fresh air).

The January 2021 National Model Design Code from the Government (Ministry of Housing Communities and Local Government), indicates that tall buildings are more appropriate for large city centres. Whereas Town Centres and Local/District centres should be predominantly of low rise buildings. I am attaching an extract from the publication as evidence.



Re: Strategic Policy SP SS2: Making Good Places and Section 3 (Places)

Locally Agreed Design Codes - For the Strategic Policy Areas listed in Fig 3.1 and page 37, i.e. SP PL1 to SP PL7, see below (but excluding SP PL9 - Crews Hill and SP PL10 - Chase Park, which are negated by the objections to Green Belt development above), it is recommended that locally agreed Development Design Codes within the principles of the National Model Design Code, be agreed with the local councillors and representatives of the local community, so as to guide future building-development proposals.

The Strategic Policy Areas

- Strategic Policy SP PL1: Enfield Town
- Strategic Policy SP PL2: Southbury
- Strategic Policy SP PL3: Edmonton Green
- Strategic Policy SP PL4: Angel Edmonton
- Strategic Policy SP PL5: Meridian Water
- Strategic Policy SP PL6: Southgate
- Strategic Policy SP PL7: New Southgate

In conclusion, I believe that the proposals to build on the green belt will be detrimental to the population of Enfield and Londoners who rely on access to good quality green spaces. And that encouraging the building of tall buildings (especially residentially tall buildings) is detrimental to public health.

Yours faithfully,