

Dear Local Plan Team

Response to the Local Plan Vision Survey

On behalf of the committee and many supporters of Enfield RoadWatch, thank you for the opportunity to participate in this exercise to craft a vision for the future of our Borough.

Unfortunately, many of the questions in the survey are couched in either/ or terms with no opportunity for nuance or detail. Also we believe that many of the guiding principles that are presented in the survey as mutually exclusive are in fact possible in combination. We have therefore chosen to respond in this form rather than completing the online survey. We represent over 1,200 local supporters so we will not respond to **Questions 1-5**. However, we will address all the issues covered in the remaining survey questions.

Question 6 - Wider context

We do not believe that self-sufficiency means we have to be inward-looking. The Borough needs to provide a full range of first-class opportunities to its residents, while being part of a wider community. For instance, there are many opportunities within the borough to foster local employment, including in the agricultural industry, to encourage new local businesses to minimise commuting and support local retail, etc., to promote excellent schools and to provide a variety of local entertainment. Achieving that level of self-sufficiency does not mean we are inward-looking.

We do not believe the Borough should be a corridor – or a bedroom community – or a place people live until they can move on somewhere better. It is a place – and a home – in its own right and should be seen as such.

We do not believe, as suggested, that looking South to London and North to Hertfordshire and beyond are mutually exclusive. We cannot avoid being part of the larger community. However, that does not mean that Enfield should take more than its fair share of housing and strategic industrial capacity.

We believe that all of the following statements from the survey reflect important goals that are not mutually exclusive.

A deeply green Londoner – A place where the green open spaces of the borough permeate through the urban fabric from wild places in the rural north. A place that leads London in terms of providing access for all to green and blue infrastructure, nature recovery and access to green spaces.

An innovative and smart Londoner – An energetic and regionally important innovation hub providing high quality employment and super connected in terms of IT networks and smart city technology.

A shire area focused to the north – A place focussed on its heritage, countryside and places outside London to the north, connected to neighbouring places in Hertfordshire and Essex.

A productive and creative borough – A place which continues the heritage of production in the industrial corridor, with enhanced creativity permeating the borough.

A family retreat – A place catering to the needs of families, with excellent educational facilities, and opportunities for young families to stay in the borough and flourish.

Question 7 - Connectivity

Connectivity in the future needs to focus on green and healthy solutions and must provide cheap and convenient alternatives to car use. Our selected options are:

Highly connected by networks of walking, cycling bus and train routes that provide access through and into and out of the borough in all directions and which serve local small centres, larger town centres, transport hubs and major employment, community, recreation and open space locations.

Providing a significantly improved network of east to west walking, cycling, bus and train routes connections across the borough and into neighbouring areas.

Questions 8–11 - Scale of Growth

The unconstrained housing target should not be considered. The Mayor's housing target is manageable without releasing Green Belt, especially in light of expected changes to retail and commercial use post-Covid. We refer you to the *Space to Build – Enfield* report, produced by Enfield RoadWatch, The Enfield Society and CPRE-London, which provides a detailed survey of brownfield and previously-built site opportunities throughout the borough and which was presented to the Planning Department and council in 2019. https://www.cprelondon.org.uk/news/space-to-build-in-enfield/

We also believe that post-Covid the housing mix needs to be considered in light of homeworking and/or provision included for local work hubs, which could utilise some of the disused retail space. Changing work and home patterns should be considered as an opportunity to re-think the future of the borough, but we do not see this reflected in the vision.

Question 12 - Industrial and Logistics Employment Land

The proposal seems oversimplified. As per the New London Plan Policy E7, an increase in logistics space can be achieved by expanding density on existing SIL sites without taking over new land. The proposal also does not take into account existing sites that may be available post-Covid. A master-plan for Enfield's industrial and logistics employment land should be presented to the public for consultation rather than the simple question in the survey.

6.7.1 In collaboration with the Mayor, all boroughs are encouraged to explore the potential to **intensify industrial activities** on industrial land to deliver additional capacity and to consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses.

Question 13 - Planning priorities for industry and logistics

Supporting the current mix of manufacturing and distribution activities, building on existing strengths.

Supporting the growth of new clusters, including film and TV, food and drink, and maker spaces?

Supporting and protecting small scale light industrial workshops and garages close to where people live?

All of the above are important, but 'building on' should mean intensification, not adding large new logistics hubs. Also 'new clusters' should be located on previously-built sites.

Question 14 - Type of place by 2039

A small-scale place focussed on local neighbourhoods with different characters.

A vibrant city scale place with dense neighbourhoods supporting a range of activities and intense built forms, especially at transport nodes and in town centres.

A place of two distinct characters and scales of development – green low-density countryside areas to the north and urban areas to the south and east.

A place where the urban and countryside areas have been meshed and linked together with green open spaces of the countryside expanded and drawn deeply into the urban areas of London and urban activities have been drawn into the countryside.

A deeply green place where nature and green and blue spaces penetrate through streets, open spaces and buildings through innovative and pioneering design.

A place where all have equal and easy access by sustainable means to nature, open spaces, job opportunities, community and social facilities, affordable housing.

A healthy place where most activities are within 15 minutes walking and cycling distance of home.

A clean and unpolluted place where water and air quality is prioritised and protected.

A safe place where spaces have been designed to discourage crime and improve feelings of safety and well-being.

A place where people can move easily around by car and goods can flow easily to destinations by road and rail.

A place where high quality design is prioritised and considered essential.

A place where the primary means of moving around is by walking and cycling or by public transport, limiting car usage.

A place where the sub regionally important facilities of the borough (including its blue green spaces, employment estates, heritage, training and education assets, and Crews Hill retailing facilities) are valued and retained and served by sustainable transport links to surrounding areas.

A place of equality where all have the same level of good access to quality housing, safe places, community and social facilities, nature and open spaces.

A place that nurtures the borough's young talents/entrepreneurs while attracting young diverse talents from inner London and from out of London, providing suitable spaces for creatives, makers and young businesses.

An intergenerational place where young and old generations live together harmoniously, their needs are equally catered for and they equally contribute to the richness and diversity of the borough. A place where young generations can start a new family without having to move out of the borough.

Neither of the first two options are realistic or desirable for Enfield. NO

Option 3 is realistic and desirable. YES

Option 4 is definitely not desirable, as it implies considerable release of Green Belt. NO

Options 5 – 9 present a vision that could we welcomed by all. YES

Option 10 places too much emphasis on road travel, which needs to be reduced in the borough. NO

Options 11 – 15 again present a highly desirable vision for all residents. YES

Question 15 - Character by 2039

A mosaic of small and diverse places focused on small centres of community services linked by networks of green spaces and sustainable transport corridors.

A place of two distinct characters and scales of development – green countryside areas to the north and denser urban areas to the south and east.

A mix of suburbs, town centres, regeneration areas, large and small employment areas, recreation and open spaces linked by transport corridors.

A low-rise place with growth accommodated by infill, modest increases in building heights and development of large new places at low heights.

Option 1 is not practical for a London borough. NO

Options 2 and 3 make up the status quo, which needs improvement in all aspects, but which would create a borough that works for its residents.

Option 4 presents an unacceptable and unnecessary vision of more sprawl, when there are better alternatives.

Question 16 Spatial vision – Support.

Section 16 presents ideas as mutually exclusive which are not in fact so. The options are therefore misleading and many need clarification before they can be answered. Of the options, only one, the final option, is acceptable as presented and that has been bolded.

Providing for all our housing is a top priority Housing is a top priority but the Mayoral even if it means building taller or in target can be met on previously-developed countryside areas. sites without building in any countryside areas. We refer you again to Space to Build <u>– Enfield</u>. With regard to taller buildings, the London Plan allows boroughs to define what they mean by 'a tall building' based on the local context. No such definition has been provided in the survey which makes it impossible to know if 'building taller' will be acceptable or not. Enfield is required to decide if there are any areas in the borough where tall buildings would be acceptable and if so an acceptable height for each area. None of that information is included in the survey. Providing for all our industrial and logistics If it means building on countryside areas, needs is a top priority even if it means then it should not be a top priority. building on countryside areas. However, those needs can be met in other ways as discussed above. Intensifying our town centres and suburban This combines two very different propositions. Intensifying town centres, areas to enable countryside to be protected which have services and amenities is from development, even if it means accepting tall buildings in our town centres. acceptable. Intensifying suburban areas, which will add traffic, is not acceptable. With regard to tall buildings in town centres, without information on what constitutes a tall building, it is impossible to say whether it is acceptable or not. Providing new homes with gardens, access Enfield is well-provided with parks and green to nature and generous nearby parks spaces spaces and allotments. The problem is more even if it means we build fewer homes one of access. Therefore we do not accept overall or build on the green belt. the premise. None of these desirable aspects

	of suburban living should be used as an
	excuse for building on the Green Belt.
Converting industrial areas to housing so	Another false premise. The London Plan is
that urban areas can be preserved, and large	clear about what and how industrial areas
scale housing developments can be avoided	can be released for housing and other uses
in countryside areas, even if it means losing	in a way that won't deplete jobs. We refer
industrial jobs and businesses.	you again to <u>Space to Build – Enfield</u> which
	shows that there are ample previously-
	developed sites to meet the housing target.
Providing high-quality affordable homes	All of them have to be provided so it is a
takes priority over providing schools,	meaningless question.
community facilities, transport infrastructure	
and open space facilities.	
Providing for improved biodiversity and	Biodiversity and nature are not in
networks of green spaces and access to	competition with housing and employment.
nature to improve people's health and well-	Enfield should be embracing a green
being takes priority over other types of	economy which works with nature, not
needs such as housing and employment.	against it.
Providing for education, health, community	All of them have to be provided so it is
and cultural facilities takes priority over	another meaningless question.
other types of need such as housing and	
employment.	
Improve air quality, human health and	This one is acceptable and a move in the
mitigate and adapt to climate change even	right direction.
if it means reducing reliance on the car and	
reducing parking provision and reducing	
road capacity.	

Question 17 Spatial vision – not support

As discussed above in Question 16, we do not support any of the visions except the final one.

In summary, we are disappointed that the survey is presenting stark choices instead of a creative vision for a borough that is greener, cleaner and healthier and that provides all of the amenities listed above for the benefit of all residents. For us the bottom line is embracing and working with nature and the environment. This is no longer a luxury but an absolute necessity given the possible calamity of climate change. The vision should start with protecting and improving the environment and then creative green solutions employed to meet housing, employment, community, health and other needs.

Sincerely

Ian D'Souza

Chair

Enfield RoadWatch

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