

Enfield Draft Local Plan

Analysis of documentation June 6 2021

The document pack comprises a full draft Local Plan with some consultation questions, proformas for the Site Allocations (but not Crews Hill?) a Sustainability Appraisal (a legal requirement) and a Topic Paper for Crews Hill.

To be read in conjunction with the accompanying PDF "*Enfield Draft Local Plan: Some key extracts*" - illustrative screen shots of the most interesting/concerning parts.

Initial comments:

1. The Spatial Strategy options on pages 30-32 is misleading. The 'preferred approach' is for 25,000 homes under a 'medium growth' approach. Policy H1 of the London Plan 2021 (Table 4.1) says that Enfield must plan for 12,460 homes in the period 2018/9 to 2028/29. Paragraph 22 of the NPPF says that plans should look ahead over 15 years. Extrapolating the annualised London Plan requirement of 1,246 over 15 years means that the total to aim for is Paragraph 15 years x 1,246 = 18,690 new homes. So to say that the options are either 'baseline growth' of 17,000 'medium growth' of 25,000 or 'high growth' of 55,000 is completely fanciful. The options should instead have focused on different ways of meeting the London Plan housing figures. It appears that the higher numbers are only in there as a way of saying to people 'look how reasonable we have been by not going for the high growth option'. That is false and needs to be called out. There is no housing trajectory published in the documents so it is impossible to understand whether the housing numbers stacks up.

2. There is a lot to worry about in this Plan for people who care about Enfield, in particular the following (this is only a start):

- *Policy PL1: Enfield Town Centre.* The individual sites and the housing numbers are on pages 311-319 of the appendices PDF. The Council is estimating 350 dwellings at Palace Gardens. The policy makes tall buildings in the town centre acceptable. Policy *DE6: Tall Buildings* (draft Local Plan page 156). *Figure 7.5: Appropriate Locations for Tall Buildings* appears to indicate that 60 metre towers in the town centre would be acceptable, but the figure is very blurry and hard to read (there is a cross-reference to the online map but that has not yet been published). Another reason why Councillors cannot put this forward for consultation. Note paragraph 7.6.3 states that "*Carefully sited tall buildings can help optimise the development potential of sites and can make a positive contribution to the skyline, denoting areas of activity and core functions by providing landmarks.*"

- *Policy PL8: Rural Enfield – a leading destination in London's National Park City.* This is the Council's defence against opposition arguments that it is proposing to 'concrete over' the countryside. As a strategy it is plausible. However opponents of Green Belt development must argue that it does not mitigate the harms caused to the integrity of the historic Enfield Chase, just as building on part of Hampstead Heath would not be made acceptable by enhancing part of the Heath. Note the reference to Tottenham Hotspurs in the policy it should be explained in the supporting text but it isn't. Instead it is buried on page 375 - a massive expansion of the Spurs facilities within the Green Belt as far as the M25.

- *Policy PL9: Crews Hill.* Why is the site allocation missing from the documents? It is not at all clear what is proposed on the Concept Plan in Figure 3.9 as there is no key, so it is hard to see how people are supposed to provide a meaningful response. It appears to suggest development not only on the existing built-up area but also across a lot of attractive countryside as far as the M25. The Topic Paper 'Crews Hill Placemaking Study' is at pages 403-461. The plans on pages 433 to 435 and p 443 are illegible, including proposals for how the area could be developed. Councillors should not be presented with crucial information in that shoddy format as a basis for such an important decision on Wednesday evening.

- *Policy PL10: Chase Park.* Allocated for 3,000 homes (page 338). Fails to acknowledge that the land is a large chunk of the historic Enfield Chase. Nonsense to say that the site would provide development land beyond 2039 - given the 5 year housing supply situation (see below) the Council

will be under pressure to grant permission for it almost immediately it comes out of the Green Belt (if not before). The statements about sensitivity to landscape are nonsense given the topography, long views etc. No mention of the Vicarage Farm Borough-wide Site of Importance for Wildlife Conservation, which appears to be in part obliterated by the development in the Concept Plan. They are also allocating the former Leonard Cheshire site north of Crofton Way, which they dismiss on page 339 as an 'overgrown field' but is actually heavily treed and adjacent to the designated Borough-Wide Site of Importance for Nature Conservation in the lower field. The Topic Paper is at pages 53-105 of the main report.

- Policy SA54: Land West of Rammey Marsh (page 364). 12 hectare Green Belt site/open land to become new industrial land.

- *Policy D2: Masterplans to achieve comprehensive development.* This is an important policy and a lot rests on it. But why can't the Council publish masterplans for the major Green Belt sites so that the public can understand for the purposes of consultation? The two Topic Papers for Crews Hill and Chase Park are inadequate in this regard.

Both policies PL9 and PL10 are much too vague in respect of a social infrastructure. Are primary and secondary schools required or not? If they are, that would substantially reduce the developable area and the housing numbers that could be delivered. Ditto for open space and other community facilities such as shops etc.

3. It's a bit shoddy that important parts of the Plan are missing e.g. Figure 8.1 Areas for SIL Intensification (page 233). Councillors really need to have all the information in an easy to understand, concise format with plenty of time to digest it well in advance of agreeing the plan in principle for consultation.

4. The Plan demonstrates no meaningful attempt to pro-actively designate areas of poor quality employment land and unsustainable locations. They could and should have designated the retail parks comprehensively rather than just reactively relied on the Call for Sites and a few phone calls. The Sainsburys A10 site is in there as is the Coliseum but there is lots more unsustainable land uses besides those sites. The draft Plan takes a more pro-active approach at Crews Hill - why not elsewhere?

5. Tactically, what the Council has done is to include a number of sites such as the new crematorium, new 'natural burial' space, redevelopment of the Council Offices site, and various 'goodies' such as leisure and biodiversity enhancements to the countryside that they are not proposing be developed. So it's likely that at the meeting on Wednesday Councillors will be told that the Council will lose millions if the Plan does not go through, the borough will end up with no burial space etc. If so, this needs to be questioned at the meeting. Councillors should also take issue with the missing documents figures, and the blurred and illegible nature of a number of the key figures.

6. The proposed 'consultation' is for the statutory minimum of 6 weeks, half the time allowed for the far less controversial 'Issues and Options' consultation. The Council is trying to steamroller it through, knowing that once people know what is proposed then they will object. 6 weeks is totally inadequate, and Councillors have only been given a few days to read (in a main report pack of 800+ pages and 654 pages in the appendices) of documentation. It is also hopeless to expect the public to have a meaningful say when huge documents are presented in this format - at very least a summary document should have been published alongside.