



## **LB OF ENFIELD DRAFT LOCAL PLAN - REGULATION 18 CONSULTATION**

### **Response of the Barnet Society**

13 September 2021

#### **INTRODUCTION**

The Barnet Society has over 650 members in and around Chipping Barnet parliamentary constituency. It has a Committee of 15 (elected at our AGM on 1 July 2021) and a Planning & Environment Sub-Committee chaired by Robin Bishop. In commenting on major developments, it draws on the advice and experience of our Vice Presidents and specialist advisers, who include architects, landscape architects, engineers and architectural historians who currently work, or have worked, with central and local government, Historic England and other organisations in the fields of housing, conservation, and urban renewal.

The London Borough of Enfield forms our eastern border, so the Society takes an interest in prospective developments there. Many of us enjoy visiting the Borough's many and various facilities and amenities. We value its shopping centres including Enfield Market and Crews Hill, restaurants in Cockfosters, cultural assets such as Chickenshed, and leisure facilities in Trent Park and the Lee Valley. Some of our residents work in Enfield and some of our students attend Enfield schools. In doing so, we often travel through – and value highly – Enfield's Green Belt.

We generally support comments made on the draft Local Plan by the Enfield Society, Enfield RoadWatch Action Group and the Hadley Wood Association. Our own follow below.

#### **ENFIELD'S DRAFT LOCAL PLAN**

##### **2.3 Spatial vision and objectives**

We support Enfield Council's Vision, but believe that several of its Strategic Objectives are flawed (see below).

##### **2.4 Enfield's spatial strategy**

We consider the Council's overarching spatial strategy "to provide for sustainable growth" to be fine, but the devil is in the details (again, see below).

##### **Strategic Policy SP SS1, Para 3**

We doubt that the wording of the Council's draft policy, "Tall building development will only occur where it is exemplary in quality and in appropriate urban locations", will be rigorous enough to guarantee design quality. A major test of the Council's definition of 'exemplary' will be its decision on the current planning application for Cockfosters Station car park (21/02517/FUL).

The four proposed tower blocks are little more than identikit inner-city tower blocks on oversized platforms, alien to both their suburban context and the parkland and Green Belt that adjoin them. The architects' fraying of the corners of one block and of the rooflines of two others does little to soften their overbearing bluntness. At up to 14 storeys high, they would be visible from many parts of Barnet as well as Enfield – far further than is shown on the application's map of views. If permission is granted to this scheme, it will set a dire precedent for other tall buildings in Enfield.

#### Strategic Policy SP SS1, Para 12

Improving the quality, accessibility and sustainability of rural areas for the benefit of all is a fine ambition. To try to do so 'exponentially' is wishful thinking. To do so 'gradually' or 'consistently' would be more credible.

#### Green Belt – general comments

Most of our concerns relate to the Council's plans to develop sites in the Green Belt close to us. Our comments on specific sites in the Plan follow below, but we wish to make some general comments first.

Not only do we object on principle to erosion of the Green Belt, we would take particular exception to any loss of the green buffer that exists between our boroughs, especially north and south of Hadley Road and Enfield Road. These attractive stretches of countryside are vital to preserving the separate identities of Barnet, Hadley, Cockfosters, Enfield Town and other settlements that would otherwise have merged into amorphous suburbia.

We recognise that some development may be justifiable under very exceptional circumstances. But these are not demonstrated in your consultation document. We question the government's housing targets, and believe that whatever is needed could and should be accommodated on brownfield sites, as convincingly shown by the CPRE/Enfield Society/RoadWatch study *Space to Build, Enfield* (January 2019).

CPRE research also shows that "only a tenth of homes built in the Green Belt are 'affordable' and these are rarely for social rent. Additionally, people living in Green Belt developments have poor access to public transport and are tied to owning and using cars, as well as being stuck with the cost of commuting, creating further financial stress for families on low incomes".

Climate change and Covid-19 have also raised public valuation of green spaces in and around our built-up areas. We agree with Enfield Climate Action Forum that "Building on the Green Belt...leads to urban sprawl, undermines our ability to tackle pollution, climate change and the collapse of ecosystems, and eliminates local food production, wildlife habitats and of course areas for recreation for Enfield's growing population."

#### Strategic Policy SP SS1, Para 13

We welcome the Council's promise that "The Green Belt will be protected from inappropriate development in line with Government policy." Unfortunately that promise is betrayed by several serious breaches of existing Green Belt policy, the Council's proposed Strategic Policies SP BG1.1.a & BG4.1 & 2, and London Plan Policy G2 & Para 8.2.2. We go into detail below.

#### Strategic Policy SP PL8: Rural Enfield – a leading destination in London's National Park City

We object to misuse of the National Park City Foundation's name and misrepresentation of its aims. As the Foundation pointed out in its letter dated 14 July 2021 to the Leader of Enfield Council, it does not support the loss of Green Belt.

#### Strategic Policy SP SS1 & SP PL9 – Crews Hill

The proposals for “a sustainable rural gateway settlement” at Crews Hill appear generally to enhance its existing character, though details can be questioned. We support development of its brownfield sites alongside retention of the area's horticultural and food-producing industries, and exploitation of the education, training and employment opportunities they offer. And we would be pleased to see “glasshouse building form and horticultural land use...inform innovation in architecture and public realm such as through the potential for covered public spaces, winter gardens and glass house space for every home...”

But we have strong reservations about the continuing commercial viability of Crews Hill's present businesses faced with soaring land values and traffic congestion. Significant rail and road improvements must accompany any residential development – yet transport occupies only five of the 390 pages of the Plan.

And the statement in Policy SP PL9 (Para 17) that “Development proposals should facilitate a shift towards a net zero carbon future” is far too weak: Enfield has to do much more than that by 2039 to avoid climate disaster.

#### Strategic Policy SP SS1 & SP PL10 – Chase Park

The proposed Chase Park sounds superficially attractive: “a deeply green extension to the urban area... drawing the rewilding areas of Enfield Chase into the urban areas” and “biophilic design principles...incorporated where possible to maximise urban greening and integration with blue and green networks”.

But the promise in Para 17 – “development must include greening elements on buildings, gardens, in streets in public open space and through the materials used” – would not make it ‘an exemplar scheme’ (Para 17): new housing today already has to follow those principles!

#### Strategic Policy SP H1 & Site Allocation SA45 – Land Between Camlet Way and Crescent Way, Hadley Wood

We are very concerned about the designation of this site for 160 new homes. It is a key part of the delightful valley of the Monken Mead Brook where Enfield, Barnet and Hertsmere meet. Their three parcels of land combine to create a landscape that is greater than the sum of their parts. Loss of Enfield's meadows would be greatly detrimental to the other two, yet no consultation with either Barnet or Hertsmere appears to have taken place.

The Battle of Barnet (1371) may be proved to have been partly fought in this valley, and development of the Hadley Wood site could also adversely affect its setting.

#### Strategic Policy SP E1 & Site Allocation SA54 – Land East of Junction 24

While we see the logic of a logistics hub close to M25 Junction 24, we believe the scale of development proposed at what is one of Enfield's attractive ‘green gateways’ is excessive. We are also alarmed by the casual mention that the Council would “seek to deliver the redevelopment of the wider site (in LB Hertsmere) to provide a coordinated employment offer” – especially when Hertsmere's own emerging Local Plan appears to designate nearby land for wildlife.