

## FEDERATION OF ENFIELD RESIDENTS & ALLIED ASSOCIATIONS

### Response to Enfield Council's public consultation on its draft Local Development Plan 2021-2039

#### FERAA's key reasons for rejection

- The Federation has reviewed the proposals to build 25,000 new residences over the next 18 years in Enfield, incorporating a large quantity of presently protected open space, at far greater density than currently the norm in Enfield, to accommodate some 60,000 new residents in addition to the current 334,000, thereby completely changing the face and suburban character of the borough, in our view for the poorer.
- **FERAA concludes it is not able to support these proposals** because their scale and impact on the present resident population is negative and damaging to their quality of life without commensurate gain in relieving the borough's problem areas.
- **Balancing positives against detriments** is regarded as the very essence of constructive strategic planning. The present problems of poor and inadequate housing in key wards which contribute to deprivation and low achievement are in no way relieved by these plans. The requirements of a vigorous economy are as good as ignored and we see no constructive improvements in transport or industrial infrastructure. In most

respects 2039 will present a borough much as now but with problems unresolved, opportunities not exploited, and considerable pressure on amenities from a large population influx. It will also exhibit an architectural uniformity and poverty of civic design typical of asset stripping.

- **FERAA is concerned that the administration has already approved** the plans in draft form (Chapter 18) and calls on planning officers and councillors to exercise judgement in favour of rebalancing and descaling its development ambitions; constructing itself out of current financial stresses have no chance of delivering for all residents. It urges members to put flesh on their assurances that preserving and enhancing existing amenities and heritage for the benefit of the present population remains the prime and majority-led focus.
- **FERAA fully supports the objections** submitted by ERW, TES, CLARA and Crews Hill residents whose views well represent the large communities most directly impacted by these proposals.
- **To FERAA all strategies can be reduced to one side of paper.** So it is with this draft Local Plan. Our summary of the going-in position deduced from what is now in the public domain would read:

"To secure substantial long term development investment into Enfield, so as to optimise LBE revenue generation with minimum council outlay and commitment, protecting land allocations east of

the A10, and generating majority yields from the west. Regulatory barriers to development to be regarded as negotiable, and collaboration with current landholders to be secured"

Should residents consider this in their interests? FERAA offers its insights to redirect planning to the common good.

### **1. Housing Targets – do they mean anything?**

House building is held nationally to be a top line metric in judging the virility of a draft local plan. FERAA looked closely at the dLP for insights:

- **Enfield was lambasted recently by a senior GLA politician for not achieving the (politically correct) number of house units laid down by the mayor.** This number is of course a confected target, superimposed on Londoners. It is not worthy of respect, but recent warnings issued by the deputy mayor are proof of their provenance. Nowhere do targets appear relating to relieving the needs of those suffering social stress and deprivation- a top line indicator of relevance to Enfield.
- **It appears that LBE has down played the contribution to be expected in future from smaller sites,** especially in the east of the borough. We see no reason for this – the housing needs that most beset the council are concentrated specifically in the east. As a result, meeting the theoretical target of 25,000 homes has caused overspill and extra reliance on redesignating large areas of green belt in the west. We wonder if LBE had hoped residents have not noticed this sleight of hand. Restoring housing build rates in the east of the borough will at least halve the de-

mands on green belt so why would LBE resilie from this solution, and its obvious benefits? Does LBE favour developments by large concerns, who also happen to be landowners in the west? If LBE seeks some measure of levelling across the borough, it is worthless if it does not deliver east of the A10.

- **The distribution of build targets is noticeably slanted towards the west** where land is most expensive so affordability for lower income Enfield residents is most strained. We fail to understand how this paradigm could advance social programmes in the borough.
- **The 3 housing target options presented in the dLP are of course a construct.** None of the figures has an origin or pedigree that can be respected. The Upper target (55,000 units) is equivalent to nearly one third more homes in the borough over the next 18 years. Against a normal build rate of 500 per annum this represents 100 years of building! 55,000 units subtend some 140,000 new residents – not an influx, a flood of unmanageable proportions. Does this one figure not condemn itself and much of what is offered here for absurdity, and point up how remote and political the whole targeting issue has become. If build targets have no relationship to street level needs calibration, what role can they play in long term planning?
- **The adopted 25,000 units target over 18 years** will also not be achievable in its own right without massive disruption across the borough, a factor that is not considered in this dLP. We reject this target and call for a revision geared to the borough's needs.

- **The dLP is not founded on realism.** London's population is billed in the London Plan to grow by 2041 by nearly 2 million beyond the current 8.7m. No reputable commentator will endorse such projections, they are a political construct but now being used to belabour boroughs into upping house build and development targets. We have no interest in such misrepresentations.
- **These population projections will appear even more extreme** and pointless when the results of the 2020 census are to hand in 2022. A decline in population across London is expected, reflecting losses under Brexit. Targets should then be adjusted closer to reality – if there remains scope for honest re-appraisal, further undermining the 25000 Enfield "target."
- **The end of plan (2039) housing density ratio in Enfield will be substantially greater** than now and the social cost, not exposed in the dLP, is considerable loss of amenity, personal and communal. The closer to saturation housing, the faster the personal and societal losses rack up. One need look no further than the inner boroughs for evidence.
- **The planning system has been so persistently gamed** by private and governmental parties that considerations applied to shape the development plan have been narrowed to those most favouring a political engineering of planning. As a result residents' rights to consideration have been displaced and hardly share in formulating plans for the long term which they have to endure. So it is here – residents only get to comment after the administration has in effect declared its final policy, bar a run-

past with the inspector. We reject the council's undemocratic and insupportable approach to planning our lives.

## **2. FERA advocates a strategic view to reshape the dLP:**

- **We hold that the mark of a sustainable local plan** is not the level of accordance with whatever regulations and books of preferred approaches are quoted by external bodies, but alignment with needs of current residents on the ground, and the aspirations of all who live here. The essence of planning is building a case from the ground up. In this draft plan (dLP) the reverse approach has been applied – justifying a rate of spatial growth unrelated to the long term needs and aspirations of current residents. So it can be justifiably labelled a political plan.
- **The dLP urges the most aggressive growth plan** the borough has seen in the post war period. "Good growth" features in the London Plan – the term betraying a sensitivity that not all growth is indeed beneficial. In this case, very little qualifies for such approval. Unless the plan demonstrates clearly how detriments are actually (not notionally) mitigated, there is no worthwhile advance, only degradation and disorder as can be read between the lines.
- **The test of a positive growth programme** is surely how much added value is secured through skilful planning, not how much the council can skim from the growth, as appears

to be the case here. Through productivity gains come rising dividends to all. Where is the calculation in this plan that shows an awareness of this need?

- **On this basis the welter of documents now in circulation** fails against our plan expectations and most likely NPPF standards too. The sheer volume of papers contributes nothing to the public understanding of the process or likely outcome, is in our opinion a deliberate diversion, is most unlikely to have been absorbed by the councillors who voted recently for it, and therefore lacks both general and specific mandates. The dLP should be withdrawn for irrelevance to needs, evidence of benefit and residents' mandate.
- **The dLP is presented to us as a collation** of development opportunities objectively determined and assessed. It is nothing of the sort. The plan is actually driven by prior land ownership namely Comer, Berkeley and other independents plus Enfield Council, striving to crystallise investment gains.
- **LBE has a poor history of responding to the heritage and social needs** of one third of a million residents. Cutting the council loose with this license to plough under a large part of middle Enfield is not in the public interest.
- **FERAA would be more convinced** if LBE showed recognition of Enfield's position in the sisterhood of outer London boroughs, that it appreciated how competitive each

has to be to secure not only poured concrete but intelligent investment too. Enfield has an open texture and is truly distinguishable from inner London boroughs. Its character is not framed by lines of cookie-cutter retail outlets, yet. Is this not the way to lift the expectations of residents and reward them as stakeholders with advances in opportunity and quality of life? To build on heritage. Does LBE believe the more concrete poured, the happier will all its rate-payers be? Does it see the quality and enrichment route is actually more sustainable in the long term?

- **FERAA perforce looks beyond the current dLP and fears** a rapid future encroachment into all presently open space until the borough is built out with "development opportunities" right up to the motorway. Only some of the parks would remain as open space for recreation and community activity. Enfield will become indistinguishable from any borough within the A406, a triumph of homogenisation in concrete. Surely LBE officers can see that maintaining a firm distinction between Enfield's suburban heritage and openness is not a forgoing of development gain but leveraging its singularity which, once gone to the highest bidder, is lost forever. Surely a sense of stewardship and culture is required if the dLP is to be a key to broad based prosperity, rather than an open door to developers who, once sated, leave the borough to its fate?

- **The current thrust to build at pace** is politically inspired targeting and not devised from an assessment of needs within the borough. We expand on this theme below, it is core to our case.
- **The right to meaningful consultation at every stage**, and to be secure in their ambition to enjoy enhancement of their quality of life, are not assurances to be found anywhere in this draft. The thrust to build as much as possible, but to avoid the areas needing reform, are clearly seen throughout.
- **So, does LBE sense the public concern** arising from the fact that this dLP has been roundly rebuked by all residents groups? Across the spectrum. Will it just plough on to process a pariah plan in lonely isolation, the policy nobody believes in, unfit for purpose and unmandated? Or listen and have the satisfaction of public buy-in to a revised and relevant inspected plan?

### **3. Attack on the Green Belt**

The redesignation of a significant part of Enfield's green belt for development has been foreshadowed for some time in council announcements. Arguments have been deployed over the past 5 years to prepare the ground, long before huge build targets came onto the scene. FERAA has paid close attention to the substance of the case so far presented:

- **Within LBE the culture has persisted some time that the borough has a relatively large amount of open space**, so

should extend spatial development to closer to the average of London boroughs. FERA has often called this approach as unfounded; the purpose of green belt remains to protect living standards and the environment, not just for the borough, but to make a contribution benefiting all of London, as intended by the Planning acts of 1947<. LBE has often attempted to elide past this founding purpose, employing cosmetic arguments on land quality and public access, offering swap-outs with no genuine intent to make good, using mendacious calls on land for economic optimisation. Landgrabs by any other name, we reject all of these specious arguments and with cause.

- **The amount of green belt slated for development in the dLP is put at 7%. This is a deliberately misleading representation.** Removing parks and other more securely protected sites means closer to a quarter of assignable green belt is being pressed into development. This is contrary to regional and national policy. That landowners of green belt want to realise gains is of no significance to the dLP.
- **Our most fundamental finding against building on green belt** lies in the absence of a compelling case based on absolute need to build on protected land.

#### **4. What is the housing need in Enfield?**

It is a mark of the age that facts to do with housing have been subordinated to political claims. We see no reason to swallow self-serving assertions of national housing need if contested by the facts.

- **There are sufficient homes to house all residents in the UK.** There are more than sufficient rooms for comfortable living for the whole population. There are at least half a million empty premises. There are also a large number of homes with unused rooms, the owners inclined to downsize but needing help and encouragement, relieved of tax penalties. There are many thousands of properties where upgrades and modernisation are adding to the housing stock. There are large areas of decommissioned industrial operations across the country where quality housing can and should be built – if directed there by government. There are very large communities who have recognised the realities of over concentration in the south east and have made midland towns their own, living in quality conditions not available in the south east. There is not a national housing crisis, there is a governmental failure to apportion and direct resources to maximise benefit to the population at large.
- **Dispersal of available housing / living space over the country** may never be optimal because of population shifts. Local pockets of poor provision do not make for a national dilemma.
- **Unfulfilled demand is felt nationally** in that most would like to live in a larger more spacious dwelling with gardens, in a low density high amenity neighbourhood. This ambition does not legitimately fuel a national paranoia towards the rate of house building. Politicians do that, and such ambitions should not be incorporated into calm planning considerations
- **This is especially relevant when considering the amount of housing taken up for investment and lifestyle purposes,** an

important sector which can only further expand. Planners must realise a significant portion of what they propose in the dLP will end up so. Government may work to depress investment buying, so far it has failed. Building out Enfield to feed this instinct in those with fiscal leverage is already deflecting from the borough's core needs.

- **Total home deliveries nationally to 2019 showed five year growth year on year to 243,770 units in UK.** The population has not increased at that rate, so real progress has been achieved in raising home numbers. Recent developer announcements continue to support optimism this growth trend will continue. House building outside the M25, especially into East Anglia is running at a high level; these are mainly ground level units of quality with supporting amenity.
- **The target set for London by the Housing minister, 66k units pa,** has been applied cookie cutter-like across the 33 London boroughs; the argument that this is not political but the result of careful and rational planning allocation is of course without serious foundation. It is not conceivable that each borough had no opportunity to argue its case, but it appears LBE failed in that endeavour too, so we are allocated 1274 units annually, and looking for space to build. But how was it Enfield accepted its target if it now finds it has to break all boundaries to deliver it? And we hear that if we fail to meet this target, special measures will be applied; we tremble.
- **So who will occupy them?** We note the new build will not benefit the majority of low income or temporarily housed in Enfield

because prices and rents are beyond mean incomes. These developments of many thousands of units would end up in the hands of refugees from zones 2-3 seeking more amenities than inner boroughs can reliably offer - having themselves long ago allowed their populations to exceed their amenity support levels. Will Enfield now intensify its role as a commuter silo?

## **5. What is the optimum housing type policy?**

- **By rights, and if the market were operating strictly to economic influences**, home seekers would move towards areas of lower cost and greater amenity. As we all know, family and community ties work against this with the result that, in extremis, families in the south east with annual incomes only 7% of the cost of a home purchase are striving to square the circle of their incapacity to live where they prefer. Does the state have a responsibility to remove the economic impediment and how can it perform that trick without jacking up the cost of housing (as it does now with "affordable" schemes) It is noticeable that borough programmes to build social housing are stymied for lack of return – even when interest rates are low. Trying to buck the market at scale is bound to fail.
- **Subsidising too many families to remain where they prefer** rather than let market forces take the strain is a political issue. How does the dLP seek to address that? Frankly, it cannot and won't. The borough's target build rate (1274 pa) will never be achieved, the terrain prevents that along with the need to extend amenities to ensure some quality of life for arrivals in new estates. It is no different in other outer boroughs but they have

not all resorted to mass tower developments as Enfield is proposing. The population increase subtended by the dLP will require the equivalent of 200 x 20 story towers completed over the next 18 years. It is a target too far and LBE should face up to it, not bury the green belt.

- **A further social distortion then arises from lower income families only able to afford undersized accommodation in London,** leading to deprivation and depressing levels of overcrowding. We note that the size of flats in new developments is tending to ever smaller floor space which in no way assists the social ambition to house decently, respecting the need to provide study space, home working areas and separation for older children of different genders. Planning officers should counter this trend but they fail. Housing schemes should be held to the same quality standards as now set out for public housing, or, negotiated with developers, perhaps applying S106 funding by way of reinvestment for quality features.
- **We also take issue with the cosmetic branding of developments as meeting "affordability" conditions.** Although the public at large may not realise it, this term cloaks a variety of devices that for the most part amount to a small discount from market price, not in any way an alignment through subsidy to social rent levels. This is the reality in London; it is distressing to see families needing larger accommodation for a healthy and progressive lifestyle obliged to camp in small accommodation because of price. LBE may argue this is an issue of government policy but in its many facets the borough has to pick up a large tab for the gap between policy and need. Compounding the

problem for the future by passing developments with inadequate proportions of family sized housing is beyond reproach. Developers' returns are very healthy, they need to be pared in the interests of social equality.

- **Pressure to upgrade developments to deliver more affordable larger units will continue** but land costs are punitive in London. The inducement remains to relocate to towns offering better value for money (up to 5 times more space per £ in northern counties vs London) higher amenity specifications and social prospects. That the government has no regionalisation or redistribution of population strategy is no reason for LBE is distort its own policies in some misplaced spirit of accommodation.
- **The dLP solution is to increase build rate in Enfield**, pile it higher, ignoring the social deprivation and amenity-free conditions. But this merely prolongs the deprivation, since new build costs up to 40% more per square meter to bring to market vs old – clearly of no help to lower income families.
- **Social progress cannot be achieved via small boxes pressed on the Planning Committee as meeting modern requirements.** They do not and everyone knows it. We seek quality solutions, real progress, and standards, not adherence to the meanest notions of living space.
- **Ecology and environment are not new impulses in selecting where to live.** They contribute heavily to quality of life for all, especially families which are naturally attracted to open boroughs such as Enfield. Over the next 20 years under this plan

this attraction will steadily cease to exist and this unique quality will disappear.

## **6. Families and children first**

FERAA is keenly focused on the absolute need to prioritise improvements in housing for those in temporary accommodation, and residents living in deprivation:

- **Young families pass through stages of needing ever greater space to thrive.** The cot stage does not last long, then mobility, so essential for overall cognitive development springs into focus. Safety from the perils of stairways, lifts, balconies etc becomes imperative. With later stages kids need to socialise effectively which is not possible in a small one room flat, especially one at elevation. Towers present even greater problems because parents cannot let loose their children without direct supervision which is not possible in most circumstances. Family life at more than 4 stories is stressful and restricted.
- **All developments now seek to block the largest footplate and elevation without regard to detriments.** Some such as the absurd A10 Colosseum project break all bounds with huge disadvantages. These must not be permitted; there is no case for, and a very strong case against
- **Developers frequently seek to minimise space allocations** as they cram in units to the cube over the maximum floor plate.

Storage is nugatory and play space as good as none. Offerings of communal space are at most nominal. These social impacts are not key parts of planning regulations but feature prominently in the success of a development. Developers pointing to nearby fields, or a park some way from the tower, or a scrap of open courtyard are deceiving us all – a pointless deception.

- **There can be little disagreement between communities that children achieving their potential, rather than an educational attendance pass mark, is the first order of business.** We see little assurance that future amenity / educational provision will run other than behind the curve. The plan calls for incoming residents to surge by 250% over recent rates – provision is not going to keep up is it?
- **What of the majority? FERAA seeks reassurance as to how the present population's needs and aspirations to improved quality of life,** are to be met but concludes this draft is mostly concerned with incoming residents and their expectations. But for both groups the need is for family accommodation to nurture the growth and prosperity of this and the next generation. The plan falls short on this account. Quantity over quality is an unacceptable basis for long term improvement in Enfield's housing, a solution to deprivation and sub-optimal health outcomes.
- **Looked at in the round the dLP reads as though the council regards current overall low housing densities not just as an opportunity, but as a duty to correct.** But lower density is a measure of spatial satisfaction and quality of life. The acreage

within the borough being fixed in two dimensions, it is no solution to intensify via the third dimension and project residents living happily at 29 stories in amenity free conditions. They don't. Residents are not resources to be intensified for their own good. There are limits to population growth when the impact is so negative, and this dLP fails to recognise this essential.

- **This plan fails to garner public support precisely because its approach is all about intensification of the built environment, planning rubric, and virtually nothing by way of human perspective.** This of course follows its current policy of putting on residents what a small group of isolated officers considers milestone developments that breach skylines and set a pace for much more intense use of space over the whole borough. A total densification programme squeezing out amenity and space to relax, so typical of suburban living but crafted along inner urban lines. Had this dLP been visioned from street level upwards it would not have disregarded the needs and aspirations of current residents. Current overall density of homes in the borough is key to the life aspirations of many thousands of people, a goodly number who are economically successful and valuable to the community. How barren is a plan that merely concentrates populations by intensifying use of spatial resources to align with political targets? We resist from this empty soulless programme.
- **FERAA harbours a well-founded concern that LBE planners will accept most propositions, downplay detriments, and decline to exercise restraint even over the most egregious applications.** The block sited at the junction of the A10 and M25

is a clear indicator of the lack of discretion and quality applied to home planning in the borough, leaving inhabitants to live in unmentionable concentrations of pollutants. Can we leave planning to these influences?

## **7. Major Development Proposals**

**Housing:** Of the numerous development proposals in the dLP, most of which were not proposed by residents but by landowner interests seeking to crystallise gain from speculative holdings, we choose two of the most egregious examples and most likely to fail;

**7.1 Crews Hill** is presently a semi-rural enclave of land and gardening based retail activities and some housing, remote from other parts of Enfield and amenities, cut off to the north by the M25 and served by small rural roads. A less likely or desirable site for development to house some 7000 residents in 3000 homes is hard to imagine. The cost of residential integration with Enfield to modern standards is considered prohibitive, so will remain an impediment to a successful development. Proximity to the M25 is a major health negative which this draft fails to appreciate.

- **Crews Hill is apparently suitable for development because it is classed as brownfield.** It is actually a thriving specialist retail and supply centre; LBE accords no weight to its economic and employment value in proposing it be reclassified for housing. That some of its enterprises have strayed beyond their

classifications is to be applauded, not advanced as a reason to put their sites into play. Is this an enterprise borough or not?

- **The spread of housing types envisaged is once more of little value to Enfield's needs.** At least one developer will prioritise larger expensive houses, and others will prioritise high density, maximum elevation tower units with all their attendant social stresses. So, relief for the 4500 Enfield families in temporary accommodation is highly unlikely. Claims for "affordable" housing will be mostly market discounted and still beyond the means of the majority.
- **It's time to get real with new housing costs which are typically 20-40% premium over existing housing.** To pose this source as a solution to families on low incomes is to reveal economic illiteracy of a disturbing quantum. The upshot of this is that by 2039 there is a high probability that a similar number of families will be in temporary housing in Enfield.
- **It has to be firmly recognised by local and regional government that the high cost of living in Enfield** is a major impediment that cannot be washed away. Cross subsidies in the form of "affordable" offerings are just that, so force market prices even higher. All taxes end up in the market place – that comes with a free market. This draft seems to elide from recognising the facts and proposing applicable solutions.
- **Modern amenities to support a Crews Hill development,** such as basic shops are non-existent and will be sparse even after construction; how could they be otherwise? Schools, health fa-

cilities, sports and recreation will all be limited and much delayed.

- **Connections by road are restrictive**, and there is no chance of improvements to east or west – upgrading rural roads over such lengths is not meaningful. Connecting into to the A10 is a hopeless endeavour, it is one of London's most overloaded arterial roads, with no prospects of improvements under this dLP. To the north the M25 is a permanent barrier. Enhanced connections to the south are also not in prospect. Congestion on and off-site is a given, further impacting the environment.
- **Likewise, site proximity to a low capacity rail connection is marginal, almost irrelevant**, to the likely pattern of transport need should this scheme proceed. The model of new developments focusing on and served primarily by a train service, has been so over-deployed as to defy reason. Some commuter residents may use the train, that's it. The remainder will travel by car or bus if any worthwhile service exists, which at present in CH is not the case. We await lip-curling exhortations to cycling towards the A10, verily the bottom of the locker in credible arguments.
- **Amenities are key to successful developments**, a lesson learned in the post-war years of tower build in east London, all of which failed socially. At Crews Hill they will remain sparse and residents will seek compensating outlets elsewhere, the very negation of planning aspirations to communal self-sufficiency and low use of transportation. Whole family infra-

structure is needed to approach modern standards for suburban community. Crews Hill has no realistic prospects of such standards.

## **7.2 Vicarage farm (VF)**

**Another major incursion into green belt open land** sited between the Hadley rd to the north and Bramley rd to the south. Prospectively housing some 12000 in 5000 units and completely in-filling the open space between Trent Country Park and Enfield town outskirts. A typical ribbon development opposed by all authorities pressing for moderation and proportion in suburban town development.

- **FERAA sees no case for this proposal other than Comer are pressing for the right to crystallize gains** from their land ownership. It is opportunistic and contributes nothing towards solving Enfield's need to house lower income residents better and more affordably.
- **If approved, the weight this development would impose on the stretched infrastructure of western Enfield** cannot be over-stated. None of the amenities and services required to sustain a development of this size can be added for lack of space in the neighbourhood. "Sweating the infrastructure" is resolutely opposed. The prospect of new schools and other amenities being levered into parks is real. Retailing cannot be accessed other than by car and the local schools are fully subscribed.

- **Road connections are perhaps the leading negative against this development.** The site is effectively hemmed in west and east with no chances to add to the serving roadways – Bramley rd and Hadley rd. These two are key highways connecting east and west within the borough and beyond. The threatened advent of mileage charging will divert considerable traffic onto these roads, further reducing their capacity to serve the proposed VF site.
- **Train facilities to London centre on Oakwood station but this is apparently about to lose its carpark to development,** so reducing access to the service for all but especially the mobility impaired and vulnerable groups that TfL has no apparent interest in serving. Access to employment will be curtailed. Orbital bus services are an inappropriate substitute, where they exist. Cycling……
- **We can expect car curtailment policies to be applied to VF, rendering employment prospects even harder to realise.** Access to health and education services will all entail a significant journey, adding to congestion and pollution. There is no employment within 2 km of the site.
- **Again, we forecast the density issue will play a major role in blighting this site,** if the numbers of units projected are approved. Density leads to competition between families for peace, security and the ability to withdraw from others. None of this is possible when surrounded by others going about their lives. Lower, sub-4 story elevations and lighter densities, per-

sonal outdoor space, with light and outlook, storage space within etc are essential qualities of modern accommodation. The Comer development plan does not interest itself in diluting its returns with such details - we expect the North London Business park model to be imposed, if approved by LBE.

- **Density and elevation will clearly impact Trent Country Park protected views**, contrary to LBE assertions of care for the heritage and ecology of the borough. However, when a planning decision arrives we expect the planning department to override all environmental and protection of disability group assurances. It has form.
- **No worthwhile recreational facilities will feature, unless incorporated within the site**, which as we all know will press development ever higher and with fewer on-site amenities. A notional football pitch is probably about as good as it will get. Pedestrian access to Trent Park will provide some relief for dog walkers, but there are no other modern facilities there, nor should there be if TCP is to retain its character. We leave mass intensive sports building to Spurs who are steadily absorbing the whole of north Enfield, with LBE's support, but that is some way distant by car.
- **VF represents the essence of excessive growth**, not only creating housing conditions where flourishing families find it hard to sustain their ambitions, but impacting heavily on the local population who have rights not to be swamped. There is no

specific onus on residents to yield space and amenities to accommodate unreasoned influxes.

## **8. Are Employment policies competitive?**

FERAA is concerned that LBE is not pursuing employment policies that upgrade prospects for the talented and ambitious within the borough. Much is claimed about friendliness but supportive action is not in evidence. A step change in the borough's prospects over the next generation is largely dependent on its attitude towards employment and the infrastructure required to bring it about.

- **Of the 60,000 influx LBE proposes to bring to Enfield over time, 2/3rds will typically seek employment.** Education and training will play a part in bringing skills up to standard but attracting enterprise here requires attention to retailing, housing, schooling and all the facets of life. If senior entrepreneurs choose to live here, it is a great start to building a caucus of enterprise that can be self-sustaining. Wrecking the suburban character with over-development will deliver the opposite.
- **Encouraging negative investment such as distribution warehouses (wholesale and retail) has the opposite effect.** More jobs for pickers and fork lift drivers, many on minimum wages, and little else. Enfield is already over-populated with sheds. It must resolve to permit no more precious land resource to be devoted to low return investment such as distribution sheds. Logistically they are best sited out of town, not positioned where in a short while they can petition to build more lucrative houses on re-designation. We therefore oppose any extension

of this activity, especially the proposal to permit development close to the M25 at J24 which we regard as so perverse as to be incredible.

- **Employment of a higher technical order is to be encouraged and facilitated over retail or allied services.** Problems arising from lack of personal fulfilment will be exacerbated if excessive population influx to the borough faces a continuing shortage of higher earning employment opportunities. The council knows this but has done nothing to resolve the stress, and this draft helps in no way.
- **Anyone with a mobility impediment will now have enhanced access to employment working from home,** avoiding commuting locally or long distance. This shift will be one of the largest impacts of covid and mostly permanent. But of course accommodation that does not support home working, such as undersized flats, and where children are present, is not going to benefit this group as it should. Disability provision on new schemes is not lustrous. Space is minimal and impaired people need more not less to move and operate with confidence and safety.

## **9. Industrial development policy and supporting infrastructure**

- **Economic policy in Enfield has been severely neglected for far too long.** Establishing clear policies and allocating skilled resources to optimise investment opportunities and leverage the borough's positives has not featured. Instead, an over-reliance on large chains to provide resources and initiatives for regeneration has clearly run out of steam and is no longer relia-

ble as a mechanism for advancement. And we are all aware the borough has an unenviable record of low added value employment, limited career opportunities and skills development. Is there evidence that inadequate land allocation to commerce has contributed to this scenario? We think not.

- **Industrial land use has not been planned advantageously in the past**, resulting in excessive low density use, as exemplified by large distribution sheds. Distribution centres are major absorbers of limited land, are low grade employment opportunities, and add greatly to congestion and pollution in an area already blighted. They are best located outside the M25 where land is lower cost, residential less constraining, and road access easier. The borough road network is in no condition to support such enterprise and the traffic contributes greatly to deprivation in the area. Expansion is out of the question and any opportunity to redesignate the land for higher density / value industrial use should be taken. The dLP calls for 54ha more industrial land allocation – this serves no constructive purpose and is depressing the borough's capacity to build needed homes, especially in the east. Enfield is not underprovided with industrial and commercial land. LBE should not fall into the trap of promoting distribution sheds to replace downsized retail parks. They are not equivalents.
- **This dLP now seeks to add more distribution centres close to J24 / M25, a proposal of stunning negativity**, given the limitations of feeder roads to that junction. At the same time the dLP insists there is so little developable land for housing that dense accommodation in high towers must be permitted along-

side arterial roadways (A406) and green belt seized. This cannot be allowed.

- **There are distinct commercial positives to be encouraged. The realisation of the Lea Valley development corridor as a parallel to the Thames Valley is both logistically sound and economically desirable.** Effective amenity improvements to link in with this regional policy are lacking in this plan; higher capacity north-south road connections on both sides of the Lea reservoirs will be top of the list, promoted in conjunction with neighbouring boroughs. The east-west relief road from Bullsmoor to J26/ M25 must be reinstated with government assistance; that it was removed from the NE Area development plan 7 years ago was an error.
- **Enfield cannot increase the size of its road network yet requires improved internal transport capacity for residents and commerce.** It can enhance capacity by improved junctions and underpasses (2 are justified across the A10) in the east. Making best use of road capacity by removing unproductive obstructions inserted in the name of cycling and LTN's, replacing with selective bus lanes to enhance the appeal of public transport is strongly supported, as is a policy of improving intersections.
- **Enfield is cased in major roads** and served by rural scale intermediaries. Yet traffic manages to move the equivalent of half the population of Glasgow (600k pop) every day on such roads. Plus through traffic. There may be little scope for increased traffic at busy times yet the dLP envisages another 20% increase in population over the next 18 years. Peak congestion

may increase but this is no reason to penalise all movement during the remainder of the day, nor to stigmatise reliance on personal transport, especially for the many with families, mobility issues, security concerns, and traders. All road users are free to choose the time of day they travel and we hold it is needlessly damaging to pressure all movements to even out traffic flow by penalty, charge or by force. "Traffic disappearance" is a contrivance without substance and a bust.

- **The attempt by the GLA to hasten modal shift away from cars** by eliminating roads pace, parking, etc can only meet maximum resistance in the suburbs. With a further 20% population to 2039 all seeking equal car convenience for a quality of life, the answer cannot be more of the restrictions that threaten quality of life and freedom of movement for individuals and businesses.
- **Self-employment is a vital thread to planning economic upgrading in Enfield.** It is a form of activity much in the ascendency -we shall see much more in the future, and need to bring it to the borough. We have many advantages for this kind of activity – not least (at present) the environment to encourage living here and space to permit more start-ups, especially in entertainment and technology.
- **Looking forward to an enlivened enterprise economy in Enfield, we advocate start up schemes** to encourage small businesses with physical facilities and costs offsets. We draw planners' attention to the success of Network Rail's arches properties (recently sold off) in providing first step premises for all kinds of value added businesses.

- **Amenities are very much the props to quality of life in the suburbs.** Health, education, employment services, sports and recreation plus freedom of movement - all are under pressure or not slated for upgrades anytime soon. So, in this dLP freedom of movement is played down as inconvenient to the rapid growth that is core to the London Plan, which itself offers no major transport improvements to 2041. Better management of existing services, rather than suppressed use or exclusion, is required to support quality of life for residents. On past form it's doubtful that will be delivered.
- **By going for substantial growth over the next 18 years,** existing resources will be strained and open land further threatened. How could they not? This DLP insists there is so little space for growth that the green belt has to be cut substantially. It follows that schools, typical of facilities that require space in central positions, will look to our parks to yield sites – whatever the regulations. A population of this size is not over-provided with recreation space and no new sites are proposed; a plan to secure current parks from threat is essential.

## **Conclusion and FERA recommendations**

It has not gone unnoticed that LBE began to sound the death knell of the 2010 Enfield local plan in 2015 and to undermine its influence on planning decisions. By so doing it has set in train a public expectation that it will always defer to other authorities and imperatives, and disregard even a freshly minted Local Plan - to suit its agenda. The new LP provisions should therefore be as unambiguous as possible so as to reduce evasion.

Having urged the need for an updated plan it then took 6 years to bring forward this prospectus, in reality a manifesto for another term following the local elections in May 2022. Rather obvious.

Residents rely on the LP to protect their interests from mounting economic pressures that degrade their quality of life if not controlled and regulated. A sound and mandated local plan is an essential. The needs of residents have featured much in this deposition largely because they have been severely overlooked in this dLP.

LBE appears to favour a major population growth plan for the next 20 years funded on converting landholdings to residential, relegating environmental protection to a few small sites on the periphery, with severe amenity lag. The prospects of delivering a positive outcome are remote, and the aspirations of committed residents to raise their quality of living are threatened, or likely to be voided. Indeed there is a realistic fear the quality of life will deteriorate from an overweight of unsupported expansion and destruction of heritage. The council must reconsider - the 2039 outcome projects a vision too negative to proceed, too much in the hands of third parties to control.

If residents, as stakeholders, were to be canvassed openly we believe this plan for widespread environmental destruction would never even have made it past section 18. It contains nothing positive for them. Their interests have been embayed and those of property developers advanced.

Given a clear picture of the borough's prospects, unburdened with copious distracting paperwork, there can be no doubt 80+% of voters would opt for retention of gentle progression with the present plan

and eschew the dystopia now on offer. What a commendation for a long range plan?

We have good cause to reject this draft and, apart from its self-serving convenience, the council offers nothing meritorious in advancing it. Evidence of good stewardship must be restored if widespread acceptance is to be won.

FERAA September 2021

