



Southgate District Civic Voice

Comments on Enfield Local Plan Main Issues Published June 2021

Southgate District Civic Voice (SDCV) is a local amenity society for the Southgate area. We comment below on the policies and proposals in the plan which directly affect our members' interests and of which we are highly critical.

SDCV broadly supports the comments on the plan submitted by The Enfield Society with whom we have collaborated in the preparation of our comments. The comments below on housing needs are a particular example of the result of our joint working with The Enfield Society.

Policy SP SS1: Spatial Strategy: Housing Needs

The Plan relies heavily on the need for more housing based on the London Plan requirement for 1,246 dwellings per annum. SDCV would argue that the London Plan allows Boroughs to plan for a lower level if there is compelling evidence to suggest that approach.

SDCV has concerns about the weight being placed on population and household projections when they are used to set targets. The Office of National Statistics (ONS) and Ministry of Housing Communities and Local Government (MHCLG) projections are mechanistic projections of recent trends. ONS say explicitly that they base their assumptions on past demographic trends, and do not attempt to predict the possible effects of any future political or economic developments. This means that no attempt is made to factor in the UK's departure from the European Union, Covid or policy changes (such as levelling up the "Red Wall"). They are not forecasts and the trajectories they present may be far removed from what comes to pass. They should be seen as a starting point for debate, not as fixed targets.

There is also great uncertainty about the targets which MHCLG will set for local authorities. Three quite different formulae have already been proposed. The figure of 4,397 new homes per annum quoted repeatedly in the Plan documents (and in the Leaders Summer 2021 update to residents) comes from the December 2020 formula – but the 4,397 figure comes from an abandoned algorithm and should not be used. Its only purpose seems to be to make the proposed lower figures look more reasonable.



Even the latest (April 2021) iteration is unlikely to last, given opposition from rural areas in southern England and a desire to support development in northern England. In reality it is very difficult to predict precise figures and all estimates of housing need and population growth need to be qualified.

It is also worth noting that MHCLG has decided to use 2014 rather than 2018 household projections, in the interests of “stability”. This is important for Enfield as the housing need for purely demographic reasons declined from 2,327 to 678 between 2014 and 2018. If an algorithm would be affected to that extent by moving on just four years, it suggests that the MHCLG algorithm is not fit for purpose.

It will be the GLA which ultimately allocates the overall London requirement across boroughs based on its own projections, but the constant moving of the goal posts means that even the total requirement for London is uncertain.

In addition, the assessment does not acknowledge the number of dwellings on brownfield sites already in possession of planning approval for which there is no known start/completion date.

Paragraph 8.1.15 of the Local Plan explains the discrepancy in the target numbers in the total of 30,192 rather than 24,920. The higher figure includes 419 completions since April 2019 and is intentional “over planning”. There is a detailed explanation of how the targets were arrived at in the Housing Topic paper, part of the evidence base. The options assessment in table 8.3 of the Local Plan (page 188) acknowledges that for the targets beyond 2029 (i.e., beyond the targets in the London Plan) the Council has deviated from the London Plan approach advised in 4.1.11 (of the London Plan). We question why the housing figures are not being more closely questioned and note that Enfield’s assessment of school roll projections over the last ten years has considerably over-estimated the need for primary school places.

In addition, 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.

We query the assumptions, based on the viability paper, that greenfield sites such as Chase Park will yield 50% affordable housing. Enfield’s track record in achieving affordable housing does



not back this up. Developers will inevitably find a way to reduce the levels of affordable housing to well below this level, for example by finding abnormal costs. London Councils has recently argued convincingly that market failure should be acknowledged and direct public sector provision of affordable housing accelerated.

SDCV supports the need for suitable housing to meet the housing needs of different groups, including for families, older people, and for affordable housing. There are many examples of high-quality developments across London where such housing has been achieved on brownfield land through efficient layouts and a good mix of planned private and public space.

Policy DM DE6: Tall Buildings

The indicative maximum building heights shown on Figure 7.3 within the placemaking areas could have negative impacts on many of the Borough's centres. These building heights range between 9 storeys and 26 storeys, including 13-storey towers within the Southgate Circus Conservation Area. The London Plan figure for the maximum height within sensitive heritage locations equates more closely to 7/8 storeys.

Figure 7.4: Appropriate locations for tall buildings

The designation for Southgate appears to encourage tall buildings in the roads surrounding the town centre. The legend showing proposed heights is very unclear, as are the roads included. However, what is apparent is that part of the area suggested surrounds the nationally important grade 2* listed underground station and the Southgate Circus conservation area. Tall buildings in this area would be detrimental to the siting and views of the listed buildings. Additionally, building high at the top of a hill will have a greater negative impact on the surrounding area.

The designated area to the north of the town centre is residential with buildings of 2-3 storeys only. Much of this housing is in terraces built in the 1880s and early 1900s. Tall buildings close to these terraces would be completely out of character and dominate the area to its detriment. Indeed in PL6, it states 'Away from the high street the area will maintain a residential character.' This tall building strategy seems to be at odds with that in PL6.



SDCV is opposed to policy DM DE6. The Council needs to reconsider this draft policy, particularly in the light of the London Plan and the Secretary of State's letter to the London Mayor dated 20 December 2020 and quoted in the comments on the Enfield Plan submitted by the Enfield Society in September 2021.

The Council's policy on tall buildings is confused and difficult to comprehend. An example of the confusion is provided by the proposed development up to 17 storeys high at Southgate Office Village, 286 Chase Road, London N14 6HF. SDCV is currently like Enfield Council a rule 6 Party at the public inquiry opposing this proposed development. Our viability assessment for the inquiry shows that a potentially commercially viable development for the site could be achieved by building up to a height of 4 to 6 storeys. Development to such a height would be in line with the other surrounding buildings in Southgate.

SDCV does not have any objection to increased densification where new buildings are in scale with current buildings.

Policy DM BG10: Burial and crematorium spaces

This policy allocates Firs Farm Wetlands (Site ID SA59) as a site for burial and/or crematorium use. The shortlisted crematorium site in the Draft Local Plan has already been designated for community use. Firs Farm Wetlands is a site of important ecological significance in a residential area, with close proximity to three schools.

SDCV opposes the draft policy DM BG16 as it relates to Site ID SA59 in the Draft Local Plan because:

1. Firs Farm wetlands is a vitally important community resource, essential to the health and well-being of the local people
2. The draft Policy directly contradicts Strategic Policy SP CL4 in the draft Local Plan. This identifies Firs Farm as facilitating and contributing towards developing sport and leisure facilities in Enfield.
3. The proposal will significantly affect the local Site of Interest for Nature Conservation, and reduce the biodiversity and nature conservation interest of Firs Farm wetlands, contrary to several other policies in the draft Local Plan.
4. The proposal will reduce the effectiveness of the flood alleviation provided by Firs Farm wetlands, which Enfield Council has spent more than £1 million to provide.



5. The proposal will adversely affect the environment and local traffic, and this has not been properly considered in the Integrated Impact Assessment of the draft Local Plan.
6. The policy introduces uncertainty into the future use of Firs Farm wetlands that jeopardises funding for projects secured by local community groups (e.g. from Thames Water) that have been endorsed and supported by Enfield Council.

SDCV understands that “the Leader of the Council Nesil Caliskan wrote on 9 September to the Friends of Firs Farm with an assurance that *“we will not be building on Firs Farm Wetlands - a cherished and much appreciated asset”*. SDCV is pleased to see this assurance and wonders why it is that **policy DM BG16** as it relates to Site ID SA59 for a crematorium was included in the draft local plan.

Policy SA32: Sainsburys Green Lanes

The plan proposes a mixed use development of 299 residential units. Before the Sainsburys was built the Secretary of State in 1986 imposed a range of conditions, one of which was that the green space be retained for community use. The grounds include a number of trees protected by TPOs and a rich variety of wildlife including three species of woodpecker. SDCV supports the continuation of these conditions.

Policy SA42: Fords Grove Car Park N21

The draft plan includes a proposal to build 24 houses on the car park. SDCV considers that a desirable use of this space would be as an open space and children's play area, which the area lacks.

If residential development were to be planned for this site it would need to be part of an overall approach to planning of the local environment. One need is as we have said for open space and a play area. Another major need for the area is a traffic management scheme to address the following problems:

- on street parking on both sides of Fords Grove by workers and commuters avoiding paying to park in the Fords Grove car park and taking possible spaces for Fords Grove residents' vehicles
- the resulting traffic congestion, particularly during the morning and evening journeys to and from work and school

- the pollution that the traffic produces, not just from exhaust fumes, but also dust and particles from tyres and brake linings which deposit films of dust inside the houses in Fords Grove.

Our preferred option for Fords Grove is that it should be closed to through traffic.

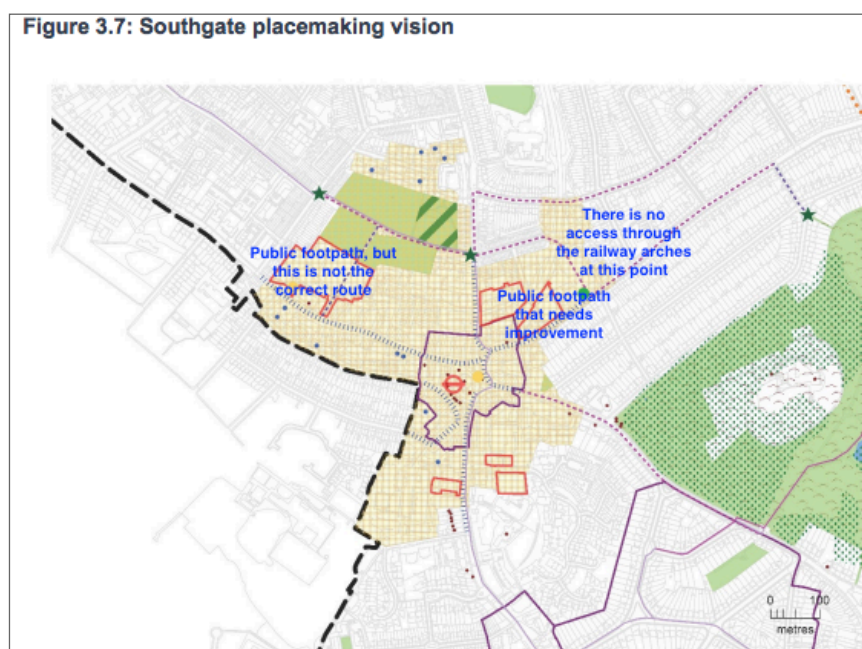
Strategic Policy PL6: Southgate

In the Southgate Placemaking Vision, the final line finishes mid sentence, so it is not clear how underused or vacant shop units and office use will be consolidated.

Southgate Placemaking Vision
<p>Southgate will be a thriving district centre that has a unique character derived from the listed tube station building and other heritage assets. It will act as a community and cultural hub, building on strong transport connections. Away from the high street the area will maintain a residential character. The distinctive quality of parks and open spaces will be sustained and enhanced with improved accessibility for all users.</p> <p>Existing and new clusters of small to medium office spaces will take advantage of good links to central London. It will have grown into an established cluster, making use of underused or vacant shop units and consolidating existing office use through.</p>

Figure 3.7: Southgate placemaking vision

This figure contains a number of interesting ideas that we welcome, however there are various errors, which make it incomplete and unsatisfactory. See annotated map and details below.



Corrections needed:

- There is a missing legend for the underground station symbol.
- Not all local heritage assets are included e.g. The Hart pub in Chase Road.

- Improvements to walking route:

The path along Hillside Grove to Winchmore Hill Road. The path shown appears to go under the underground track railway arches at the end of Hillside Grove presumably to the back of the Leisure Centre. There is currently no route through and no walking route out from behind the Leisure Centre. Therefore this should be designated as a 'new walking route opportunity' and it would be welcomed as such. See Google map street view from both sides of the arches to show current obstruction.



- New Walking Route Opportunity:

The path through the ASDA site in figure 3.7. There is a public footpath from Chase Side to the path through the allotments, which runs alongside ASDA. This is an old footpath that was diverted from its original path when ASDA was built. It is well used, but desperately in need of improvement.



There is a footpath from Winchmore Hill Road across the underground railway via a bridge into Park Road. This should be designated as a walking route opportunity as it could be improved and properly sign posted.

Further comments on Figure 3.7:

We welcome the improvements to the walking routes and implementation of new cycle routes.

The intensification possible sites – it is not clear exactly where these are as the map is not detailed enough to see actual buildings. However, they appear to be sites of garages or residents parking. While supporting intensification in principle where it is in scale with the surrounding buildings, we are concerned that the removal of garages will have implications for the residents of the surrounding flats. These appear to be potential redevelopment sites, but there is no detail included.

Point 5: Evening and Night time economy – Southgate has many cafés and restaurants that remain open into the evening, in addition the Southgate Club has evening events. The only late opening premises is The Hart, which is open until 2.30am. Given that Southgate town centre is surrounded by housing, and many of the shops have flats above, we are concerned that uncontrolled late night opening would be detrimental to the lives of the local residents.

Point 6: this states that 'The Council will work in partnership with key stakeholders (including TfL) and landowners to devise a cohesive public realm strategy'. Any discussion should also include both the businesses and the active community groups (e.g. SDCV) to ensure that the strategy meets the needs of all stakeholders.

Point 7: the list of parks includes 'Southgate', but there is not a park called Southgate, however, Oakwood Park is missing from the list.

PL6: Southgate – Site Allocations

SA23: Minchenden Car Park & Alan Pullinger Centre

The car park listed as Minchenden Car Park in Leigh Hunt Drive is used by both shoppers and commuters. Its use has been promoted by residents in feedback to the Southgate regeneration



consultation, in order to encourage shoppers to park here rather than in the town centre. This car park is key to removing cars from the town centre and driving through the area. Building on this car park will make it more difficult to achieve the aim of removing cars from Southgate.

The Alan Pullinger Centre is the only youth provision in the immediate Southgate area. It is used by a wide range of groups and has been instrumental in helping youths who may potentially exhibit anti social behaviour. Removing this facility would be detrimental to the lives of many local young people.

Rather than removing this completely, it could be redeveloped to provide better provision for youth groups and other local community groups.

Missing details on site allocation

On Figure 3.7, there is a site allocation, which appears to be Southgate Library. No details of this site have been included in this plan. Further details are needed in order to be able to comment.

**Southgate District Civic Voice
September 2021**