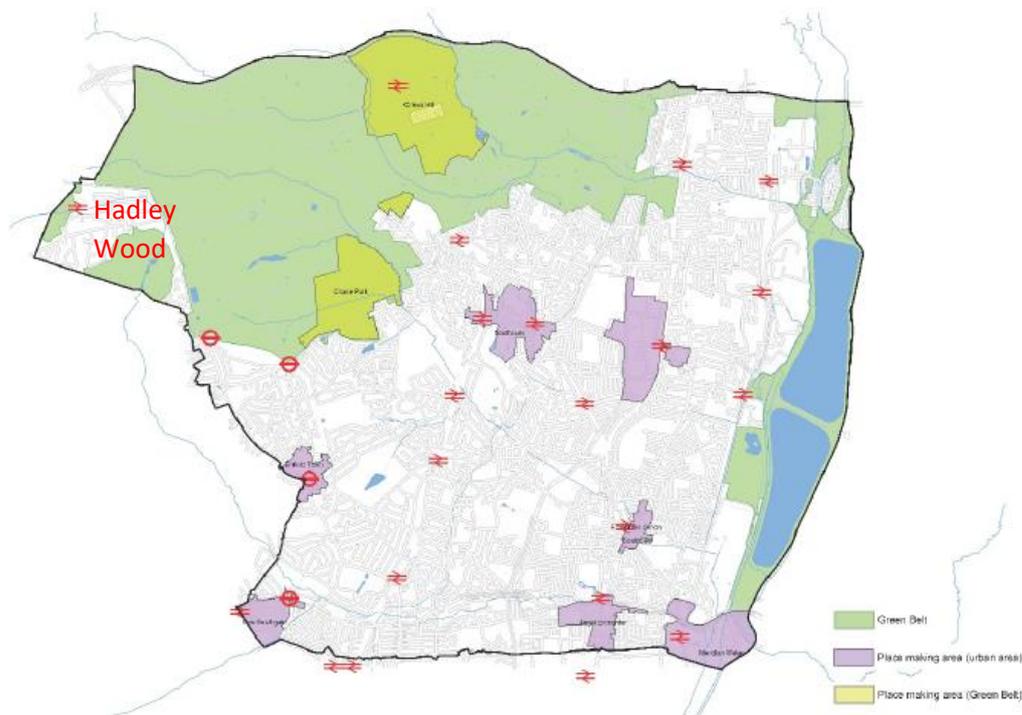


Draft Enfield Local Plan 2019-2039

In consultation 21 June to 13 Sep 2021

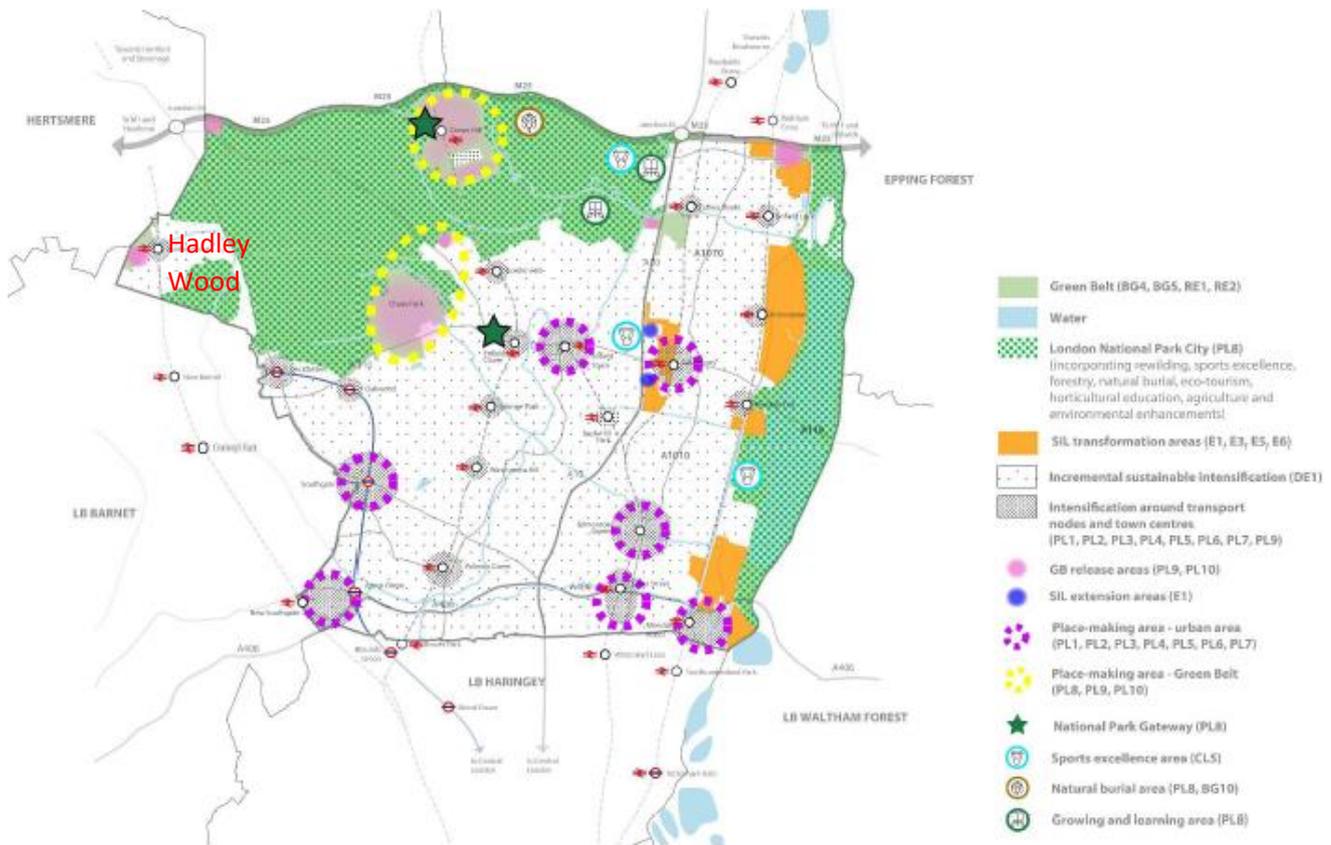
- Local planning authorities must have a Local Plan that sets out their planning policies. Enfield's new 20 year plan reflects the Localism Act 2011, new National Planning Policy Framework and the 2021 London Plan.
- The Plan will replace existing documents such as the Core Strategy (2010) and the Development Management Document (2014).
- After the 12 week consultation the Planning Dept will review the feedback and put a revised document to the Council for a vote. After that it will be sent to the Secretary of State and Planning Inspectors for evaluation before it can be adopted. [Note that the document lists questions in various places.]
- The borough currently has 130,000 households but, being on the outskirts of London, 1/3 of the space is designated Green Belt. It also has over 100km of watercourses, more than any other London borough.
- The Plan is based on 25,000 new homes, with the aim being to achieve "Good Growth". Development is concentrated in ten "place-making areas" (not Hadley Wood), directing development to "the most accessible and well-connected places".

Figure 3: Place making areas



- However, Hadley Wood will be affected by:
 - 160 homes on Green Belt land between Crescent West and Camlet Way (= 0.7% of total new units);
 - 30,000m² of industrial space at the start of The Ridgeway (next to St John's School);
 - 3,000 new homes at Chase Park, opposite the Pick Your Own Farm on Hadley Road, which will increase traffic on Stagg Hill.

- Intensification of building density, with additional homes to be built in between, behind and above existing dwellings.



- Key challenges (and opportunities) include:
 - ❖ Climate change, raising real risks of flooding and overheating;
 - ❖ Changing consumer preferences post-Covid;
 - ❖ Housing crisis – median house price in Enfield has risen from £114,000 in 2000 to £319,000 in 2019;
 - ❖ Spatial disparities – the east contains some of the most deprived neighbourhoods in the country;
 - ❖ Housing growth is more than a numbers game and good placemaking is needed;
 - ❖ The supply of new homes can address the housing crisis and help level up the borough, reducing the disparities between east and west;
 - ❖ Emissions can be reduced and biodiversity and natural assets enhanced;
 - ❖ High streets can be transformed into multifunctional hubs;
 - ❖ Attractive walkable communities can be built to make it a healthier place.
- The Strategic Objectives are to create:
 - ✓ **A nurturing place**
 1. Protect employment floorspace and promote development of new workspaces.
 2. Require Health Impact Assessments for major development proposals.
 3. Increase supply of housing.
 4. Provide a variety of housing options to meet the needs of everyone.
 - ✓ **A deeply green place**
 5. Maximise opportunities to experience greenery.

6. Tackle climate emergency by ensuring major developments are zero carbon.
7. Support the objectives of the North London Waste Plan.
8. Require that developments manage heat-, drainage- and flood risk.
9. Protect major waterways through de-culverting, naturalisation and new wetlands.
10. Deliver green infrastructure improvements.

✓ **The workshop of London**

11. Increase employment floorspace.
12. Make the most of industrial heartlands, protecting floorspace and intensification.
13. Support new office development.
14. Diversify town centres.
15. Focus growth and investment on the major and district centres.
16. Draw on character and heritage of Enfield's communities in managing growth.
17. Require developments improve connectivity, accessibility and visual appearance.
18. Deliver active travel routes and strengthen east-west links.
19. Ensure new homes are supported by high quality infrastructure.
20. Strengthen rural parts as a destination in the London National Park City.

▪ **Strategic Policy SP SS1 – Spatial Strategy**

- ❖ provision for at least 25,000 new homes, mostly in four main placemaking areas - Meridian Water, Southbury, Crews Hill and Chase Park.
- ❖ Existing residential neighbourhoods will see smaller scale developments and improvements to connectivity, local environment, and local infrastructure and services.
- ❖ Small sites on the edge of the urban area near Hadley Wood, Forty Hall and Junction 24 will provide for additional housing and employment development.
- ❖ “The Green Belt will be protected from inappropriate development in line with Government policy”.
- ❖ Rural areas will largely be managed for ambitious nature recovery.

▪ The Plan lists various options (recommended choice in bold):

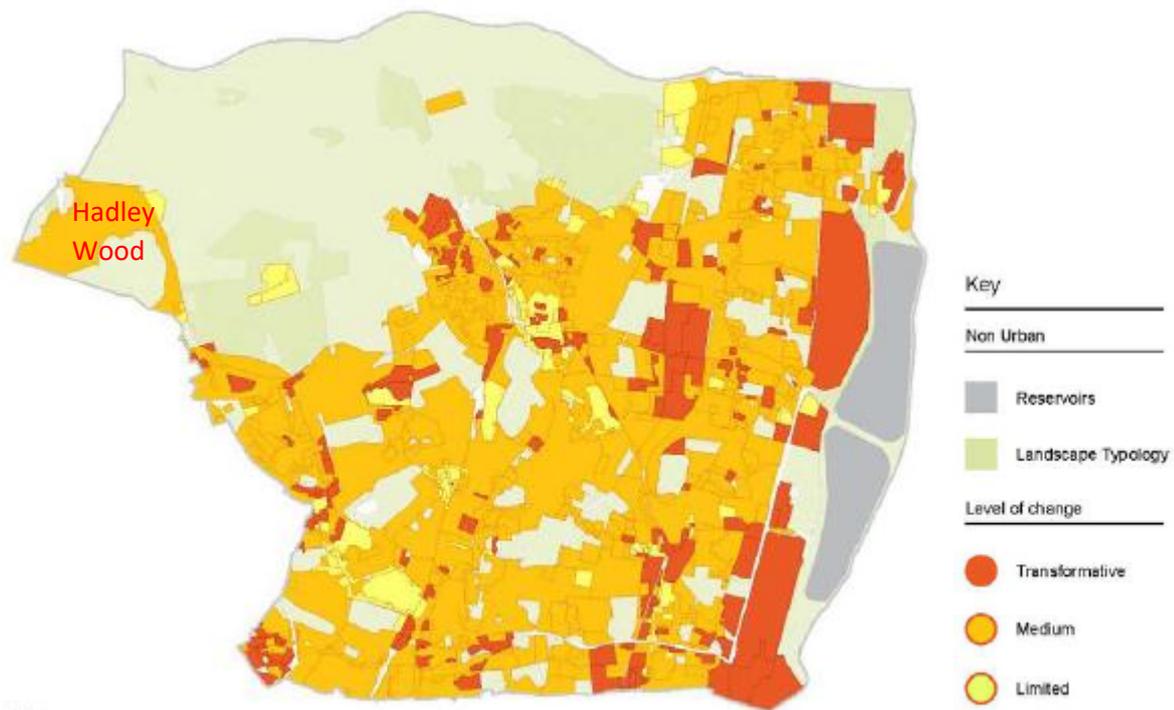
- ❖ Baseline growth – 17,000 new homes. No Green Belt release.
- ❖ **Medium Growth 1 – 25,000 new homes. Requires some Green Belt release.**
- ❖ Medium Growth 2 – 25,000 new homes. Mainly in urban areas, no Green Belt release.
- ❖ High Growth – 55,000 new homes. Significant Green Belt release.
- ❖ Majority of development outside borough.
- ❖ Majority of development east of A10.
- ❖ Majority of development west of A10.

▪ **Strategic Policy SP SS2 – Making Good Places**

- ❖ All development should contribute positively to sustainable development and contribute to the places in which they are located.
- ❖ Development proposals must:
 - contribute to the provision of social, green & blue, transport and utility infrastructure to support communities;
 - maintain the local distinctiveness;

- enhance local wildlife and biodiversity, and include opportunities for nature recovery.
- **Strategic Policy SP SE1 – Responding to Climate Emergency**
 - ❖ All planning tools will be used to meet the 2040 net zero carbon commitment set out in the Climate Action Plan. [*note: the policy does not mention on carbon sequestration, i.e. the capturing and storing of carbon in, for example, trees and grasslands*].
 - ❖ Flood risk must be reduced (including through the use of Sustainable Drainage Systems).
- **Policy DM SE8 – Managing Flood Risk**
 - ❖ New development must avoid and reduce the risk of flooding and not increase flood risk elsewhere.
 - ❖ Developments must be set back a minimum of 8 metres from culverts and watercourses.
- **Strategic Policy SP SC1 – improving Health and Wellbeing of Enfield’s Diverse Communities**
 - ❖ Developments of 50+ units must show how they will contribute to education, health, leisure and community facilities, and care homes/sheltered accommodation.
- **Strategic Policy SP BG1 – Blue & Green Infrastructure Network**
 - ❖ Proposals will be expected to contribute to the enhancement of the blue & green infrastructure, including through protecting and enhancing Green Belt and Metropolitan Open Land, biodiversity net gain, introducing new habitats to the river corridor and protecting and enhancing the habitat and wildlife resources.
- **Strategic Policy SP BG2 – Protecting Nature Conservation Sites**
 - ❖ If development will clearly affect biodiversity, the principles of mitigation in the London Plan are expected to be followed.
- **Strategic Policy SP BG3 – Biodiversity Net Gain, Rewilding and Offsetting**
 - ❖ Developments must show a minimum 10% net gain (using DEFRA model) in natural habitat, preferably on site.
 - ❖ Where the 10% min requirement cannot be met on site, or would be better served elsewhere, it can be compensated for via other projects that contribute to Enfield’s nature recovery [*note: areas of nature deficiency include Enfield Chase*].
- **Strategic Policy SP BG4 – Green Belt and Metropolitan Open Land**
 - ❖ Enfield’s Green Belt and MOL will continue to be protected from inappropriate development (as defined in the NPPF – see penultimate page) and, where possible, enhanced.
 - ❖ Development within or adjacent to Green Belt/Metropolitan Open Land should not have a significant detrimental impact on the openness or the character of its surroundings.
- **Strategic Policy SP BG5 – Green Belt and Edges of Countryside/Urban Areas**
 - ❖ Inappropriate development within the Green Belt will not be permitted. Development that is not inappropriate will only be permitted where:
 - The siting, scale, height and bulk is sympathetic and compatible with the primary aim of preserving the openness of the Green Belt;

- It displays high standards of design and landscaping to minimise the visual impact;
 - The materials used blend with the landscape;
 - Appropriate parking and landscaping are provided to ensure the openness is not prejudiced.
 - ❖ Limited infilling within existing settlements is permitted, provided the openness is not impacted, the developed proportion of the site is not increased and there is no significant increase in traffic.
- **Strategic Policy SP BG6 – Protecting Open Space**
 - ❖ Development will not be permitted on residential gardens unless the loss of such space can be compensated for and the development has overriding planning benefits.
- **Policy DM BG7 – Watercourses**
 - ❖ Development adjacent to watercourses must provide ecological and biodiversity enhancements.
- **Policy DM BG 8 – Urban Greening and Biophilic Principles**
 - ❖ New development will be expected to restore and enhance trees and woodlands, with priority given to various listed locations, including areas of flood risk.
 - ❖ Trees of landscape and biodiversity value, on and adjacent to the site, must be protected.
 - ❖ Soft landscape and tree planting must be maximised.
 - ❖ Developments that involve the loss of veteran trees and trees with TPOs with significant amenity or biodiversity value will be resisted.
 - ❖ *[note: the policy is silent on grasslands as a valuable resource for carbon sequestration.]*
- **Strategic Policy SP DE1 – Delivering a Well-Designed, High Quality and Resilient Environment**
 - ❖ Developments must be design-led and reflect, amongst others, context.
 - ❖ Characterisation Studies will be one of the factors considered when assessing the design of developments.
 - ❖ The Plan follows the new National Design Guide and Enfield has undertaken a Character of Growth study, which provides the basis for recommendations on the scale of change – Hadley Wood is “Medium”:



▪ **Policy DM DE2 – Design Process and Design Panel Review**

- ❖ Applications with design & access statements that don't explain the design rationale will not be accepted.
- ❖ All applications should seek pre-application advice.
- ❖ All major applications (10 or more units) must demonstrate meaningful engagement with local communities that give them real power to shape development.

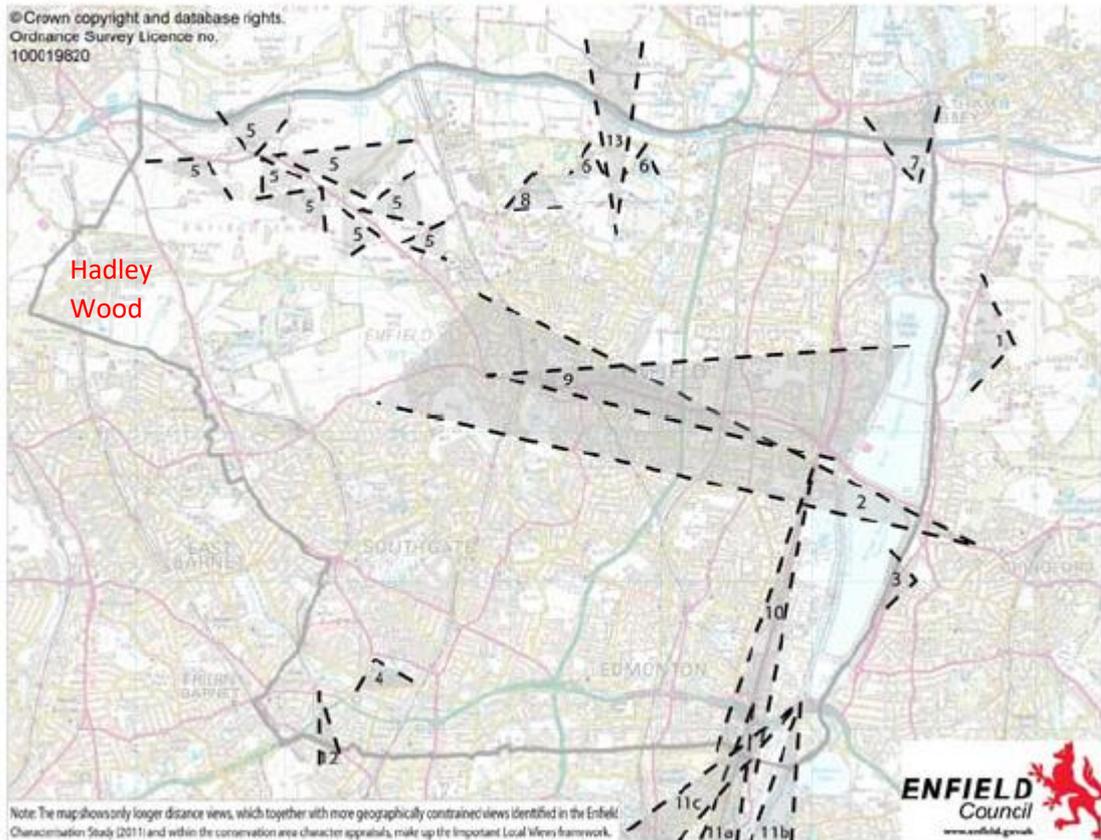
▪ **Strategic Policy SP DE4 – Putting Heritage at the Centre of Place Making**

- ❖ Development proposals should demonstrate a clear understanding of the heritage significance of the site and its surrounding context.
- ❖ Non-designated heritage assets should be assessed in line with the local heritage list criteria.

▪ **Policy DM DE5 – Strategic and Local Views**

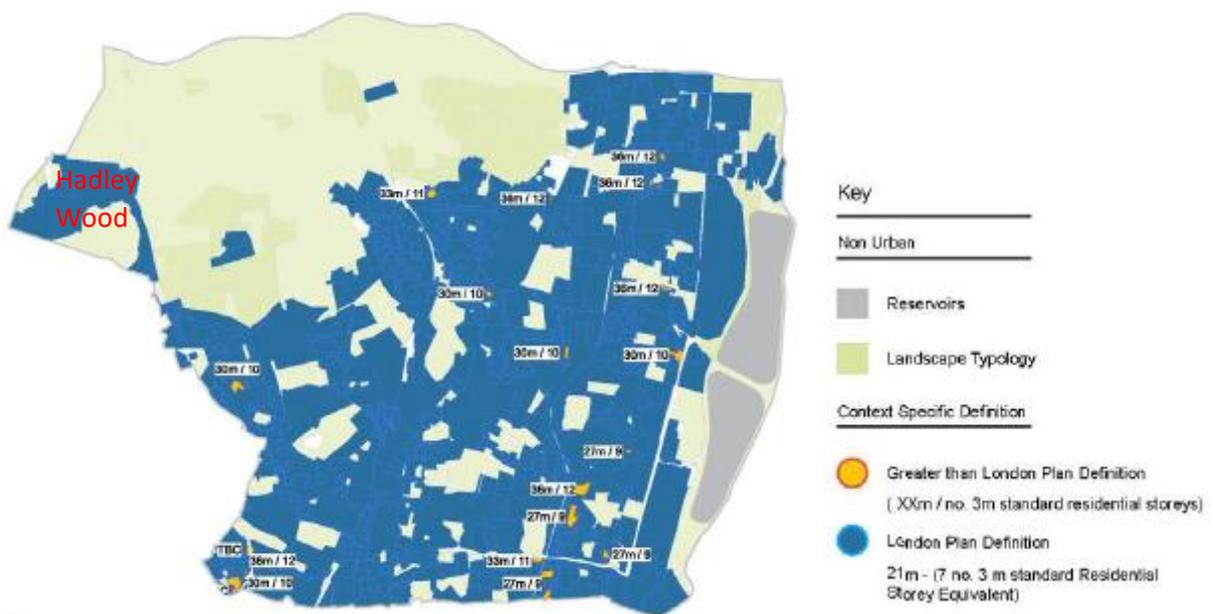
- ❖ Development must positively contribute to the setting and integrity of important long-distance views.
- ❖ The Plan lists 13 important long distance views. *[note: although the list includes The Ridgeway towards Enfield town centre, it does not contain Stagg Hill, presumably at least partly as it would raise questions around the Cockfosters tower blocks proposal.]*

Important Local Views: Longer Distance Views

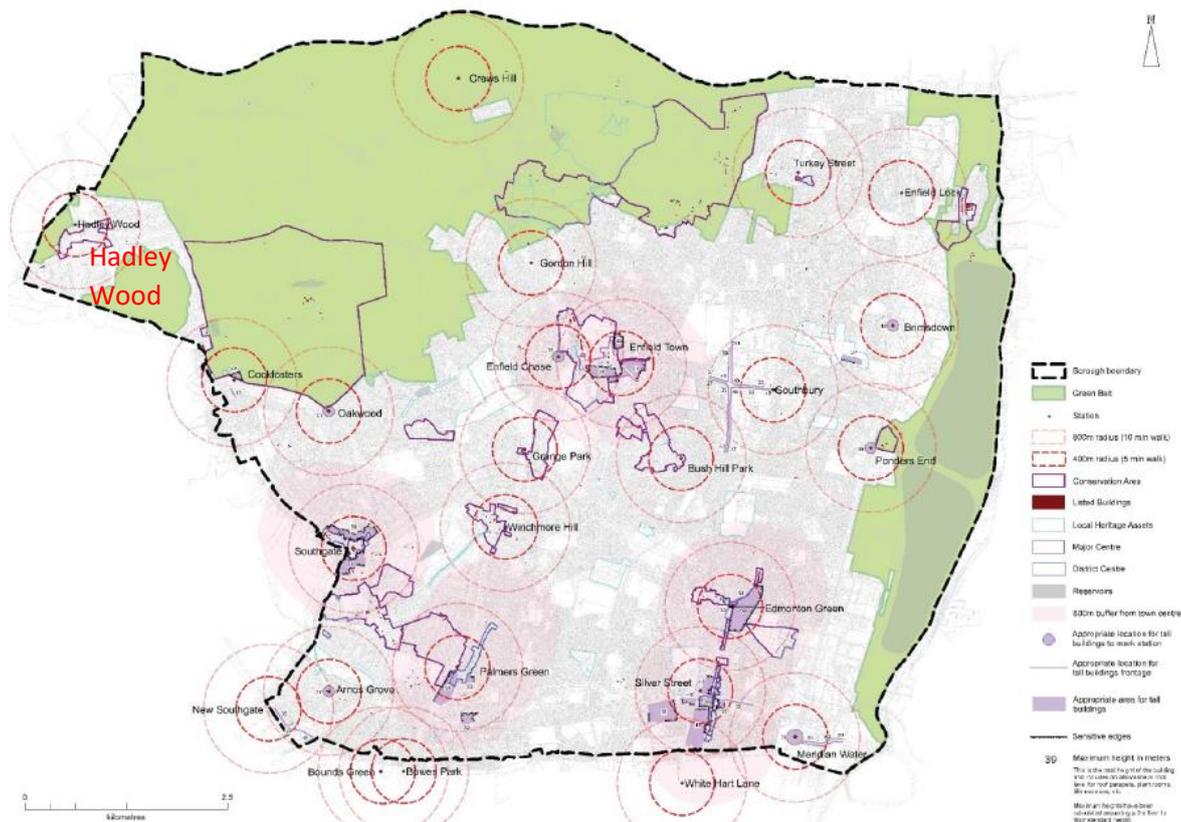


Policy DM DE6 – Tall Buildings

- ❖ Tall buildings are acceptable in appropriate locations, with height dependent on the local context.
- ❖ The document has the London Plan map, which deems most of Hadley Wood - including the Conservation Area - acceptable for development up to 21 metres (= 7 floors). [Note: policy D9 of the London Plan suggests 6 floors/18 metres, but that is measured to the floor of the top storey.]



- ❖ However, the Enfield Plan does not indicate Hadley Wood to be an appropriate location for tall buildings:



▪ **Policy DM DE10 – Conserving and Enhancing Heritage Assets**

- ❖ Development proposals must conserve and enhance the significance of heritage assets.
- ❖ When considering proposals, there should be regard to the cumulative effect of minor changes and consideration of past harm.
- ❖ Enhancement can take many forms, including removal of inappropriate development.
- ❖ Lack of visibility from the public realm does not equate to a lack of harm.

▪ **Policy DM DE11 – Landscape Design**

- ❖ Proposals will be expected to take account of, and conserve and enhance, the distinctiveness and character of an area, including the pattern of trees, vegetation and other landscaping features.
- ❖ All development will be expected to “retain existing landscape features (e.g. trees, shrubs, hedges) which contribute positively to the setting and character and historic significance of the area” and “incorporate suitable wildlife habitats”.

▪ **Policy DM DE13 – Housing Standard and Design**

- ❖ New residential development must:
 - Be of an appropriate scale, bulk and massing;
 - Preserve the amenity of occupiers [*note: would be useful to explicitly mention neighbouring occupiers, as DE15 does*] in terms of daylight, outlook, privacy, overlooking, noise and disturbance, etc;

- Provide adequate parking and refuse storage which do not affect the quality of the street scene;
- Ensure that hardstandings do not dominate the appearance of the street scene;
- Ensure that boundary treatments do not dominate or cause harm to the character or appearance of the property or street, and maintain visibility splays. Front boundary treatments should not normally exceed 1 metre;
- No part of a proposed development should be at an angle of more than 45° from the edges of the existing window [*note: not the centre*];
- Side and rear facing windows that overlook adjacent sites must not result in overlooking or loss of privacy.

▪ **Policy DM DE15 – Residential Extensions**

❖ Rear extensions must:

- Not impact the amenity of neighbours and not result in visual impact;
- Single storey – not be deeper than 4 metres for (semi-)detached properties, or taller than 4 metres (3m for flat roof);
- Multi-storey – not exceed a 45 degree angle from the edge of the nearest original first floor window of neighbouring property; where appropriate [how defined?], secure a common alignment of rear extensions; and not adversely impact the character of the area.

❖ Side extensions must:

- Not create a continuous façade which is out of character with the locality;
- Not harm the character of the local area, the bulk must be subordinate in relation to the original dwelling, and adequate visibility splays must be maintained.

❖ Roof extensions must:

- Be of appropriate size, in keeping with the character and not dominant when viewed from the surrounding area;
- Limit rooflights to less prominent roofslopes, with their placement, size and number being considered;
- Not disrupt the character or balance of a property or pair of properties;
- Front facing roof dormers must not materially affect the character of the area and must not be dominant or intrusive;
- Flat roof dormers will be refused in a conservation area.

❖ Outbuildings must:

- Be ancillary to the use as a residential dwelling;
- Be of appropriate height and bulk so as not to adversely impact on the character of the local area and amenities of neighbouring properties;
- The size, scale and siting must not have unacceptable impact on the adjoining properties.

▪ **Strategic Policy SP H1 – Housing Development Sites**

- ❖ The Plan will provide for at least 24,920 new dwellings up to 2039. The Plan contains a list of sites (unclear why there is a discrepancy in the number):

Location	Estimated Capacity	% of total
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Enfield Town	1,238	5%
Southbury	4,320	18%
Edmonton Green	1,445	6%
Angel Edmonton	1,883	8%
Meridian Water	5,000	21%
Southgate	488	2%
New Southgate	595	3%
Crews Hill	3,000	13%
Chase Park	3,106	13%
Other urban - outside Place Making Areas		
14 locations	2,105	9%
Other non-urban - outside Place Making Areas:		
Land Opposite Enfield Crematorium	270	1%
Land between Camlet Way and Crescent West	160	0.7%
TOTAL	23,610	100%

- The NPPF requires local authorities to meet the need for housing, unless the impacts would significantly and demonstrably outweigh the benefits when assessed against the NPPF.
- The London Plan has set Enfield a 10 year target of 12,460 net new housing units, and the above 20 year plan simply extrapolates that volume.
- **Strategic Policy SP H2 – Affordable Housing**
 - ❖ The aim is for 50% of all new homes across the plan to be genuinely affordable;
 - ❖ 50% of all developments of ten or more homes in the Green Belt will be affordable (vs 35% for all other major housing development);
 - ❖ Affordable housing should comprise 50% social-affordable rented (= capped at max 80% of open market rent) and 50% intermediate housing (= cost above social rent, but below market; can be rented or equity products);
 - ❖ Affordable housing must achieve the same high quality standards as the private housing element;
 - ❖ When determining the amount of affordable housing acceptable on a site, regard will be given to the economics and financial viability of the development.
- **Policy DM H3 – Housing Mix and Type**
 - ❖ New homes must provide an appropriate mix of dwelling types and sizes;
 - ❖ The site’s accessibility and amenities will be taken into consideration.
- **Policy DM H4 – Small Sites and Small Housing Development**
 - ❖ The Council supports development on appropriate small sites (<0.25ha), including infill and backland plots, especially for sites with good public transport accessibility (PTAL 3-6 vs Hadley Wood’s 0, 1a and 1b), within 800m of a tube or rail station, and those with good local infrastructure;
 - ❖ Such development must be carefully designed to avoid harm to the amenity of surrounding properties, or on biodiversity and green infrastructure;

- ❖ To help facilitate this type of small development the Council will prepare a suite of supplementary planning documents.
- **Strategic Policy SP E1 – Employment and Growth**
 - ❖ To meet the borough’s identified economic needs the Plan provides for additional industrial, logistics and office space;
 - ❖ Hadley Wood is indirectly impacted by 30,550 square meters of capacity identified east of Junction 24, at the start of The Ridgeway, next to St John’s School. [*Note that this is also Green Belt land.*]
- **Strategic Policy SP RE1 – Development in the Green Belt**
 - ❖ Unclear how this fits in with Strategic Policy SP BG4 – Green Belt and Metropolitan Open Land;
 - ❖ Inappropriate development within the Green Belt will not be permitted;
 - ❖ Development that is not inappropriate will only be permitted where:
 - The siting, scale, height and bulk is sympathetic to, and compatible with, the primary aim of preserving the openness of the Green Belt;
 - It has regard to site contours, displays a high standard of design and landscaping to complement and improve its setting, and minimises the visual impact;
 - The nature, quality, finish and colour of materials blend with the landscape;
 - Appropriate parking, access and landscaping is provided to ensure vehicles are parked safely and the openness of the Green Belt is not prejudiced.
- **Policy DM RE2 – Character of the Green Belt and Open Countryside**
 - ❖ Development adjoining or within close proximity to the Green Belt must:
 - Not have a detrimental impact on the visual amenity of the landscape and Green Belt;
 - Maintain views from the Green Belt into urban areas and vice versa, especially at important access points.
 - ❖ Development adjoining or within close proximity to the Green Belt is expected to:
 - Improve the character of the Green Belt and landscape through tree-planting etc;
 - Retain existing features of landscape and townscape value;
 - Conserve and not detract from the open character of Green Belt and surrounding landscape.
- **DRAFT Strategic Policy SP T1 – Promoting Sustainable Transport**
 - ❖ Travel choice and sustainable connectivity will be improved throughout the borough. New development will therefore be, amongst others, car-free (or offer a low level of parking provision) and support complementary measures, such as car clubs and contribute towards walking and cycling routes.
- **DRAFT Strategic Policy SP ENV1 – Local Environmental Protection**
 - ❖ Proposals must be designed to minimise the impact of light pollution on adjacent occupiers and natural habitats, biodiversity and the ecology of watercourses.

Outside of the Placemaking Areas (non-urban sites) – Site Allocations

SA45: Land Between Camlet Way and Crescent Way		
		
Existing Site Information		
Address	Land between Camlet Way and Crescent West, Hadley	
Site Area	11.05ha	
Existing Use(s)	Pasture / Grazing land	
Site Considerations		
Flood Zone	1	
PTAL	1	
Heritage Considerations	Immediately adjacent to Hadley Wood CA. Within immediate setting of Grade II Listed Buildings. Within wider setting of numerous other heritage assets including, but not limited to: Wrotham Park Registered Park and Garden and the Battle of Barnet Registered Battlefield and non-designated heritage assets. Amber – heritage constraints; potential to develop; usual methodology for assigning indicative density will not apply; heritage impact assessment required; mitigation required	
Impacts an Archaeological Priority Area	Within APA2: Enfield Chase and Camlet Moat Amber – heritage constraints; potential to develop; usual methodology for assigning indicative density will not apply; heritage impact assessment required; mitigation required	
Proposal		
Land Use Requirements	<ul style="list-style-type: none"> The site should provide new homes 	
Implementation		
Timeframe for Delivery	0-5 years	5-10 years
	-	-
		10+ years
		X
Estimated capacity by proposed Land Use		
Growth Scenario / Spatial Strategy	Baseline / Urban Area only	Medium / Urban area + Green Belt
Capacity Estimate	160 homes	160 homes

Green Belt

- Construction on Green Belt Land prohibits “inappropriate development”, except in “very special circumstances”, where the harm from the development is clearly outweighed by other considerations (NPPF §143-144).
- “Inappropriate development” is defined in NPPF §145 as anything other than:
 - Buildings for agriculture and forestry;
 - Facilities for outdoor sports and recreation, cemeteries and allotments;
 - Replacement, extension or alteration of an existing building provided it’s not disproportionate;
 - Limited infilling in villages;
 - Limited affordable housing for local community needs; and
 - Limited infilling or redevelopment of previously developed land;
 - Mineral extraction and engineering;
 - Local transport infrastructure;
 - Development under a Community Right to Build Order or Neighbourhood Development Order.
- Local authorities can change the Green Belt boundaries as part of their Local Plan, if there are “exceptional circumstances” that are fully evidenced and justified (NPPF §136).
- Note: neither “Very special circumstances” nor “exceptional circumstances” are defined and each situation will be considered on its own merits, but the former has been held by the courts to require a higher standard, i.e. it’s easier to take land out of the Green Belt than it is to build on Green Belt land.
- Enfield’s Local Plan proposes Green Belt changes for a number of sites, including the land between Crescent West and Camlet Way. To do this:
 - The change must be part of the Local Plan (NPPF §136);
 - Strategic policies should establish the need for changes to the Green Belt boundaries (NPPF §136);
 - Enfield Planning must demonstrate that it has examined fully all other reasonable options for meeting its identified need for development (NPPF §137 – see below);

137. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

138. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.