

OPPOSITION PRIORITY BUSINESS – FULL COUNCIL 18/9/2019

Inappropriate high-rise residential development and the loss of car parks, etc.

1.0 Executive Summary

- 1.1 The purpose of this OPB report is to draw attention to the increasing number of high-rise, high density residential schemes in suburban areas in Enfield that are in the pipeline, to raise concerns about the impact on local communities and to debate the implications for local planning policy.
- 1.2 The report is concerned with the damage that these schemes will cause to the character of these areas and amenity of existing residents. These problems could be reduced if there was greater clarity about the appropriate scale and location of such schemes. The need for additional housing for young people is fully recognised by the Conservative Group, but we are concerned that, because larger housing schemes provide higher levels of affordable housing, the Administration may not give due weight in the Local Plan to other considerations when dealing with such planning applications.
- 1.3 The differences in approach to housing density between the current London Plan and the new Plan are examined in order to clarify the range of options and discretion the Borough has when it comes to planning policy for larger residential schemes.
- 1.4 It would be inappropriate to make detailed recommendations about schemes that have been submitted for planning or are under consideration. Rather it seeks to identify areas of concern and uncertainty in current planning policy and put forward broad guidelines to assist decision making in the future.

2.0 Recommendations

- 2.1 The Council should seek to amend the draft Local Plan to direct housing developers, both private and public, in the main to former industrial areas and other brownfield sites, and low-rise retail sites in the Borough. The Local plan should provide guidelines regarding the suitable height and density for residential development in different parts of the Borough.
- 2.2 Under the Local plan, the Council should deter high-rise residential blocks **outside** our town centres where the existing building form is traditional and low density. Developing housing near transport hubs in some cases is perfectly reasonable, but only where all the other relevant material planning considerations, including the appropriate height and density, have been taken into account.
- 2.3 The Council should also generally restrict (not prohibit) high rise, high density residential developments in traditional suburban town centres like Enfield Town and seek an article 4 direction to control inappropriate development of offices into residential with the consequence loss of jobs. The new residential development of the Electric Quarter in Ponders End is a good example of the sort of desirable, low rise housing that should be encouraged in our town centres.

3.0 Background

- 3.1 In the 1960s, Enfield Council developed the largest number of high-rise blocks of Council flats in London. Although spacious by modern standards, these tower blocks became notorious for anti-social behaviour and proved to be very problematic and expensive to maintain, e.g. in terms of lift replacement and door entry systems. Not surprisingly, they proved unpopular with many tenants who in most cases were on low incomes and had limited choices about where to live. More recently, refurbished high-rise blocks have been subject to a number of serious fires and loss of life, as occurred at Grenfell Tower. The lessons learnt from this type of housing development should not be forgotten.
- 3.2 In the last period of Conservative control, a substantial amount of affordable housing and retail regeneration was successfully initiated, e.g. in partnership with Green Horizons in Edmonton Green. In this period, much of the Galahad and Victoria Rd areas near Edmonton Green Station were replaced with good quality, low-rise, family housing.
- 3.3 In recent months, a clutch of new proposals for very large, high-rise residential schemes have come forward. Two of these schemes are promoted by Transport for London on the car parks adjacent to Cockfosters and Arnos Grove Underground Stations. Two further high-rise developments are proposed for Southgate Village near Southgate Underground Station and for a retail site on the A10 known as the Colosseum scheme. They each involve the development of hundreds or in the case of the Colosseum scheme thousands of new units. The Colosseum scheme proposes three towers, one of which would be up to 29 storeys high and would be visible across the Borough.
- 3.4 To date, only the Southgate Village scheme has been submitted for planning, but it is likely that the others will be submitted in the next few months. This report is about the precedent being set by the scale and location of these proposed developments and their impact on local communities.

4.0 Planning Policy

- 4.1 The Mayor's new London Plan has completed its consultation and Examination in Public stages and is likely to come into effect shortly. The consultation process for the Council's Local Plan has only just started and will take several years to complete. In the meantime, local planning decisions will need to be in conformity with the Mayor's London plan once it is approved by the Secretary of State for Communities and Local Government.
- 4.2 The Mayor's London Plan has been amended significantly and beneficially during the consultation process. It is now more of a nuanced document which gives local boroughs considerable discretion and scope in developing their own policies. It is a given that the population in London is rising rapidly and that growth of the housing stock is a priority. However, location, density and infrastructure considerations are still a matter for local discretion because circumstances vary in different parts of London.

- 4.3 One significant departure in the new draft London Plan is that the residential density guidelines in the current London plan (Table 3.2) have been dropped in favour of a more discretionary approach. The current guidelines specifically quantify different housing densities for Central, Urban and Suburban areas, in each case increasing with closer proximity to public transport. This had the advantage of being relatively clear and recommended housing densities in suburban areas that were substantially less than indicated in the latest schemes referred to above.
- 4.4 The new London Plan takes a broader approach: “To help assess, monitor and compare development proposals several measures of density are required to be provided by the applicant. Density measures related to the residential population will be relevant for infrastructure provision, while measures of density related to the built form and massing will inform its integration with the surrounding context. The following measurements of density should be provided for all planning applications that include new residential units:
1) number of units per hectare
2) number of habitable rooms per hectare
3) number of bedrooms per hectare 4) number of bed spaces per hectare”

These new guidelines however would appear to leave responsibility for setting appropriate density figures to individual boroughs.

- 4.5 The new draft London Plan gives further useful guidance: “Delivering good quality, affordable homes, better public transport connectivity, accessible and welcoming public space, a range of workspace in accessible locations, built forms that work with local heritage and identity, and social, physical and environmental infrastructure that meets London’s diverse needs is essential if London is to maintain and develop strong and inclusive communities”.
- 4.6 Finally, it states: “Early engagement with local people leads to better planning proposals, with Neighbourhood Plans providing a particularly good opportunity for communities to shape growth in their areas. Taking advantage of the knowledge and experience of local people will help to shape London’s growth, creating a thriving city that works better for the full diversity of its inhabitants.”

5.0 Concerns

- 5.1 These planning policy distinctions may appear obscure, but they are of vital significance to decisions that will be taken over the next few years in regard to housing developments in Enfield. Uncertainty on the part of councillors, officers and members of the public over the planning position will undoubtedly lead developers to press for excessively large and high residential tower blocks in appropriate locations as we have already seen.
- 5.2 These new schemes have upset and outraged many local residents, who feel powerless to object to them. This is contrary to the spirit of the new London Plan.

- 5.3 As well as these schemes being out of character and proportion with the suburban landscape, local residents are deeply concerned that the large number of additional residents will place undue strain on their already creaking health and education services and create even worse traffic congestion, pollution and parking problems.
- 5.4 In particular, the TfL developments would lead to the disappearance of two large car parks at Cockfosters and Arnos Grove Underground stations that are used by commuters to enable them to travel into central London for work and who often live some distance from the Piccadilly Line. Effectively a park and ride scheme. As well as being disruptive to members of the public this is environmentally damaging and may generate greater car use not less.

6.0 Conclusions

- 6.1 The Conservative side recognises that the population of Enfield is likely to continue to grow in future years and this necessitates greater housing development.
- 6.2 The report concludes that local Boroughs can through their Local Plans set clear guidelines about acceptable housing densities in specific locations and, just as with setting appropriate room sizes and heights, should do so.
- 6.3 Failure to address this issue will simply lead to developers taking advantage by submitting larger and higher residential schemes in inappropriate locations justified by claims that they are merely helping to solve the housing crisis.
- 6.4 Enfield is lucky compared to other more built up areas in London in having substantial amounts of brown field sites available. The Council should concentrate on enabling the development of these sites and not permit the many attractive traditional housing areas within the Borough to be spoiled for future generations.

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