



Enfield RoadWatch Action Group

Hearing Statement

Matter 5: Key Diagram, Spatial Strategy and methodology for selecting site allocations

8/1/2025

Note: many of the 'duly made' representations submitted by Enfield RoadWatch appear within the Representations Database under the wrong policy, ID reference or hyperlink.

Issue 5.1 Whether the vision and strategic objectives have been positively prepared and are justified and effective.

Q5.1 Are the spatial vision and strategic objectives soundly based, justified by the evidence and is it clear how the Plan's policies will help to deliver the vision and strategic objectives over the Plan period?

No. The objective of being a “*distinctive and leading part of London*” does not reflect an understanding of the unique character of the western part of the Borough. This area relies heavily on its proximity to the edge of Enfield Chase and the panoramic views of Trent Park across the countryside. None of the Council's submitted documents demonstrate an awareness of this critical aspect.

The objective that the Plan be “*deeply green*” is belied by a number of factors:

- The blurring of the distinction between urban and rural areas
- Harm to the historic landscape
- The proposed allocation for development of a number of designated Sites of Importance for Nature Conservation (SINCS), including at Crews Hill Golf Course, Glasgow Stud, part of the Vicarage Farm and Rifles Site
- The loss of critical non-designated habitat ‘stepping stones’ (NPPF 185a) at Vicarage Farm, Whitewebbs and south of Enfield Road
- Biodiversity and habitat improvements in the countryside will happen without the Plan as set out by the Friends of Enfield Chase in their representations
- The plan would result in the urbanisation and effective loss of popular countryside walks, notably the Merryhills Way and the Hertfordshire Chain Walk

Q5.2. is the spatial strategy for the scale and distribution of growth, as set out in Policy SS1, justified and appropriate for the sustainable development of the areas when considered against reasonable alternatives? What reasonable alternatives were considered by the Council and why were these rejected?

Please refer to the representations by Better Homes Enfield.

The Council has inflated the scale of growth required in comparison to what is actually required by the London Plan, and underestimated the potential contribution of key urban

growth locations such as Meridian Water. Tactically, this suits the Council because it can then claim that it has no alternative but to allocate the proposed sites at Crews Hill and Chase Park as part of a ‘bold’ strategy which justifies development of its landholdings.

Q5.10: What transport infrastructure, or other mitigation schemes, have been identified that would address these transport issues? Has the likely effectiveness of proposed transport mitigation schemes been assessed?

Our representations:

Policy	Web link
PL10 para 12k	01687-27-1.pdf

There is very little clarity over the transport mitigation measures in the Infrastructure Delivery Plan, and the costs and even the locations of the mitigations are uncertain. The rural lanes around Crews Hill and Clay Hill are particularly unsuited to highways ‘mitigations’ that could result in the loss of mature and established hedgerows. In light of the unresolved issues with the traffic modelling showing delays of 1173 seconds at Hadley Road PL10 (see our reps on PL10 paragraph 12k), there is also an imperative to revisit the modelling in the vicinity of the mini-roundabout by St Marys church at Windmill Hill/The Ridgeway and Oakwood, once the modelling issues have been resolved. We have also demonstrated that the proposed active travel corridor along the A110/Enfield Road would be ineffective given the gradients and width constraints around Slades Hill.

Q5.13: Is the Plan effective in ensuring adequate provision of infrastructure and local services to deliver the spatial strategy, in particular those relating to education, health and green infrastructure?

Our representations:

Policy	Web link
SS1 para 16	https://www.enfield.gov.uk/file/PDFs/email/01687-20-1.pdf
PL10 para 16	https://www.enfield.gov.uk/file/PDFs/email/01687-24-1.pdf
SA11.5	https://www.enfield.gov.uk/file/PDFs/email/01687-32-1.pdf
SA11.6	https://www.enfield.gov.uk/file/PDFs/email/01687-33-1.pdf

No. We commented on the selection of preferred options before completion of the infrastructure assessment. The IDP section on Crews Hill and Chase Park (pages 49-51) contains scant information regarding the provision of infrastructure in these areas. The tables for each area contain ‘shopping lists’ unsupported by evidence of costs, need or deliverability.

The Infrastructure Delivery Plan (IDP) does not contain any details of the expansion capacity of existing schools, no forecasts of the future needs for school places, nor any comfort around the availability of land for a new secondary school at Crews Hill. The IDP suggests that the funding would derive from S106 developer agreements, yet it is clear from a number of

developer representations that there is concern about the equitable division of Section 106 expenses, and doubts as to the viability of a number of items including railway bridges.

The IDP states at paragraph 3.25 that new GP facilities should be provided in the east of the Borough (Labour Council Wards) but makes no mention of facilities at Crews Hill or Chase Park and no indication of the impact of these developments on waiting lists at existing facilities in the west of the Borough. In Policy PL10 there is no evidence of the costs, location or scale of new or expanded facilities, nor any evidence of commitments from the NHS to deliver them. The Local Plan itself refers to new health facilities at Chase Park (PL10 para 16) but the IDP provides no further information.

Green Infrastructure provision in terms of the 'country park' at Chase Park is unlikely to come forward given resistance from the landowner, Comer Homes as set out in their Regulation 19 representations. Similarly, it is unclear whether the landowners in parts of Crews Hill where Green Infrastructure is identified in green on Figure 3.14 (p106), notably areas SA11.5 and SA11.6, are willing to make land publicly available for such a purpose. Comer Homes has also questioned the 20% biodiversity net gain requirements and it is unclear whether in fact there will be any developer money to fund the items referred to in part 5 of Policy BG7 (p164).

Issue 5.5: Whether the allocations in the Plan have been selected using an appropriate methodology based on proportionate evidence

Q5.20: Is the approach to the assessment and selection of sites, as set out in the Site Allocations Topic Paper justified? Does the submitted evidence demonstrate that the sites have been selected on a robust, consistent and objective basis?

No.

In relation to Matter 1, we set out concerns about the influence of Council land-ownership. On the next page we have set out a map showing the Council landownership overlaid with the proposed Local Plan site allocations. As this demonstrates, the Council is the major landowner.

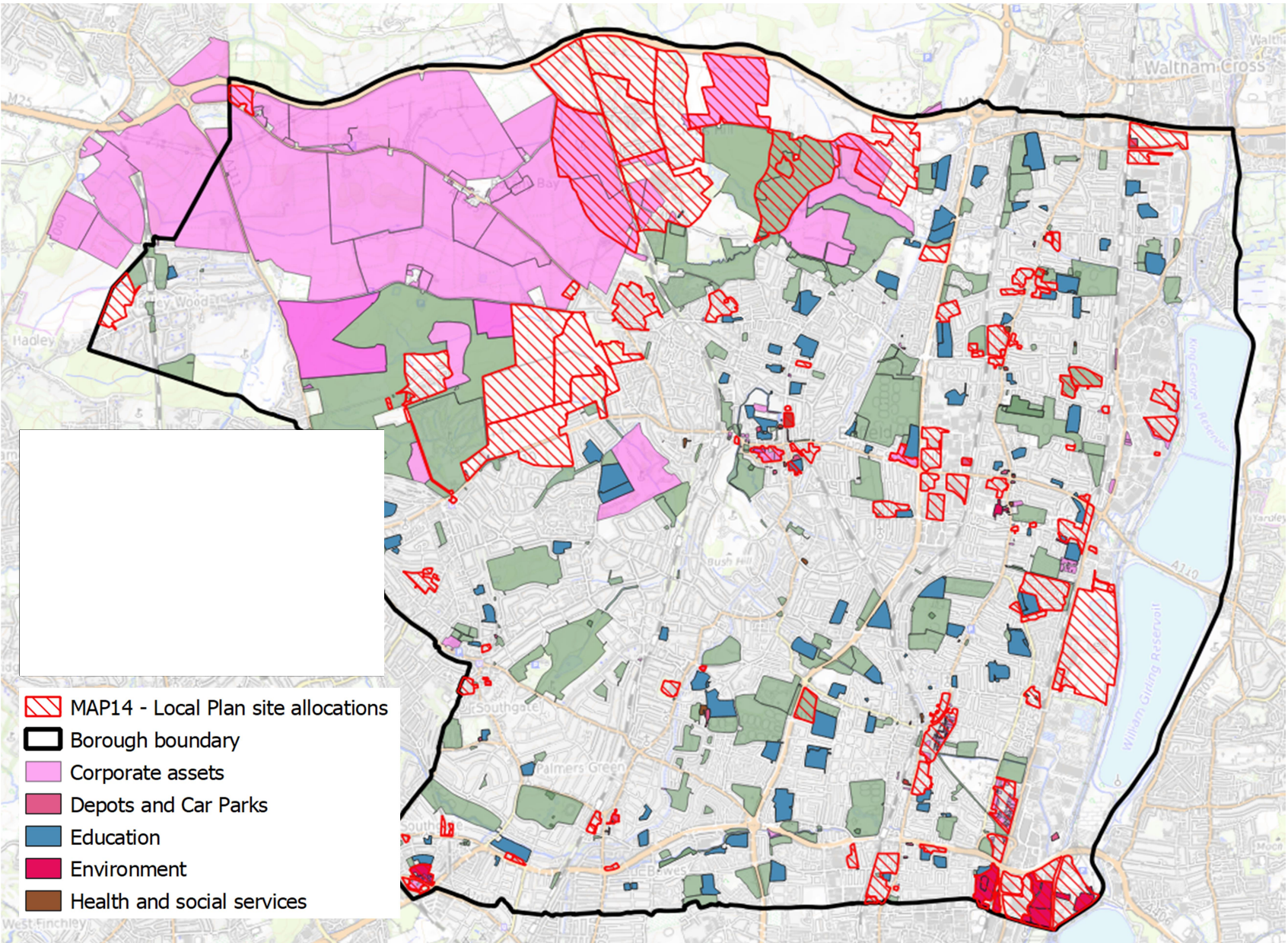
Furthermore, as shown in the map on the following page, most of the Council-owned land proposed for allocation through the Local Plan is situated in Conservative-voting Wards, but the Council is currently controlled by the Labour group based in the east of the Borough.

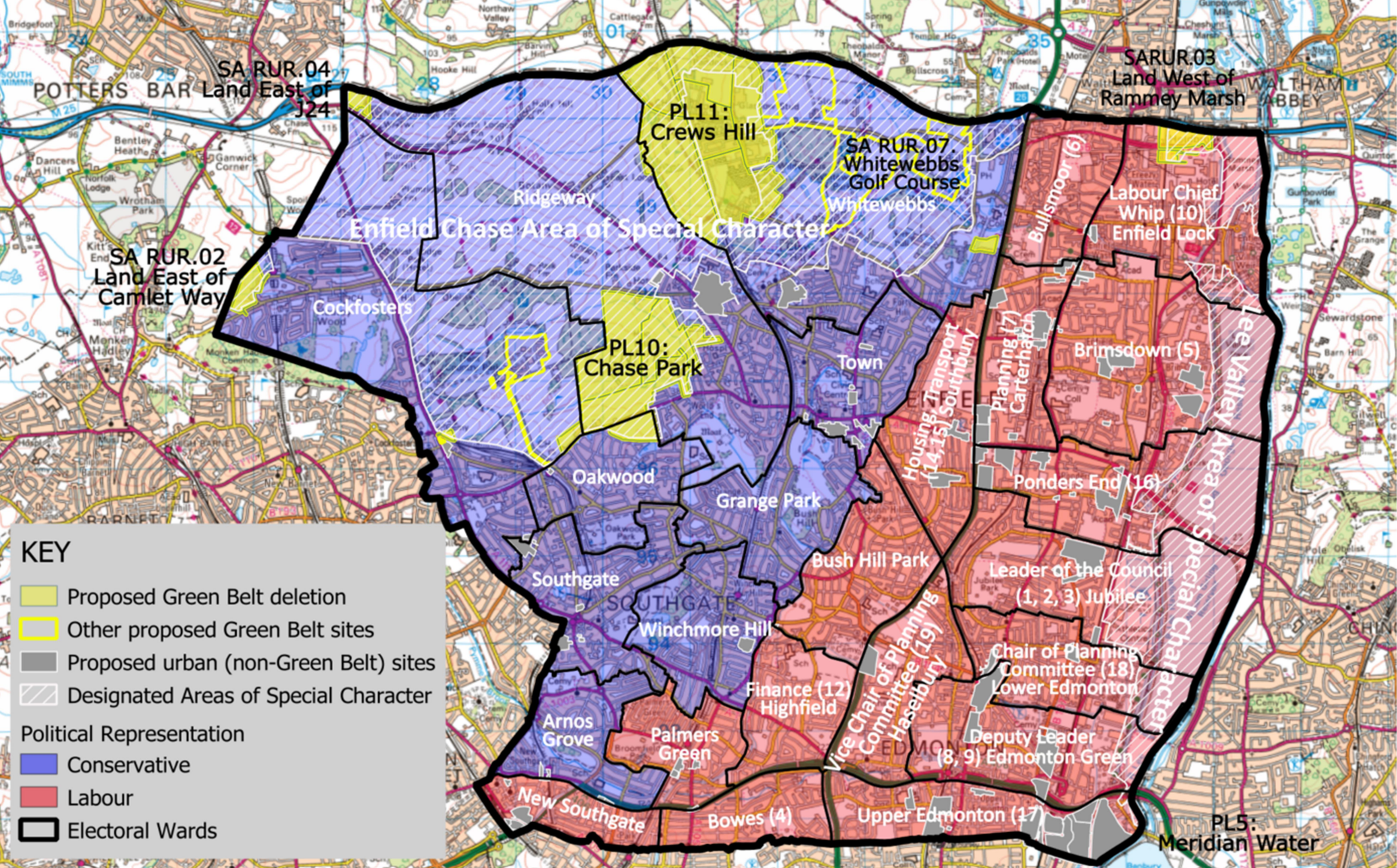
Given these two basic facts, there is a very high bar for the Council to cross in terms of demonstrating that it has been completely scrupulous and transparent as to how the sites were assessed and selected.

However, we can find no public records of review and discussion of methodology in public with elected members at any point during the preparation of the Local Plan or thereafter. The methodology set out in the topic paper relies heavily on planning judgements made in private¹. Our overarching concern therefore is that whilst the Topic Paper purports to demonstrate a rational and logical process, it leaves open the potential for manipulation in favour of the Council's preferred outcome – i.e. a 'bold' strategy that includes allocation of extensive areas of its own land. The staff involved were under the jurisdiction of the Council's Director of Planning and Growth, who is part of a senior leadership team tasked with the corporate asset strategy of delivering £800 million by selling green belt land for development². It is reasonable to conclude that a significant consideration in any balancing exercise would be whether the Council owns or otherwise has an interest in promoting further the wider strategic justification for release of its own sites.

¹ As stated in the LDS, "*political oversight was by the Cabinet member for planning*".

² See our response to Matter 1 Q1.1.





Turning specifically to the Topic Paper.

The emphasis in paragraph 4.7 on ‘*strategic release*’ of land ‘*in order to meet our housing targets*’ sidesteps the London Plan context altogether, which actually suggests much lower housing targets than that proposed, as has been demonstrated by Better Homes Enfield and others.

Stage 3b ‘technical constraints’ is set out in Tables 4 and 5. In neither of these tables is it clear how matters related to landscape, character or heritage (encapsulated in the Area of Special Character, hatched in white in the second plan above) were addressed, despite the extensive concerns raised.

In relation to the Integrated Impact Assessment (IIA, Section 6 and Table 6 of the Topic Paper), the extremely brief ‘justifications’ provided by the Council in IIA *Appendix I: Audit Trail of Site Selection* do nothing to allay concerns that the nature of decision making behind closed doors has played a decisive role in decisions around a number of allocations.

Whilst this level of response may satisfy basic legal procedural requirements for IIA, given the lack of other ‘balancing’ exercises based around the main issues arising from the Regulation 18 consultation responses, it reinforces concerns that the resulting decisions were not formulated on an objective basis, given the issues identified around the Council’s own interests in the Local Plan.

Please refer to The Enfield Society for our joint response regarding Q5.22

Q5.23 Are the reasons for selecting some sites and rejecting others clearly set out and justified?

The reasons are set out in Appendix I. It is not clearly set out because there is no accompanying map and it is unclear where each of the selected or rejected sites refers to. We would like an opportunity to review this evidence with the benefit of a clear map showing each of the reference numbers referred to in the tables.

Q5.24. Were constraints to development, such as transport, flooding, landscape, character, heritage and mineral safeguarding appropriately taken into account as part of the selection process?

Policy	Web link
PL10	https://www.enfield.gov.uk/file/PDFs/email/01687-42-1.pdf
PL10	https://www.enfield.gov.uk/file/PDFs/email/01687-15-1.pdf
SA10.1	https://www.enfield.gov.uk/file/PDFs/email/01687-21-1.pdf

We submitted representations regarding the importance of the strategic gap on Enfield Road as explained in the Enfield Characterisation Study, and submitted our own photographic analysis.

We refer to the Enfield Society's submission and comments on this question regarding landscape, character, and heritage, and echo their concerns around the lack of consideration of the **Area of Special Character (ASC)** designation, which relates to all of these matters. This is a long-standing designation that has been endorsed by a number of public bodies and is key. The only reason given for its abandonment is the argument that there is a pressing need for development. There does not appear to have been any serious attempt to assess the value of the ASC before deciding that it is outweighed by development needs.



Issue 5.6: Whether Policy SS2 is justified, effective, consistent with national policy and in general conformity with the London Plan

Q2.30. [5.30?] Is the Plan clear as to when masterplans or planning briefs must be prepared and the mechanism by which they could be approved.

Our representations:

Policy	Web link
PL11 para 2	https://www.enfield.gov.uk/file/PDFs/email/01687-5-1.pdf

As we set out in our representations, it appears that these items would be approved either by Cabinet or Full Council. There is a Labour majority on the Council, and Labour Councillors have recently shown themselves to be whipped into line in support of a Plan that aims to dig the Council out of financial difficulty by selling Green Belt land, or to inflict unwitting damage on areas where the majority of residents do not vote Labour.

For this reason, the Local Plan must leave no room for ambiguity or for self-approval of plans by the Labour majority. We drew attention to PL11 paragraph 15f ‘reflecting’ the natural landscape and ‘minimising’ impacts on long views from the west ([representations here](#)), and the ambiguities in relation to Chase Park ([representations here](#)) This type of language leaves massive scope for intrusive developments deep into open countryside and well beyond the indicative limits of development in the Illustrative Concept Plans, which the Council has confirmed do not form policy.

For example, at Crews Hill, a self-approval mechanism could lead the Council to approve a masterplan that allowed development to sprawl well beyond the extents shown in Illustrative spatial framework Figure 3.14 (Local Plan page 106) to encompass areas proposed for removal from the Green Belt as far as Turkey Brook. The Council recognises this possibility where it states in its response to PQ27 that *“These figures are explicitly labelled as ‘illustrative’ and are not intended to form part of the policy.”*³ The risk is particularly acute given that the Council has already advanced problems with the deliverability of urban sites at Crews Hill as justification for release of Green Belt⁴ The outcome of this would be severe, long term sprawl into the open historic landscape of Enfield Chase.

Tweaks to the language alone are not enough to make the Plan sound. The form of development must leave no scope for manipulation through the Council approving its own documents. This is a major part of the reason why we have argued that there must be no development west of the railway line at Crews Hill. For similar reasons, the weak Green Belt boundary along the gallop at Chase Park invites ambiguity as to how far development should extend towards Hadley Road.

We also pointed ([reps here](#)) to major problems of land assembly in SA11.4 in the ‘core’ of Crews Hill, and the practical difficulties of the Council’s proposed use of CPO. Furthermore, in light of proposals from the Council’s property team to develop land at Rectory Farm in land removed from the Green Belt as set out in the map on p12 of their Regulation 18 representations ([rep here](#)), it is almost inevitable given financial troubles at the Council that reliance on self-approval mechanism by the Council will result in this area coming forward for development even in the event of failure to deliver SA11.4.

TOTAL 2414 WORDS

³ [Document E5](#), paragraph 19

⁴ Site Selection Topic Paper Appendix 3 p 52-53