Paul Samson on behalf of the Ray Franklin Will Trust

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

Examination of the Enfield Local Plan 2019-2041

Policy number PL11, Crews Hill, Site allocations SA11.3 and SA 11.5

In relation to the Glasgow Stud, Burnt Farm Ride, Crews Hill, EN2 9DY

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?

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?

We consider that in respect of the above site the above processes have not occurred. Whilst parts of the Glasgow Stud have been allocated for development, much of it, which is previously developed and will be well served by public transport (by the proposed public transport network at Figure 3.14 of the draft local plan) has been excluded from development.

This is particularly so in respect of the 'white' land depicted on Figure 3.14 of the draft local plan.

It is also clear that the LPA have not taken account of the findings of our Preliminary Ecological Appraisal Survey by Cambridge Ecology, in particular Figure 5.1 on Page 37. This indicates that larger parts of the Glasgow Stud are suitable for allocation.

Nor has the potential of the development of the Glasgow Stud to include flood alleviation works been considered.

Moreover, the impact on the Crews Hill proposals by unauthorised and environmentally damaging uses on sites to the north of the Crews Hill placemaking area has not been considered, including the impact on the proposed public transport network by traffic accessing these unauthorised sites.

On this basis the decision of the LPA to exclude most of the site from development is flawed and not justified taking into account the reasonable alternatives, and is not based on proportionate evidence.

Therefore, this part of the Plan is not sound, and the parts of the site shaded green and orange (to the west of Cuffley Brook) on Figure 5.1 of the Ecological Appraisal Survey by Cambridge Ecology should be allocated for development.

Word Count: 378