

The Enfield Conservative Group

Enfield Local Plan Examination

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

Representations to which this statement relates: 01670-1-3; 01670-5-1

Please note that the links shown in the representations database do not point to the representations referred to in the Council's 'Summary' of our representations. This has made it very difficult to know whether our representations are available to the Local Plan inspector.

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?

The real basis of the vision is to reduce any disparities between the eastern and western parts of the Borough by reducing the quality of the west. The main means by which the Local Plan will achieve this is to remove the countryside of Enfield Chase, which is currently the major contributor to the character of the area.

There is a major contradiction between the objective that Enfield will be "a distinct and leading part of London" (objective p 23) and the reality, which is that the main source of the distinct identity of the area, i.e. the historic landscapes of Enfield Chase, will be lost, as development in the Green Belt sprawls into the countryside, blurring the distinction between urban and rural areas. This is the reality of the "seamless connection" between the "urban fabric" and the "wild spaces" (p.22).

The Local Plan actually proposes to monetise the land owned by Enfield Council, whether by fencing it off and renting it out (for example to Tottenham Hotspur FC at Whitewebbs) or charging visitors for activities in the countryside and gradually replacing farming with activities that are out of place in the Green Belt. This is likely to result in the loss of the value of the countryside, which is the main contributor to our character as an area.

Issue 5.2: Whether Policy SS1 establishes and appropriate spatial strategy, taking into account reasonable alternatives

Q5.2. is the spatial strategy for the scale and distribution of growth, as set out in Policy SS1. Justification 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?

The Council has gone to considerable lengths in its attempt demonstrate that there is no choice but to allow the loss of swathes of open countryside and allow development of public land in its ownership. There are a number of flaws in this. Firstly, the Council has repeatedly argued in favour of an ever-higher housing target, regardless of the London Plan context. The aim of doing this is to support a spurious argument that "there is no choice". Secondly, the Council has also repeatedly insisted that no plan can be sound unless it fully addresses whatever the latest 'needs' are, regardless of the damage that so doing would cause to the character of local areas, beyond its heartlands in the east of the Borough.

Law requires that Plans should achieve 'sustainable development' which implies a win-win. This plan does not do that. It represents a loss for Enfield.

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?

The Infrastructure Delivery Plan (IDP) is extremely vague about the potential transport infrastructure and mitigation schemes. The scale of development proposed at Chase Park and Crews Hill are so large that they can be expected to generate very large volumes of additional traffic, much of which will gravitate towards the M25 (junction 24). The IDP suggests that a number of measures may be needed, however the scale, nature and location of these proposals is unclear. The roads around Crews Hill, particularly at East Lodge Lane, Whitewebbs Road, and Clay Hill are rural in character and even a brief visit to these areas indicates that their capacity to accommodate additional traffic is very limited. Furthermore, the impact on the character of those rural lanes, and on small communities such as Botany Bay (which appears to be targeted for an unspecified intervention) is likely to be highly adverse.

Q5.17 Does the key diagram (Figure 2.4) effectively and accurately illustrate the spatial strategy?

The key diagram (p24) shows how the developments will spill out into Enfield Chase west of the railway line at Crews Hill and towards Hadley Road into the countryside. It significantly underplays the extent of the impact that proposals for 'sporting excellence' associated with Tottenham Hotspur FC's training ground will have in limiting public access to the beauty spots of Whitewebbs Park. Indeed, much of what is now open space will be housed behind high security fencing and much of the green space replaced with astroturf.

Q5.18 Is the relationships between the concept of 'gentle densification' and areas identified for 'intensification around transport nodes and town centres'? Are these two policy approaches compatible?

The key diagram (p30) shows intensification (which appears to imply tall buildings) around all railway stations, regardless of their suitability or the availability of sites. Whereas 'gentle densification' is appropriate in these locations, tall buildings and intensification are not. There is a fundamental contradiction. The Enfield Conservatives have been particularly concerned about the proposed very tall towers at the station car parks at Cockfosters station, and also proposals at Oakwood station. Not only would they result in the loss of valuable car-parking, they would also overshadow the Registered Historic Park at Trent Park and would be totally out of scale with the surrounding areas. A number of the other 'transport nodes' shown are clearly unsuitable for tall buildings, including Gordon Hill, Grange Park and Bush Hill Park.

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?

We have looked at the Infrastructure Delivery Plan on the website [here](#). This contains very little detail in relation to education, health and green infrastructure. We would expect that at a minimum there would be some indication of the costs so that the viability of funding them through S106 agreements could be understood. Furthermore, we can find no information regarding the capacity of existing schools to accommodate additional pupils arising from new developments, nor can we see projections of the likely demand for new school places to 2041, and therefore it is unclear whether the lack of additional secondary school provision at Chase Park is justified. For the proposed new secondary school at Crews Hill, it is unclear whether the landowner is agreeable to hosting the proposed secondary school on their land. If the landowner is not willing, then it seems very unlikely that adequate provision for schools will be made. Educational and utilities infrastructure (including water) is already stretched in the Crews Hill area and the Plan offers no convincing evidence that these problems will not be considerably worsened by the proposals.

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?

The selection was not made on an objective basis. The topic paper was produced retrospectively to justify the sites that were selected behind closed doors. None of the Conservative Group were involved in the site selection process at any point. (See our comments in Matter 1).

The Site Allocation Topic Paper (Document TOP2) refers to a 'bespoke approach' to stage 2 for the largest sites which requires balancing various factors. The problem with this is that it allows significant latitude for the Council to take a favourable view of land that it owns, and consider that any harms were outweighed by the benefits.

The Council has declared its intention of raising £800 million by selling Green Belt sites (presentation to the Finance and Performance Scrutiny Panel, 11th January 2023, Item 5)¹. This was not presented in the context of engaging with members around the proper consideration of site selection through the Local Plan, but as a *fait accompli*. Enfield Council carries £1.3 billion of debt, is paying £31 million per annum in debt interest repayments and has dwindling reserves. Therefore it is highly inappropriate that it hid its intentions to use the Local Plan to bolster its financial position, in fact allocating sites on this basis is wholly inappropriate. The Green Belt site allocations should be withdrawn on this basis alone as it is neither robust, consistent or objective.

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<https://governance.enfield.gov.uk/ieListDocuments.aspx?CId=832&MId=14261&Ver=4>

We have been made aware of the LBE Strategic Property consultation agents responses² published following submission (you can filter them in Column F of the Representations Database on the website), but this is the first time that this information was published as far as we are aware, and again as far as we are aware these comments have not been tabled at any meeting during the Local Plan process. Given the importance both financially in terms of this this Local Plan, we find it astonishing that the Council have submitted these comments without democratic scrutiny or comment on behalf of the residents of Enfield.

We have been made aware (not by the Council) that the Land Registry records show a restrictive covenant dated 1981 on upwards development at Palace Gardens shopping centre, which is presumably in the Council's gift as freeholder to relax, probably on payment of a fee. This is another example of a commercial relationship, here between Deutsche Bank and the Council, not being explained and debated amongst elected members. This is particularly inappropriate, as shown by the uproar that ensued (even the local Labour MPs condemned the proposals) when Deutsche Bank unveiled proposals for tall buildings at the heart of the Conservation Area. The Local Plan proposes to reintroduce the withdrawn schemes through the back door.

There is also retrospective 'boldness' with regard to the M25 Junction 24 site which attempts to justify release of large areas of Council-owned Green Belt (both in Enfield and to apply pressure to Hertsmere Borough to release land owned by Enfield in that Borough) and at Rectory Farm and Crews Hill Golf Course. The weight of evidence against the development at Crews Hill Golf Course is so substantial that it seems that the 'bold strategy' for very large amounts of development can only be an attempt to justify that strategy.

It follows from this that the 'bold' strategy and particularly the emphasis on a certain type of 'family housing' (which is provided elsewhere in London without using high quality countryside) is an attempt to disguise this underlying financial motive. Even those sites that are not Council-owned seem to be included in order to add to the case for release of the Council-owned land from the Green Belt.

As set out in our response to Matter 1, with regard to site selection the Full Council meetings of the 9th June 2021³ (Reg 18) and 19th March 2024⁴ (Reg 19) there was block voting from both major political groups (there were also 7 independent Councillors at the time of the 2021 meeting who voted along with the Conservatives against the Draft Local Plan) which the minutes show. This was not a proper process of engagement but an inevitable outcome of the failure to put in place any kind of proper deliberative forum. Whilst a pre-publication draft was made available from December to February 2024, this was only after all the content had been decided behind closed doors. Effectively Full Council had become a rubber stamping exercise rather than rather than functioning as a cross party forum to determine what was best for the Borough.

² https://www.enfield.gov.uk/__data/assets/file/0026/85427/Local-plan-representation-database-Planning-V2.csv

³ <https://governance.enfield.gov.uk/ieListDocuments.aspx?CId=108&MId=13694>

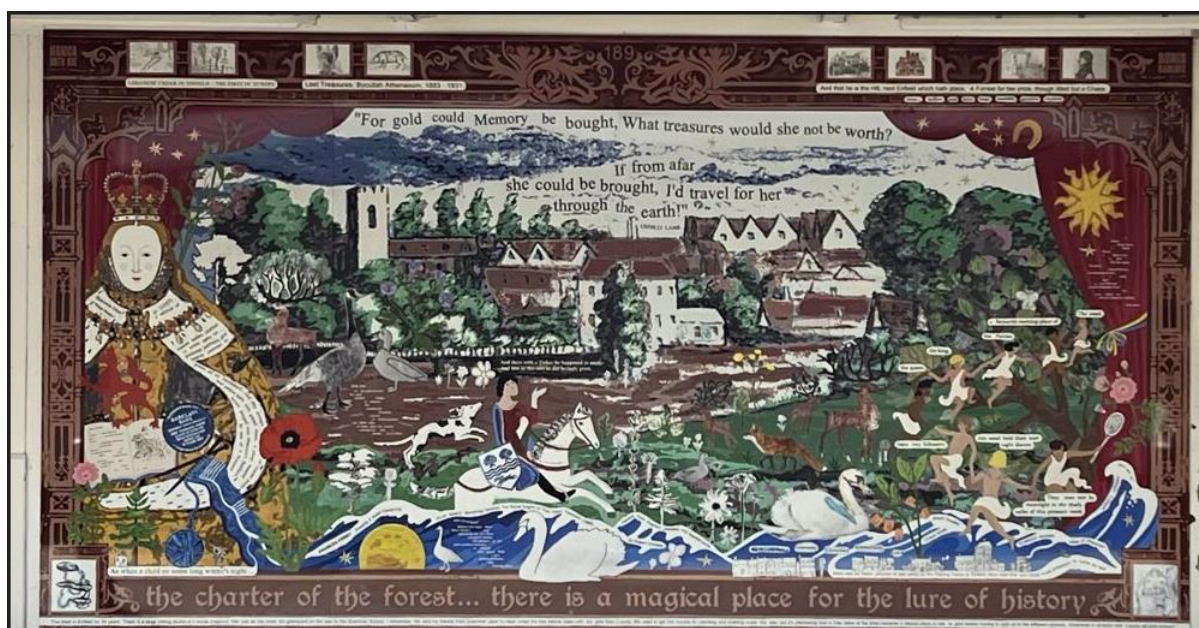
⁴ <https://governance.enfield.gov.uk/ieListDocuments.aspx?CId=108&MId=14918>

Given the above it is of great concern that given that the ruling group has a majority on Planning Committee, there do not appear to be any checks and balances on planning applications that the Council may submit to itself for determination.

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?

No. It can be demonstrated that constraints to development, in particular landscape, character and heritage were not appropriately taken into account.

It is very hard to exaggerate the importance of the historic landscape of Enfield Chase to the wellbeing of people in the western part of the Borough. It is not an exaggeration to say that Enfield Chase is to Enfield as Wimbledon Common is to Wimbledon or Hampstead Heath is to Hampstead. The point is illustrated in the very large mural recently installed at Enfield Chase station, a reproduction of which is shown below.



The mural shows a view from Enfield Chase across the site of the (much later) station towards the tower of St Andrews Church, showing the (now demolished) palace and Gentleman's Row, and illustrates the ties of the area with royalty and hunting, manifested by the open spaces of Enfield Chase at Enfield Road, the Ridgeway, and elsewhere.

Character, heritage and landscape, together with ecology and habitats, were the main reasons for the enshrining the Enfield Chase Heritage Area of Special Character with the Enfield (Unitary) Development Plan in 1994. Although introduced under a Conservative Leader, subsequent Labour leaders have overseen the expansion of the Area, including in 2014. Without an understanding of the wider financial and political issues we described in Matter 1, it is unclear why what appeared to be by common consent the principal asset of the Borough is now to be sacrificed for unnecessary development.

A very large number of representations submitted by local residents in western and northern Enfield suggest that landscape, character and heritage in particular were not appropriately taken into account. This is a theme that ran through the Regulation 18 stage in 2021 and it is highly distressing for many local people that decisions that affect the main contributors to the

character of their local areas are being targeted for development by an administration with its power base in a different part of the borough.

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

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

The mechanism for approval of masterplans and planning briefs is unclear from policy SS2.

Masterplans and planning briefs could work effectively through a mechanism of approval by either Cabinet or Full Council for most of the urban “place-making areas” located in Labour-voting parts of the Borough where the local Councillors have a clear interest in ensuring that the plans serve the local area well.

However, given the overriding corporate imperative to raise money to address the administration’s Council’s budgetary shortfall, it seems likely that the production of robust masterplans and planning briefs in the interests of local areas will be of secondary importance in other areas, notably at ‘Chase Park’ and at Crews Hill.

At Chase Park, the Council’s response to Comer Homes that it will defer consideration of the ‘country park extension’ to the masterplanning stage (Consultation Statement SUB12.1 p404, SA10.1) suggests that the country park will never be delivered. Although the Council does not own the land, its budgetary position is such that it is unlikely to take on extra open space maintenance liabilities and this is likely to result in pressure to concede much of the proposed open space within the allocation boundary, particularly given the proximity of existing open space at Trent Park.

At Crews Hill, the Council owns the land bought from Trinity College Cambridge in the 1930s for the protection of Enfield Chase as Green Belt countryside in perpetuity. The proposed de-designation of this Green Belt as far as Turkey Brook means that potentially all the de-designated land, including the newly planted areas at Kings Oak Plain/Rectory Farm could come forward for residential development through approval by a majority vote at Full Council, making a major contribution to the Council’s income but at the cost of huge damage to the public enjoyment of the historic Chase. Indeed, this scenario is made more likely because the fragmented ownership of land east of the railway line will result in far lower volumes of development than shown in the Local Plan, requiring far more development west of the railway line in order to fill a new secondary school. This reality will likely be reflected in the any proposed masterplan or planning brief, and the evidence of landscape harms set out in the sensitivity analysis will be easily set aside given the broad principle of a new settlement within the Local Plan.

Given the failure of the deliberative plan-making process we demonstrated in our statement for Matter 1, and the fact that a Labour majority has been used to force through the Local Plan at two Full Council meetings, and that a substantial part of the current mechanism is

geared to raising money through the sale of Green Belt land, it seems likely that this process will be repeated in future, even if masterplans or planning briefs differ significantly from the illustrative plans for Chase Park and Crews Hill. This is of little interest to Labour Councillors in the east of the Borough, whose main concern is to fix the Council's finances. Legitimate input from Conservative Councillors would simply be dismissed.

Furthermore, the proposal to defer details of major elements of infrastructure provision to the masterplan or planning brief stage makes it likely that critical items, such as road infrastructure, including new bridges over the railway at Crews Hill, will be dropped at that stage as developers question the viability.

The implications are that the outcome of approval of these proposed allocations, with or without the masterplans proposed in policy SS2, would not comprise a sustainable pattern of development and would therefore be contrary to both national policy and the London Plan.

The proposed approach is not justified because it would result in radically different forms of development to that suggested in the illustrative framework plans, and would not be effective in delivering the form of development proposed.

Total 3,090 WORDS (including Inspector's questions)