



Enfield RoadWatch Action Group

Hearing Statement

Matter 1: Legal, Compliance and General Issues

8/1/2025

Regulation 19 representations to which this hearing statement relates:

ID/Policy	Hyperlink/short description
01687-3-1 SS1	https://www.enfield.gov.uk/file/PDFs/email/01687-3-1.pdf Our role in the consultation process
01687-35-1 SS1 para 3	https://www.enfield.gov.uk/file/PDFs/email/01687-35-1.pdf London Plan housing target
01687-18-1 SS2 ¹	https://www.enfield.gov.uk/file/PDFs/email/01687-18-1.pdf Lack of consistency with London Plan ‘Good Growth’
01687-15-1 PL10	https://www.enfield.gov.uk/file/PDFs/email/01687-15-1.pdf Chase park inconsistency with London Plan, ‘green gap’
01687-23-1 PL10 para 15	Walking and cycling links from Chase Park https://www.enfield.gov.uk/file/PDFs/email/01687-23-1.pdf
01687-44-1 gradient analysis	https://www.enfield.gov.uk/file/PDFs/email/01687-44-1.pdf
SA11.6 01687-33-1	London Plan Policy T1 https://www.enfield.gov.uk/file/PDFs/email/01687-33-1.pdf
PL10 para 14	London Plan Policy T1 [missing from database]

This statement has been prepared in consultation with The Enfield Society, and we are in mutual agreement as to the concerns raised.

¹ The database [at 26/12/2024] incorrectly includes SS2 under SA10.2

Q1.6 Has the Council maximised the effectiveness of the Plan by engaging constructively, actively and on an ongoing basis with neighbouring authorities and the other prescribed bodies and the relevant strategic matters and what form has this engagement taken?

No. We agree with The Enfield Society's response to this question.

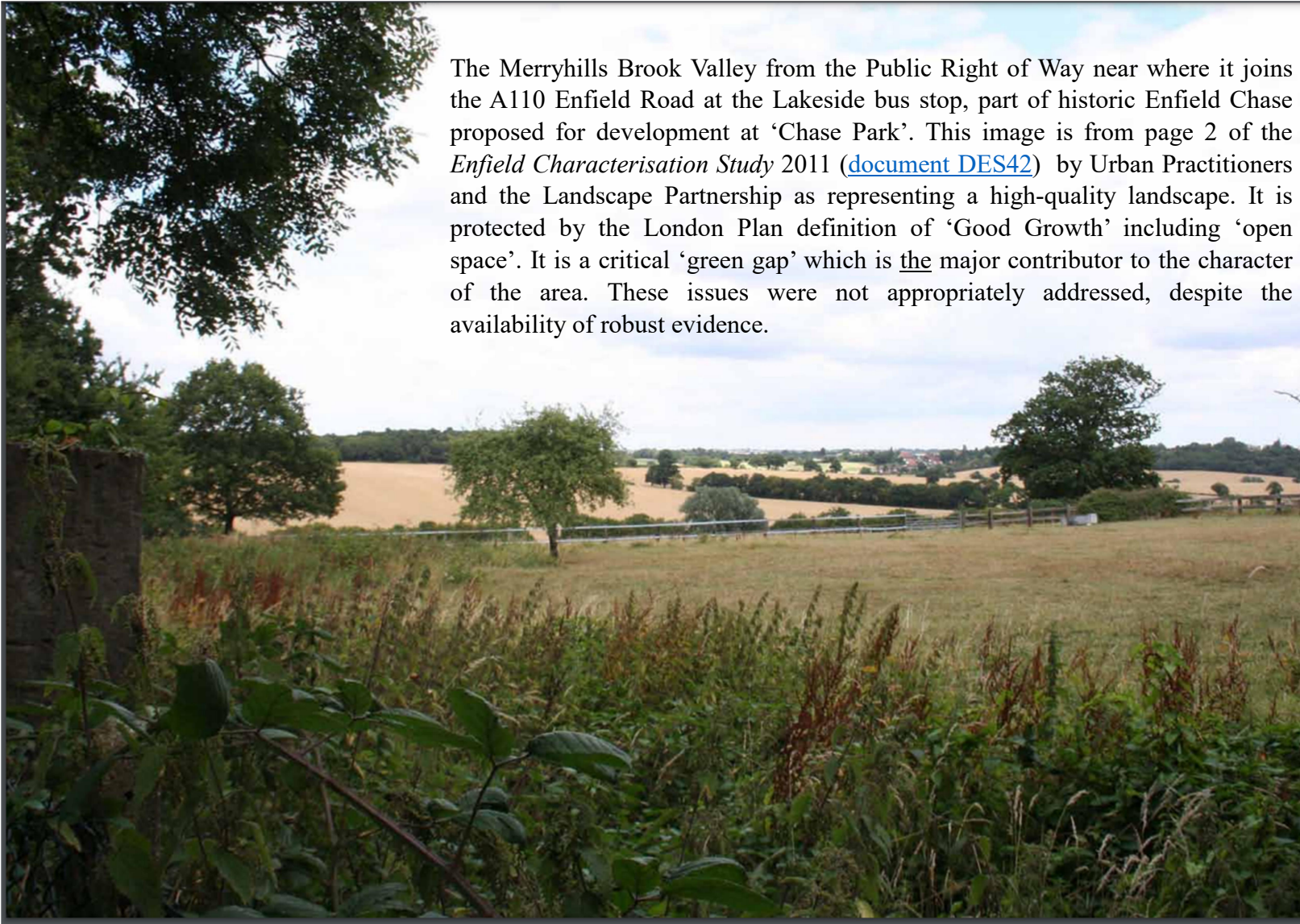
Q1.7 In overall terms, is the Plan in general conformity with the London Plan?

No. The Regulation 19 consultation response proforma used by the Council failed to seek views regarding conformity with the London Plan, a fact in itself indicative of a profound failure to recognise the importance of this legal requirement.

The 'Good Growth' spatial development patterns set out in Chapter 2 of the London Plan are expressed through a number of policies. In our representations regarding policy SS1 paragraph 11 ([weblink 01687-1-1](#)) we pointed to non-compliance with London Plan policies for transport and open space. Regarding policy SS2 ([weblink 01687-18-1](#)) we showed that the meaning of 'sustainable patterns of development' within the NPPF relating to Green Belt, when applied within the context of the London Plan, requires that Local Plans should focus new development on town centres, Opportunity Areas and regeneration sites. Furthermore, in our comments on policy SS1 paragraph 3 ([weblink 01687-35-1.pdf](#)) we pointed out the linkage between the overall London Plan strategy and the approach to housing numbers, which should result in far lower housing numbers than those proposed in the Enfield Local Plan. We also showed ([weblink ID 01687-28-1](#)) how 'Good Growth' supports the protection of open space through London Plan policies [GG2](#) (part F), [G1](#) and the [Glossary](#) definition of open space that includes private land. The implications of the proposed major departures from the London Plan at the 'rural placemaking areas' are also evident in terms of the impact on historic landscapes ([weblink ID 01687-21-1](#)) and green gaps vital to the character of London ([weblink ID 01687-42-1](#) – photographic survey), as already demonstrated.

No other London Councils have allocated general housing sites in the Green Belt since adoption of the London Plan in 2021. A Local Plan Inspector asked **Barking and Dagenham Borough Council** to remove two small proposed Green Belt housing sites from its draft Local Plan (Post Hearings Letter 9 January 2024, paragraph 15, document EX191 [weblink here](#)). **Hounslow Borough Council** in west London recently dropped proposals for all Green Belt housing sites from their Regulation 19 Local Plan and stated in a report of 16 July 2024 that "*this helps ensure general conformity with the London Plan (2021), which requires boroughs not to release Green Belt land to meet their housing needs.*" ([weblink here](#), paragraph 3.9)

The Merryhills Brook Valley from the Public Right of Way near where it joins the A110 Enfield Road at the Lakeside bus stop, part of historic Enfield Chase proposed for development at 'Chase Park'. This image is from page 2 of the *Enfield Characterisation Study 2011* ([document DES42](#)) by Urban Practitioners and the Landscape Partnership as representing a high-quality landscape. It is protected by the London Plan definition of 'Good Growth' including 'open space'. It is a critical 'green gap' which is the major contributor to the character of the area. These issues were not appropriately addressed, despite the availability of robust evidence.

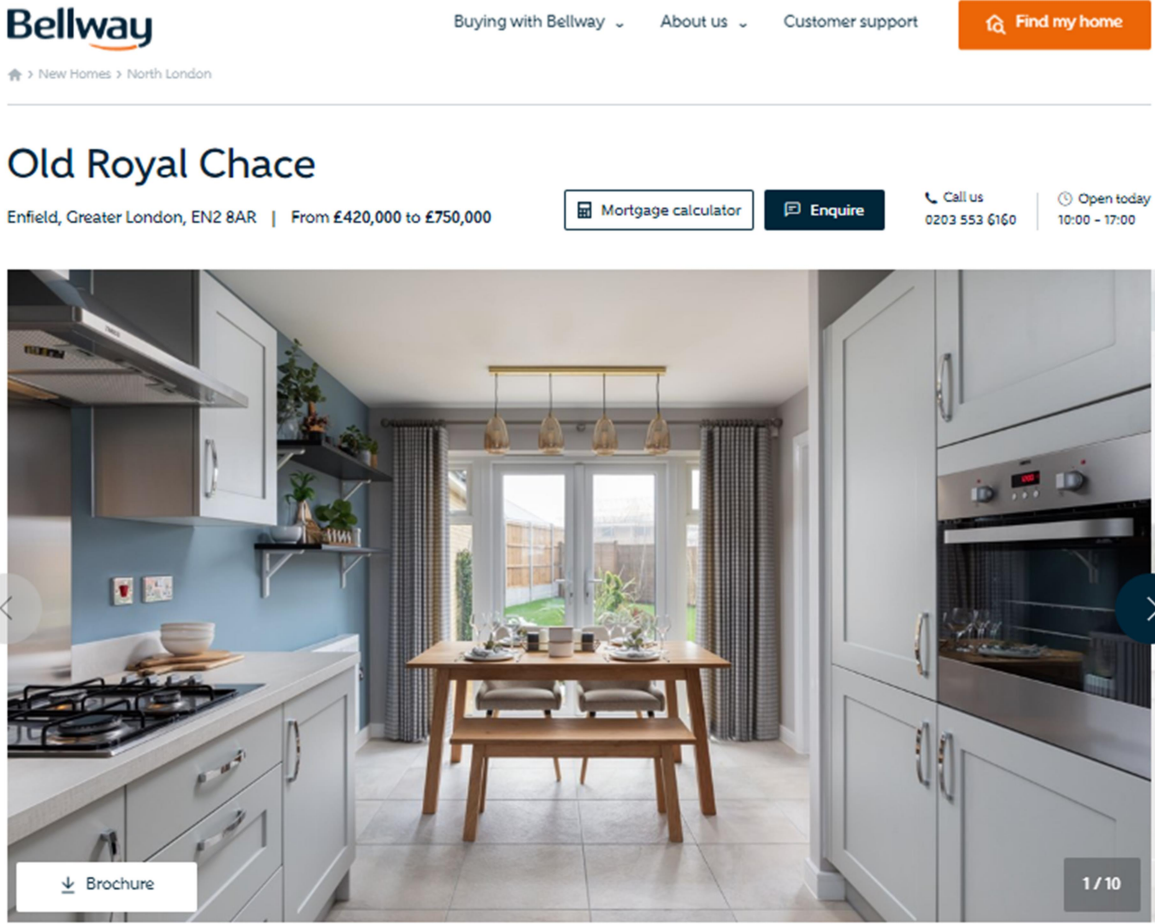


Development of the scale envisaged in this location is not consistent with London Plan requirements for 75% of trips in outer London to be by non-car means in Policy TM1. As we argued, this approach to transport is fundamental to the overall approach to ‘good growth’ because it underpins the strategic focus on accessible Opportunity Areas and town centres and protection of open space, and we demonstrated the problems with the gradients at Chase Park and Crews Hill in terms of compliance with the London Plan.

The implications of this are clear from the **marketing brochures** for various developments in the north of the Borough, all of which are Local Plan sites with similar characteristics to the proposed developments at Chase Park and Crews Hill in terms of being located on the edge of the countryside with good car access to Junction 24 of the M25. Despite having been granted planning permission by Enfield Council (the applications for which made much of their supposed sustainable transport credentials at the time) the reality is clear. If Chase Park and Crews Hill are removed from Green Belt, then they will similarly be marketed for their access by car to the M25 and elsewhere, perpetuating and worsening existing problems of car-dependency, making it very hard to achieve London-wide targets for non-car travel and undermining the approach to ‘Good Growth’ set out above. This would set a dangerous precedent and fetter the ability of the Mayor to revise the London Plan based on strong sustainability principles.

The following examples illustrate the likely car-dependent outcome of deviation from the London Plan ‘Good Growth’ approach from allocating the ‘rural placemaking areas’ at Chase Park and Crews Hill.

Bellway marketing website (June 2023) for housing at Local Plan Site SAURB.11 (The Former Royal Chace) shows “around 10 minutes’ drive to Enfield town centre” and “five minutes’ drive to M25” as major selling points.



i We are now offering drop-in appointments across all our developments, however, should you wish to have dedicated time with our sales advisor, we encourage you to book ahead of your visit. [Click here](#) for further details.

Just launched

A development of new homes in Enfield, around 15 miles from central London and surrounded by open countryside. These new homes will appeal to a range of audiences, including families, first-time buyers... [Read more >](#)

Features

- ✔ 1 and 2-bedroom apartments; 2 and 3-bedroom houses
- ✔ Allocated parking to all homes; gardens to all houses
- ✔ Well-regarded schools locally
- ✔ **Around 10 minutes’ drive to Enfield town centre**
- ✔ **Around 20 minutes’ walk to Gordon Hill train station and around five minutes’ drive to the M25**



Contact our sales office

View plot details



This extract from Bellway Homes' marketing brochure ([weblink here](#)) for Local Plan site SAURB.11 features short drive times as a major benefit of living at the new development (see enlargement next page). Public transport does not feature.

OLD ROYAL CHASE

PARK LIFE

FIND THE PERFECT BALANCE BETWEEN CITY AND COUNTRY LIFE WITH A HUGE CHOICE OF LEISURE ACTIVITIES CLOSE BY, PERFECT FOR FAMILY FUN, RELAXING OR A WORKOUT

Enfield is renowned for its abundance of parks and open spaces, each one offering a beautiful green break from the concrete of the city. There are also plenty of ways to keep fit within reach of Old Royal Chase, from sports pitches to swimming pools, making it the perfect choice for those seeking a better quality of life.

CREWS HILL GOLF CLUB EN2 8AZ
5 mins by car
One of the top 10 golf courses in Middlesex founded in 1920 offers a real challenge for every level of golf.

GO APE, COCKFOSTERS EN4 0DZ
7 minutes by car
Explore the forest canopy via a treetop rope course and the longest zip wire in London.

TRENT COUNTRY PARK EN4 0JY
8 minutes by car
With over 400 acres this enchanting country park is a popular destination for jogging, cycling, walking or just chilling out.




DAVID LLOYD ENFIELD EN1 4LF
10 minutes by car
With state-of-the-art gym facilities, indoor and outdoor pools, spa, and sports courts, David Lloyd prides itself on providing first-class fitness.




FORTY HALL ESTATE EN2 9HA
11 minutes by car
The 273 acre Grade II listed estate with a lake, fishing ponds and walled garden and incredible wildlife offers something to enjoy all year round.

PARADISE WILDLIFE PARK EN10 7QA
21 minutes by car
Home to over 800 animals including penguins, pandas and tigers, plus an animatronic dinosaur adventure trail set in acres of natural woodland.

Travel times taken from google maps.

Enlargement of Old Royal Chace marketing brochure SAURB.11 indicates the drive times “taken from Google maps” (presumably not at peak times). No indication of any public transport or cycling connections. The assumption is that residents will take their bike to Trent Park by car to enjoy cycling after arrival.

 <p>CREWS HILL GOLF CLUB EN2 8AZ</p> <p>🚗 5 mins by car</p> <p>One of the top 10 golf courses in Middlesex founded in 1920 offers a real challenge for every level of golf.</p>	 <p>GO APE, COCKFOSTERS EN4 0DZ</p> <p>🚗 7 minutes by car</p> <p>Explore the forest canopy via a treetop rope course and the longest zip wire in London.</p>	 <p>TRENT COUNTRY PARK EN4 0JY</p> <p>🚗 8 minutes by car</p> <p>With over 400 acres this enchanting country park is a popular destination for jogging, cycling, walking or just chilling out.</p>
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 <p>DAVID LLOYD ENFIELD EN1 4LF</p> <p>🚗 10 minutes by car</p> <p>With state-of-the-art gym facilities, indoor and outdoor pools, spa, and sports courts, David Lloyd prides itself on providing first-class fitness.</p>	 <p>FORTY HALL ESTATE EN2 9HA</p> <p>🚗 11 minutes by car</p> <p>The 273 acre Grade II listed estate with a lake, fishing ponds and walled garden and incredible wildlife offers something to enjoy all year round.</p>	 <p>PARADISE WILDLIFE PARK EN10 7QA</p> <p>🚗 21 minutes by car</p> <p>Home to over 800 animals including penguins, pandas and tigers, plus an animatronic dinosaur adventure trail set in acres of natural woodland.</p>
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Travel times taken from google maps.

Marketing for Local Plan site SAURB.06 (Former Middlesex University, Trent Park)

The 14-minute drive to the M25 Junction 24 and 35-minute drive to Heathrow airport feature as major benefits of living at Trent Park according to this web marketing for Berkeley Group.

15:16 57%

Berkeley
Group

TRENT PARK
NORTH LONDON

Jump To

A Quintessential Country Estate

Trent Park

Enfield, EN4 0FD

£699,000 - £2,535,000

- Set in 56 acres of parkland
- Surrounded by a 413 acre country park
- Exceptional selection of new and refurbished homes
- 24 hour security & resident shuttle bus to Oakwood Station
- 14 minute drive to M25 J24; 35 minutes to Heathrow Airport by car
- Former royal hunting ground used by Henry VIII, Elizabeth I, James I and Charles I

Smartphone icon, Telephone icon, Star icon





Marketing for Local Plan site SAURB.03 (Former Chase Farm Hospital Site).

Linden Homes, the authors of this marketing piece state *“The M25 (J24) is just 4 miles drive, while Oakwood Underground (Piccadilly Line) is just 3.3 miles (11 minutes’ drive).”*

The expectation that new residents will drive is clear and presumably based on their own market and customer research.

Locksley Place
Enfield

A collection of 2 bedroom apartments
and 3 & 4 bedroom houses



Conveniently located off Lavender Hill in Enfield, Locksley Place will provide an aspirational collection of 2 bedroom apartments and 3 & 4 bedroom houses. Less than 2 miles from Enfield town centre, with its range of high street shops, eateries and cinema and close to the wide open green spaces of Enfield Chase and Trent Park,

residents at Locksley Place will find the best of town and country living. Families will find a good number of schools to choose from in the area, with all ages catered for. And with simple access to good transport links into London and beyond, there are a great number of benefits to making this your new home.

With easy commuting into London by train from Gordon Hill station, with services to Kings Cross and Moorgate stations both around 36 minutes. **The M25 (J24) is just 4 miles drive**, while Oakwood Underground station (Piccadilly Line) is just 3.3 miles (11 minutes’ drive).

Q1.14: Have representations been adequately taken into account?

No, both in relation to simple matters of collation and publication and at the deeper level of ‘taking account of’ in terms of genuinely engaging with and being influenced by the representations.

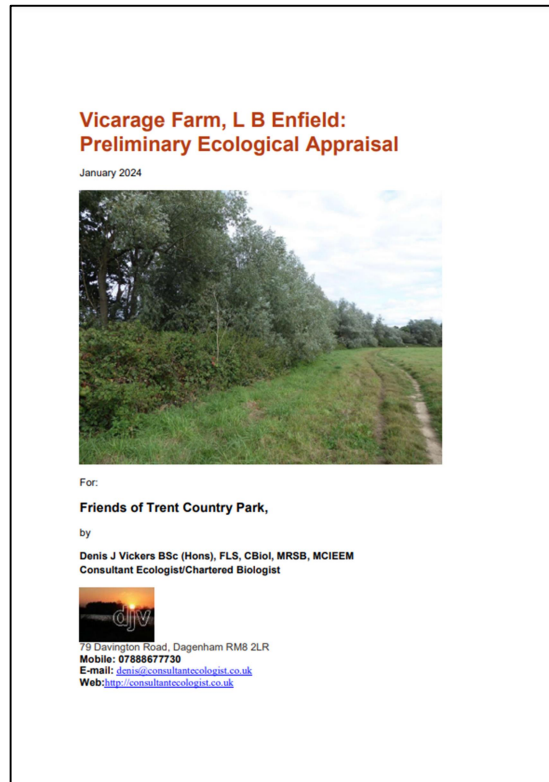
In relation to the **Regulation 19 representations**, there has been an on-going saga whereby the Council omitted to process a large number of ‘duly made’ representations. *Enfield RoadWatch* and The Enfield Society have made concerted efforts to assist the Council with rectifying these omissions but, at the time of writing, a large number of representations submitted by members of the public remain unaccounted for in the Representations Database. Furthermore, again despite a number of emails to the Council pointing out the errors, a number of representations submitted by Enfield RoadWatch have not been properly addressed, including:

- A number of the covering representations are not correctly related to the covering explanation text on the ‘proformas’
- New responses were added to the Representations Database, but there has been no corresponding update to the Consultation Statement, in breach of the [Regulation 22 c part v](#)) because it has not shown how it has responded to these representations.

We cannot find any references to where the Council has taken account of any of the representations made at the **Regulation 18 plan preparation stage**, which appears to have been treated as an extended opportunity to anticipate objections and erect defences around the Council’s case for releasing land in its ownership from the Green Belt, rather than as an opportunity for third parties to genuinely influence the Plan.

Many of the Council responses to the Regulation 19 representations in document SUB12.1 are cursory and do not meet the threshold of showing that representations have been ‘taken into account’. For example, there is no clear attempt to engage with representations around harm to the character of Enfield from the loss of countryside at Enfield Chase or urbanisation of the Merryhills Way.

The Friends of Trent Country Park submitted a preliminary Ecological Appraisal for Vicarage Farm (*see cover below*) which does not appear in the Representations Database and does not appear to have been made available as part of the Examination process.



Out of frustration at the lack of genuine engagement during the plan preparation stage, an umbrella coalition of local groups, including Enfield RoadWatch, organised a **petition** in 2022 as Action for Enfield's Future [AfEF], which was signed by 4,321 residents. The campaign requested 12 weeks to read, digest and respond to the numerous plan making documents and to allow time for Councillors to brief and obtain feedback from their constituents in advance of any council vote to proceed to Regulation 19. The Council voted in favour of this at the Full Council meeting on 12 October 2022. With a timely reminder by Enfield RoadWatch, a draft of the Local Plan was published in December 2023, although many key evidence documents were not released until the start of the Regulation 19 consultation in late March 2024.

Q1.15: Is there any clear evidence that the public consultation carried out during the plan-making process failed to comply with the Council's SCI or any other legal requirements?

Yes. We provide evidence below.

On pages 6 and 7 of the SCI (document there is a commitment to ensure that the Local Plan process will be "*meaningful: an on-going process...collaborative*" and "*open, transparent and responsive....showing how comments and views have been considered.*"

[Town and Country Planning \(Local Planning\)\(England\) Regulations 2012, section 22\(1\) \(c\)iv](#) require that the Consultation Statement should include a statement of “*how any representations made pursuant to regulation 18 have been taken into account*”. There is no such statement within the submitted Consultation Statement (document SUB12.1) nor in earlier iterations of the document, and therefore the Local Plan is in breach of the regulations. Retrospective updating of the Consultation Statement to include a schedule would not be able to fix the failure to abide by the SCI commitment to follow an open, transparent and meaningful process in formulation of the Plan.

Clear evidence of failure is also provided by the **printed leaflet (below)** that was distributed to households in August 2021 as part of the consultation on the Regulation 18 Local Plan Issues and Options consultation. The leaflet forms a lengthy defence of the proposals in the draft Plan. The main² failure in terms of the SCI is that it **fails to explain what the actual proposals within the Local Plan are or how to find them within the documents**. There is no borough map showing the broad location of the proposed development sites³, nor is there a list or table showing the proposed amount of development in each of the proposed sites. Given that the Council published for the first time several thousand pages of evidence alongside the lengthy Local Plan in July 2021, and that trawling through all this documentation in order to locate the proposals was clearly impractical for the majority of busy people, clear communication of the proposals through this leaflet or other information should have been paramount within the context of the SCI commitments to openness and meaningfulness of community engagement.

² There are numerous inaccuracies in the leaflet, including the 4,397 new homes requirement, and claims about ‘discussions and workshops with residents’, but there is insufficient space here to detail these at length.

³ A map such as that buried inside the Local Plan on page 360 would have gone a significant way to meeting the SCI requirements.

Printed brochure distributed to householders, August 2021



Summer 2021

Update from the Leader of Enfield Council on the Enfield's Draft Local Plan

Dear Enfield Resident

Here is some information about Enfield Council's Draft Local Plan which is currently out for a consultation. We need a Local Plan to tackle the housing crisis in our borough. Residents in Enfield are finding it difficult to find decent or affordable homes to rent or buy. Our Draft Local Plan is about planning for the future - for more homes, transport and social infrastructure like schools and health care.

Enfield Council is currently investing £1bn to provide 3,500 new council led homes over the next 10 years. In addition we are building 10,000 new homes at Meridian Water. However, in reality this is insufficient to meet need. By 2039 the population in our borough is projected to grow by an additional 50,000 (GLA/ONS 2019), so we need a Local Plan that will allow us to build thousands of new homes - Enfield homes for Enfield people.

The Draft Local Plan proposes 25,000 new homes over 20 years to 2039 - with 18,500 homes delivered in Enfield's urban and brownfield locations and 6,500 in rural areas, including new places near Crews Hill Train Station and Chase. Enfield has a statutory duty to provide an additional 1,246 new homes each year, but the Government would actually like us to deliver 4,397 per year.

We also need a sound Local Plan to protect the majority of our Green Belt from the proposed national planning changes and the risk of uncontrolled development. The Draft Local Plan proposes development on just 7% of the Green Belt in Enfield to meet our housing need.

Our plan also guards against the development of skyscrapers being built in inappropriate locations across our borough, so that we can continue to enhance Enfield's historic heritage.

I know residents in Enfield feel passionate about getting our Local Plan right - protecting our green spaces and delivering more affordable homes. I encourage you to respond to the Council's consultation by 13 September 2021. Thank you to everyone who's provided feedback to date.



Best wishes,

A handwritten signature in black ink, appearing to read 'Nesil Caliskan'.

Cllr Nesil Caliskan
Leader of Enfield Council
Leader@enfield.gov.uk



The process for developing a new Local Plan for Enfield

The Local Plan sets out the vision for future development in our borough, essentially the local guide to what can be built, where. It is a statutory requirement for all councils to prepare a Local Plan and ensure that it is up-to-date. Enfield's current Development Plan includes a Core Strategy published in 2010, a Development Management Document published in 2014 and several area action plans of varying ages. Most of these plans are older than five years and are required to be reviewed. Without an up-to-date Local Plan the Council cannot effectively control development through the planning process.

Enfield Council's Draft Local Plan has been informed by engagement first dating back to 2018/2019, when there was a 12-week consultation. Since then Enfield Council has continued to speak with residents and stakeholders through workshops and discussions, Council meetings, as well as responses to enquiries submitted by your local councillors.

Enfield's Draft Local Plan was recently discussed at a Council meeting on Wednesday 9 June and as part of the next stage of the plan preparation process, the decision was taken to launch a 12-week borough-wide consultation.

Enfield's Draft Local Plan

The new Draft Local Plan has been designed to create homes for future generations - Enfield homes for Enfield residents. The plan will also protect the unique heritage of our borough, invest in our green spaces and enhance our local wildlife.

The Draft Local Plan will:

- Deliver 25,000 new homes across the borough by 2039, including more homes around all our transport hubs.
- Commit to delivering 50% of new homes as genuinely affordable to rent or to buy – to meet Enfield's needs.
- Improve biodiversity and invest in our natural green spaces so more people can access and enjoy them.
- Support our local economy by identifying employment floor space and creating jobs in Enfield,

including new locations in the north and east of the borough.

- Add new infrastructure in the form of schools, sustainable transport, health & other community facilities to sustain and strengthen the places of Enfield.

Enfield's housing need and government housing targets

Our borough is facing a housing crisis which means residents are finding it difficult to find decent and affordable homes in Enfield. This is pushing many people into financial hardship and in some cases forcing people to move away, when they would prefer to stay.

- We have overcrowding, and many households in Enfield on median and lower incomes are having to spend more than 40% of their disposable income on housing rent or mortgage repayments.
- We have over 4,500 residents on the housing needs register.
- The average home in Enfield costs 14 times the median household income.
- By 2039, Enfield's population is expected to have grown by 50,000.

The Government has said that Enfield needs to build 4,397 net new homes in our borough every year to help address local need.

The responsible thing for Enfield Council to do is to have a plan for our borough and our residents. It is important for us to face these issues head on if we don't want our children and grandchildren to be priced out of Enfield.

Enfield Council is already maximising housebuilding on brownfield sites

Enfield Council's Draft Local Plan prioritises developing on urban brownfield sites. However, the reality is that we do not have enough brownfield sites to meet the housing need in Enfield.

Approximately 18,500 homes are proposed to be allocated in the urban areas, whilst 6,500 homes are proposed in the rural areas. This will deliver new

QUALITY ECONOMY, HEALTH, SPORT, TOWN CENTRES



neighbourhoods with family size homes, houses with gardens and enhanced access to nature.

Developing a Local Plan that will stop skyscrapers in inappropriate locations

Addressing the housing supply issue requires us to either build up, or carefully build further out into Enfield.

Like many residents, we do not want to see skyscrapers in inappropriate locations all over our borough. Enfield Council's Draft Local Plan guards against the development of inappropriate tall buildings. Instead we are exploring other practical solutions, like developing well designed homes near all existing transport hubs, such as Crews Hill Train Station.

Enfield's history of suburban family housing is continued in this draft plan, which includes proposals for well designed beautiful terraced family homes.

A 'sound' Local Plan protects the majority of the Green Belt in Enfield from proposed planning changes and the risk of uncontrolled development

Enfield Council legally requires a technically 'sound' Local Plan that demonstrates the allocation of adequate land to meet housing requirements in our borough.

If our Local Plan does not allocate adequate land to deliver the annual housing target of 1,216 houses per year, the Local Plan would be deemed to be 'unsound' by the Planning Inspectorate.

Without a 'sound' Local Plan, and such an existing acute housing need in Enfield, landowners and developers can apply for planning permission to build houses anywhere in our borough. It could be difficult for the Council to refuse planning applications or defend against them at appeal.

If the Council does not agree a Local Plan (in whatever form), the risk of uncontrolled development all over our Green Belt is heightened.

Investing in Enfield green spaces and addressing climate change

Enfield Council's Draft Local Plan provides specific protection for our rich network of biodiversity, our ancient woodlands and our commitment to be a carbon neutral borough by 2040. It will also support our plans to enhance access to green spaces and invest further in our existing parks.

CONSULTATION



Let us know your views by visiting the Let's Talk online platform: letstalk.enfield.gov.uk/localplan

You can read the Enfield's Draft Local Plan, supporting information and find out about forthcoming consultation meetings and workshops on www.enfield.gov.uk/enfieldlocalplan

The consultation happening this summer is part of a statutory process Local Plans must follow. This leaflet helps publicise a consultation on a "preferred option" as part of a Regulation 18 Issues and Options phase.

Nothing in this leaflet is a predetermination of the consultation process or the wider statutory planning process.

After the consultation, Enfield Council will consider all representations and other information received and use these to help prepare the next iteration of the draft Enfield Local Plan which will be considered at a Full Council Meeting before submitting the plan to the Planning Inspectorate for Examination.

**FUTURE
ENFIELD** ▶

ENFIELD HOMES FOR ENFIELD PEOPLE

**HOUSING, JOBS, SUSTAINABILITY,
ECONOMY, HEALTH, GREEN
SPACES, TRANSPORT,
TOWN CENTRES AND MORE.**

**GIVE US YOUR VIEWS ON ENFIELD'S
DRAFT LOCAL PLAN TODAY!**

Visit our Local Plan consultation on
letstalk.enfield.gov.uk/localplan by 13 September 2021



This was not an isolated example, but was a consistent pattern of failings at all three statutory consultations, in 2018, 2021, and 2024.

- No simplified plan contents or accessible version of the site allocations policies and maps were produced. For example, the 2018 ‘*issues and options summary and questionnaire*’ ([document ISO1](#)) in which the ‘2036 growth options diagram’ appears on page 8, and the references to possible large-scale new development at Crews Hill in the main document do not appear anywhere in the summary. None of the 16 questions ask whether Crews Hill or Vicarage Farm would be suitable locations for large-scale development, despite questions 6, 7 8 and 9 all asking housing-related questions.
- The *Regulation 19 stage consultation summary leaflet* issued in March 2024, reproduced on pages 122-123 of the Consultation Statement ([document SUB12.1](#)) contains no maps or details such as location or amount of development at the proposed developments.
- Events that the Council has claimed to be ‘workshops’ (which implies some degree of collaboration) were not substantive opportunities to discuss site-selection but were actually ‘briefings’
- Full Council meetings on 14 July 2021 and 19 March 2024, which we attended as observers, were Councillor shouting matches (as is clear from the recordings) and a reading out of statements of pre-determined positions along rigid party lines, but are misrepresented in the Printed Minutes and Consultation Statement as ‘debates’ and ‘discussions’. In Reality, there was no proper deliberative discussion.
- Up until the post-submission Consultation Statement, any serious planning issues raised were simply recorded by the Council as ‘constructive and helpful’ (seemingly to bolster their legal compliance credentials) without actually responding to or showing how issues raised would be addressed.

The view of many residents is that although – thanks to the efforts of local groups including ourselves and The Enfield Society on their website at <https://enfieldsociety.org.uk/localplan/> – they are aware of the Local Plan Green Belt proposals, the whole process is too complicated to get involved with. This complexity could and should have been reduced through effective communications. They were not. This is a major breach of the statutory requirement for open and meaningful communication set out in the Statement of Community Involvement.

Planning Practice Guidance (PPG) states that “*We would encourage authorities to publish documents forming part of their evidence base as they are completed on their website in an accessible format, rather than waiting until options are published or a local plan is published for representations, to keep communities informed and involved.*” (Paragraph: 035 Reference ID: 61-035-20190723). The Document Library is misleading because it suggests that the evidence documents were published at different times. In fact there were only two dates when these documents were published to the website – in July 2021 and in March 2024, both at the start of publication for representations.

A further major issue in terms of both SCI compliance, and more generally with the usability of the Plan, is the **poor navigability and legibility** of the Regulation 19/submitted Plan itself.

Although the submitted Plan necessarily has much more content than existing documents because it contains site allocations, the document should have been much more concise (NPPF paragraph 15) and user-friendly. These failings become clear through comparison with the current adopted Enfield plans. See **examples below**.

Below: the current adopted Enfield Plans such as the Core Strategy and other DPDs are easy to navigate, based a single PDF with hyperlinks from the Contents page to the relevant sections of the Plan, a readable font size, and not loaded down with unnecessary photographs.

Core Strategy Adoption November 2010 Enfield Council		
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Below: the presentation of the Regulation 19 Local Plan was/is impenetrable to all but the most determined reader. This is because it is: a) split into multiple PDFs, b) the site allocations Table of Contents hard to find on pages 358-, c) lacking in hyperlinks, d) contains so many photographs that the documents are slow to download, e) the font size is tiny, and f) much of the text in the main document is unnecessary. This made the consultation almost impossible for local people to grasp, and it is doubtful whether members of the Planning Committee will be able to triangulate the various parts of the plan in order to correctly apply policies in the future.

ENFIELD DRAFT LOCAL PLAN REGULATION 19 MARCH 2024		Appendix C														
C.1 HOUSING AND MIXED-USE SITE ALLOCATIONS																
Enfield Town 363																
SA1.1: Palace Gardens Shopping Centre	SA4.2: Upton Road and Raynham Road	SA7.5: Coppice Wood Lodge, 10 Grove Road														
SA1.2: Enfield Town Station & Former Enfield Arms	SA4.3: Langhedge Lane Industrial Estate	Palmers Green														
SA1.3: Tesco, Southbury Road	SA4.4: South-east corner of the North Middlesex University Hospital	SA8.1: Morrisons, 19 Alderman's Hill														
SA1.4: Enfield Civic Centre	SA4.5: 50-56 Fore Street	SA8.2: Lodge Drive Car Park														
SA1.5: St Anne's Catholic High School for Girls	Meridian Water	SA8.3: Corner of Green Lanes and the North Circular														
SA1.6: 100 Church Street	SA 5.1: Meridian Water Phase 1	SA8.4: Travis Perkins, Palmers Green														
SA1.7: Oak House, 43 Baker Street	SA5.2: Meridian Water Phase 2	Chase Park														
Southbury	SA5.3: Former IKEA, Meridian Water	SA10.1: Land at Chase Park South														
SA2.1: Colosseum Retail Park	SA5.4: Tesco Extra, Meridian Water	SA10.2: Arnold House & Land to the rear														
SA2.3: Morrisons, Southbury Road	SA5.5: Meridian 13	SA10.3: Chase Park North East														
SA2.4: Southbury Leisure Park	SA5.6: Meridian East (Harbet Road)	SA10.4: Chase Park North West														
SA2.5: Tesco, Ponders End	Southgate	Crews Hill														
SA2.6: Sainsbury's, Crown Road	SA6.1: Southgate Office Village	SA11.1: Land North of Cattlegate Road, Crews Hill														
Edmonton Green	SA6.3: Minchenden Car Park & Alan Pullinger Centre	SA11.2: Land South of Cattlegate Road, Crews Hill														
SA3.1: Edmonton Green Shopping Centre	New Southgate	SA11.3: Land South of M25, Crews Hill														
SA3.2: Chiswick Road Estate	SA7.1: Former Gasholder, New Southgate	SA11.4: Land North and South of Cattlegate Road														
Angel Edmonton	SA7.2: Aldi, New Southgate (Formerly Homebase)	SA11.5: Land East of Theobalds Road Park, Crews Hill														
SA4.1: Joyce Avenue & Snells Park Estate	SA7.3: Ladderswood Estate	SA11.6: Land South West of Theobalds Park Road														
	SA7.4: Arnos Grove Station Car Park															

Q1.16: As part of the integrated impact assessment (IIA) has the formulation of the Plan been based on a sound process of sustainability appraisal?

The IIA has no regard to the London Plan ‘good growth’ principles in deciding how to assess sustainability. This is a significant failing because within London sustainability has a stronger definition than in other parts of the country.

The formulation of the Plan was not “*based on*” the IIA: the perfunctory ‘reasons for allocation’ in Appendix I to the IIA do not address the main planning issues or explain how the balance was struck.

Please see the representations submitted by the Friends of Trent Country Park, The Trent Park Conservation Committee and the Western Enfield Residents Association for examples of some of the flaws with the IIA.

Total 2930 words including questions but excluding screenshots.