

**Friends of Trent Country Park (FoTCP)**  
**Trent Park Conservation Committee (TPCC)**  
**Western Enfield Residents Association (WERA)**

**Matter 1: Legal, procedural and  
other general matters**

**8/1/2025**

## **Issue 1.2: General Conformity with the London Plan**

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

<b>ID/Policy</b>	<b>Hyperlink/brief description</b>
PL10 para 13 03448-5-1	<a href="https://www.enfield.gov.uk/file/PDFs/email/03448-5-1.pdf">https://www.enfield.gov.uk/file/PDFs/email/03448-5-1.pdf</a>

No.

We set out in our representation above that the approach is not in general conformity with the London Plan in terms of its protections for open space. This issue has been addressed more fully by The Enfield Society in their representations in terms of understanding the London Plan ‘in the round’ and we will not dwell on it here.

However, it is crucial to emphasise that Enfield Chase, with its vital contribution and protected status as an Area of Special Character, should not be the first part of the London Green Belt sacrificed to development. This area holds significant community and environmental value, and there are likely to be other less critical Green Belt areas or even brownfield sites across London. Allowing Enfield to proceed independently, without a comprehensive London-wide approach, would not only jeopardise this cherished area but also overlook potential opportunities elsewhere.

## **Issue 1.3: Public Engagement**

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

No.

The groups submitted comments at Regulation 18 stage in 2021 and we can find no explanation of how these comments were taken into account.

Furthermore, the Regulation 19 stage representation by the WERA, which was submitted on May 19, 2024, was found to be missing from the database in early December. The Local Plan team was notified by email on December 2 and the representation finally appeared in the 30/12/2024 database. It remains absent from the SUB12.1 and therefore without Council Response.

A map of walks in and around Trent Park [see below] was submitted with the Friends representation for PL10 paragraph 13F at 11:59 on 6/5/24 and the acknowledgement came at 13:40 the same day. However, the document is missing from the database. The document is referred to in the SUB12.1 but with no Council Response. The only comment is ‘Received with thanks’.

Reduced-size screenshot of the missing A3 size map referred to in The Consultation Statement (SUB12.1) p217

Friends of Trent Country Park <https://friendsoftrentcountrypark.org.uk>

## Walks in and around Trent Country Park and Enfield Chase

From short nature rambles and tours of the lakes, gardens and historic buildings of Trent Park to longer countryside hikes through the former royal hunting ground of Enfield Chase, this leaflet (best printed at A3 paper size), sets out some ideas to help you find your way.

**Short Walks (1-2km)**  
 Focus on Trent Park Mansion with the beautiful Daffodil Lawn. Park at the **public car parks** at either Hadley Road or Cockfosters Road. Kids will enjoy the **animal sanctuary** a short distance away.

From the **mansion**, find the nearby **gardens** including Wasteria Walk (spectacular in May) and the Long Garden, originally planted by noted garden designer Norah Lindsay. The historic orangery and the cupola of the restored stable block are on the left. Take the path across the **north lawn** with lovely views across the lake towards the **obelisk**. Return via the lakeside path and back up the recently replanted **Lane Walk**.

**Medium walks (3-5km)**  
 With more time, extend the walk from the north lawn by crossing between the two lakes and head along the far shore of the east lake. Enjoy views of the restored mansion across the lake and visit the Japanese **water garden** with its cascade, first constructed in the 1920s.

Walk through ancient woodland to **Camlet Moat**, site of the first keeper's lodge within Enfield Chase. A short walk from the obelisk beyond the park boundary (look carefully for the gate) leads to the excellent **tea rooms** at Ferry Hill. Enjoy views across rolling hills from the **Lane Tree Avenue**. See people moonlighting around in the trees from the footpaths around **Go Ape**.

Alternatively, for peace and tranquillity head in the opposite direction, and from the water garden head along the northern edge of the adjacent field (muddy in winter) to circuit **Williams Wood**, known for its beautiful birdsong. From the southern edge of Williams Wood there are lovely views across the historic hunting grounds of Enfield Chase at the Merryhills Brook.

From **Oakwood station**, a stroll along either Snakes Lane or through the rolling countryside to the west via the footpath entrance (near the Oakwood bus stop), visiting the Mansion and returning via Charns Wood is around 4-5km.

**Long Walks (6-10km)**  
 A complete circuit of the perimeter of Trent Park (excluding the golf course) is around 7km (4.5 miles). Adding in detours to the centre of the park can make a satisfying route. For longer walks see the section on the London LOOP and the Merryhills Way (see left).

**Obelisk from London LOOP**

**The London Outer Orbital Path (LOOP) and Merryhills Way**  
 The **London LOOP** stretches for nearly 150 miles (242km) around the capital. Enfield is fortunate to have one of the best stretches (section 17), recently enhanced with an all-weather surface and accompanied by tree planting, new ponds and seating areas as part of the Enfield Chase Restoration Project. A new crossing island on Hadley Road leads to an information board. Further information boards along the way include details of local wildlife as well as the history of Enfield Chase.

**The Merryhills Way** opened as a Public Right of Way in 2011 following the efforts of local volunteers. Although less than 2km long, it provides a popular and scenic route through previously inaccessible areas of Enfield Chase at Vicarage Farm and provides excellent access into Trent Park. Access is from Fairview Road off the Ridgeway, Trentwood Side or Camp Road opposite the Jolly Farmers Public House.

Combining the Merryhills Way and the London LOOP provides a very satisfying walk through varied countryside, either in the form of a circular route via the Ridgeway or as a linear walk, whether to **Monken Hatley** via Hadley Common (4 km) or to **Forty Hall** (6km).

**Vicarage Farm Wildlife Site**

**Camlet Moat**

**The Long Garden and Orangery**

**View across Enfield Chase from Williams Wood**

Similarly, a Preliminary Ecological Appraisal for Vicarage Farm was submitted with PL10 13A at 11:56 on 6/5/24 and the acknowledgement came at 13:01. However, it does not appear in the Representations Database and does not appear to have been made available as part of the Examination process.

**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.

Openness:

The SCI commits to **openness and transparency**.

It has been a subject of outrage locally that the Council announced that it is looking to raise £800 million by selling Green Belt land. However, this was not something that was clearly communicated but appears to have been inadvertently revealed in a presentation by the Head of Property Services outside the Local Plan context. There has never been an invitation to a public debate about whether the Council should use Green Belt land in its ownership in this way.

### **Optimising our assets to deliver better returns and outcomes**

- We are revitalising our industrial estates to deliver quality employment opportunities and improved long-term income streams
- We are utilising our rural estate to create a new national forest and alternative sources of income
- We are working towards unlocking £800m of capital value by selling greenbelt land
- We are supporting parks usage via delivery of new cafes and toilets in major parks

Meaningful engagement

The SCI also commits to **meaningful engagement**.

The community is represented first and foremost by our elected Ward Councillors. However, our perception and that of most local groups who have followed the process since 2018, is that our Ward Councillors have been excluded from the formulation of the Local Plan.

The first sentence of Paragraph 3.6 of the Consultation Statement states that a Local Plan Cabinet Sub-committee was formed to oversee the preparation of the Enfield Local Plan (ELP). The next sentence states that *“More recently (in 2022) this was replaced by a Cross-Party Working Group (CPWG), that was tasked with considering issues relating to the content of the proposed site allocations in the ELP.”* This account is wholly misleading in two major respects:

- The Local Plan Cabinet Sub-committee was axed by the Council leadership, last meeting on 27 June 2019<sup>1</sup>. Therefore during the critical period of site selection, from 2019 to 2021, there was no Local Plan committee. The 2022 CPWG came after all the selection of sites had been made in private and then put into the public domain in June 2021 for the Full Council meeting, prior to the Regulation 18 consultation
- There are no published minutes or agendas for any cross-party working group, and our understanding is that the group never met because opposition Councillors understandably felt that they had been excluded from the real process of decision-making that took place behind closed doors. They quite reasonably believe that the belated offer to establish a cross-party group was therefore not made in good faith.

This meant that, in breach of the SCI, during the critical period of plan preparation there were no opportunities to engage and influence decisions through a collaborative approach. Given the controversial nature of many of the proposals, it would have been reasonable to expect there to have been a series of public meetings during the process of plan preparation throughout 2019 and 2020. Notwithstanding Covid, these could have been hosted and broadcast online as they were in other Local Planning Authorities.

The next sentence of paragraph 3.6 states that *“Elected Members have been kept informed of progress with the ELP through regular updates at: the Environment Forum, Regeneration and Economic Development Scrutiny Panel, Planning Committees, Cabinet and Full Council.”* Whilst it is true that progress updates were provided, the agenda items and minutes of these other meetings make clear that they were not an opportunity for review of the evidence or site selection process.

The lack of a proper deliberative committee working on the Local Plan during the critical period 2019-2021 (or indeed thereafter) is a particularly serious failing given

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<sup>1</sup> <https://governance.enfield.gov.uk/ieListMeetings.aspx?CommitteeId=639>

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the highly political nature of Enfield, given the east/west split in the party political affiliations of the Ward Councillors.

As the table and map below show, the deliberative forum of the Local Plan committee was replaced by political block voting at the Full Council. The result of this is that the preparation of the Local Plan has had a serious corrosive effect on public trust in the plan-making process, as well as breaching the duty of the openness and meaningful engagement that the public meetings of the Local Plan committee could have enabled. This is a clear breach of the SCI commitments set out above.

**Table 1: Labour Group control of Enfield Local Plan (Regulation 19 vote, Council Meeting, 19<sup>th</sup> March 2024)**

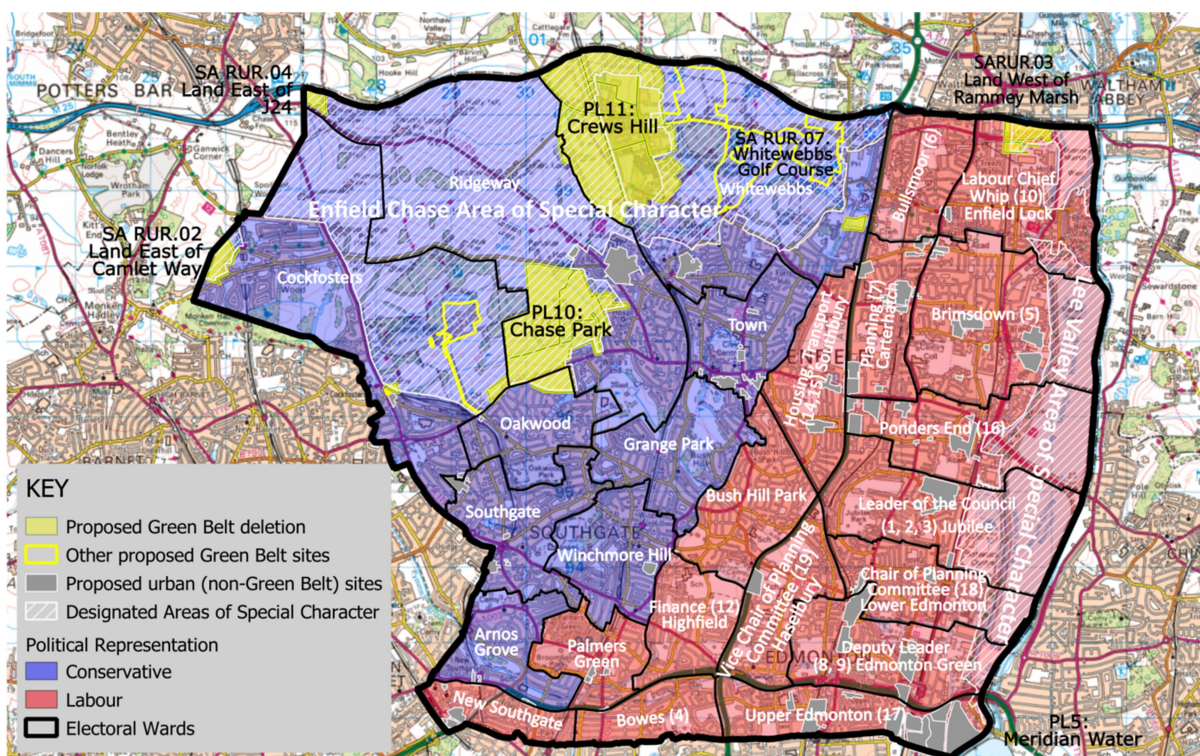
Map ref	Council Position (May 2024)	Ward	Councillor Name	Political Group	Local Plan Vote 19 March 2024
1	Leader of the Council	Jubilee	Nesil Catiskan	Labour	For
2	Environment, Culture and Public Services	Jubilee	Chinelo Anyanwu	Labour	For
3	Health and Social Care	Jubilee	Alev Cazimoglu	Labour	Absent
4	Community Cohesion and Enforcement	Bowes	Gina Needs	Labour	Absent
5	Associate Cabinet Member (Enfield North)	Brimsdown	Ahmet Hassan	Labour	For
6	Associate Cabinet Member (non-geographical)	Bullsmoor	Destiny Karakus	Labour	For
7	Planning and Regulatory Services	Carterhatch	Susan Erbil	Labour	For
8	Children's Services	Edmonton Green	Abdul Abdullahi	Labour	For
9	Deputy Leader of the Council	Edmonton Green	Ergin Erbil	Labour	For
10	Labour Party Chief Whip	Enfield Lock	Sabri Ozaydin	Labour	For
11	Associate Cabinet Member (Enfield South East)	Haselbury	George Savva	Labour	For
12	Finance and Procurement	Highfield	Tim Leaver	Labour	For
13	Associate Cabinet Member (Enfield West)	Palmer's Green	Chris James	Labour	For
14	Housing	Southbury	Ayten Guzel	Labour	For
15	Transport and Waste	Southbury	Rick Jewell	Labour	For
<b>Other significant non-Cabinet positions</b>					
16	Mayor	Ponders End	Mohammad Islam	Labour	For
17	Deputy Mayor	Upper Edmonton	Margaret Greer	Labour	For
18	Chair of Planning Committee	Lower Edmonton	Sinan Boztas	Labour	For
19	Vice-Chair of Planning Committee	Haselbury	Mahym Bedekova	Labour	For

**Table 2: Other Councillors without positions within the Council administration**

Map ref	Council Position (May 2024)	Ward	Councillor Name	Political Group	Local Plan Vote 19 March 2024
	None	New Southgate	Josh Abey	Labour	For
	None	Ponders End	Nicki Adeleke	Labour	For
	None	Lower Edmonton	Elif Erbil	Labour	For
	None	Brimsdown	Hivran Dalkaya	Labour	For
	None	Haselbury	Mustafa Cetinkaya	Labour	For
	None	Bullsmoor	Cllr Kate Anolue	Labour	For
	None	Edmonton Green	Gunes Akbulut	Labour	For
	None	Southbury	Mahmut Aksanoglu	Labour	For

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Map ref	Council Position (May 2024)	Ward	Councillor Name	Political Group	Local Plan Vote 19 March 2024
	None	Carterhatch	Nawshad Ali	Labour	For
	None	Enfield Lock	Eylem Yuruk	Labour	For
	None	Palmers Green	Doug Taylor	Labour	For
	None	Highfield	Nia Stevens	Labour	For
	None	Upper Edmonton	Doris Jagge	Labour	For
	None	Carterhatch	Nawshad Ali	Labour	For
	None	New Southgate	Nelly Gyosheva	Labour	For
	None	Upper Edmonton	Thomas Fawns	Independent	For
	None	Grange Park	Chris Dey	Conservative	Against
	None	Whitewebbs	Hannah Dyson	Conservative	Against
	None	Bush Hill Park	Peter Fallart	Conservative	Against
	None	Whitewebbs	Reece Fox	Conservative	Against
	None (Leader of the Opposition)	Cockfosters	Alessandro Georgiou	Conservative	Against
	None	Bush Hill Park	Pat Gregory	Conservative	Against
	None	Arnos Grove	Adrian Crumi	Conservative	Against
	None	Bush Hill Park	James Hockney	Conservative	Against
	None	Southgate	Stephanos Ioannou	Conservative	Against
	None	Ridgeway	Joanne Laban	Conservative	Against
	None	Southgate	Elisa Morreale	Conservative	Against
	None	Oakwood	Tom O'Halloran	Conservative	Against
	None	Arnos Grove	Paul Pratt	Conservative	Against
	None	Town	Michael Rye	Conservative	Against
	None	Oakwood	Julian Sampson	Conservative	Against
	None	Cockfosters	Ruby Sampson	Conservative	Against
	None	Whitewebbs	David Skelton	Conservative	Against
	None	Ridgeway	Edward Smith	Conservative	Against
	None	Town	Jim Steven	Conservative	Against
	None	Town	Emma Supple	Conservative	Against
	None	Ridgeway	Andrew Thorp	Conservative	Against



**Issue 1.4: Sustainability Appraisal**

**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?**

No.

The IIA (document SUB8 admits on page B18 that it has used a simplistic approach for **Objective 15: Protect and enhance the character, quality and diversity of the Borough’s landscapes and townscapes**: *“Enfield’s ‘Character of Growth’ informed the IIA of most site options at Regulation 19 stage. The study provides recommendations on the acceptable level of development and change in landscape and townscape terms for different areas of the Borough. Some site options were located in parts of the Borough located outside the scope of the Character of Growth Study (broadly those in the Green Belt or open spaces). IIA of these site options in landscape/ townscape terms fell back on a more simplistic appraisal method used at Regulation 18 stage, based on the size of sites and whether they are located in urban or more rural areas. Actual effects on landscape and townscape will also depend on the design, scale and layout of development within the site, which may help mitigate and/or enhance effects on the existing townscape.”* (document page B-18)

Had documents PLA13 and PLA14 been done **first**, it could have informed these findings, rather than relying on the ‘simplistic appraisal method’ that was actually used. Even without that work, the appraisal for Green Belt areas should still have drawn on the *Enfield Characterisation Study* (DES43-44).

The superficiality of the assessment is further illustrated by the clearly erroneous conclusions for the Southbury Road superstore site SA6 (page G-37) as shown below.

IIA14: Historic environment	-?	Site is adjacent to Enfield Town Conservation Area and within 500m from two Grade II* listed buildings (North east building from Enfield Grammar School, and Church of St Andrew Enfield Parish Church) and a number of Grade II listed buildings. Although the site contains built development, its redevelopment could affect the setting of these heritage assets.	-?	The Council's assessment of heritage considerations records this site as 'Amber' and states that a Heritage Impact Assessment should be undertaken and mitigation provided.
IIA15: Landscape and townscape	+?	Site is located within the settlement of Enfield Town and contains built development.	+?	Site is located within the settlement of Enfield Town and contains built development.



## **Issue 1.6 Local Development Scheme**

**Q1.21. Has the Plan been prepared in accordance with the Local Development Scheme in terms of its form, scope and timing?**

No.

Paragraph 5.5 of the Local Development Scheme ([SUB16](#), p 12) is reproduced below.

- 5.5 Political overview will be through regular meetings with the Portfolio Holder. For each Development Plan Document (DPD), approval of draft documents at the early consultation stage (regulations 18 and 19) and final versions of all DPDs will be approved by the Cabinet and Full Council. At these stages, reports may be called for further consideration through the Council's Scrutiny Committees.

The final version of the Regulation 18 and 19 stage consultations were not approved by the Cabinet, nor were they called for further discussion. This is a serious point because the only meetings about site selection were held in private between Officers and the Portfolio Holder. Full Council, which was recorded, was not a debate, but a series of statements of party-based expressions of support and opposition.

**TOTAL 1473 WORDS [EXCLUDING QUESTIONS AND SCREENSHOTS]**