



Enfield Over 50s Forum (EOFF) submitted six representations as below (Dec 2024)

Representation Number	Type of representation	Organisation represented	Policy	Site allocation reference
01765-2-1	Enfield Over 50s Forum	DM H4: Small sites and small housing development		https://www.enfield.gov.uk/file/PDFs/email/01765-2-1.pdf
01765-3-1	Enfield Over 50s Forum	SP PL10: Chase Park		https://www.enfield.gov.uk/file/PDFs/email/01765-3-1.pdf
01765-4-1	Enfield Over 50s Forum	DM H5: Supported and specialist housing		https://www.enfield.gov.uk/file/PDFs/email-21.11.2024/01765-4-1.pdf
01765-5-1	Enfield Over 50s Forum	SP PL11: Crews Hill		https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf
01765-5-2	Enfield Over 50s Forum	Appendix C: Site Proformas	RUR.03: Land west of Ramme Marsh	https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf
01765-5-3	Enfield Over 50s Forum	DM DE6: Tall buildings		https://enfield.gov.uk/file/PDFs/email-16-12/01765-5-1.pdf

Introduction

1. Enfield Over 50s Forum (EOFF) is mindful of the focus of this Matter, relating to the decision to remove land from the Green Belt and the necessity, therefore, of constraining our responses to considerations at a strategic level, taking account of the need to promote sustainable patterns of development.
2. SUB 1 (1.22) quotes the NPPF in two respects, firstly (NPPF para 17 and 18) regarding the need to distinguish between strategic and non strategic policies where the former is distinguished by an “overall strategy for the pattern, scale and design quality of places”. The second (NPPF para 20) concerns the need to make sufficient provision for: a) housing, retail, leisure b) infrastructure for transport c) community facilities (such as health and cultural infrastructure); and d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.
3. SUB 1 (1.23) states *“All policies in within the ELP are strategic, except for the non-strategic policies identified in Table 1.1.”* Insofar as our submission is concerned this includes PL10 and PL11.
4. However, because of the concerns expressed in significant submissions about car dependence and the sustainability of both PL10 and PL11, our concerns about SC1 (Improving health and wellbeing of Enfield’s diverse communities), addressed in our REG 18 response ([2953](#)), remain. Hence we point to responses at both Reg 18 and Reg 19 regarding the importance of active travel for health and wellbeing for older people.
5. Further SC1 is one of few Strategic policies that explicitly mentions the needs of older people: *“an inclusive development layout and public realm that considers the needs of all, including groups with relevant protected characteristics such as the older population and disabled people;”* (SUB2 p141 1e) and *“active design principles which support wellbeing and greater physical movement as part of everyday routines”* (SUB2 p141 1f).
6. That is apart from PL10 Chase Park which is the only place making policy that refers to older people. As explained in Matter 1 (Para 5)

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7. We are also conscious of the detrimental effects of loneliness and isolation addressed as an equalities objective in [Fairer Enfield 2021 – 2025](#) under The Public Sector Equality Duty. It states (p12) that *“Social isolation and loneliness can affect anyone, however **people aged 65 and over are particularly at risk**. In 2016, a national report by the Campaign to End Loneliness estimated that 30% of over 65s were mildly to severely lonely⁴. Insufficient social connection can have a detrimental effect on psychological health and can increase the risk of physical health issues”*. ⁴ Regrettably this reference is misattributed in Fairer Enfield 2021 – 2025 (p18).
8. SC2:Protecting and enhancing social and community infrastructure (SUB2 p141 2a) is relevant here, stating that *“new community facilities be located within or adjacent to the Borough’s designated town centres (as shown on the Policies Map) and neighbourhood shopping parades, unless they are within walking distance of public transport, pedestrian and cycling routes or form part of a recognisable or planned cluster/hub of community facilities or are embedded within the communities they serve”*.
9. Whilst the plans for Chase Park refer to the creation of a community, in the absence of a masterplan, or timeline, or development plan, the risks of developments that fail to fulfil the aims of the draft Enfield Local Plan (ELP) are too great for us to endorse Chase Park as a suitable location for older people in terms of both their well being, both social and health.
10. Therefore we are not satisfied that *“Further details and updates will be included in the masterplanning work to ensure compliance and address your concerns comprehensively”* is an adequate response to our PL10 submission either (SUB12.1 p213) . Please see para 30 – 33 below.
11. Finally, we wish to reiterate the view expressed in our PL10 submission that the proposed development at Chase Park would not meet the requirements of the London Plan (LP21)
 - Policy T1 ‘Strategic approach to transport’,
 - Policy ‘T2 Healthy Streets’,
 - Policy T2 ‘Healthy Streets’
 - Policy GG2 ‘Making the best use of land (part F), which requires that plans should ‘plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles... ‘

and as such is not in general conformity with LP21.

12. We reiterate this because the response to our PL10 submission in SUB12.1 (p213) refers us to the Chase Park Topic Paper which does not adequately address the issues raised.
13. In the SUB12 (p273/4) response to our PL11:Crews Hill submission, the council acknowledges our concerns *“about the Crews Hill development, emphasizing its impact on health and well-being, especially for elderly members who rely on the area for physical activity and social interaction”*. Again in response it refers to plans yet to come, referring to *“detailed assessments”* and *“specific considerations and mitigations”* that will be *“detailed in a Supplementary Planning Document (SPD) to ensure **comprehensive planning and community engagement**”*. In the light of our experience (EOFF Matter 1 Qn1.13 para 3-5; Qn1.14 para23 – 34; Qn 1.15 para 38 – 46) we very much doubt this and find the Crews Hill Topic Paper (also referred to) of limited comfort.
14. EOFF is disinclined to let hope triumph over experience concerning issues as critical to Enfield’s sustainability as NPPF para 18, 19 and 20 (see Para 2 above) and the flight of policies in Homes for All (SUB2 p221), **and** the loss of Green Belt.
15. EOFF has addressed housing need in Matter 2.

Issue 4.1:

Whether all reasonable options for meeting the identified need for housing and employment development on land that is not in the Green Belt fully examined.

Q4.2: WERE ALL REASONABLE OPPORTUNITIES ASSESSED FOR MEETING THE NEED FOR (A) HOUSING AND (B) EMPLOYMENT RELATED DEVELOPMENT OUTSIDE THE GREEN BELT, INCLUDING THROUGH MAKING AS MUCH USE

AS POSSIBLE OF SUITABLE BROWNFIELD SITES AND UNDERUTILISED LAND AND OPTIMISING THE DENSITY OF DEVELOPMENT?

16. No, please see EOFF Matter 2.
17. We are mindful of IN1 PQ20 and 21c, and the Council's response E2 p9 and E3 p7 para 39 – 43, in this context.

Issue 4.2:

Whether removing land from the Green Belt as proposed in the Plan necessary to ensure that the identified need for housing and employment development can be met in a way that promotes sustainable patterns of development.

4.5: IN SELECTING THE LOCATIONS TO BE REMOVED FROM THE GREEN BELT, WAS FIRST CONSIDERATION GIVEN TO LAND WHICH HAS BEEN PREVIOUSLY DEVELOPED AND/OR IS WELL SERVED BY PUBLIC TRANSPORT?

18. At both R18 and R19 statutory respondents and community organisations explained the link between sustainable development i.e. well served by public transport, and good health and wellbeing, and welcome statements such as those quoted in Chap 5 p141 from Enfield's draft Local Plan.
19. For instance, REG2 [0575](#) under "Active Design", "*Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice*".
20. And "*The Canal and River Trust strongly supports the requirement to consider how design can support wellbeing and greater physical movement as part of everyday routines*" REG2 P61 Table A7. Few specifically related this to older people.
21. Nevertheless, in establishing an important principle, these are good starting places in answering Q4.5 because PL10 Chase Park cannot be considered as well served by public transport but, perversely in our view, is unique in Enfield's Local Plan "Places" (p36 – 117) in having, superficially at least, a focus on older people.
22. Excepting, of course, non strategic policies such as H5: Supported and Specialist Housing and DE13: Housing standards and design and, perhaps, H3:Housing Mix and Type). It's hard to avoid the sense that such non strategic policies are tokenistic insofar as older people are concerned (see Matter 1) in the absence of higher ranking strategic policies to address the needs in a coherent and evidence based manner.
23. Transport for London [0891-3-3,5,6,7](#) (page 1) raises significant concerns about the ability of Crews Hill and Chase Park to deliver sustainable neighbourhoods that are not car-dependent

However, we continue to have significant concerns about the ability of the rural placemaking areas at Crews Hill and Chase Park to deliver genuinely sustainable neighbourhoods that would not be car dependent. These areas are not well connected by public transport compared to the urban placemaking areas and would require substantial investment in transport infrastructure and services, more urban typologies and densities than are currently proposed, and a restraint based approach to car parking to deliver sustainable neighbourhoods.

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24. We note the importance of TfL Passenger Transport Accessibility Levels (PTALs) in making assessments of the extent to which neighbourhoods are car dependent. We looked at [this TfL map](#) with some incredulity, reflecting as it does the fact that Chase Park in the vicinity of Worlds End (Enfield Road A110) is rated 0 or 1a out of 6 (worst performing in London) whereas Enfield Town Centre is scored as 6a out of 6 (among the best performing). EOFF would urge Enfield Council to think more strategically about where to focus provision for older people, mindful of SC1 and SC2

Access level (PTAL)
Time mapping (TIM)

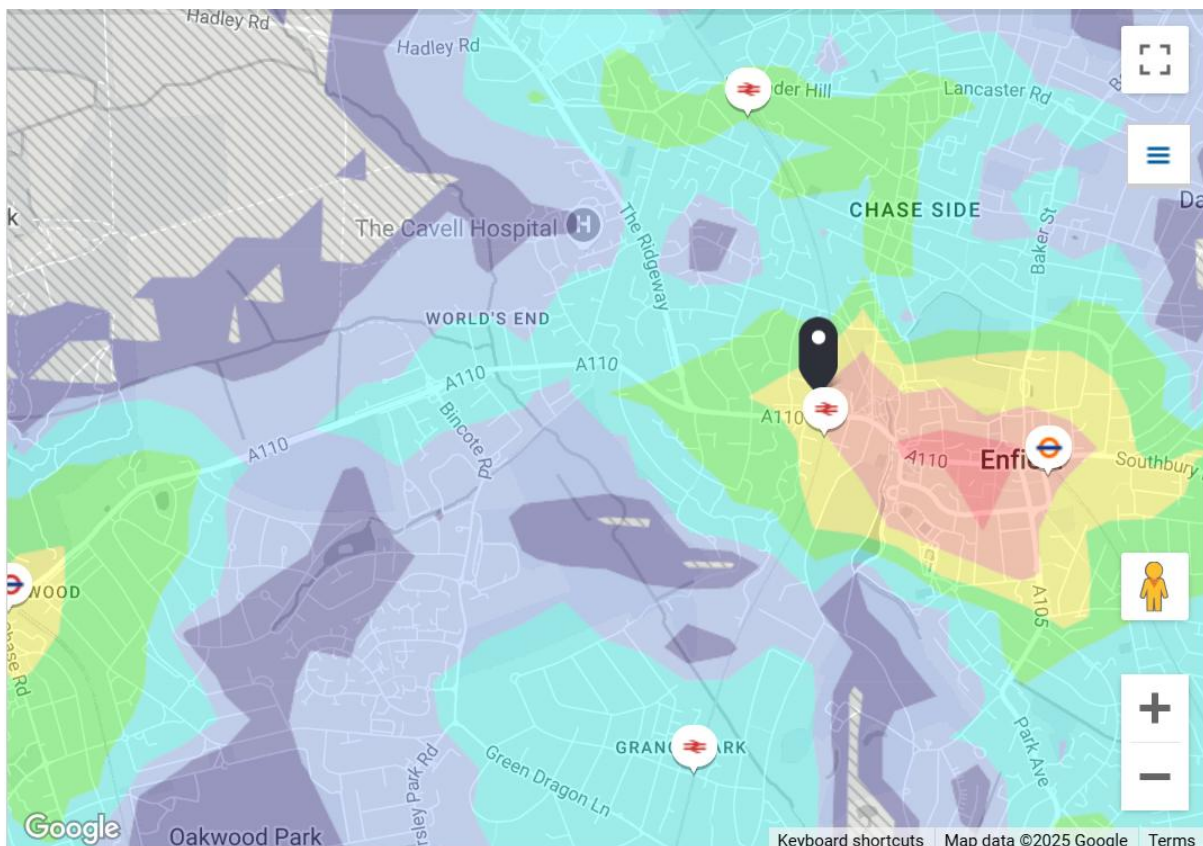
PTAL: a measure which rates locations by distance from frequent public transport services.

Map key - PTAL

0 (Worst)	1a
1b	2
3	4
5	6a
6b (Best)	

Map layers

PTAL (cell size: 100m)



Q4.8: OVERALL, ARE THERE EXCEPTIONAL CIRCUMSTANCES IN PRINCIPLE TO JUSTIFY ALTERING GREEN BELT BOUNDARIES FOR A) HOUSING AND B) EMPLOYMENT DEVELOPMENT?

25. Too many respondents to list have criti the case made for exceptional circumstances to justify altering Green Belt boundaries. Our expertise does not lie in such technical evaluations.
26. However EOFF represents several thousand older people, many of whom have lived in Enfield all their adult lifetime. Many EOFF Trustees (past and present) served Enfield for many years as ward councillors in both the East and West of Enfield, and as cabinet members. EOFF members know Enfield exceedingly well. How regrettable it is, then, that many of the people creating the plan (officers, developers, consultants,

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Council leaders) who do not have an intimate first hand knowledge of the borough and have not reached out. The council should have been drawing on grass roots ideas and feedback not imposing a top level vision.

27. So, in answer to Q4.8 EOFF would argue **No, quite the contrary**. The documentation, the plans (such as they are), the strategic policies PL10, PL11, SC1, SC2 and Homes for all (SUB2 Chap 8) reinforce the case that, for older people (paras 18 – 24 above) the plans for the release of Green Belt is exactly the opposite of what can help. Not least because the plans are so under developed.
28. The risk of leaving this to masterplans and SPDs is considerable and such an approach, to us, perverse. After 300+ planning documents why do we need more (SUB1 Chapter D2: Masterplans and Design Codes) *“to achieve comprehensive development”* ?
29. There is a comprehensive London Plan, too, with which Enfield must be in general compliance (IN2:1 MIQs Para 2 page 1).
30. In its summary of the GLA submission, the Council recognises that *“The GLA emphasises the need for a robust, masterplanned, and phased implementation strategy to ensure upfront provision of infrastructure and public transport services”*. We couldn't have put it better. In preparing this hearing statement we'd like to have been able to scrutinise the Council's responses more effectively to discover how many other submissions were told, in effect, to wait for further plans. We couldn't (EOFF Matter 1 para 8 page 3).
31. We noted with interest 01794-1-1 from The Enfield Society which raises concerns about the masterplanning policy (SP SS2 Making Good Places PARA 3 - MASTERPLANNING (p34) because it conflicts with the Corporate Asset strategy to raise £800 million through the sale of Green Belt land. A point to which the Council does not respond (SUB12.1 p 171)
32. We note, too, the image of Meridian Water (SUB1 p35) It doesn't look remotely like this (early days perhaps ?) and we could find no planning applications or Masterplans, or even references to such, that could persuade us that this was more than a fantasy.



33. In the context of question 4.8 we are mindful of

- DOCUMENTS NOT PART OF THE DEVELOPMENT PLAN: IN1 PQ62 and the council's response E5 para 144 – 145 p 28 and Appendix 3 p 54 – 74.
- TRANSPORT: IN1 PQ46 and the Council's response E2 p9 and E3 p14 para 73, ad E3.5

2017 words