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In response to the Enfield Local Plan 2021 Consultation I am writing to object to the policies listed as follows:

**1. Housing developments: SP PL10, pages 80-87, and Figure 3.11 – Chase Park Site Allocations; ;Policy SP PL9, pages 77-80 and Concept Plan Figure 3.10 – Crews Hill Site Allocations; ; PolicySA45: Land Between Camlet Way and Crescent Way, Hadley Wood, page 364; PolicySA54, page 374;Policy SA62 page 372; and Policy SA62 page 383 and SP CL4 pages 277-279;**

In general, Enfield Council is the custodian of Enfield's historic green belt land and therefore has a moral duty to protect and preserve this highly historic, culturally symbolic and ecologically unique environmental resource, as previous councils have done. Enfield is a Green Belt borough and being born in Enfield I believe that the Green Belt should be wholly preserved for future generations. Evidence of the current affects of Global Warming and Climate Change also support the

need for the preservation of natural land, especially for the absorption of rain water to prevent flooding on lower land in the borough and woods and trees for the reduction of air pollution and providing habitat for wildlife in order to rebuild the ecological balance, in particular the catastrophic drop in the number of pollinators over recent years.

The consultation does not provide any hard evidence that housing development on Green Belt land is justified or is indeed of direct benefit to Enfield residents. In detail my objection to the housing development plans are:

### ***1.1. Destruction of irreplaceable Green Belt land and the character of the London Borough of Enfield.***

This proposal will radically alter the character of the borough of Enfield and will be destroying Enfield's historic and cultural heritage. In addition Enfield will merge with Potters Bar at the M25, destroying the ability of the Green Belt to prevent urban sprawl.

### ***1.2. Destruction of the valuable Green Belt eco-system***

The natural ecological systems on and around the Green Belt would have taken hundreds of years to establish. Enfield Council has no right to take this away from current and future generations; planting trees will never replace the current Green Belt and its eco-system .

### ***1.3. Lack of Brownfield Re/Development driven planning***

There is no evidence that a quantitative analysis of brownfield development/re-development has been undertaken in the borough as a whole and there is no specific Brownfield Re/Development Policy for the borough. Enfield Council should focus developers on this matter rather than appearing to ask them where they would like to build: Strategic Housing Land Availability Assessment (SHLAA) 2.6 “Most of the sites are submissions from landowners and developers for possible future development potential”.

### ***1.4. Increased risk of Flooding***

The building of houses and the associated hard surfaces and road structures would greatly increase rainfall run-off and the risk of flooding at locations downhill. This would be a particular problem for the high ground developments such as Crews Hill (PL9) and in the case of PL10 the long downhill stretch from Oakwood could flood the area and properties at Frog’s bottom. Extended development up to the M25 (PL9) would generate disastrous flood and pollution risks (point 1.5) for Edmonton and downstream to the Thames. I cannot find any assessment of this risk and the necessary mitigation measures in the consultation.

### ***1.5. Increased risk of Pollution***

The storm and rainfall run-off from roads would be

highly likely to increase the pollution load into Turkey and Salmons Brooks, feeding into the Lee Navigation and polluting Edmonton (through Pymmes Brook) and ultimately the Thames. There is no mention of this in the consultation and I would suggest that it strongly contradicts the “Duty to Cooperate” section on page 11 as this has an impact on other London boroughs. Also, extra volumes of water during storm events would worsen the impact of CSO (Combined Sewer Overflows) from the downstream Deephams Sewage Works into the Thames. I can find no impact analysis involving Thames Water or general mitigation measures in the consultation.

### ***1.6. Impact on Utilities Networks and ‘hidden’ development***

The consultation does not describe how sewage, electricity, gas and communications networks will have to be developed and enhanced in order to accommodate the extra housing and the impact that this will have on the borough of Enfield due to the large scale Civil Engineering and general construction works that will be required as a result.

### ***1.7. Benefits of Housing for Enfield Residents doubtful***

The consultation does not directly quantify how the additional housing will be of benefit to Enfield residents and those on Enfield Council’s housing waiting list. There are no binding guarantees for housing developers that the housing or a suitably large

proportion of it will directly address Enfield's current housing requirement. As the consultation stands 0 benefit for Enfield residents is a possible outcome. I would respectfully request that Enfield Council investigates higher density housing on brown field sites rather than top-end market developments on the higher level Green Belt land to the north of the borough as being of more direct benefit to the residents of Enfield.

**2. Spatial Strategy SPSS1 page 23 : 9. Employment needs will be met through the intensification of existing industrial areas, and new sites in urban and rural locations. A new logistics hub close to Junction 24 of the M25 will provide for a significant amount of the Borough's employment needs in the plan period. Cross boundary expansion of the hub may provide for additional employment needs beyond 2039.**

The consultation provides no evidence to support the need for a logistics hub at Junction 24 of the M25. It is not clear if there is a real requirement for the service or if the proposed hub is designed to attract business away from the other hubs close by in Essex, in this case making the proposal unnecessary and in addition risky. Specific objections are:

### ***2.1. Congestion on the M25***

This stretch of the M25 is currently subject to traffic congestion, the addition of an entry/exit point for large vehicles will further increase congestion.

## ***2.2. Increased Heavy Goods Traffic on Enfield's Roads***

The drivers of heavy goods vehicles will be tempted to cut north through Potters Bar and Hatfield to the A1 and South through Enfield and Edmonton to the A406 and M11 to avoid the frequent traffic congestion on the M25. This will greatly reduce the quality of life for Enfield residents and negate the benefits of the recently introduced cycle lanes.

## **3. Policies SP CL4: Promoting sporting excellence pages 277 to 279 and SA62 page 383**

I object strongly to any transfer of public amenities into the private sector. Bull's Cross has already been partly taken over by the Tottenham Hotspur football club and any more incursions by this private enterprise close to Myddleton House over the 'foot print' of Green Belt land is unacceptable. The council is correct to promote Sport and Recreation but should manage this directly for Enfield residents and not through commercial proxies. It must be remembered that a previous Tottenham Hotspur training ground was at Cheshunt and the club sold this land for development.

## **4. Policies DE6, and SA2 Palace Gardens Shopping Centre page 321**

These policies propose tall buildings which in many cases would mar the landscape, place areas in shadow during the day and would destroy the

character of the area in which they are sited. The market town character of Enfield would be destroyed.

The tall buildings are also likely to be unnecessary as other lower-rise building forms could provide the same accommodation, as stated in the policy.

## **5. Policy SA52 page 372**

This policy would remove part of Rammey Marsh, a wildlife area and public amenity, from the Green Belt.