
Dear Sir/Madam,

Thank you for the opportunity to respond to this consultation on Enfield's draft Local Plan. While it may be necessary to plan for future housing needs (guided by the London Plan), I feel strongly that these attempts to address housing needs are misguided. This draft Local Plan poses a very serious threat to Enfield's Green Belt land, and to the character of the borough of Enfield as a whole. I, along with many others, am strongly opposed to this Local Plan and firmly believe it should be re-drafted in light of the following points.

I am splitting my response into four numbered sections, note that these are not in any particular order of importance – I see all of these points as equally important, and they should all be taken into account when considering the merits of this draft Local Plan.

1. **There are no exceptional circumstances to justify changing Green Belt boundaries**

There should be no de-designation of the Green Belt in Enfield for housing - in other words, the preferred **spatial strategy option 2** (medium growth 1, page 26) should be ruled out on this basis alone. My reasons for stating this are the following:

- There are brownfield sites available that could accommodate the projected housing needs – one notable example is the Meridian Water site, which is promised to eventually bring 10,000 homes to Enfield. **Why is Meridian Water East (Harbet Road Industrial Estate) being pushed out to the next plan period with the loss of a potential 5000 homes?**
- In 2019, Enfield RoadWatch produced their [Space to Build](#) report that concluded “There is no need to review Green Belt in Enfield: there is enough Previously Developed Land (PDL) to accommodate needs - specifically we have identified • space to build at least 37,000 homes on space which is currently inefficiently used • additional space which could be intensified for commercial / industrial use.”. **Why has the Council not taken into account the conclusions of this report when preparing this draft Local Plan?**
- The **NPPF** (revised Feb 2019) states that “*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified*”. It also states that “*the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.*” In a similar vein, The London Plan states “*Exceptional circumstances are required to justify either the extension or de-designation of the green belt*” – such exceptional circumstances simply do not exist at the proposed Chase Park site. **Why does the Council feel that the NPPF and the London Plan should be ignored in preparing this draft Local Plan?**
- Enfield's [Detailed Green Belt Boundary Review](#) (produced in 2013) was supposed to “*provide robust and defensible boundaries over the Core Strategy plan period, (next 15 to 20 years)*”. **So why is this draft Local Plan (only 8 years later) talking about radical changes to Green Belt boundaries?**

I am objecting to the following specific Policies:

- SP PL9: Crew’s Hill, pages 77-80, and Concept Plan Figure 3.10
- SP PL10: Chase Park, pages 80-87, and Figure 3.11
- SP CL4: Promoting Sporting Excellence, pages 277-279
- Policy SA45: Land Between Camlet Way and Crescent Way, Hadley Wood, page 364
- Policy SA52: Land West of Rammey Marsh, page 372
- Policy SA54: Land East of Junction 24, page 374
- Policy SA62: Land at Tottenham Hotspurs Football Club Training Ground, page 383

These sites are part of historic Enfield Chase, which is unique in the southeast and played an important role in the development of Enfield. It is a rare and valuable landscape asset, and its loss would cause permanent harm not only to the Green Belt, but also to the very character of the borough.

2. Uncertainty in housing requirements

It is not at all clear how the figure of 25,000 was arrived at for Enfield’s housing requirement in the plan period. Paragraph 2.4.4 (page 25) admits to “uncertainty ranging from 17,000 to 55,000 additional new homes”, and with factors such as Brexit (which has led to many EU citizens leaving the UK) and covid (which has led to some people moving out of London) at play, that uncertainty is amplified even further. The default assumption that population growth will simply carry on in the same trajectory as before seems ill-judged when looking ahead over a period extending as far in the future as 2039. **Why is there so much uncertainty around such an important point that is critical to the decision making behind this draft Local Plan?**

3. Specific objections to policy SP PL10: Chase Park

The draft Local Plan talks about a “desperate need for more affordable houses” and states “We currently have over 3500 families in temporary accommodation, and on average a home costs 13.7 times household income.” The proposed Chase Park development, as described in [comer-homes-vicarage-farm-vision.pdf \(enfieldsociety.org.uk\)](https://www.enfieldsociety.org.uk/comer-homes-vicarage-farm-vision.pdf) as “3000-5000 quality homes”, seems unlikely to be the kind of development that will help those in temporary accommodation. Additionally, there is little evidence that a large new development such as the proposed Chase Park will do anything to reduce house prices – see for example [Building more houses cannot solve the housing crisis | UCL Grand Challenges - UCL – University College London](https://www.ucl.ac.uk/grand-challenges/building-more-houses-cannot-solve-the-housing-crisis) – in particular the comment “Building more houses under the current economic system cannot reduce house prices and may in fact lead to worse affordability in many areas.

I have the following additional comments relating to policy **SP PL10: Chase Park**:

Page 85 (point 6)

This paragraph states “The development should provide new green links to facilitate movement between the existing and new communities, and to Trent Park as a publicly accessible landscape” – as a long-term resident of the area (I live on Hadley Road), I am of the view that there is no need for “new green links”, one existing link, MerryHills way (see [Merryhills Way – The Enfield Society](https://www.enfieldsociety.org.uk/merryhills-way-the-enfield-society)) already provides a beautiful green link from the Ridgeway (Fairview Road) all the way to Trent Park. The proposed Chase Park development would devastate the open scenery and views

accessible via MerryHills way, with no meaningful increase in accessibility to Trent Park.

The same paragraph also states “Development should close the gap in the missing link in wider routes such as National Cycle Network route 12 and the link between the Enfield Chase landscape and its namesake station, as shown on the Concept Framework Plan at Figure 3.11” – in Enfield Council’s mini-Holland bid literature, the proposed route for route 12 was to follow the path of the London loop along Salmon’s brook, and then cut directly across to re-join the existing route at the bottom of Waggon Road – this would a far more logical and direct route for route 12 than what would be a very circuitous and undulating route through the proposed Chase Park development.

Page 86 (paragraph 3.10.4)

It is not at all clear what parts of the Chase Park placemaking area this paragraph is talking about – the very next comment is “planning policies which states the intention for Green Belt boundaries to have permanence in the long term”, surely the best way of achieving that is to leave the current boundaries of the Green Belt as they are?

Page 86 (paragraph 3.10.6)

This paragraph states that contemporary suburbs make “active travel - walking and cycling - the natural choice for day to day moving around”, but the centre of the site is approximately a mile (1.6km) from either Oakwood Station on the Piccadilly Line (at the bottom left of the picture), or from Gordon Hill on the overground (at the top right of the picture). Getting to either requires climbing significant hills, so is unlikely to be the kind of journey people would make either on foot or by bike. Enfield is already a car-dominated borough, and people have been encouraged to use private transport rather than public transport during the covid pandemic – this proposed development is only going to increase vehicle traffic.

Page 87 (3.10.8)

Regarding page 87 (3.10.8), the Council seems to be saying that building on the Green Belt can make it greener than it was before! The same paragraph then states “A place that can act as the gateway to the parkland landscapes of north Enfield while being a great place to live sustainably” – empty marketing language such as this has no place in the decision-making process when so much is at stake.

4. Objections to other policies

I also object to Policies SA62 page 383 and SP CL4 pages 277-279 because they transfer part of Whitewebbs Park, a public amenity, into private management. I reject the Council’s analysis that Whitewebbs Golf Course was losing money and call for its reinstatement.

I am also objecting to Policy SA52 page 372, which would remove part of Rammey Marsh, a wildlife area and public amenity, from the Green Belt.

I am also objecting to the tall building policies on pages 156-160, Figure 7.3, Figure 7.4 and Policy DE6, and SA2 Palace Gardens Shopping Centre page 321 which propose areas for and the

acceptable height of tall buildings which, in many cases would mar the landscape and are unnecessary because other lower-rise building forms could provide the same accommodation, as stated in the policy.

Conclusion

The areas of Green Belt land proposed as placemaking areas in this draft Local Plan have for many years served a vital role as clearly articulated in the **NPPF**:

- a. to check the unrestricted sprawl of large built-up areas;
- b. to prevent neighbouring towns merging into one another;
- c. to assist in safeguarding the countryside from encroachment;
- d. to preserve the setting and special character of historic towns
- e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In addition, Green Belt land also has a vital environmental aspect, acting in Sadiq Kahn's (accurate) words as the "lungs of the capital", and providing open space with expansive views close to built-up areas. The Green Belt should be preserved and allowed to continue providing these vital roles in the future.

I have outlined the key reasons I am opposed to this draft Local Plan and urge the Council to re-draft it, revisiting the other spatial strategy options and removing any plans to de-designate Green Belt land.

Yours sincerely,