

Summary

The key issue in the Draft Local Plan is clearly the proposal to allow substantial residential development on Green Belt land. Whilst I'm sure this will be welcomed by the Property Speculator owners, who I see have already commissioned outline plans, I am strongly against this proposal. I feel we should continue to regard the Green Belt as sacrosanct.

Building on undeveloped land is an easy option. Rather than encouraging such development the stance should be to refuse all such requests. There must be alternatives, and that assumes the numbers of new homes necessary is still valid. My view is that the Council should "find another way".

Responses to Specifics in the Local Plan

Firstly I should applaud the Enfield Council's officers for a comprehensive collection of policies which has clearly taken a great deal of research and thought. The overall plan however seems to have formed its conclusions regardless of what has been said in many of the policies. I can't claim to have read every word of the 413 pages (and I'm unconvinced the Council Members will have done either) but I have looked over much of what has been written and where I have something to say I have commented below.

2.2 Key Spatial Issues. Almost touched on, but I would specifically stress the need for Intra Enfield Connectivity – how residents in all parts of the Borough can access the various facilities – by roadside walking, pedestrian paths, cycleways and an extensive bus network. So as well as highlighting how Enfield can connect to Central London, focus should be made of how all Enfield's residents can share what it has to offer.

2.2.1 The fourth question to be changed to read "How to achieve well defined and robust development needs without impacting adversely on the Green Belt"

2.4.2 On page 23 it states "Chase Park will provide a deeply green extension to the urban area". This is misleading. It is not extending anything green at all, it is simply a proposal to provide housing by reducing the green space.

2.4.4 I am unconvinced by the stated need for 17,000 to 55,000 new homes. I have referred to the Growth Topic Paper but that in itself is based on 2014 and 2018 household projections which surely now must be questionable. The population reductions post Brexit and post Covid could clearly not have been anticipated. Whilst I can only supply anecdotal evidence of such a reduction, such as the current surplus of primary school places, that in itself suggests that Enfield's demographic projections have been overtaken by these two

major events. The paper makes much play of Enfield's accessibility to Central London but with what seems to be a permanent shift to significant working from home, that accessibility probably isn't the draw of people to Enfield that the Local Plan is based on.

I am also concerned that greater housing availability in Enfield will lead to increased placement of homeless households from elsewhere into Enfield. This will impact on services such as education provision, access to health and social care and increase demand for leisure and other social opportunities which are already in dwindling supply.

Table 2.2 Preferred option 2 actually includes two large scale green belt releases, craftily described as "rural placemaking". This is not being open and honest. At least mention is also made that the "Risk could be found unsound". Despite this though 2.4.7 is surprisingly justified as the preferred option.

3.1.14 I agree that Enfield Town is need of improving. It is sad though that once again the Council feels this is only achievable by building on green spaces, eg St Annes field. It would be helpful to learn of any vehicle re-routing proposals.

3.3.12 and 3.4.10 – the visions for Edmonton Green and Angel Edmonton appear very vague when compared with some specific ideas for, say, Southbury. Although I very much agree with the need to better integrate Silver Street station somehow.

3.6.2 The wording highlighted in green under the Southgate Placemaking Vision is unfinished, although it is expanded on later.

3.8 Some nice things suggested but these should complement existing Green Belt, not be the compensation for the loss of a large chunk of it.

3.9 I am against the development of Crews Hill and wish to protect Green Belt land there.

3.10 I am strongly against the development of (what I guess is the developers draft name) Chase Park and I wish it to remain protected Green Belt land. As well as this objection being based simply on a matter of principle I also feel that such a development close to watercourses is a conflict to the Council's own policies of floodrisk and watercourse protection/improvement.

3 Places. By way of a general observation it does strike me that Enfield Town and Southbury, along with the Green Belt losses in Crews Hill and Chase Park, are the only sites with specifics really considered. Meridian Water does too of course but appears slow to materialise. The other specific areas have a broad “vision” of what could be done. No mention of Ponders End or Brimsdown at all despite their fast rail connections to Central London and Hertfordshire. It all rather looks like the easy, lazy option has been put forward.

6.1.5 “Enfield’s long term ambition is to become the greenest borough in London” is a statement at odds against the green Belt proposals.

Figures 6.1 and 6.2 on pages 114 and 117 appear to be missing. Nevertheless promises to protect Nature Conservation sites should surely be expanded to include “non-designated” sites in Enfield.

6.4.2 The Local plan is in conflict with this assurance.

7.6.3 Whilst tall buildings do seem to be an evitable partial outcome for any necessary future housing provision, they should not impact on Green Belt land as stated in the policy. The Council’s solution (referring back to page 79) is simply to remove Green Belt designation from Crews Hill.

9.2 (p 224) I would challenge that Enfield will have the growing population once predicted. I fear that industrial development of green Belt is already happening through stealth.

9.17 (p 225) Again an explanation for taking the easy option.

9.18 An uplift in office space is recommended yet so many previous offices are currently being converted to residential use? In any event I question the continuing validity of this in the post pandemic era with staff increasingly working from home.

12.2 The Policy detailed on page 273 on supporting new leisure/sports proposals and resisting loss of existing ones isn’t very dynamic or pro-active. The claimed expanding population needs further opportunities, particularly for teenagers and young adults whose boredom can be a trigger for anti social activities.

12.3 In view of point 5 of the policy set out on page 275 it will be interesting to see the Council's reaction to proposals for the Royal Chace hotel as its loss could provide some needed housing and care facilities.

12.6 The Protection of Public Houses policy as described on page 284 – I'm not sure this should be a big priority for the Council and it certainly isn't happening as pubs are closing and being converted. The philosophy and thinking here I feel applies more to a rural/village location.

13.1 and 13.2 I certainly agree with the Policies on sustainable and active transport/travel, subject to considering the mobility difficulties of what is likely to be an ageing population.

Concluding Observations

It has been an interesting, if exhausting, exercise to read through much of what has been produced for this Local Plan, and some of the associated papers that were referenced.

I have no wish to be critical of the Council's proposals but my key response to the Plan is my resistance to the erosion of Green Belt land. I understand the rationale for new housing but I also question the Plan's validity based on population growth. In 9.21 the Policy writers have recognised that for industrial and in particular office space there has been a change since the impact of Covid; and I would argue since Brexit too. I feel the demographics on which the plan is based are now questionable and the number predictions need to be revisited.

I understand too why Council members would not wish new housing to be solely located in the already densely populated parts of the Borough. In the interest of openness, I have to confess that I am in part motivated by my living close to a proposed Green Belt development. But I haven't always done so and have lived in the less "leafy" parts of the Borough for some of my 60 years in Enfield. I don't regard myself as reluctant to see change, nor would I class myself as a NIMBY. I know they are cliches but I regard the Green Belt as London's backyard, and its lungs too.

Development of the Green Belt should not be undertaken. The Plan should be adjusted to recommend only the baseline target and follow Option A. It may prove that option might be heavily dependent on more taller buildings than we would have desired. But if they are built sympathetically, with vision, and with the green values that you wish to be promoted I am sure desirable new accommodation can be provided to meet future needs. And alongside that, it must be made easy for all Enfield residents to access and enjoy our remaining green spaces and improve and enlarge them where we can, including green walls, rooftops and balconies on any higher buildings.

Please take a step back, think what sort of world we want our children and grand children to live in and what sort of habitat our wildlife needs. Surely it must be clear to everyone that we need to protect our environment.

I fear that the over-built Enfield that is proposed will not be the one that any resident desires. Please give us the Enfield we would like to live in rather than one we feel forced to live in. Please amend your Green Belt Proposals.

Thank you for considering my comments.