Dear Sirs

Re: Draft Local Plan Consultation.

Please register this response to the public consultation as an **OBJECTION**.

This objection to the draft local plan is made in particular reference to the planned release of Enfield's Greenbelt land.

The draft local plan should be considered unsound when assessed against the following

- 1. The proposal is not online with the London Plan. The London plan was adopted following extensive London wide consultation and review by the Secretary of State and is therefore the overriding policy position. The London Plan clearly states no release of greenbelt land should occur without a London wide assessment, thus it is not for individual boroughs like Enfield to make London and nationally important decisions on Greenbelt release. Furthermore the NPPF does not require Enfield to review and or release Greenbelt.
- 2. The council incorrectly perceive the need to release Greenbelt land for residential development due to;
- a. The council's failure to make use and encourage development of existing brownfield land opportunities.
- b. The council's failure to adequately assess the opportunities offered by the redevelopment of small sites within existing areas of development that could contribute to housing supply. This includes the opportunities offered for upwards extension of existing housing stock particularly flats. Many such flats are within the council's own housing stock.
- c. The council's failure to adequately consider the redevelopment of existing housing land to aid intensification. The release of Greenbelt can not be justified without out maximising these opportunities.
- 3. The council have failed to consider the impact of the release of Greenbelt land on the environment in the following areas;
- a. The widely accepted realisation that the country faces a climate emergency and the development of green undeveloped land for urban sprawl is an out dated solution to development and regeneration.
- b. The location for the proposed release of Greenbelt land is not sustainable in term of transport infrastructure and is based on unfounded and un-funded expectations for improvement to the railway network beyond the control of the council. Redevelopment in unsustainable locations will increase traffic generation in the borough and wider. The PTAL of the land suggested for release is in the part of the borough with the lowest

accessibility level, which will lead to reliance of cars.

- c. The council, with the land owners have allowed the degradation of the land in question over many years in a long term strategy towards development. This should now not be used a reason to suggest that this land in any less valuable to the community of Enfield and London beyond then other parts of the Greenbelt. It should be considered as loss of quality farmland that should be contributing to the supply of food for London.
- d. The draft plan fails to consider the impacts of flooding, the loss of wildlife habitat, pollution in the forms of air, light and noise by the increased development which will impact any surrounding Greenbelt, which in turn will come under development pressure.

In summary the draft local plan fails to set out any exceptional circumstances or an evidenced based approach to the proposed release of Greenbelt land, fails to follow London and National planning policy and thus is unsound and should be rejected.