



3 September 2021

Response to the draft consultation Enfield Local Plan - June-September 2021

The National Park City Foundation is the charity behind London National Park City.

The draft Enfield Local Plan issued for public consultation from 21 June to 13 September 2021 misappropriates and misrepresents London National Park City and its status in support of a choice to de-designate Green Belt in the London Borough of Enfield.

In issued policies and various public statements made in their support during the Local Plan making process, the London Borough of Enfield and its representatives have justified the proposed loss to development of London's Green Belt in the borough on the claimed assumption that any remaining Green Belt within Enfield borough would be improved as part of London National Park City.

The London Borough of Enfield did not contact the National Park City Foundation / London National Park City during its preparation of the draft Local Plan as the Local Planning Authority (LPA). Contact was made on 14 July by email after the Foundation had first raised its concerns about the Council's misappropriation and misrepresentation of London National Park City in support of its policy choice.

The draft consultation Local Plan contains numerous references to London National Park City including the dedicated policy 3.7 on page 70.

The proposed restoration of Enfield Chase appears laudable and the planned enhancements for public access seem ambitious, but they are not a justification for the chosen loss of Green Belt, which the Foundation does not endorse or support, and which both government planning policy and the new London Plan aim to avoid.

It is incorrect and misleading of the LPA and any of its representatives, its documentation or other materials and communications to either state or imply that London's National Park City status can provide any form of protection for land, features or natural assets either extant or in the future.

Any comparison with England's 10 National Parks which are established in law is only valid in terms of applying the kind of thinking at the heart of National Parks to start reversing London's declining environmental conditions which have a bearing on learning, health, fitness, recreation, and community.

Had the LPA engaged with the Foundation during the draft Local Plan making process that could and would have been clarified.

Paragraph 3.8.8 on page 71 of the draft Local Plan states that “The designation is not strictly a national park...”. The LPA must be clear that London National Park City lacks, and does not seek, any formal planning role nor the legal status of the established National Parks. London National Park City is NOT a National Park; the word ‘strictly’ does not apply one way or the other.

Paragraph 3.8.9 on page 71 adds that “The National Park City designation has the potential to achieve a net increase of 25% green cover in Enfield...”. It is unclear how the LPA has arrived at its ‘net increase of 23% green cover’ assumption and calculation, nor how London National Park City status has a bearing on this given its lack of powers compared with the LPA’s abilities and role.

Given that London National Park City does not confer any protection of existing or remaining Green Belt it is not clear how the LPA’s assurance about future threats either from further development pressures or from the application of Enfield’s LPA policies can be assured.

A casual reader of the draft Local Plan and communications used to promote and justify it could easily be left with the impression that future protection of Green Belt and other green space and natural assets would be fully assured when it is not at all clear that the same recent justifications or other reasons would not be used to justify further losses and depletions of spaces and their role.

The London Borough of Enfield LPA already has the powers to set the policies and supplementary guidance to ensure protection for existing green and blue spaces, including both London’s Green Belt and its unique designation of Metropolitan London Land (MOL).

The LPA’s Local Plan, and various statements made around its communication and justification by its representatives, clearly misappropriate both the spirit and intention of London National Park City. The LPA should not seek to justify the deliberate loss of Green Belt and green space and the multiple functions these provide and their potential future provision by reference to London National Park City.