



Enfield Draft Local Plan Response

Main Issues and Preferred Approaches

'Regulation 18'
Consultation Response

September 2021



About the Enfield Society

The Enfield Society was established in 1936. The object of the Society is the conservation and enhancement of the civic and natural environments in the London Borough of Enfield and its immediate surrounding area, for the public benefit. The Society is a limited company without shares and a registered charity, with approximately 1,860 paid-up members across the Borough. Over several years, the Society's volunteers have implemented many improvement projects across the Borough, including the establishment of over 15 miles of new footpaths as well as extensive tree planting and environmental improvements. Since its inception, the Society has aimed to promote high standards of planning and urban design.

The logo of the Society is the Enfield Beast, a mythical creature that is reputed to have once stalked Enfield Chase. It comprises the head of a fox, forelegs like an eagle's talons, the chest of a greyhound, the body of a lion, and the hindquarters and tail of a wolf. The Enfield is used in heraldry but has been adopted as a symbol by a number of local clubs and societies as well as by Enfield Council.

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Executive Summary

- i. The **draft Local Plan includes** a draft Proposals Map, and a large number of 'evidence studies', as well as strategic policies, site allocations (the details of which are included in the Site Proformas within Appendix C to the Plan, pages 315-383), and development management policies. The plan includes provision for 30,000 homes across the borough by 2039, more than 6,000 of which will be in the Green Belt and countryside. Seven urban 'place-making areas' around the main urban centres are proposed; and new facilities for sport and recreation. Information about infrastructure provision is lacking from the draft Plan and the Council states that its intention is to publish that as part of the 'Regulation 19 stage' consultation next year.
- ii. The Society **supports** a number of aspects of the plan, including the 'place-making areas' within the existing built-up areas; design policies; and some aspects of the approach to housing, jobs, and some environmental policies.
- iii. The Society has significant concerns about the impact of certain policies in the Plan on the Green Belt countryside of the borough and some Conservation areas. Some of the proposed development, would have **highly damaging impacts on the special character and identity of the borough**. The Council appears to have removed the *Enfield Characterisation Study* from its list of Local Plan evidence studies. According to the 2021 'Character of Growth Study (page 7 "*The 2011 study is a detailed analysis of the borough's character, identifies typologies and explains the history of the urban environment. It is a solid base for this study and does not need to be fully revised.*" We agree. The 2011 Characterisation study identifies a number of harms to the character of Enfield that would result from development in some of the locations that the Council is now proposing. It is concerning that the Council does not appear to have considered that evidence in selecting its preferred sites. The study should be reinstated to the website.
- iv. The London Plan states at paragraph 8.2.2 that the Mayor may support development on 'derelict and unsightly' parts of the Green Belt, but the draft Enfield Local Plan proposes development on high-quality countryside. In proposing to release such sites, the Council appears to have pre-empted the Mayor's own assessment of the Metropolitan Green Belt.
- v. The Society has concerns that the **Spatial Strategy (Policy SS1) affords too much weight to the protection of Strategic Industrial Locations (Strategic Policy E3)** and too little weight to the contribution of Green Belt countryside and historic landscapes such as Enfield Chase to the history and character of the borough. The Secretary of State directed the Mayor to '*provide boroughs in the difficult position of facing the release of Green Belt or Metropolitan Open Land with a greater freedom to consider the use of Industrial Land in order to meet housing needs*'.
- vi. **Alternative options** such as (but not limited to) Harbet Road, Meridian Water East Bank, and Brimsdown, should be brought forward. A number of these sites benefit from the advantage of excellent walking and cycling links, strong

connections the open spaces of the Lee Valley Regional Park, opportunity to address dereliction and improve the quality of the environment, whilst achieving significant net gains to biodiversity. With a draft plan for mixed-use development endorsed by Enfield Council we feel sure that investors will come.

- vii. The Society has concerns regarding **Strategic Policy PL8: Rural Enfield**, which attempts to justify the development in Green Belt countryside elsewhere, as the National Park City Foundation has observed in a letter of objection to the Leader of Enfield Council. The vision of the rural area as a '*leading destination in a national park city*' appears to be part of an elaborate argument that development on the Chase (SP PL9, SP PL10, SA45 and SA54) is necessary in order to fund 'attractions' such as visitor centres and sculpture parks. Our alternative vision is for a wildlife-rich network of small family-run farms, with heritage boards and an expanded network of paths for local people to enjoy. Our vision is realistic and sustainable and is focused on local people rather than people from outside the borough.
- viii. The Society objects to **Strategic Policy PL9: Crews Hill** (in particular development on Crews Hill Golf Course), which would result in development on some high quality Green Belt countryside within Enfield Chase, and would result in traffic pressure on the Conservation Areas and at the rural East Lodge Lane and at the remote hamlet of Botany Bay.
- ix. The Society objects to **Strategic Policy PL10: Chase Park**. The proposed development would cause high or very high harm to open Green Belt countryside; it would cause irreversible harm to the coherence and integrity of Enfield Chase Heritage Area, severing the link between Trent Park and Old Park and adversely affecting the setting of both; it would end the visual separation between Oakwood and Enfield Town provided by the experience of passing through open countryside on the A110; it would spoil the openness of the popular Merryhills Way (a survey of users is provided in Appendix C); it would worsen an existing deficit in open space provision in postcode areas EN2 7 and EN2 8; it would harm an important strategic wildlife habitat connecting the Rifles Site with Trent Park; and it would harm the character and identity of the area.
- x. The Society objects to the Site allocation **SA45 Hadley Wood** and **SA54 Land east of Junction 24**. These two sites are both strongly performing Green Belt countryside and part of Enfield Chase. The proposed industrial and employment site on the Ridgeway at SA54: East of Junction 24 would destroy an attractive green gateway to the borough.
- xi. The Council does not appear to have given any consideration to the **Areas of Special Character** in selecting its preferred development sites. Development on the above sites would cause severe harm to the *Enfield Chase Heritage Area of Special Character (AoSC)*. A review of the AoSC undertaken by the Council in 2013 is attached to our submission at Appendix F. Expert testimony and various documents (see our submission on PL10 and Appendix A) confirms that Enfield Chase is of national significance.

- xii. A **heritage impact assessment** should have been undertaken to inform the selection of development sites and the form and extent of development. This should involve appreciation of the nature of historic landscapes and their collective contribution to understanding of the historic environment.
- xiii. The proposed development has the potential to have **adverse impacts on a number of rural lanes** which form a central part of the borough's identity. These include the visual impact of 'Chase Park' on Hadley Road, cumulative impacts on Whitewebbs Lane, and also on East Lodge Lane/Botany Bay.
- xiv. We are concerned that the Council's **approach to rewilding in Policy BG3: biodiversity net gain, rewilding and offsetting could force the Council's tenant farmers off the land**. A more effective approach to biodiversity enhancement in Enfield Chase would be to work with the tenant farmers to encourage best practice in agri-environmental management, for example in the approach to crop rotation, reduction in the use of chemical fertilisers and pesticides, and allowing field margins to flourish. A further benefit of this approach would be that it would not require financial contributions from developments in the Green Belt countryside.
- xv. A number of indicators suggest that the **housing need** is less than that proposed in either the London Plan or the draft Enfield Local Plan. A recent report by *London Councils* suggests that the best way to provide more affordable housing is to acknowledge market failures and for public provision to be accelerated.
- xvi. The evidence base lacks detail on the **impacts of tall buildings on Conservation Areas**. Examples include 13 storeys at Palace Gardens and 23 storeys at Edmonton Green, as well as at other Conservation Areas including Southgate. A Heritage Impact Assessment, including modelling of the impacts from relevant vantage points should have been presented for public comment at the Regulation 18 stage of consultation.
- xvii. We question the robustness of the proforma format used to present the site allocations in **Appendix C**. At the very least the proformas should specify which DM policies are particularly relevant in each case and explain why. High-level masterplans or (where high-rise development is proposed) massing models should be available for each site and subject to proper scrutiny as part of the plan-making process.
- xviii. We doubt that the level of **infrastructure** required to support the very high levels of growth proposed can be delivered without further harm to the character of the borough. The Regulation 19 (pre-submission) consultation should be of 12 weeks' duration in order to allow for adequate scrutiny of that complex evidence.
- xix. The Council should not determine any planning applications on the basis of the draft Local Plan until after examination and adopted by the Council as the new statutory development plan.

The Housing Topic paper says that mixed use development would 'compromise the integrity' of protected 'Strategic Industrial Land' such as that at **Harbet Road (below)**, despite the clear regeneration opportunities offered by this and other similar sites in the Lee Valley, and potential willing investors in mixed-use development.



(Below)...whereas **Vicarage Farm** ('Chase Park'), is proposed as a suitable location for a housing estate of 3,000 homes.



1. Policies which the Enfield Society supports

The Enfield Society in principle supports the following policies:

- Subject to some concerns about details and comments on individual site allocations, the emphasis on place-making at six out of the ten 'place-making areas': Angel Edmonton, Edmonton Green, Meridian Water, New Southgate, Southbury and Southgate.
- Intensification and redevelopment of transport hubs (PL1-7) although development should be sensitive to the surrounding area and heritage assets such as Conservation Areas and Listed Buildings. This is particularly relevant in relation to the Conservation Areas in Enfield Town and Southgate Circus.
- Proposals for environmental improvements to address climate change and improvements to biodiversity, urban greening, allotments and community food production, especially the de-culverting of watercourses and naturalisation of river channels.
- Design policies including shopfronts and advertisements, civic and public developments, housing standards and external amenity standards.
- Housing policies including small sites and smaller housing developments, supported and specialist housing, community led housing, build to rent, and student accommodation.
- Economic policies including in relation to supporting offices, providing for workspaces, local jobs, skills and procurement; and
- Culture, leisure and recreation policies, with the caveat that we have some concerns about the proposed activities at Whitewebbs Lane, which would be inappropriate if they lead to loss of the openness of the existing Green Belt.

2. Policies to which the Enfield Society objects

However, we do have a significant number of serious concerns about the proposals, in particular the following policies:

Strategic Policy SS1: The Spatial Strategy

This policy affords too much weight to the protection of Strategic Industrial Locations (Strategic Policy E3) and too little weight to the contribution of historic landscapes such as Enfield Chase to the history and character of the borough. We have concerns about part 2 of this policy and object to parts 7, 8, 9, and 11 relating respectively to Chase Park, Crews Hill, warehousing in the Green Belt east of Junction 24 of the M25 of the Ridgeway, and housing in the Green Belt at Hadley Wood. We object to the use of the phrase 'Chase Park', which suggests an existing area of urban development, when it is entirely open farmland and valued open space. We have a number of comments on the spatial strategy and alternatives elsewhere in our submission, for example section 5 below.

The Council should not determine any planning applications on the basis of the draft Local Plan until after examination and adopted by the Council as the new statutory development plan

Strategic Policy SS2: Making good places

This policy would permit overdevelopment of sensitive areas of the borough with insufficient concerns for impacts on the amenity or existing quality of life for our communities. The policy provisions would completely fail to mitigate the adverse impacts of certain of the development proposals, particularly those at Chase Park and Crews Hill. The policy could provide the potential for Neighbourhood Plans within 'Place-Making' areas to foster genuine community participation in planning. There is insufficient reference to the lack of infrastructure in many of the place making areas.

The place-making focus in the Local Plan would benefit from closer attention to the *Enfield Characterisation Study 2011*. According to the 2021 Character of Growth Study (page 7) "*The 2011 study is a detailed analysis of the borough's character, identifies typologies and explains the history of the urban environment. It is a solid base for this study and does not need to be fully revised.*" We agree. The 2011 Characterisation Study identifies a number of locations where development would be avoided, but strangely the draft Local Plan nevertheless proposes development in those locations. Our response provides further details in relation to specific sites below.

Strategic Policy PL8: Rural Enfield

This policy puts too much emphasis on 'improvements' paid for by development that would despoil large parts of the most beautiful and strategically important Green Belt countryside. The improvements would make marginal difference to the rural area and would fail to compensate for the harm inflicted by development elsewhere in the rural area. We believe that policy misuses the 'National Park City' concept to justify harmful development. We note that our view is shared by the National Park City Foundation who strongly object to the proposals.

Part 2b of Policy SP PL8 refers to a "new cultural gateway hub at Enfield Chase, including a new visitor centre and public art installations, in the form of sculpture, in a parkland setting." The significance of Enfield Chase lies in the quality, coherence and extensiveness of its historic landscapes, and the relationship with its historic hinterlands, including Enfield Old Park and Trent Park. We question what value or relevance a 'cultural gateway hub' or sculpture park would have to an understanding of the Chase. Similarly, whilst the 'rewilding' referred to in part 2b) of the policy may be laudable, we question whether more cost-effective 'higher level stewardship' or equivalent of the existing farms may enable the Council's tenant farmers to contribute to productive agriculture whilst encouraging biodiversity and increased tree cover in the field margins. We feel that such an approach would be more sympathetic to the story of the division of Enfield Chase in 1777 (as set out in Section 4 and Appendix A to our submission).

We are concerned that this policy is part of an elaborate argument that development on the Chase (SP PL9, SP PL10, SA45 and SA54) is necessary in order to fund expensive projects such as visitor centres, rewilding and sculpture parks. From our consultation response it will be apparent that this vision undervalues and misrepresents the importance of Enfield Chase. We think the vision put forward by the Council is unrealistic, betrays a lack of understanding of the history of Enfield Chase, and would erode and undermine our local sense of pride and identity with the area in which we live.

Enfield Chase is of national significance in historical terms, but this does not translate into it being a major visitor attraction.

The Enfield Society's alternative vision for the rural area differs from that set out by the Council in the draft Local Plan. The Enfield Society proposes an alternative vision of wildlife-rich but productive small farms run by the Council's tenant farmers in accordance with best practice environmental land management principles (see our comments on policy BG3), with an extended network of public paths to improve access to the countryside. Our vision is far more realistic and sustainable than the proposals put forward by policy SP PL8. Our vision is aligned with the government's 'Path to Sustainable Farming' agricultural transition plan. Importantly, it is one that is focused on local people, rather than people from outside the borough.

Strategic Policy SP H1: Housing Development Sites

Objections to particular sites are provided below. A number of the sites included Table 8.1 should be subject to a heritage impact assessment as part of the Local Plan process in order to understand (and not left to planning applications) to understand whether the a) the principle and b) the proposed levels of development is appropriate at each site, taking account of the impact on heritage assets and Conservation Areas.

Furthermore, no design or masterplanning work to demonstrate the capacity or other feasibility testing of the proposed levels of development has been provided within the published documents. That deficiency should be rectified at the Regulation 19 stage and the proposed levels of development adjusted accordingly.

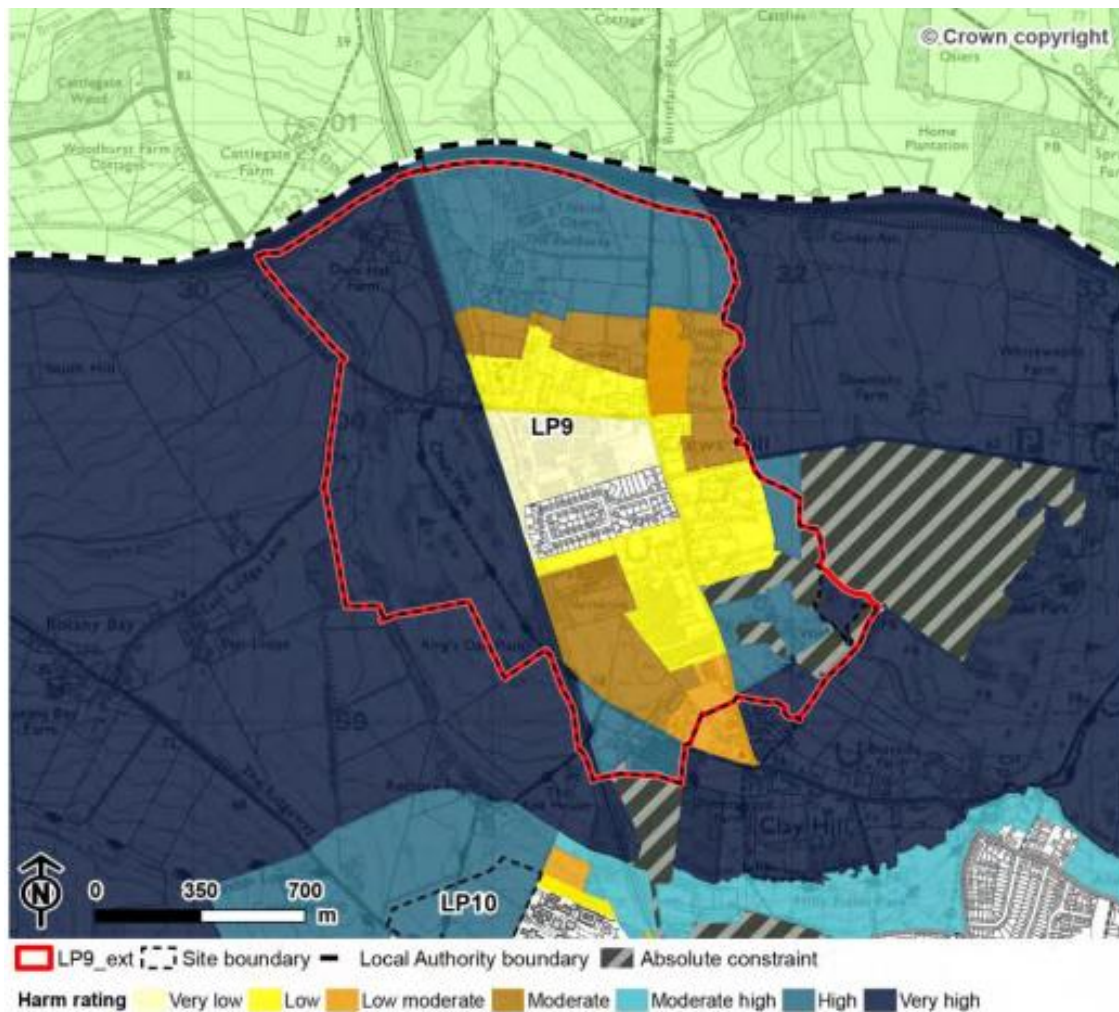
Strategic Policy PL9: Crews Hill

This proposal includes the development of housing on both sides of the railway line, including at Owl’s Hall to the north and Crews Hill Golf Club to the south of Cattlegate Road, as well as on the existing ‘brownfield’ glasshouses and retail areas. The policy proposes 3,000 homes at Crews Hill, with the prospect of significantly more in the longer term. Large scale development in this area would be unsustainable because it would be largely car-dependent and would result in severe congestion at Botany Bay, Bulls Cross and Clay Hill. Increased traffic and congestion would severely harm the rural character of Whitewebbs Lane, East Lodge Lane and the Conservation Areas at Forty Hill and Clay Hill. The *Enfield Characterisation Study* says “It is important to the character of the area that Botany Bay remains as an isolated rural hamlet.” (page 159).

The area shown as indicatively for housing would entail development as far as the western edge of the Golf Course, resulting in an urbanisation of Enfield Chase when viewed from the Ridgeway and from the permissive paths in the area.

Harm to the Green Belt

The *Green Belt and Metropolitan Open Land Study* (2021) conclusions in respect of Crews Hill are presented below (Appendices Part 4 p 92):



The study states that *"The greatest distinction from the Crews Hill developed area within the site area can be found to the west of the railway line where a combination of this strong boundary, the sloping topography and mature tree cover screen Crews Hill from view and facilitate open views of the countryside to the west."* (Appendices Part 4, PDF page 90)

The Council asked Land Use Consultants (LUC) to consider opportunities to minimise harm from the proposed site allocation. Unsurprisingly in light of the above findings, LUC's conclusions in that respect are as follows (Appendices part 4, PDF page 75)

"Restricting release to the Green Belt land north of Crews Hill and east of Cuffley Brook up to the M25 would have a relatively minor/negligible impact on the distinction of the adjacent Green Belt land due to the presence of strong boundary features – the railway line to the west, the M25 to the north and the treelined Cuffley Brook to the east – limiting Green Belt harm to a high level."

It is not apparent why the Council has disregarded the advice of its own consultants in this respect.

According to the *Enfield Characterisation Study*, Crews Hill Golf Course lies within the Turkey Brook Valley landscape character area and *"It is essential that the Green Belt roles of the area are protected and future development is restricted"* (page 159). The Golf Course is traversed by the popular 'Chain Walk' public right of way.

(Below) Looking south along Chain Walk. The path follows the crest of a ridge and slopes down on both the western and eastern sides, affording long views through the trees to both east and west. The proposed site allocation would involve housing across both sides of the footpath.



The stretch from Tingey Tops Pond to Cattlegate Road follows a ridgeline and is particularly scenic, affording views west across Enfield Chase and glimpses of the

Hertfordshire hills to the east. Development at Crews Hill Golf course would represent an urbanisation of an undulating, high quality landscape within the historic Enfield Chase.

(Below) Looking west from Chain Walk across the Chase. The land slopes down to Turkey Brook. The right of way affords enjoyment to non-golfers. The Local Plan proposes housing on this slope.



(below) Photo from Strayfield Road footpath north across the glasshouses of Crews Hill towards the M25. The contrast with the golf course in terms of the topography and landscape is striking.



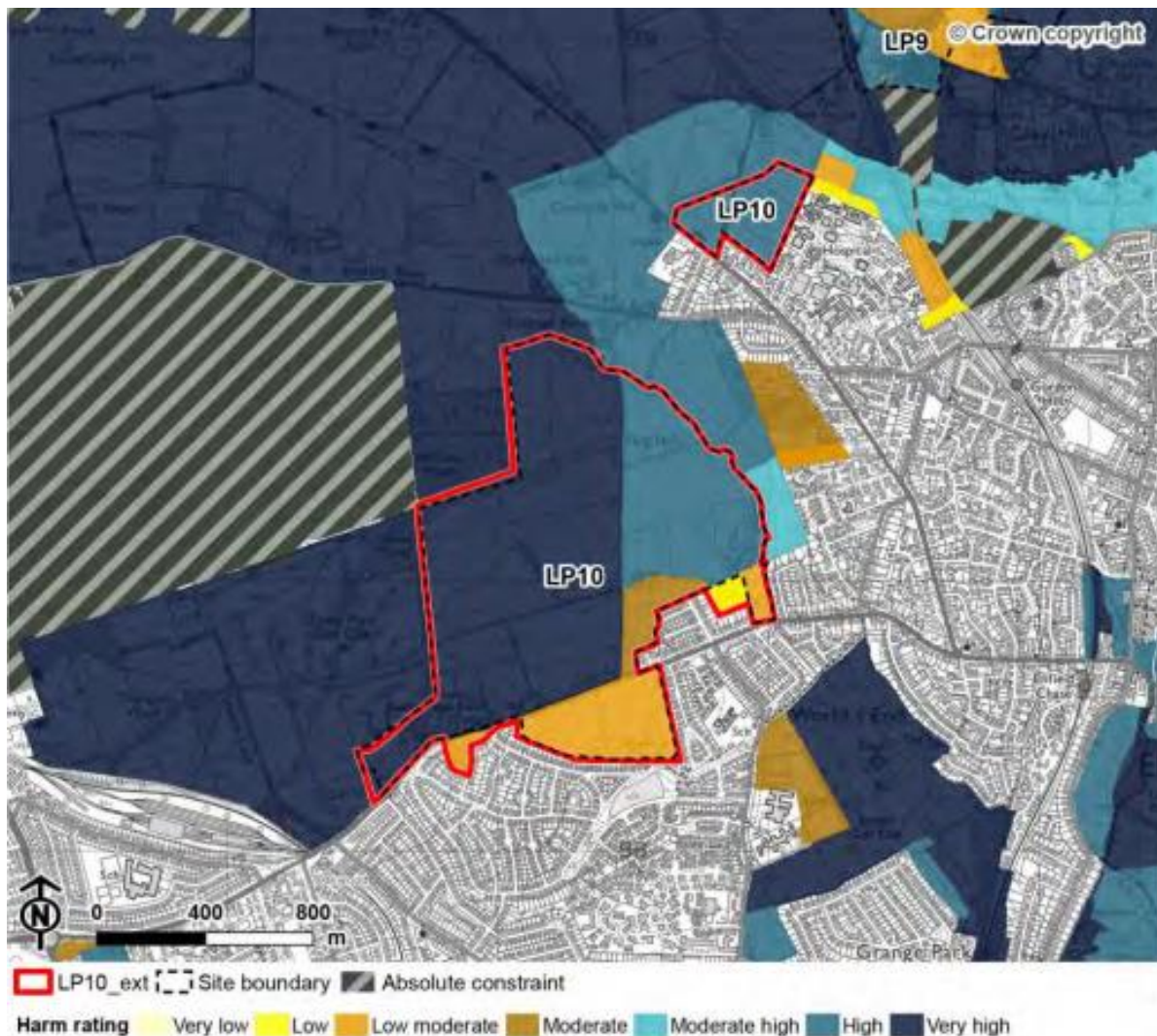
Strategic Policy PL10: Chase Park

This policy proposes 3,000 dwellings, including at Vicarage Farm, land south of the A110 Enfield Road (Bramley Road), and at a smaller site to the east of the track to Rectory Farm, adjacent to Roundhedge way.

Any development in this area would have a number of hugely damaging impacts, including on the Green Belt, the integrity of Enfield Chase, on the Merryhills Way, on high quality countryside, harm to access to open space in the EN2 7 and EN2 8 postcode areas, harm to biodiversity, and harm to the character and identity of Enfield. We address each of the various harms below.

Harm to the Green Belt

The *Green Belt and Metropolitan Open Land Study* (2021) indicates that either High or Very High Harm would be caused to this strongly performing area of Green Belt as shown below (Appendices Part 4 PDF page 62):



The Council asked Land Use Consultants (LUC) to consider opportunities to minimise harms to the Green Belt at proposed development areas. For the Chase Park area, LUC’s findings are as follows:

“Opportunities to minimise harm to the Green Belt

Significantly reducing the size of the area of release within site LP10 (sic) represents the best opportunity to minimise harm to the Green Belt in this location. Notable opportunities include confining release to the northern isolated portion of the site in between the Ridgeway and Chase Farm Hospital, where harm could be minimised to no more than high harm. If Green Belt release was confined to the land south of Bramley Road/Enfield Road and the allotments and grazing paddocks north of the Jolly Farmers pub, Green Belt harm would be reduced to a low-moderate level. Finally, releasing these sites in combination with the field north west of Trentwood Side Road would limit Green Belt harm to a moderate level. Regardless of the scale and pattern of Green Belt release, the open undulating nature of the Green Belt within this location and the high potential for adverse impacts on the distinction of remaining Green Belt land, particularly to the east of the southern portion of the site, highlight to importance of finding and/or creating clear, permanent alternative Green Belt boundaries that protect what remains of the wider Green Belt in the long term.” (Appendices Part 4 - PDF page 62)

From this it is clear that LUC consider that there are no opportunities to minimise the harm from the proposed site allocation, other than to effectively ‘write off’ the area as Green Belt.

Harm to the integrity of Enfield Chase Heritage Area

The proposed development at Vicarage Farm or ‘Chase Park’ is proposed within a strategically important part of Enfield Chase between Enfield Old Park and Trent Park. This would affect the historic environment in two ways:

- There would be adverse effects on the wider historic setting of Trent Park within the wider landscape of the historic Enfield Chase
- Development would sever Enfield Chase from Old Park, i.e., it would sever a connection between the Inner Park and the Outer Park that goes back to medieval times

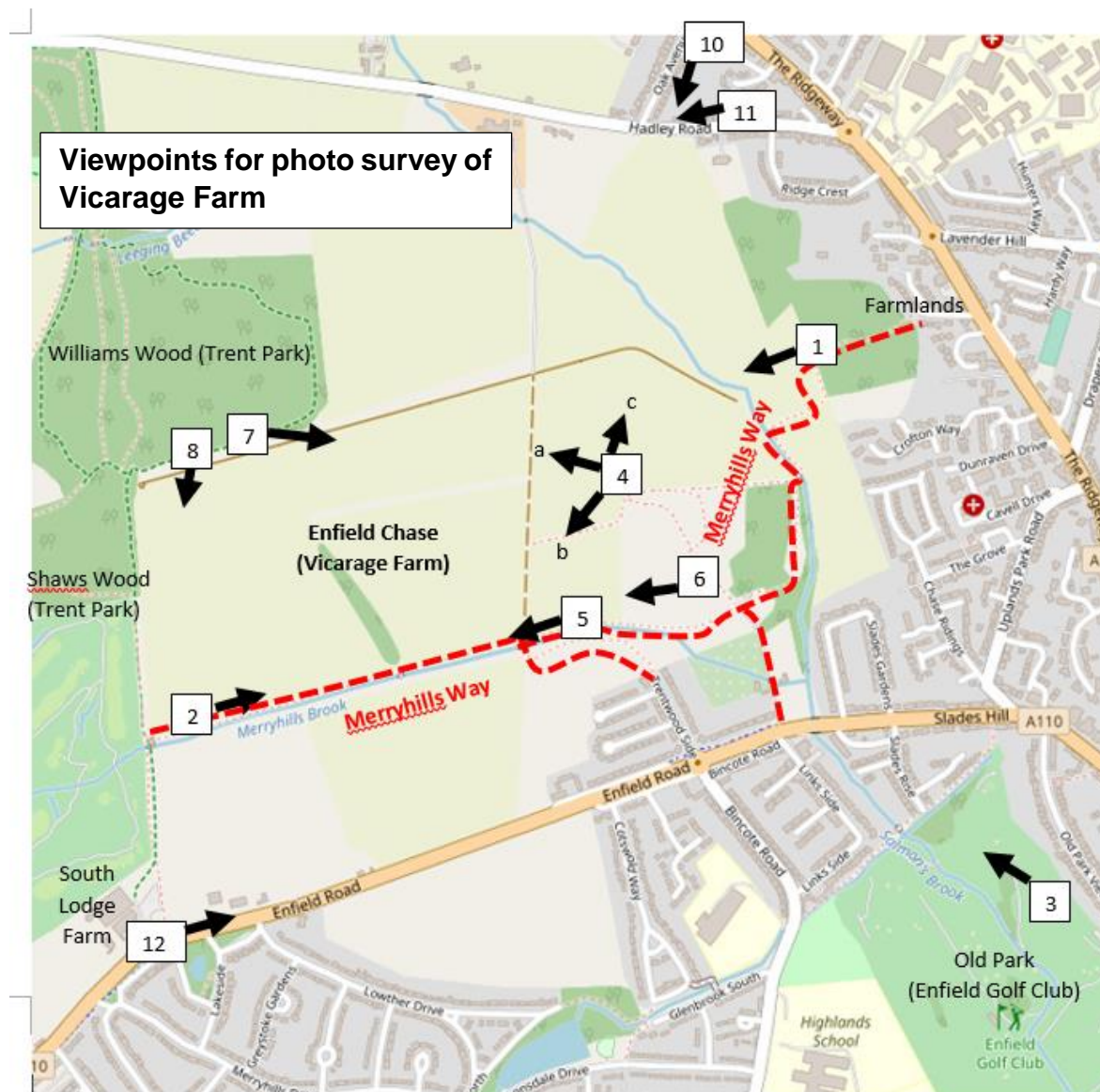
Please refer also to Section 4 of our submission in relation to the Enfield Chase Heritage Area of Special Character. The proposals for Chase Park are the single most harmful development proposals to Enfield Chase within the draft Local Plan.

Harm to the countryside

The proposed development would have an adverse impact on some of the finest remaining countryside within the M25. According to the *Enfield Characterisation Study* the area forms part of the Merryhills Brook landscape character area.

“On the east side, built development has already extended to the east of the Ridgeway and it is important that this part of the urban edge is not developed further weakening the Green Belt. The existing tree belts on the east side provide a valuable buffer between the urban edge and the agricultural landscape and these should be protected and maintained.”
(page 161)

The Enfield Society has undertaken a photographic survey to understand the magnitude of these adverse impacts. The numbered viewpoints below correspond with the numbered photographs on the following pages.



Note: The photographs for viewpoint 12 are presented in relation to policy DM DE5: Strategic and Local Views below.

Photo 1 (below): View west towards Trent Park over Hog Hill. The proposed Chase Park development would extend from Salmons Brook (in the depression) as far as Trent Park in the distance, not only destroying perhaps the finest quality landscape in north London but also destroying the historic connection between Old Park and Enfield Chase (see photo 3 below).



Photo 2 (below): Looking east along the Merryhills Way. The openness of the valley landscape would be lost by a development of housing up the valley slopes to the edge of Trent Park (unseen, left).



Photo 3 (below): View north-west from Enfield Old Park (Enfield Golf Course) towards Williams Wood and Trent Park. Photo taken when the course was closed during COVID lockdown. Enfield Road is hidden behind the trees in the middle distance. The fourteenth-century Old Park Keeper's Lodge Scheduled Monument is in the Salmon's Brook valley to the left of the photograph. Deer were raised in the Old Park and then released into Enfield Chase. If the Council's 'Chase Park' proposals become a reality, the distant slopes as far as Trent Park would be developed with housing, thereby destroying the historic landscape and visual connection between Old Park and the wider Chase.



Hog Hill (Photographs 4a-c)

Hog Hill takes its name from the common right to pannage in this area of the Chase. The Domesday Book refers to pannage (grazing of 2,000 pigs) in the manor of Enfield, and rights of pannage were established in the year 1217 by article 9 of the Charter of the Forest. These rights became a key feature of the social history of Enfield Chase and the common grazing rights enjoyed by the local inhabitants. Infringement of these rights was a key driver of social unrest and troubles with the authorities, for example in 1659 (see '*The Story of Enfield Chase*' by David Pam, ref **Appendix A** below).

Since 1777 these common rights took a different form, as local people enjoyed the open spaces and tremendous views from Hog Hill. The Western Enfield Residents Association and the Enfield Society tried to formalise this right through the creation of the Merryhills Way, which was initially proposed to traverse the Hill. However, due to a technicality this particular battle was lost and the landowner in 2020 erected fences to prevent access. More information about the Merryhills Way is provided below.

Hog Hill was selected by the wartime government as the site for an anti-aircraft gun emplacement given its excellent all-round views.

(below) Photo 4a: View west from Hog Hill towards Williams Wood/Trent Park. Policy SP PL10 proposes housing on all the land in this picture as far as Williams Wood.



Photo 4b (Below) view south-west from Hog Hill towards South Lodge Farm. The Merryhills way runs along the treeline in the middle distance. Policy SP PL10 proposes housing development across the whole of this area, which would despoil the historic landscape including the geometric field patterns.



Photo 4c (Below): View north from Hog Hill towards Oak Avenue, Hadley Road and Wolverton. Policy SP PL10 proposes development of the fields in the foreground as far as the trees along Salmons Brook, leaving a narrow strip of open space from the brook to the treeline.



Photo 5 (below): View west along the Merryhills Way where the Public Right of Way crosses the old track to Vicarage Farm. Shaw’s Wood at Trent Park is visible in the distance. The Merryhills Brook is in the trees. The Merryhills Brook Valley slopes up to the Enfield Road through paddocks on the left and through arable fields on the right up to Williams Wood/Trent Park. If the Council’s vision for Chase Park is realised, the footpath would be surrounded by housing on both sides.



Photo 6 (below): View west from the Vicarage Farm and Rifles Site of Borough-Wide Importance for Nature Conservation towards Williams Wood, Trent Park. This part of the wildlife site would be lost to housing development, as well as all the fields as far as Trent Park.



(below) Photo 7: View south-east from the track along the southern edge of Williams Wood, Trent Park towards the Spire of St Mary Magdalene Church, Windmill Hill/The Ridgeway. If the Council's plan for Chase Park is realised, this view will be lost to housing development.



Photo 8 (below): Looking east along the track along the southern edge of Williams Wood, Trent Park. All the countryside to the right of the track as far as the woodlands will become a housing estate if the Council’s plans for Chase Park are realised.



Photo 9 (below): View south from the track along the southern edge of Williams Wood, Trent Park towards Jubilee Cottage and the A110. The skyscrapers of the City of London can be seen over the top of the ridge. This setting forms part of the Chase landscape setting of Trent Park. It would disappear to housing development under the draft proposals in the Local Plan.



Photo 10 (below): View south from Oak Avenue. South Lodge Farm and Jubilee Cottage are both visible in the distance. The proposed development at Chase Park would be highly urbanising within this view.



Photo 11 (below): South from Hadley Road towards Williams Wood, Trent Park. The Local Plan proposals for Chase park include development on the rising slope to the treeline, with a buffer on the downslope from Hadley Road. As this photograph shows, the buffer would be ineffectual in preventing the urbanisation of Hadley Road. The rural character of Hadley Road is critical to the identity of this part of the borough.



Harm to the Merryhills Way

The Merryhills Way (a popular Public Right of Way from the Ridgeway to Trent Park) traverses Vicarage Farm as shown on the map below. During summer 2021, the Enfield Society carried out a survey of the usage of the Merryhills Way. In total, **448** responses were received. 63% of respondents were from the postcode areas EN2 7 and EN2 8, and this correlates closely with those who arrived on foot. The full survey results are in **Appendix C**.

The main findings of the survey are as follows:

1. the Merryhills Way is very well used all year round, not just in summer
2. all stretches of the Way are well used, including the access from the Ridgeway at Farmlands as well as the stretch along the Brook itself
3. the Way is used by families with children, groups of friends, and individuals, as well as by people walking their dogs. it is popular with people of all ages.
4. the Way is highly valued for the openness of the surrounding countryside
5. a number of groups use the Way, including the Trent Park Runners, the Scouts, organised walking/hiking groups, and the Sarah Jane Montessori Nursery at the Ridgeway.
6. a large majority of users reach the start of the Way on foot

A large number of respondents submitted comments, which are contained within Appendix C. Of these three are reproduced below:

"It was an incredible place to visit during first lockdown when we felt the parks were too busy. I will never forget the feeling of going there for a walk with my three-year-old son and five-month-old daughter after being stuck in the house for a month. All the open space and surrounding nature made us all feel so much better. We have been going on nature walks there ever since."

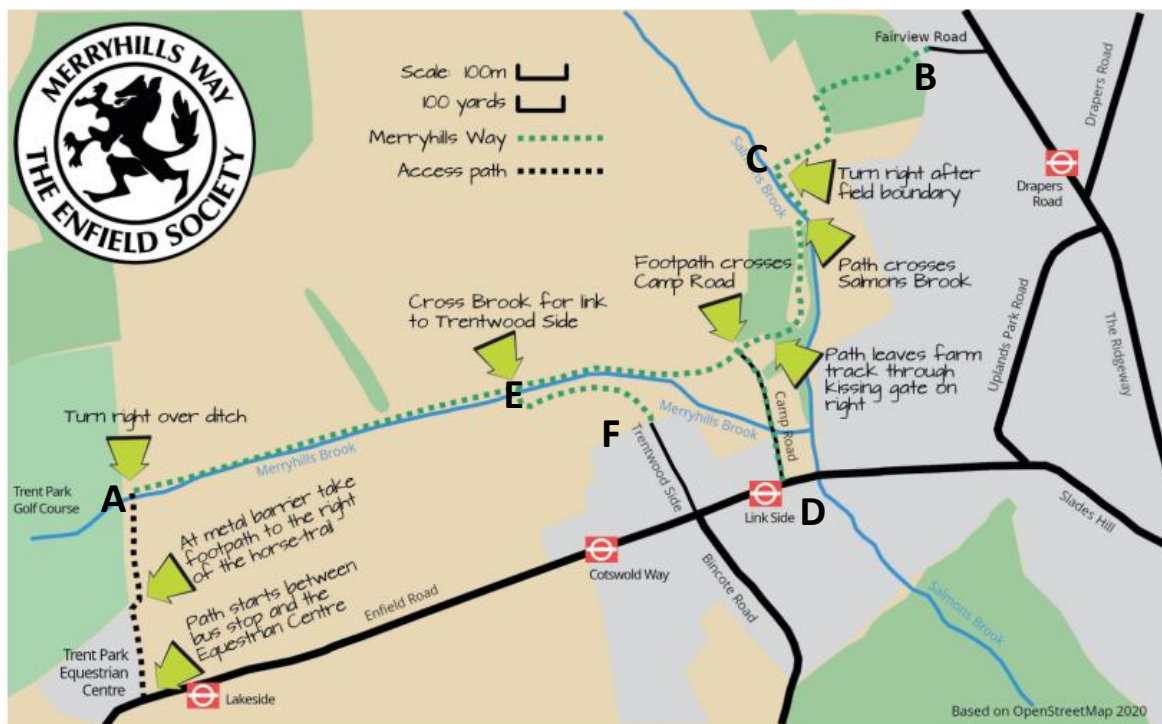
"I live in a built-up area and visiting the Merry Hills Way and surrounds helps me to relax and improves my mental health an enormous amount. I rarely drive (always avoid it if possible) so having open space within jogging distance of home is very important to me."

"I have been using the Vicarage Farm paths between The Ridgeway and Slades Hill since I was a teenager in the 1980s and it's just as beautiful now as it was then. Emerging from the woods on The Ridgeway to the open vista over rolling hills towards Cockfosters still takes my breath away the newer part of the path right into Trent Park is a wonderful addition which I use occasionally but husband and my 78-year-old father use far more frequently. During lockdown the fields off the Ridgeway became a favourite route for my 15-year-old daughter and her friends."



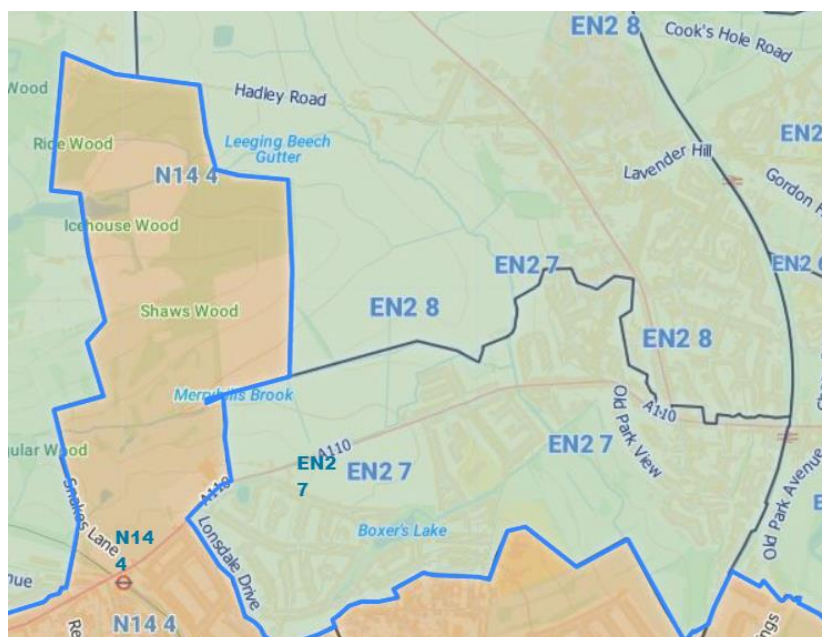
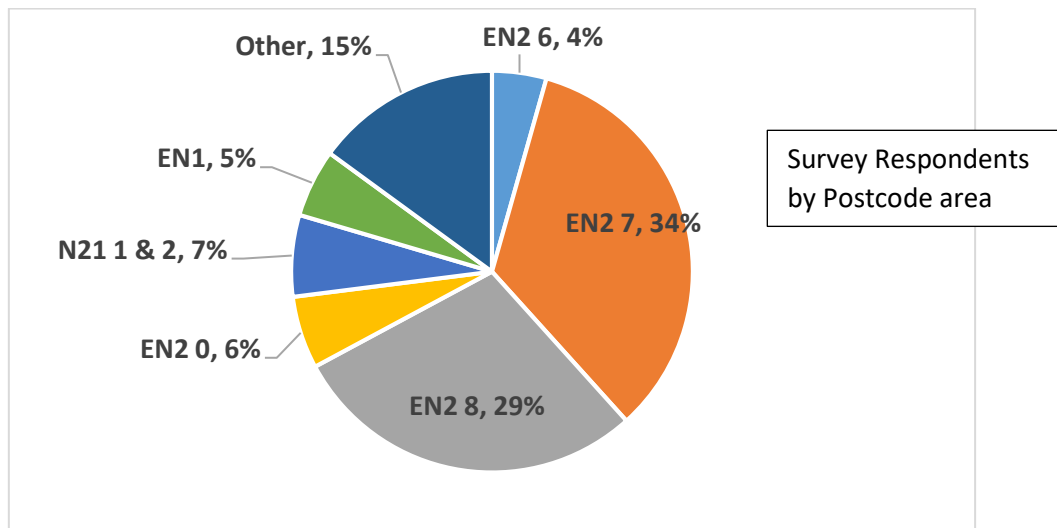
Word cloud indicating high-frequency words from the comments received

(Below). The traditional route over Hog Hill (for which the Enfield Society put in a Right of Way application in 2008, see **Appendix B**). Due to an error with the choice of coloured lines on the map accompanying the right of way application form, a negotiated settlement with the landowner led to the Public Right of Way becoming established through a previously fenced paddock adjacent to the Rifle Club from 2009 onwards. A new kissing gate was installed (see left, below). However, people continued to use the traditional route (up the hedgerow straight ahead) until the landowner dug a ditch and erected a fence in spring 2020. The Enfield Society aspires to reinstate the original route from C to E, reinstating access to the lovely views over Enfield Chase from Hog Hill (see p.20-21)



Harm to access to open space

In our survey, 63% of users of the Merryhills Way came from the EN2 7 and 8 postcode areas, comprising residential areas west of the Ridgeway and north and south of the A110. These two postcode areas are particularly poorly served by open space. The only open spaces within these postcode areas are Cheyne Walk and Boxer’s Lake. However, both of these open spaces are small and lacking in facilities, and are situated towards the bottom of steep hills, making them less accessible to the less mobile or to bicycles. Our survey demonstrated that many of the residents in the area visit the Merryhills Way on foot. Other parks visited (Grovelands, Town Park, Trent Park, Forty Hall) are some considerable distance away and would be visited by car. The proposed open space east of Salmon’s Brook within ‘Chase Park’ is not realistic because a) it is situated on a steep slope and b) it would entail trampling of the Vicarage Farm and Rifles Site Borough-Wide Site of Nature Conservation (SINC). Loss of the countryside at the Merryhills Way would severely affect the amenity of residents of the EN2 7 and EN2 8 postcode areas.



Harm to Biodiversity

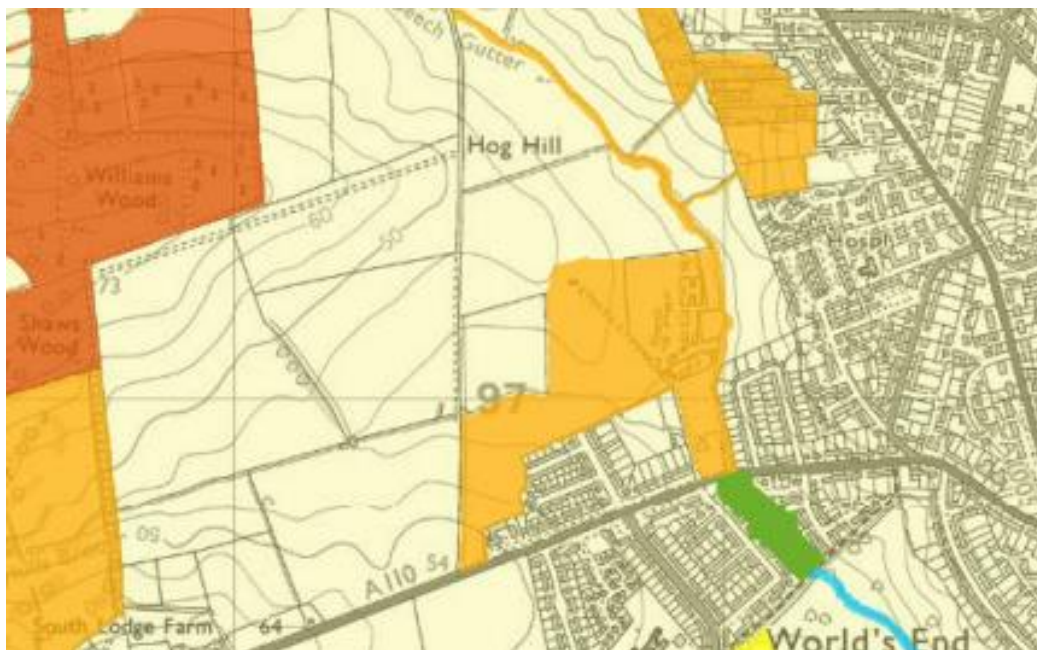
The 'errata note' removes reference to the Bug Life B-Line from policy BG3 as a minor modification. The Buglife B-Line corridor is a network of 'insect pathways' where wildflower-rich habitat will be restored and created to connect existing wildlife areas, which will be of benefit to insects, such as bees and butterflies. It is of significance not only in itself but also for birds and species that rely upon insects for food.

We believe that this removal has significant implications for draft Policy CH10: Chase Park. This is because the *Review of Sites of Importance for Nature Conservation (2021)* identifies that the *Vicarage Farm and Rifles Site Borough-Wide Site of Importance for Nature Conservation (SINC – LUC site ID30, SINCID ENb15)* is connected with the SINC's at Trent Park by 'similar' habitat (see the Review, Appendix C, PDF page 14).

"The site is located within central Enfield and is bound by arable fields and hedgerows to the west north and partially in the east. The site is part of a wider network of similar habitats, and offers unique habitats within the borough. Therefore it is considered to be of key importance at a strategic level." (Appendix D, PDF page 86)

LUC identify the 'strategic' importance of the wildlife site 'given its location'. They also note that the habitat is 'irrepleacable' (Appendix D PDF top page 87). Trent Park and Vicarage Farm essentially comprise one large area of strategic wildlife habitat. We believe this is why bird sightings, including skylarks in spring and early summer, have been so frequent in the fields near Trent Park at Vicarage Farm. We think that the BugLife B-Line should be reinstated to the policy and Chase Park removed from the Local Plan.

Below (extract from Figure 1.1 in Appendix C to the 2021 Review of Sites of Importance for Nature Conservation by Land Use Consultants). LUC point to the 'strategic' importance of the SINC by reference to its connections with Trent Park nature conservation sites.



'Chase Park' South of Enfield Road A110

The openness of this land is important because it forms a landscape connection between Boxer's Lake (formerly within the grounds of South Lodge) and the wider Chase. The *Enfield Characterisation Study* states that this falls within the Merryhills Brook landscape character area and:

"The area is immediately adjacent to the urban edge of World's End and in many places there is a clear and well-defined boundary between the urban edge and the open countryside. The south-eastern and southern edge is strongly formed by the Cockfosters sidings, Enfield Road and the rear boundaries to properties on Lowther Drive and Cotswold Way. By the latter, two fields extend to the south side of Enfield Road (near Boxer's Lake) performing an important function of extending the green belt up to the urban edge and creating separation between Slades Hill (World's End) and Oakwood. The experience of passing through this area of green space is important and provides a valuable connection with and experience of the Green Belt for traffic moving through the Borough on the A110." (page 160)

The open landscape on the south side of Enfield Road also contributes to the feeling of being in the open countryside for travellers along the Enfield Road. Finally, the open space has long been used informally by residents of the Cotswold Way and Lonsdale Drive residents and its openness is an important part of their residential amenity.

Below: Looking down the slope from the A110 south towards the Merryhills Drive estate (South Lodge Estate) on the lower ground.



'Chase Park' East of the Rectory Farm track

Adjoining the existing urban area at William Covell Close, Spring Court Road, and at Roundhedge Way. A photograph is provided below.

(below). View south from King's Oak Plain across Rectory Farm to the proposed 'Chase Park Extension' housing site. The site would not have a clear Green Belt boundary and would cause harm to the outlook and amenity of adjacent residential properties, as well as causing high harm to the Green Belt.



The Council asked Land Use Consultants about options to minimise the harm to the Green Belt from the proposed Chase Park development. Their response identifies this site as follows:

"Significantly reducing the size of the area of release within site LP10 (sic) represents the best opportunity to minimise harm to the Green Belt in this location. Notable opportunities confining release to the northern isolated portion of the site in between the Ridgeway and Chase Farm Hospital, where harm could be minimised to no more than high harm." (Green Belt and Metropolitan Open Land Study, Appendices part 4 page 62)

It is clear from this that Land Use Consultants struggled to find any effective ways to minimise the harm to the Green Belt.

SA54: Land East of Junction 24)

This draft policy proposes light and general industrial, storage and distribution use on land shown below to the left side of the Ridgeway (photograph below). The site is within the Enfield Chase Heritage Area of Special Character (Section 4). The Enfield Characterisation Study states: *“The presence of such attractive and well maintained landscapes close to the urban edge is a valuable asset for the borough. They provide a landscape setting for the borough and an attractive gateway area when entering and leaving the borough to the north.”* (page 159). We strongly agree with that conclusion and object to the proposed development at this site.

As one of the responses to our survey (Appendix C) remarked: *“If I take a trip out of the borough it is always delightful to leave the M25 and see the rolling hills and woods surrounding Enfield. I know I’m nearly home.”*

(below) the proposed development on the left side of the road in both pictures would significantly harm the green gateway to Enfield and its Chase.



SA45: Land Between Camlet Way and Crescent Way, Hadley Wood)

The proposed site allocation SA45 suggests that 160 new homes could be built on Green Belt land at Hadley Wood. The site is within the defined Area of Special Character. The site lies within Green Belt parcel EN3 (*Green Belt and Metropolitan Open Land Study Appendix 1*, PDF pages 30-31). According to the study, the parcel makes a strong contribution to 4 out of 5 Green Belt purposes and release of the land would result in High harm. According to the *Enfield Characterisation Study* (page 167) this site forms part of the Hornbeam Hills South character area (1f) and is part of an important area of Green Belt with a clearly defined boundary. This site is very attractive open countryside currently used as a paddock. It is visually prominent in the landscape, as shown in the site photograph below.

(below) View from Bartram’s Lane across the proposed housing site allocation SA45. The trees in the depression form the administrative boundary between Enfield, Barnet, and Hertsmere Boroughs.



This site, adjacent to Monken Mead Brook, is very close to the protected area of the Battle of Barnet in 1471, one of the most important battles of the Wars of the Roses. The Battle of Barnet Project and archaeological survey in 2015-2018 was inconclusive as to the precise location of the battle, although the best available evidence suggests that the Yorkist position was established within this area of Enfield Chase¹. These fields did not form part of the survey area and it is possible that the proposed site allocation could have been part of the battlefield.

¹ <https://archaeologydataservice.ac.uk/archives/view/1003872/index.cfm>

SA60: Sloeman’s Farm

The proposal (page 381) is for 47 hectares of natural burial space within the Green Belt. The Enfield Society supports the principle but there is a lack of clarity in the proposal as to whether any ancillary built development is proposed within the site, what landscape impacts there might be and how these might be managed, how the Public Right of Way that passes through the site from north to south will be maintained, and how the rural character and frontage onto Whitewebbs Lane will be maintained.

Whitewebbs Lane is an ancient country lane with a strong rural character, views and wildlife-rich hedgerows punctuated by views across open countryside (see photograph below). Unless carefully planned, this proposal has the potential to cause significant harm to that character. The policy is vaguely drafted and more detailed work, including specific protections within the policy, is required in order to safeguard that character. There is a high risk that reliance on wording elsewhere in the document could result in key site-specific issues being overlooked.

Below: *Whitewebbs Lane is a winding country lane with country views to either side*



SA62: Land at Tottenham Hotspurs Football Ground

The ‘errata note’ published towards the end of the consultation indicates that a boundary line map of Sloeman’s Farm proposed natural burial site (SA60) has been incorrectly shown in the Plan under the above policy, and a correct red line boundary has been belatedly provided further to the east. We query why this is presented in the table as a ‘minor’ modification.

It is unclear from the amended map what is existing and what is the proposed expansion land, although we speculate that the expansion is shown to the north of Whitewebbs Lane and to the west of the existing facilities. The western expansion appears to wrap around Archers Wood and to encompass three hectares of land at Whitewebbs Golf Course.

It appears from the Proposals Map that the site is to be retained within the Green Belt. At present the Whitewebbs Golf course is open land and the Enfield Society would have concerns about the impacts on the openness of the Green Belt from

fencing off portions of the site. The Council has already allowed a number of inappropriate built structures in the Green Belt within the existing Spurs training grounds and there appears to be significant potential for further harms from these proposals. We would like to see significantly more detail presented at the Regulation 19 stage.

The Enfield Society has concerns about the cumulative impacts of this proposal on the character of Whitewebbs Lane, when considered together with the proposals for Sloeman’s Farm (SA60) and at Crews Hill (SP PL9).

Strategic Policy CL4: Promoting Sporting Excellence

We note that it is proposed to retain site SA62 within the Green Belt. However, policy protections for the rural character (including hedgerow protection) of Whitewebbs Lane should be added to this policy to guard against the cumulative effect of erosion of the character of the lane when combined with the proposed natural burial ground and the existing entrance to the Spurs training facility on the south side of Whitewebbs Lane, which is also within the Green Belt but where the entrance (including built development in the Green Belt) is not in keeping with the character of the rural lane.

(below). *Enfield Council granted planning permission for the Spurs facility 2008. ‘Very special circumstances’ were cited in permitting a number of buildings in the Green Belt within the site. Without stronger and more specific protections in the policy, the kind of inappropriate and unsympathetic landscaping could be replicated, further eroding the character of the historic Whitewebbs Lane.*



Policy DM DE5: Strategic and Local Views

Figure 7.2 omits the very important strategic views of the open countryside on both sides of Enfield Road, which provides a sense of separation between Oakwood and Enfield Town, and which are highly valued by users of the A110 Enfield Road, providing a clear sense of separation between the town and the countryside. It also fails to indicate the fine views south and west from the periphery of Trent Park (see our objection to Policy SP PL10).

Below: view east from the bus stop opposite Lakeside (the former South Lodge). The open countryside of Vicarage Farm is on the left, and is important to the sense of separation between the rural and urban area, as the Enfield Characterisation Study notes (p 160-1)



Below: view east towards Enfield Town (see viewpoint 12 on the map on page 16 above). The spire of St Mary's is visible in the distance. The fields south of Enfield Road contribute to the sense of separation between Oakwood and Enfield Town, as noted by the Enfield Characterisation Study (page 160-1)



Policy DM DE6: Tall Buildings

The indicative maximum building heights shown on Figure 7.3 within the place-making areas could have negative impacts on many of the Borough’s centres. These building heights range between 9 storeys and 26 storeys, including 13-storey towers within the Enfield Town Conservation Area and similar towers in the Southgate Conservation Area. The London Plan figure for the maximum height within sensitive heritage locations equates more closely to 7/8 storeys.

Below: View from the roof terrace of the new Microsoft/Metaswitch building across the Enfield Town Conservation Area to St Andrew’s Church and beyond the spire of Christ Church, Chase Side. The three tall buildings of Tower Point, The Civic Centre, and New River House are distant and dispersed enough to ensure that the character of the town centre remains essentially low-rise.



As the Secretary of State said in his letter to the Mayor dated 20th December 2020 – “I am issuing a new Direction regarding Policy D9 (Tall Buildings). There is clearly a place for tall buildings in London, especially where there are existing clusters. However, there are some areas where tall buildings don’t reflect the local character. I believe boroughs should be empowered to choose where tall buildings are built within their communities. Your draft policy goes some way to dealing with this concern. In my view we should go further and I am issuing a further Direction to strengthen the policy to ensure such developments are only brought forward in appropriate and clearly defined areas, as determined by the boroughs whilst still enabling gentle density across London. I am sure that you share my concern about such proposals and will make the required change which will ensure tall buildings do not come forward in inappropriate areas of the capital.” (see Appendix E to our submission)

The presence of three dispersed tall buildings does not represent a 'cluster' and should not be taken as providing a green light to further inappropriate development that would harm the Conservation Area.

Below: *View north-east across Town Park (previously part of Old Park) across Palace gardens. The 13-storey Civic Centre is just visible but is not intrusive because of distance. New River House is more intrusive but is also distant (Tower Point is to the right, out of sight). The proposal for 13 storey buildings at Palace Gardens close by would be jarring within the context of many vantage points within the Conservation Area, including this view.*



We feel that the Local Plan provides insufficient material for the public to make an informed comment as to the appropriateness of these building heights. Furthermore, paragraph 3.4 states that *'the appropriateness of siting of tall buildings will be assessed taking account of the findings of the Character of Growth Study'* when that study does not present any analysis of the impacts from different vantage points, particularly in terms of the impacts on the historic environment. The 'method' set out in Table 8 (page 27) of the *Character of Growth Study* is very crude and does not provide a suitable basis for determination of building heights.

In order to properly understand the impacts of proposed building heights 3-D visualisations from a range of vantage points are required so that the impacts on street scene, the historic environment, and the amenity of local residents can be properly understood. From Policy DE5 it appears that the Council uses Vucity Dynamic Modelling software to generate *"accurate visual representations of the development form the surrounding area and from different points within the viewing corridor"*. The Council provides an example of the type of images that can be produced using Vu City on page 27 of the *Character of Growth Study* (see below). As an absolute minimum these kinds of images should be produced for

different vantage points for all the proposed tall building clusters, in particular those which could affect Conservation Areas and the setting of listed buildings. As far as possible resolution should be increased to facilitate comprehension.



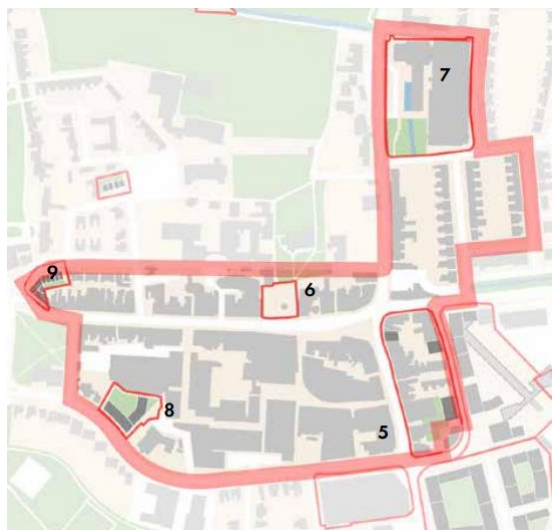
2. VU City testing on the A10, the yellow building is the extant permission for NEAT developments

(left) Extract from the *Character of Growth Study 2021*, page 27

The Council should also consider whether its proposals would reflect best practice as set out in the *London View Management Framework Supplementary Planning Guidance*.

Finally, we refer to the Council's 2017 *Enfield Town Centre Framework Masterplan* by Allies and Morrison and Urban Practitioners, which identified

a number of opportunity areas. Of those, it considered the possibility of up to eight storeys at the Palace Exchange site (see extract below).



Enfield 'Core Centre'

Site 5: London Road Island

"Building heights are less sensitive in this south eastern part of the site than other areas. As a result, building heights of up to eight storeys may be appropriate subject to other policies in the plan."

(page 67)

<https://governance.enfield.gov.uk/documents/s62634/Enfield%20Town%20Masterplan%20-%20Appendix.pdf> [accessed 4 September 2021]

The Council should not determine any planning applications for tall buildings on the basis of Policy DM DE5 or other draft Local Plan policies until after examination and adopted by the Council as the new statutory development plan. This will enable confidence that a robust framework for the determination of appropriate locations for tall buildings is in place.

Strategic Policy BG1: Enfield’s blue and green infrastructure network

The Enfield Society has an active footpaths group and has long been active in the creation and maintenance of rights of way and permissive paths in the borough. Whilst we welcome aspects of policy BG1, we are concerned that the ‘blue and green infrastructure network’ is being used by the Council, together with the ‘National Park City’ concept (policy SP PL8) to justify the loss of important areas of countryside and Public Rights of Way.

Policy BG1 (part 2a) refers to the creation of continuous ‘green loop’ into Enfield Chase. This route is missing from the consultation version of the Plan, but is included as Figure 6.1 in the ‘errata’ slip issued separately towards the end of the public consultation. Our observations about this are as follows:

- a) the Green Loop already exists as a public right of way as part of the London Loop footpath, a continuous circuit that extends through the Green Belt around the metropolis. The Green Loop is remote and is not accessible on foot for many residents in EN2 7 and EN2 8 in particular.
- b) the proposed enhancements, including the new ponds and the all-weather shared foot and cycle ways are already mostly complete, and are paid for by the Mayor of London. Additional developer funding is not necessary and they do not represent any form of compensation for the harms caused by the proposed development.
- c) Figure 6.1 shows the Merryhills Way as a ‘green link’ (see our comments on Policy SP PL 10: Chase Park). The evidence from our survey and usage counts (Appendix C of our submission) indicates that many users value that Right of Way highly because it is accessible on foot, near their homes, for its access to high quality open landscapes. The Merryhills Way should be upgraded from a ‘green link’ (which could pass through the proposed housing estate at Vicarage Farm) to a full part of the green and blue infrastructure network, shown in green on Figure 6.1, because the Merryhills Way offers a high quality experience of Enfield Chase and is noted for the quality of scenery in close proximity to local residents.
- d) We note that the green link is shown as continuing through Enfield Golf course (Enfield Old Park) but this would not compensate for the proposed urbanisation of the Merryhills Way in Policy SP PL 10. We doubt the feasibility of putting a footpath through the middle of the fairways at the golf course.

The Enfield Society is in an ongoing struggle to secure the public right of way across Hog Hill, which affords magnificent views over Enfield Chase to which local people once had access, but which has recently been blocked off by the landowner. Please refer to **Appendix B** for maps and photographs of the route and details of the ongoing struggle in respect of the route of the Public Right of Way.

Strategic Policy BG3: Biodiversity Net Gain, rewilding and offsetting

Paragraph 6.3.5 makes clear that the main thrust of this policy is about developer contributions to off-site biodiversity compensation. We assume that this is part of the Council's elaborate argument to justify development in Enfield Chase (SP PL 10 in particular).

Policy BG3 identifies Enfield Chase as an area of nature deficiency. This appears to reflect the fact that there are a number of Council-owned farms worked by tenant farmers within the Chase. Traditionally, high-intensity agriculture has left little room for biodiversity. However, there is now ample evidence from around the country of farmers who are working to achieve biodiversity gains at the same time as running a profitable agricultural business. The Government is actively encouraging this through agri-environment schemes to replace the production subsidies that were a feature of the European Common Agricultural Policy (CAP). The Council should work with their tenant farmers to secure access to these environmental government subsidies. We do not believe that the Council should be looking to force tenant-farmers away in order to make way for 'rewilding' projects financed by developers.

A much more effective approach would be to foster good practice amongst tenant farmers, for example through appropriate programmes for field margins, crop rotation, reduction of chemicals and pesticides to enable pollinators to return. Importantly, such an approach would not require funding from developments in the Green Belt countryside.

Net gains to biodiversity can much more easily be achieved at brownfield and derelict sites such as Harbet Roads and Brimsdown, than at wildlife rich sites such as Vicarage Farm.

The Bug-Life B-Line

The 'errata note' removes reference to the Bug Life B-Line from the policy as a minor modification. The Buglife B-Line corridor is a network of 'insect pathways' where wildflower-rich habitat will be restored and created to connect existing wildlife areas, which will be of benefit to insects, such as bees and butterflies. It is of significance not only in itself but also for birds and species that rely upon insects for food. We believe this is why bird sightings, including skylarks, have been so frequent over the fields near Trent Park at Vicarage Farm.

We believe that this removal has significant implications for draft Policy CH10: Chase Park. This is because the *Review of Sites of Importance for Nature Conservation* (2021) identifies that the Vicarage Farm and Rifles Site Borough-Wide Site of Importance for Nature Conservation (SINC – LUC site ID30, SINCID ENb15) is connected with the SINC at Trent Park by 'similar' habitat (see the Review, Appendix C, PDF page 14). LUC identify the 'strategic' importance of the wildlife site 'given its location'.

Trent Park and Vicarage Farm essentially comprise one large area of strategic wildlife habitat. We think that the BugLife B-Line should be reinstated to the policy and clearly shown on the mapping.

Policy DM D2: Masterplans to achieve comprehensive development

Whilst The Enfield Society agrees with the principle of masterplanning to achieve comprehensive development, we question whether it is adequate to leave all masterplanning to the planning application stage. Some degree of masterplanning should be frontloaded onto the plan-making stage and subject to examination rather than deferred. The Society expects to see considerably more detail of emerging sites at the Regulation 19 stage because the indicative sketches provided in Appendix C to the draft Local Plan are inadequate to form a reasonable judgement as to expectations of design quality and layout.

Policy Options: SP E1: Employment and Growth

Paragraph 9.11 states that London Plan Policy E4 requires the Borough to provide sufficient supply of land and premises to meet current and future demands for industrial and related functions. Paragraph 9.12 states that the Employment Land Review (2018) indicates a need for 25,505 sq.m floorspace for industrial uses, requiring 56 hectares of land.

The draft Local Plan (page 229) proposes the following binary options:

- A. Meet the Borough's industrial and logistics needs in the urban area
- B. Meet the Borough's industrial and logistics needs in the urban area and selected Green Belt sites (Council's preferred approach, including 11 hectares East of Junction 24 and 12 hectares at Land West of Rammey Marsh, Policy SA52).

The Council's premise that 'needs' should be met, irrespective of any adverse implications for our borough, is highly disturbing. As stated above in relation to Policy SA54, the *Enfield Characterisation Study* indicates that land east of Junction 24 plays a critical role as a green gateway to the borough. For that reason, however attractive the Ridgeway is to logistics companies for its excellent access to the motorway network, land there should not be released from the Green Belt.

Paragraph 9.21 suggests that demand has increased significantly since 2018 due to Covid and the Council will update the ELR. The implication is that once the study is completed and the resultant identified increased demand is confirmed, the Council will accordingly propose even further sprawl of industrial development deep into the Green Belt countryside of Enfield Chase. This is an unsustainable position to take.

The Council should recognise what is precious about the character and identity of the borough and should not sacrifice these qualities to meet the insatiable demands of logistics and distribution companies for warehousing and truck parking space.

Strategic Policy SP E3: Protecting Employment Locations and managing change

Figure 9.1 is missing in the consultation Local Plan but is contained within the 'errata note' as a 'minor modification'. That figure shows that very large areas of Strategic Industrial Land (SIL) are proposed for 'intensification'. The implication of this is that there are significant opportunities for development within the SIL.

The policy says that that *"the Council will safeguard the borough's Strategic Industrial Locations (SIL) as identified in the London Plan and on the Policies Map to meet strategic economic needs and accommodate increases in employment floorspace."*

This inflexible approach to restriction of SIL to employment uses does not reflect the final version of the London Plan following the intervention of Secretary of State Robert Jenrick. In modifications to the London Plan the Secretary of State directed the Mayor to remove references to 'no net loss' in employment. His letter states:

"I am issuing a further Direction in relation to Direction DR4, specifically regarding updated para 6.4.8. This is a modest amendment to my previous direction which will provide boroughs in the difficult position of facing the release of Green Belt or Metropolitan Open Land with a greater freedom to consider the use of Industrial Land to meet housing needs."

The Secretary of State's letter is provided at Appendix E. The Secretary of State's intention in amending the London Plan is very clear. Enfield Council should use that freedom to pursue development in more suitable locations rather than in areas of high-quality Green Belt countryside, as other local planning authorities are doing.

3. Housing and economic development needs

Please apply the comments below to policy SP SS1: Spatial Strategy

We agree with the statement at paragraph 2.1.15 that *"growth is never just a 'numbers game' and good place-making is needed to ensure that the valued qualities, uniqueness and distinctiveness of Enfield's neighbourhoods are celebrated."* However, we fear that as drafted the Local Plan is very much numbers-driven and would cause significant damage to the special qualities of Enfield, including harm to its Green Belt countryside and its Conservation Areas.

Housing Needs

The Plan relies heavily on the need for more housing based on the London Plan requirement for 1,246 dwellings per annum. The Society would argue that the London Plan allows Boroughs to plan for a lower level if there is compelling evidence to suggest that approach.

The Society has concerns about the weight being placed on population and household projections when they are used to set targets. The ONS and MHCLG projections are mechanistic projections of recent trends. ONS say explicitly that they base their assumptions on past demographic trends, and do not attempt to predict the possible effects of any future political or economic developments. This means that no attempt is made to factor in the UK's departure from the European Union, Covid or policy changes (such as levelling up the "Red Wall"). They are not forecasts and the trajectories they present may be far removed from what comes to pass. They should be seen as a starting point for debate, not as fixed targets.

There is also great uncertainty about the targets which MHCLG will set for local authorities. Three quite different formulae have already been proposed. The figure

of 4,397 new homes per annum quoted repeatedly in the Plan documents (and in the Leaders Summer 2021 update to residents) comes from the December 2020 formula – but the 4,397 figure comes from an abandoned algorithm and should not be used. Its only purpose seems to be to make the proposed lower figures look more reasonable.

Even the latest (April 2021) iteration is unlikely to last, given opposition from rural areas in southern England and a desire to support development in northern England. In reality it is very difficult to predict precise figures and all estimates of housing need and population growth need to be qualified.

It is also worth noting that MHCLG has decided to use 2014 household projections rather than 2018, in the interests of “stability”. This is important for Enfield as the housing need for purely demographic reasons declined from 2,327 to 678 between 2014 and 2018. If an algorithm would be affected to that extent by moving on just four years, it suggests that the MHCLG algorithm is not fit for purpose.

It will be the GLA which ultimately allocates the overall London requirement across boroughs based on its own projections, but the constant moving of the goal posts means that even the total requirement for London is uncertain.

In addition, the assessment does not acknowledge the number of dwellings on brownfield sites already in possession of planning approval for which there is no known start/completion date.

Paragraph 8.1.15 of the Plan explains the discrepancy in the target numbers in total 30,192 rather than 24,920. The higher figure includes 419 completions since April 2019 and is intentional “over planning”. There is a detailed explanation of how the targets were arrived at in the Housing Topic paper, part of the evidence base. The options assessment in table 8.3 of the Local Plan (page 188) acknowledges that for the targets beyond 2029 (i.e., beyond the targets in the London Plan) the Council has deviated from the London Plan approach advised in 4.1.11 (of the London Plan). We question why the housing figures are not being more closely questioned and note that Enfield’s assessment of school roll projections over the last ten years has considerably over-estimated the need for primary school places.

In addition, recent projections from the government-funded Economics Statistics Centre of Excellence, indicate a reduction of around 700,000 in London’s population (i.e., 8-9%) arising from the UK’s departure from the European Union and exacerbated by the Covid-19 epidemic.

We query the assumptions, based on the viability paper, that greenfield sites such as Chase Park will yield 50% affordable housing. Enfield’s track record in achieving affordable housing does not back this up. Developers will inevitably find a way to reduce the levels of affordable housing to well below this level, for example by finding abnormal costs. London Councils has recently argued convincingly that market failure should be acknowledged and direct public sector provision of affordable housing accelerated.

The Enfield Society supports the need for suitable housing to meet the housing needs of different groups, including for families, older people, and for affordable

housing. There are many examples of high-quality developments across London where such housing has been achieved on brownfield land through efficient layouts and a good mix of planned private and public space.

Economic Development Needs

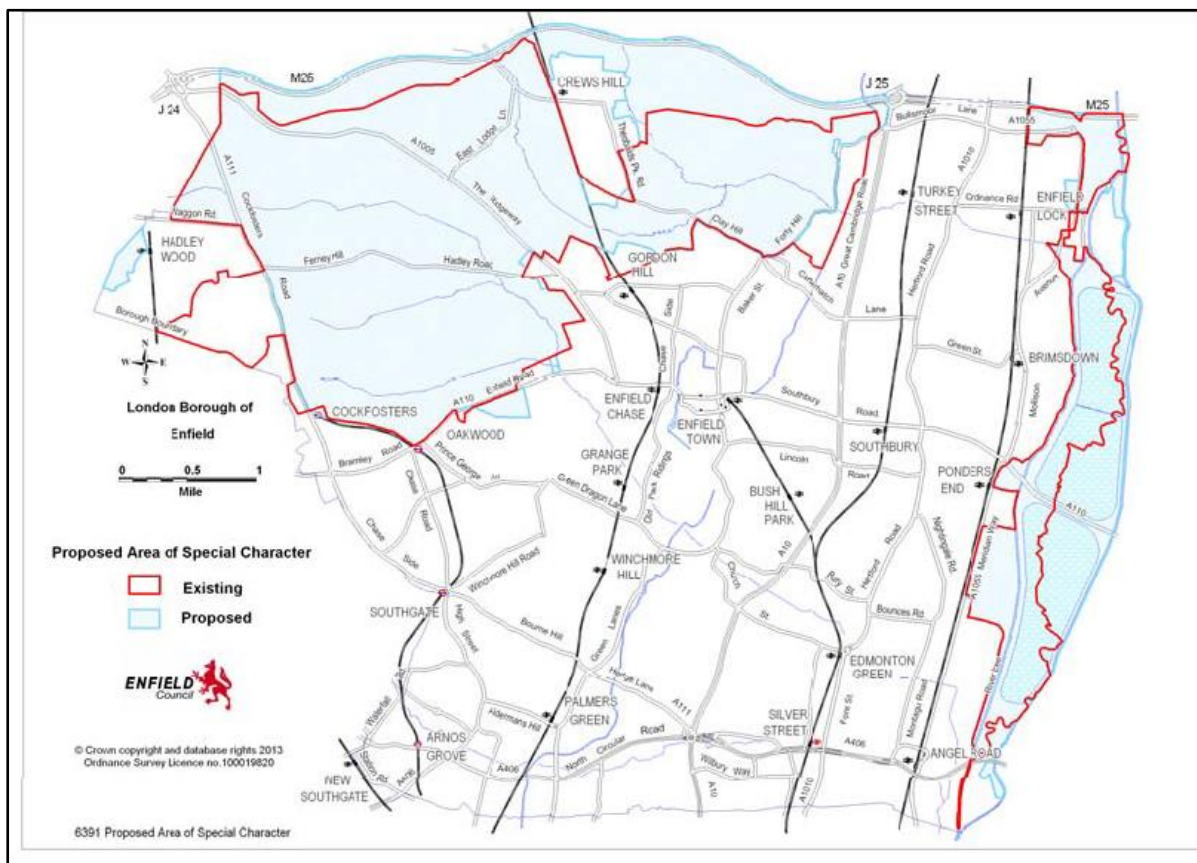
The draft Local Plan identifies a need for 56 hectares of industrial land, which appears to be based on the 48 hectares identified on page 136 of the Employment Land Review (2018) rolled forward from 2036 to 2039. We have concerns that the Council is using a crude approach to calculating 'needs' and then mechanistically assigning that 'need' to Green Belt sites such as land at the Ridgeway ('East of Junction 24, policy SA54), which are clearly utterly inappropriate for warehousing and distribution uses. Such uses are generally footloose and will operate anywhere with good access to the motorway network. The Council should only make provision for such uses if there are appropriate locations available, and certainly not at the gateway to Enfield's Green Belt.

4. Enfield Chase Heritage Area of Special Character

Please apply the comments below to Section 2.4: Enfield’s Spatial Strategy and also to Policy DM DE10: Conserving and Enhancing Heritage Assets.

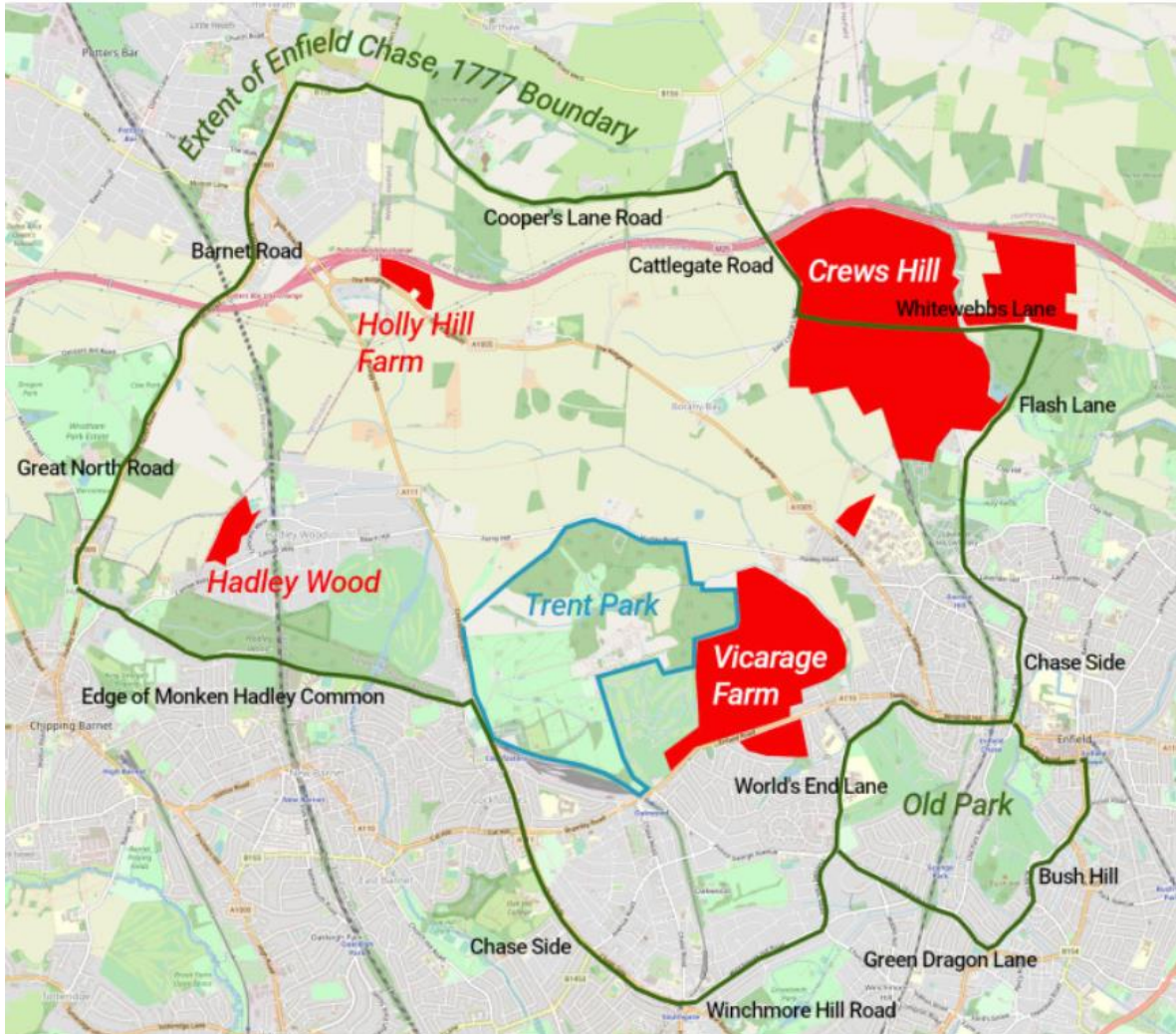
The Enfield Society is surprised to see that no account appears to have been taken of the Areas of Special Character. The majority of the open countryside of the borough is of a special quality and character and for that reason in 1994 Enfield Council established the *Areas of Special Character (AoSC)* in planning policy.

In preparation for the emerging Local Plan review, in 2013 a *Review of the Areas of Special Character* was undertaken by Enfield Council. We attach that review to our submission. Paragraph 2.1 of the Review identifies two AoSCs: the Lee Valley AoSC and Enfield Chase Heritage AoSC (page 5). The Review identified expansion of the Enfield Chase AoSC to the M25 to the north and to encompass land to the south of the A110 Enfield Road, as shown in the plan below (copied from page 8 of the Review). The proposed new boundaries were incorporated into the updated development plan for Enfield and are shown on the current borough Proposals map.



One proposed site allocation, site SA52: Land West of Rammey Marsh, lies within the Lee Valley AoSC. This 12 hectare site adjacent to the M25, lies within the Green Belt, and is proposed for new employment floorspace.

Within the Enfield Chase Heritage AoSC the draft Local Plan proposes development at SP PL9: Crews Hill, SP PL10: Chase Park, SA54: Land East of Junction 24 at Holly Hill Cottages; and SA54: Land between Camlet Way, Hadley Wood). The location of these proposed development sites in relation to the extent of the historic Chase is show in the plan below.



The boundaries shown on the above plan have been determined with reference to the 1777 'Survey and Admeasurement of Enfield Chase' map produced by Francis Russell to accompany the Act for the Division of Enfield Chase (with an aerial photograph to assist with the identification of the boundaries and features of the Chase).

The above map shows that a significant amount of the Chase has been developed, for example at Borehamwood, Hadley Wood, Southgate, and Enfield, but that a significant amount of high-quality open Chase land survives. The remaining land should be treated as a fragile and precious asset. The plan also shows the relationship between the Registered Historic Trent Park and the Old Park, which dates back to Anglo Saxon times and is mentioned in the Domesday Book. Development at Chase Park would destroy an important connection between Trent Park and Old Park, which would fundamentally harm the heritage AoSC.

Below: Survey and Admeasurement of Enfield Chase, Francis Russell, 1777



The Survey indicates the boundaries of the Chase as follows:

- The Causeway, Coopers Lane Road and Cattlegate Road to the north
- Chase Side (Southgate) and Winchmore Hill Road to the south
- Monken Hadley Common and Barnet Road to the west
- Chase Side, Flash Lane, and Whitewebbs Lane to the east.

The Survey indicates the total area of the Chase to have been 8,349 acres in 1777.

There is compelling evidence that Enfield Chase is of not just local historic importance but also of national importance. This is borne out by the extensive historical research conducted by scholars over many years.

Celebrated local historian David Pam carried out extensive research on the Chase and the Society published *The Story of Enfield Chase* in 1986. As part of our commitment to a full understanding of its importance, we have had the book digitized and have made it available on the Enfield Society website. We believe that the Local Plan should acknowledge the history of the area. A summary of David Pam’s book is provided at Appendix A, together with a summary of the

history of the Chase based on a range of published words listed in the 'Further Reading' section. Dr John Langton, one of the country's leading experts on medieval chases and forests, has submitted a letter of objection to Enfield Council's Local Plan consultation regarding proposals to develop within Enfield Chase. Dr Langton points to the uniqueness of Enfield Chase within the south-east of England.

Draft Enfield Local Plan: Vicarage Farm Site '(Chase Park)' – consultation response
Submitted by email to **on 24 June 2021**

I have looked at the proposals for 'Chase Park' (Strategic Policy SP: PL10) on pages 81 to 87 of the Draft Local Plan. I have significant concerns about the principle of any development in this location, which is situated in open countryside that was once at the heart of Enfield Chase. I am aware of a campaign of opposition to these proposals and am supportive of that campaign.

For the last thirty years or so I have been researching and writing on the history of England's forests and chases, which were very distinctive features of the countryside owing to their function as hunting grounds within which inhabitants had extensive rights over the natural vegetation that was protected for the purposes of hunting, sheltering and feeding deer. Some of them persisted into and through early-modern times, and still-surviving remnants provide some of the most highly-valued elements of our contemporary landscape as national parks, areas of outstanding natural beauty, and other public open spaces. Those within the Greater London area include Epping Forest and Bushy and Richmond parks; Enfield is the only surviving example of a chase, within which rights to game and over vegetation varied slightly from those in forests. This is outlined in a paper I gave in Enfield in 2011, which I attach with this letter as part of my submission.

Moreover, as far as I am aware, the only other chase which has survived to the present day is in the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty.

Thus, Enfield possesses an extremely rare and very valuable landscape asset. It would be a great pity to lose part of what is left of it to housing development. I do hope that you will reconsider your decision to allow this.

The Enfield Society considers that the proposed spatial strategy is unsound because it relies upon inappropriate development that would cause severe adverse impacts to a heritage asset of national significance. The Chase is irreplaceable and mitigation of the harm arising from development is not possible.

5. Alternative development locations

Please apply the comments below to Section 2.4 Enfield's Spatial Strategy.

Table 2.2 'spatial strategy options' Option 3 refers to 'Limited SIL (Strategic Industrial Land)' release at Harbet Road, Meridian Water East Bank' but suggests that there would be '*difficulty in securing SIL release under London Plan Policy*'. The Greater London Authority has shown itself willing to work with local authorities in relation to creative ways of introducing mixed-used developments within industrial lands.

One example of this is the Blackhorse Lane Masterplan for a mixed-use development. The Greater London Authority and Waltham Forest Borough Council are working together on a scheme including 1,800 new dwellings within the Uplands Business Park area of the Blackhorse Lane SIL area. Waltham Forest Council has put forward this proposal through its draft Local Plan, which is currently at Examination. Further information is available at:

<https://www.walthamforest.gov.uk/content/blackhorse-lane-masterplan>

<https://neatdevelopments.com/developments/uplands/>

<https://futureofuplands.com/>

We are aware that Enfield Council has been approached by Areli Real Estate, who are looking to pursue a similar approach to masterplan-led developments on SIL in Brimsdown. According to their website <https://areli.co.uk/projects> Areli are looking to provide a new waterfront development at Brimsdown: "*Areli Developments is providing strategic planning and development advice toward the creation of a whole new town for London on 65 acres of riverside land. Through careful intensification of existing industrial land, an opportunity exists to both substantially increase the employment space and add over 7,500 new homes.*" We understand that there are a number of landowners in the adjoining land parcels who may be persuaded to join in with this approach, should the Council provide the necessary encouragement to an appropriate vision. The Council should give serious consideration to how under-used employment land could be used more effectively through a place-making approach.

The Enfield Society is pleased to note that the draft Local Plan contains a policy commitment to masterplanning Southbury (Policy SP PL2). A wider comprehensive approach to the proper masterplanning of Southbury could yield significantly higher levels of development than the 4,350 dwellings shown at sites SA8-12 and reduce the threat to the town centres from out of town big box retail. A vision for the area was provided in the Wider Area study in part 2 of the Design and Access Statement accompanying the planning application for the Colosseum Retail Park (application 20/00788/OUT).

Finally, the Society acknowledges that not all Green Belt within the borough is high-quality countryside. If some Green Belt needs to be released, 'grey' areas of Green Belt could be brought forward, subject to master planning and a proper strategy for the relocation or compensation of existing affected users.

Below: Harbet Road could accommodate a strategic scale mixed-use waterfront development



The merits of strategic scale development in the Lea Valley are as follows:

- there are opportunities to remediate very large areas of semi-derelict land and improve the gateways to the Valley, which are often subject to fly tipping and other anti-social activities.
- there are potentially a number of major investment companies that would be interested in working together with the Council to realise the investment opportunities in these sites.
- the River Lee /Navigation and reservoirs present clear opportunities for environmental enhancements and land value uplift.
- the area is flat and conducive to active travel by bicycle. National Cycle Network Route 1 has recently been upgraded at the Eco Park and there are good walking and cycling connections to locations in Enfield and Waltham Forest.
- good connections to the Lee Valley Regional Park and its many wetlands and high quality open spaces.

If the Council were to indicate its willingness to work with investors for the area on a mixed-use projects there is huge potential waiting to be unlocked.

6. The Consultation Process

The Enfield Society has been approached by many of our members who have expressed concern about the consultation process. We share that concern.

The Local Plan proposes to allow development of housing, warehousing and industry on areas of exceptionally fine open Green Belt countryside, as well as proposing tall buildings in several locations across the Borough.

The Local Plan refers to the Statement of Community Involvement (SCI) that was approved in 2020, but this only appears to commit the Council to a minimum of consultation and engagement. Given the importance of the Local Plan and its wide-reaching proposals we believe that there have been insufficient opportunities for comment and public engagement.

In summary, the process gives the unfortunate impression of being designed to ensure that the Plan is approved no matter what damage is done to the historic and natural environment of Enfield, or to local communities. At an absolute minimum, the Society would like to see the Council publish responses to the draft Local Plan consultation promptly and in full, rather than simply publishing a summary together with Council responses on the eve of the Regulation 19 consultation.

A letter from the Enfield Society to Sarah Cary, Executive Director of Place at Enfield Council, raising these issues was sent to the Council and is attached at **Appendix D**.

Update 2 September 2021

To date no response to our letter has been received. We note that following our letter, a summary of the draft Local Plan was published towards the end of the consultation period. The Council has also published the Issues and Options consultation responses towards the end of the current consultation period. The responses have been published by consultee name in alphabetical order but not in document order, so we cannot easily review the responses in relation to particular matters of interest. The time provided has been insufficient for us to review these responses and inform our response to this consultation. We request that the responses to the current consultation should be sorted in document order and provided within a reasonable time (weeks rather than months) after the close of the consultation.

7. Conclusions

Please apply the comments below to Policy SP PL1: Spatial Strategy

The Society welcomes the opportunity to comment on the Local Plan and supports the need for additional housing and the attempts to create a greener more sustainable Borough for all residents.

However, as presented we are concerned that, rather than 'place-making', the proposed developments in the countryside would significantly erode the character of the borough, reduce access to the countryside, and would cause harm to assets of very high significance. It is therefore imperative that the Council should revisit the spatial strategy by working with community groups, land owners and developers to identify how the additional housing that is required can be built without sacrificing open countryside.

The Council should have proper regard to Section 15 of the National Planning Policy Framework, in particular paragraph 174 which states that "*Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes and b) recognising the intrinsic character and beauty of the countryside*". We do not consider that Policy PL8: Rural Enfield is an appropriate strategy because it would attempt (but in our view, fail) to justify the destruction of some of the most precious countryside in the borough at the proposed site allocations in Enfield Chase.

As an alternative, we believe that there are also opportunities to release or introduce mixed-use intensification of some strategic industrial land, for example in the Brimsdown area and around Meridian Water. The Society recognises the importance of strategic industrial land, but in some cases better use can be made of sites allowing a rationalisation of land use. As the Secretary of State said in his letter to the Mayor dated 20th December 2020 – "*I am issuing a further Direction in relation to Direction DR4, specifically regarding updated para 6.4.8. This is a modest amendment to my previous direction which will provide boroughs in the difficult position of facing the release of Green Belt or Metropolitan Open Land with a greater freedom to consider the use of Industrial Land to meet housing needs.*"

Finally, it is understood that the Council is proposing to publish further information about infrastructure at a subsequent stage of the Local Plan process. The Society requests that at least 12 weeks should be provided to enable adequate time to review this further information. At present it is unclear how the very high levels of development will be supported by the necessary infrastructure, including sewerage capacity and transport infrastructure.

End.

Appendix A: Brief History of Enfield Chase

Enfield Royal Chase originated in Enfield Wood, part of the great Forest of Middlesex, which extended as far south as the River Thames. William, I gave the manors of Edmonton and Enfield to Geoffrey de Mandeville after the Norman Conquest. The Chase was created around 1140-4, and the name 'Enfield Chase' first appears in public records in 1326. In 1399 the Chase became a Royal Manor and passed into the hands of the Duchy of Lancaster. A number of offices were created, including the rangers, woodwards, surveyors, keepers, foresters, and verderers. The Chase was divided into three 'walks' in 1419, each with its own lodge (east, west, and south). There is extensive documentary evidence of hunting on the Chase by Tudor and Stuart monarchs.

The Domesday Book (1086) entry for Enfield refers to a park in Enfield (in the Latin original, '*et parcus est ibi*'), and that the manor was held by Ansgar, staller to King Edward the Confessor. Historians believe that the park referred to is the Enfield Old Park, and which would have been created for Ansgar. Upon creation of the Chase the Park became the Interior Park ('*parcus intrinsicus*') and the Chase became the Exterior Park ('*parcus extrinsicus*'). Important vestiges of Old Park remain today at Enfield Town Park, Bush Hill Golf Course and the 14th Century moated site Scheduled Monument within Enfield Golf Course.

Hog Hill at Vicarage Farm takes its name from the common right to pannage in this area of the Chase. The Domesday Book refers to pannage (grazing of pigs) in the manor of Enfield, and rights of pannage were established in the year 1217 by article 9 of the Charter of the Forest. These rights became a key feature of the social history of Enfield Chase and the common grazing rights enjoyed by the local inhabitants. Infringement of these rights was a key driver of social unrest and troubles with the authorities, for example in 1659.

Radical thought has been linked to the Chase, and there was a Digger Community in the area. The local 'clergyman' William Covell wrote a series of pamphlets promoting radical ideas, including collective farming on the Chase and taxing the rich to pay for old age pensions.

John Norden's map of 1593 (right) represents the royal Chase in its heyday, when Queen Elizabeth I was a frequent visitor to the hunting lodges in the area, including Enfield Palace (now Palace Gardens) and Elsynge Palace (within the grounds of Forty Hall). The map shows the relationship between the Old Park (encircled by a pale or fence) and the Chase, as well as the site of the battle of Barnet (a cross) and a number of fish ponds that



remain at Pond Wood near Potters Bar and at Boxer's Lake south of Enfield Road A110.

By the 17th century under the Commonwealth of Oliver Cromwell the Chase was seen as unproductive land and plans were drawn up for its division into small farms. These plans were reversed at the Restoration in 1660 but latterly wealthy and powerful people came to view the Chase as unproductive waste land. Deer-stealing and poaching had become endemic. Arthur Young of Potters Bar referred to it as a '*dunghill, a real nuisance to the public*'.

The Act for the Division of Enfield Chase of 1777 stated that the Chase '*yields very little profit or advantage either to his Majesty, or to the said Freeholders and Copyholders or their Tenants, in comparison to what it might do if the same was divided and improved.*' The Act included provision for the creation of a miniature deer park, now Trent Park, which was gifted by George III to his physician, Dr Jebb, who had travelled to Trento in Italy where he successfully treated the Duke of Gloucester (the King's younger brother) for mental illness.

Less happily, the Act provided no compensation for loss of common rights enjoyed by the poor, and was probably ultimately a contributory factor in the selection of a location for the Edmonton Union workhouse on Chase Side. The site is now occupied by St Michael's Hospital.

The poet John Keats was educated at Clarke's Academy (where Enfield Town Station now stands), a progressive institution which fomented a culture of dissent and forms an important backdrop to Keats' poetry, including classics such as *To Autumn*, which was also influenced by the Enfield countryside of his childhood. Further enclosure of the Chase in 1803 (at which time Chase Green was created) inflamed Keats and other Romantic poets. Charles and Mary Lamb, authors of the popular *Tales from Shakespeare*, lived at nearby Gentleman's Row next to the Chase.

Much of the history of the Chase can be charted through the pubs on its periphery. The Duke of York on Barnet Road commemorates the Battle of Barnet in 1471, one of the most important battles of the Wars of the Roses (surveys suggest that the Yorkist positions were located within the Chase, east of Ganwick Bank – now the Great North Road). The King and Tinker on Whitewebbs Lane was involved in the planning of the gunpowder plot. The Rose and Crown at Clay Hill was run by the uncle and aunt of the famous highwayman Dick Turpin, who used the pub and Chase as a hideout.

After 1777 a number of local placenames reflected the perceived remoteness and inaccessibility of the Chase. World's End Lane culminated at the Park Gate. Botany Bay was named after the 'discovery' of a bay in Australia by Captain Cook in 1770. Highlands hospital (now a Sainsburys supermarket and housing estate encompassing the original buildings) was chosen as a good location for a tuberculosis isolation hospital or 'pest house'.

Development within the Chase was shaped by the coming of the railways. Hadley Wood takes its name from the station, opened in 1885. The last major developments on the Chase took place at South Lodge (now the Lowther/Merryhills Drive area) in 1935-39 as a result of the opening of the

Oakwood station on the Piccadilly Line in 1936. The estate was marketed as countryside by developers Laing and the 'garden village' within the parkland setting of the former lodge and the style of the development reflected that.

Thankfully much of the countryside of the Chase can still be enjoyed today because of the planning legislation creating the Green Belt after World War II. As a result, at places such as Trent Park, Fir and Pond Wood, and along rights of way at Salmons Brook, the Merryhills Way across Vicarage Farm have been protected from urban sprawl. The continued protection of these landscapes as an important part of our local history and identity should be a matter of considerable local pride.

Further Reading

E. P. Thompson, *Whigs and Hunters: The Origin of the Black Act*

Christopher Hill, *World Turned Upside Down*

David Pam, *The Story of Enfield Chase*

Douglas Haigh, *Old Park in the Manor of Enfield*

JM Patrick, *William Covell and the Troubles at Enfield in 1659*

Matthew Clark, *The Gentry, the Commons, and the Politics of Common Right in Enfield, c. 1558 – 1603*

Nancy Clark, *Hadley Wood*

Nicholas Roe, *John Keats and the Culture of Dissent*

A symposium hosted by the London Gardens Trust entitled '*Enfield Chase: from Hunters to Commuters*' was held in 2011. Several excellent papers delivered at that symposium, including by Dr John Langton, Sally Williams, and Michael Ann Mullen, are available on the London Gardens Trust website at:

<https://londongardenstrust.org/conservation/publications/enfield-chase/>

The Charter of the Forest (text of the 1225 edition):

<https://www.nationalarchives.gov.uk/education/resources/magna-carta/charter-forest-1225-westminster/>

The Act for the Division of Enfield Chase, 1777:

<http://www.monkenhadleycommon.net/documents/Enfield%20Chase%20Act,%201777.pdf>

Summary of 'The Story of Enfield Chase' by David Pam

The 1986 book '*The Story of Enfield Chase*'. Authored by David Pam, former Local History and Museums Officer at Enfield Council, draws on extensive archival research and provides compelling evidence of the historic significance of Enfield Chase. The book includes details of the following:

- The Anglo-Saxon origins of Enfield Old Park, and how the Park was too small for hunting and was later used to stock the Chase (p.10)
- The establishment of the Chase in 1140-4 under the de Mandevilles, the transfer to the de Bohuns, and then to the Crown under the Duchy of Lancaster (Ch 1)

- The importance of common rights to the subsistence of the local inhabitants, including pannage (grazing of pigs) and the fierce resistance of local people to infringement of these rights, for example during riots against Parliamentary soldiers in 1659 (pp. 74-76)
- The isolated Keepers' Lodges (South, West, and East) and their various residents, including Prime Minister William Pitt the Elder, who lived at South Lodge (p.131)
- The Rangers (keepers) of the Chase, including the Dukes of Chandos, Sir Basil Firebrace, and General John Pepper (Ch 7, 8, and 9)
- The Battle of Barnet, which took place on the edge of the Chase in 1471 (p.22-3)
- Manorial law and the Court of Roundhedge or ancient wood court (p.40-1)
- How Queen Elizabeth I enjoyed hunting in the Chase, and stayed at local hunting lodges including West Lodge, Enfield Palace and Elsyng Palace (Chapter 3)
- Cutting of 'Ridings' and a 'Great Square Lawn' from 1685, ostensibly for the convenience of King James II when he came hunting but in reality, a licence to sell timber (p.85 and p.97).
- The dangers of the Chase as a lair for highwaymen and footpads (p.118)
- The Black Act of 1723 to criminalise the use of camouflage by poachers (p.112)
- The notorious Crew brothers who gave their name to Crews Hill, and William Crew who was landlord at the Fallow Buck pub (Ch 11)
- The Act for the Division of Enfield Chase in 1777, including the 'allotment' of land to the Parishes of Enfield, Hadley, and South Mimms, and the creation of new roads through the Chase (Ch.12)

The full text of the book can be downloaded free of charge from the Enfield Society website at: <https://enfieldsociety.org.uk/documents/localplan/the-story-of-enfield-chase-david-pam-eps-1986.pdf>

Appendix B: About the Merryhills Way (PL10: Chase Park)

Please add this section to our submission in respect of Policy SP PL10.

Creating and maintaining public rights of way all over the borough has been a core part of the mission of the Enfield Society since its founding in 1936. The Society has a popular guided walks programme.

Vicarage Farm has long been a popular area for local walks. In January 2008 the Western Enfield Residents' Association, submitted a claim for a public right of way to local landowners for three footpaths across land belonging to Vicarage Farm, The London Diocesan Fund (Track from the Jolly Farmers) and the Woods to the West of Fairview Road.

Forty-two residents completed "Public Right of Way Evidence Forms" stating they had walked unchallenged and openly across all or sections of the paths over a period of twenty years.

On 25th Sept 2008 the claim was approved at an Enfield Council Planning Committee meeting. The 'final' plan route is shown below (dated October 2008). The next step in the process, approval by the Secretary of State, failed on a technicality as the proposed path was shown in the wrong colour on the map!

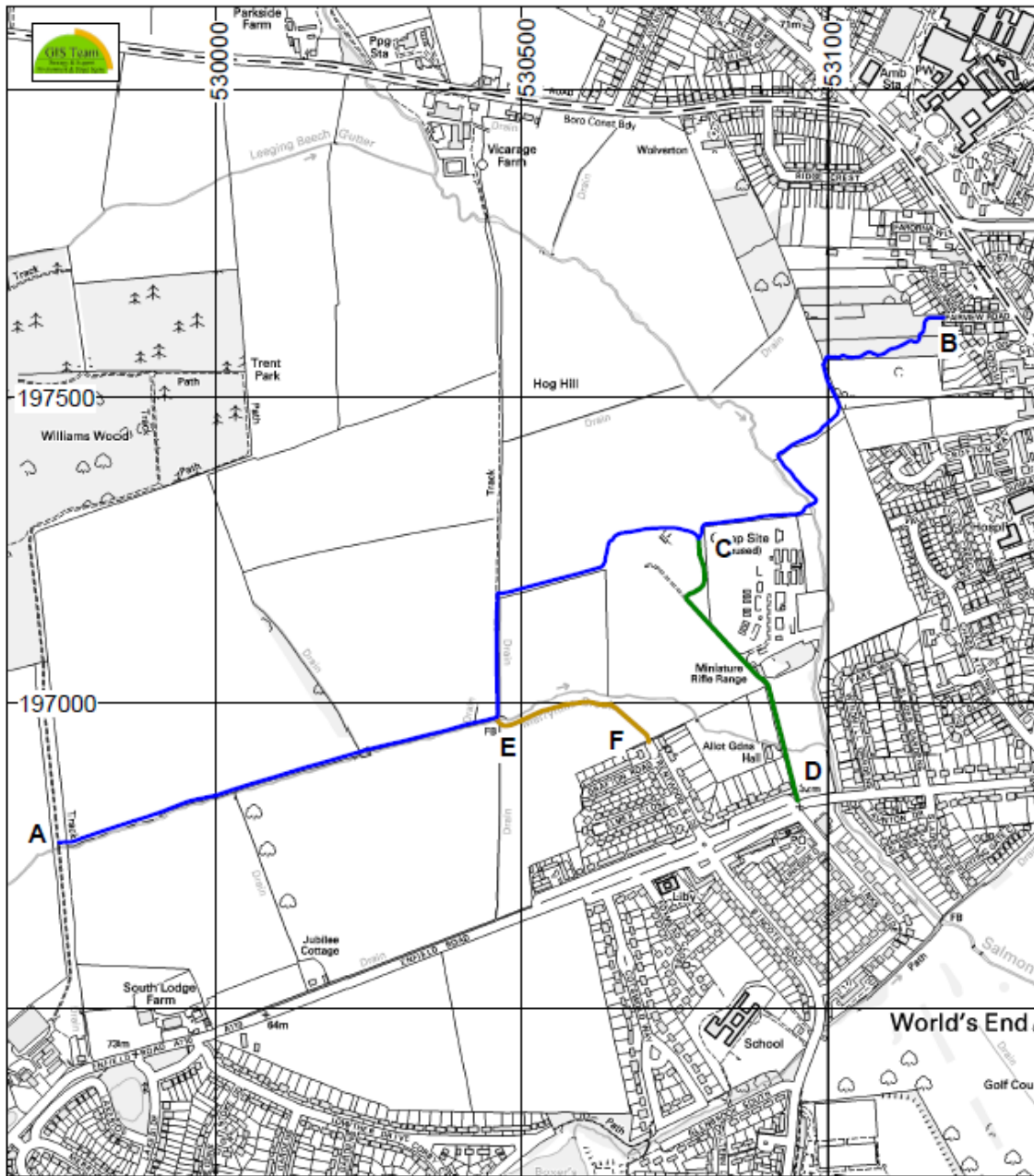
The Council then decided it would be easier to reach an agreement with the landowners for creation of the three footpaths. Unfortunately, the landowner would not agree to the originally proposed route and proposed an alternative avoiding Hog Hill (see March 2009 version below). This alternative route is much less satisfactory from a walkers' point of view. The landowner will not permit access from Chase Ridings, and it is assumed that this is being withheld as a bargaining chip in the planning process.

In November 2010 permission was gained for way-markers and kissing gates to be installed. The work was completed by volunteers from the Enfield Society and Groundforce in April 2011 with The Enfield Society paying for the way-markers.

On 14th May 2012 the agreement order for the three footpaths was signed. However, it was not until 6th June 2018 that the Council's legal department eventually signed off all the documents on the legal agreement of the footpaths becoming public rights of way. The final right of way varies slightly from those shown below in that it passes through the former camp area, currently used as stabling.

It remains the aspiration of the Enfield Society to achieve the public right of way across Hog Hill as originally agreed with the Council, to enable residents once again to enjoy the sweeping views across the open landscapes of Enfield Chase.

October 2008: 'Final' Right of Way across Hog Hill approved by the Council.



Footpath 326

Point A - OS Grid 529743 196771
 Point B - OS Grid 531189 197628
 Appears on DM Sheets:- 139, 140, 163, 164, 165, 184 & 185

Footpath 327

Point C - OS Grid 530789 197267
 Point D - OS Grid 530951 196838
 Appears on DM Sheets:- 164 & 186

Footpath 328

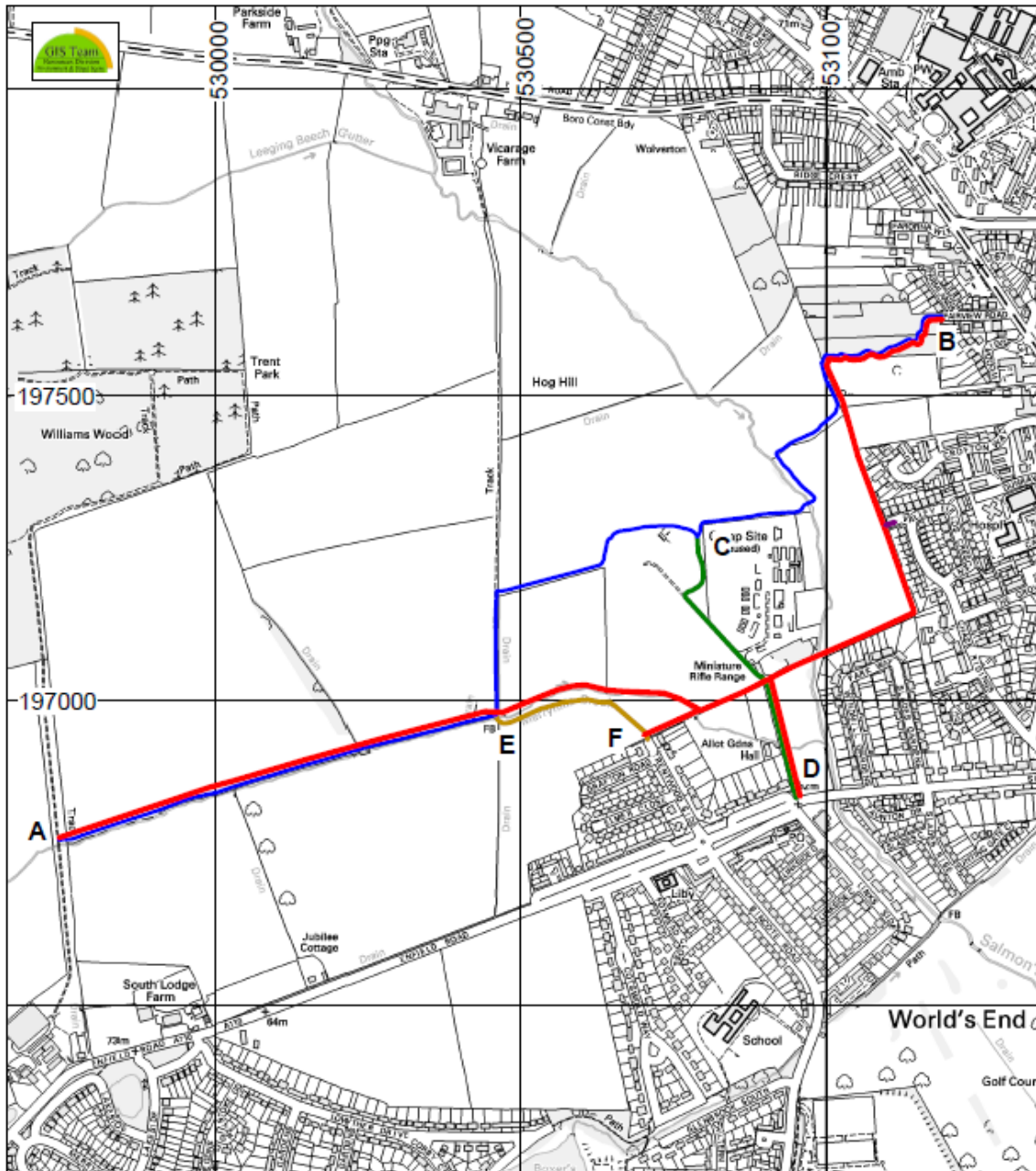
Point E - OS Grid 530460 196976
 Point F - OS Grid 530707 196934
 Appears on DM Sheets:- 185 & 186

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Scale = 1:6000 @ A3
 Date October 2008
 Drg. No. 5808XX

March 2009: 'Alternative' route avoiding Hog Hill proposed by Mr Comer



Footpath 326

Point A - OS Grid 529743 196771
 Point B - OS Grid 531189 197628
 Appears on DM Sheets:- 139, 140,
 163, 164, 165, 184 & 185

Footpath 327

Point C - OS Grid 530789 197267
 Point D - OS Grid 530951 196838
 Appears on DM Sheets:- 164 & 186

Footpath 328

Point E - OS Grid 530460 196976
 Point F - OS Grid 530707 196934
 Appears on DM Sheets:- 185 & 186

Proposed Alternate Route - Mr Comer / Mr Blandford Vicarage Farm & Mr Cockle

Proposed Alternate Route - Mr Cockle




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Scale = 1:6000 @ A3
 Date March 2009
 Drg. No. 5808xy

(below). The Enfield Society runs a popular programme of walks in Enfield Chase and beyond, and publishes a Footpaths map showing all the permissive paths (not shown on Ordnance Survey maps). The extract below comes from our leaflet about the Merryhills Way.



Introduction

The Merryhills Way is a short footpath at 1¼ miles (2km) running from Trent Park in the West to Fairview Road (off the Ridgeway) in the East. It derives its name from following the Merryhills Brook between Trent Park and the mid-way point.

It's an easy path to walk—though it can become very muddy in the winter or after prolonged rain—and gives glorious views over pastureland to the North. At the Eastern end, just before the path enters a wooded area, there is a wide view across to Oakwood and Cockfosters (above). There are good public transport links at either end of the route.

Please do not leave the official route, described here.

History



In January 2008 The Western Enfield Residents' Association, submitted a claim for a public right of way supported by forty two local residents who completed "Public Right of Way Evidence Forms" stating they had walked unchallenged and openly across all or sections of the paths over a period of twenty years.

On 25th Sept 2008 the claim was approved at an Enfield Council Planning Committee meeting but failed approval by the Secretary of State due to a technicality.



The Council then decided it would be easier to reach an agreement with the land owners and in November 2010 permission was gained for way-markers and kiss gates to be installed. The work was completed by volunteers from Groundforce and The Enfield Society in April 2011 with The Society paying for the way-markers.

The Merryhills Way finally became a right of way on 6th June 2018 when the Council's legal department signed-off all the documents.



The route

The path begins on Enfield Road near the Equestrian Centre (above, left). Walk about ¼ mile down the footpath on the right of the horse trail from the Equestrian Centre. Cross the brook by a footbridge, then turn right over the ditch into the field (above right). You are now at the start of the Merryhills Way. After ½ mile you come to the path for Trentwood Side.

At Camp Road you may take the track down to Enfield Road (Jolly Farmers pub-restaurant opposite). The Merryhills Way continues straight over, through a kissing gate.

After crossing the Brook, turn left. At the next field boundary, turn right and follow the field edge up and round to the gate into the wood. The path then climbs to emerge at the end of Fairview Road (above, right).

Public Transport

You can find a list of the public transport options on our web-site page for the Merryhills Way. Go to enfieldsociety.org.uk/merryhills-way

Enfield Society Footpaths map

Our popular footpaths map covering the whole Borough can be purchased for £3.50 (including postage) from our web-site shop.

Appendix C: Merryhills Way Survey and Usage Counts

During August 2021, the Enfield Society undertook a survey of users of the Merryhills Way. 97% of users confirmed that they had used the footpath within the past month and 98% of users confirmed that everything stated on their response was true to the best of their knowledge. The form was hosted on the Enfield Society website and is shown below.

Merryhills Way Survey

The Enfield Society is collecting information about usage of the Merryhills Way Footpath at Vicarage Farm. Survey results will be submitted to Enfield Council with the Society's consultation response to the current draft Local Plan, which proposes extensive development on the fields at Vicarage Farm. See the link at the end of this survey for more information and how to respond.

If you respond to this survey, your data will be held in accordance with the Enfield Society's privacy notice <https://enfieldsociety.org.uk/privacy-notice/>. In order to demonstrate the robustness of the survey, the names of participants may be published in an appendix to a public report. Email addresses and postcodes will never be released to any third party. All personal data will be destroyed upon adoption of the Enfield Local Plan.

Map of the Merryhills Way (source: Open Streetmap)



Photo: view east along the Merryhills Way



What was the date of your most recent visit to the Merryhills Way?

Date

dd/mm/yyyy

1. Where do you live?

- In the Borough of Enfield, near the Merryhills Way
- In the Borough of Enfield, some distance from the Merryhills Way
- Outside the Borough of Enfield

2. During the warmer months (April -October), how often do you use the footpath?

- Very rarely
- Less than once a month
- More than once a month but less than once a week
- More than once a week but not every day
- Every day

3. During the colder months (November-March), how often do you use the footpath?

- Very rarely
- Less than once a month
- More than once a month but less than once a week
- More than once a week but not every day
- Every day

4. Normally, where do you start your visit to the footpath?

- Trent Park
- Oakwood area
- Fairview Road/Farmlands (Ridgeway area)
- Trentwood Side (Slades Hill area)
- Other:

5. Normally, how do you get to the start point of your visit?

- On foot
- By bicycle
- By bus
- By car
- By train/tube

6. Normally, what is the far point of your visit?

- Along the path
- Trent Park
- Oakwood area
- Slades Hill area
- Ridgeway area
- Other:

7. (Tick all that apply). Normally, I visit the Merryhills Way...

- ..alone
- ...with family/spouse/partner
- ...with friends
- ...with (a)child(ren)
- ...with a group
- ...with (a) dog(s)
- Other:

If you visit with a named group, please enter the group name here

Your answer

8. What other open spaces do you visit? (tick all that apply)

	Visit frequently	Visit infrequently	Don't visit
Enfield Town Park	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Oakwood Park	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cheyne Walk	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Trent Park	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Any other open spaces in the borough you visit?

Your answer

9. Which of the following explain why you visit the Merryhills Way (tick 'important' or 'not important' for each)

	Important	Not important
Exercise: walking or rambling	<input type="checkbox"/>	<input type="checkbox"/>
Exercise: running or jogging	<input type="checkbox"/>	<input type="checkbox"/>
Nice scenery	<input type="checkbox"/>	<input type="checkbox"/>
Mental wellbeing	<input type="checkbox"/>	<input type="checkbox"/>
Spending time with family/partner	<input type="checkbox"/>	<input type="checkbox"/>
Social occasion	<input type="checkbox"/>	<input type="checkbox"/>
Walking the dog/s	<input type="checkbox"/>	<input type="checkbox"/>
Pleasant walk to Trent Park	<input type="checkbox"/>	<input type="checkbox"/>

Any other comments

Your answer

Your age range

- Under 18
- 19-30
- 31-45
- 46-60
- 61+
- rather not say

Are you a member of the Enfield Society?

- Yes
- No

Would you like to receive information about how to join the Enfield Society?

- Yes

Verification

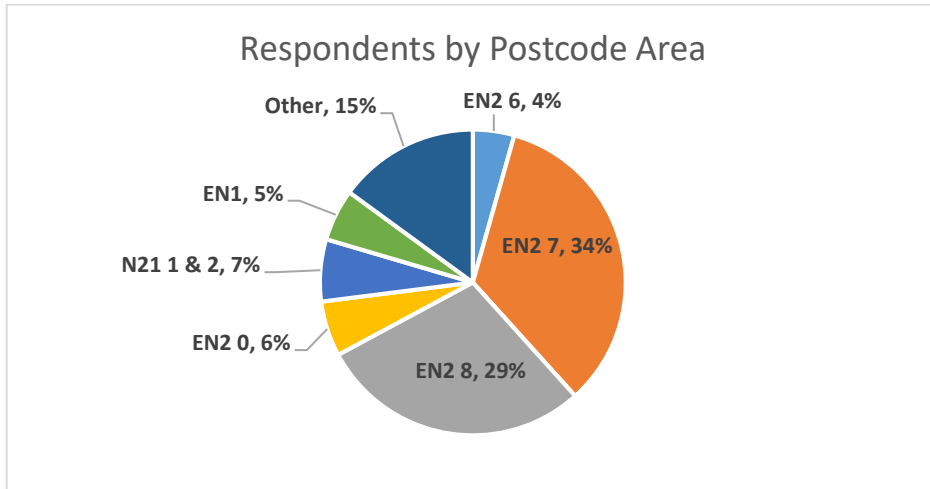
- All the answers provided on this form are accurate to the best of my knowledge

Check your spam/junkmail folder for an email copy of your response.

For more information about the Enfield Local Plan consultation, including proposed development at Vicarage Farm, and details of how to respond to the consultation, please click here:

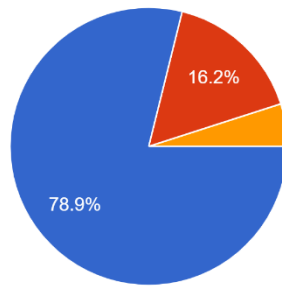
<https://enfieldsociety.org.uk>

Survey results



1. Where do you live?

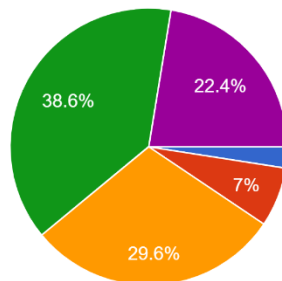
445 responses



- In the Borough of Enfield, near the Merryhills Way
- In the Borough of Enfield, some distance from the Merryhills Way
- Outside the Borough of Enfield

2. During the warmer months (April -October), how often do you use the footpath?

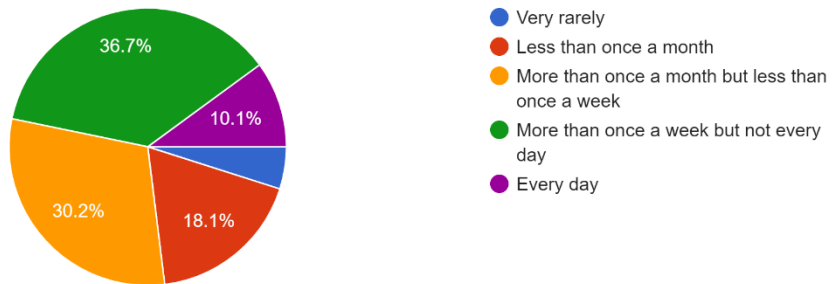
446 responses



- Very rarely
- Less than once a month
- More than once a month but less than once a week
- More than once a week but not every day
- Every day

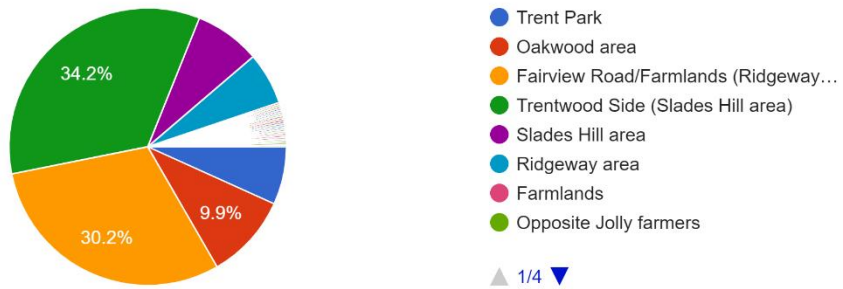
3. During the colder months (November–March), how often do you use the footpath?

447 responses



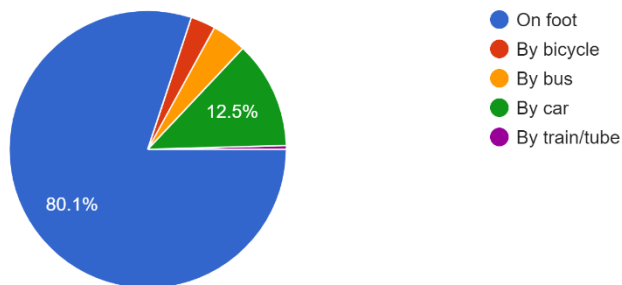
4. Normally, where do you start your visit to the footpath?

444 responses



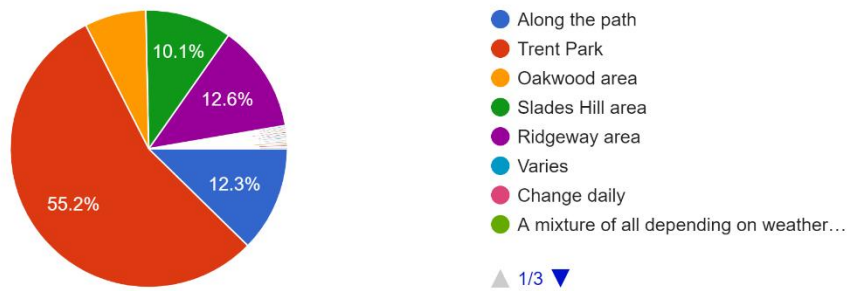
5. Normally, how do you get to the start point of your visit?

447 responses



6. Normally, what is the far point of your visit?

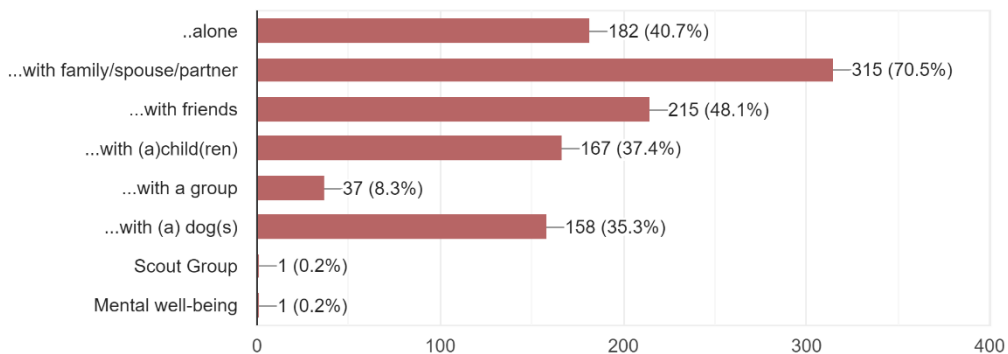
446 responses



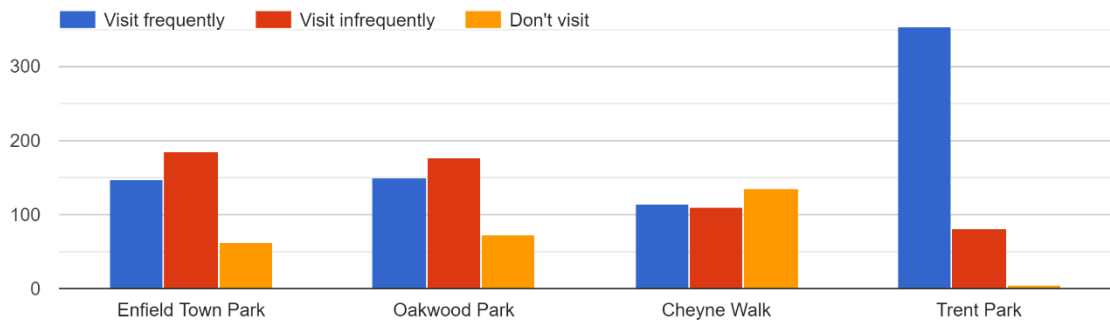
A number of respondents commented that they normally visit with a group. The named groups were **Trent Park Running Club, Carol June Montessori Nursery, 19th Enfield Scouts, the Ridge Crest Walkers, and the Enfield Society.**

7. (Tick all that apply). Normally, I visit the Merryhills Way...

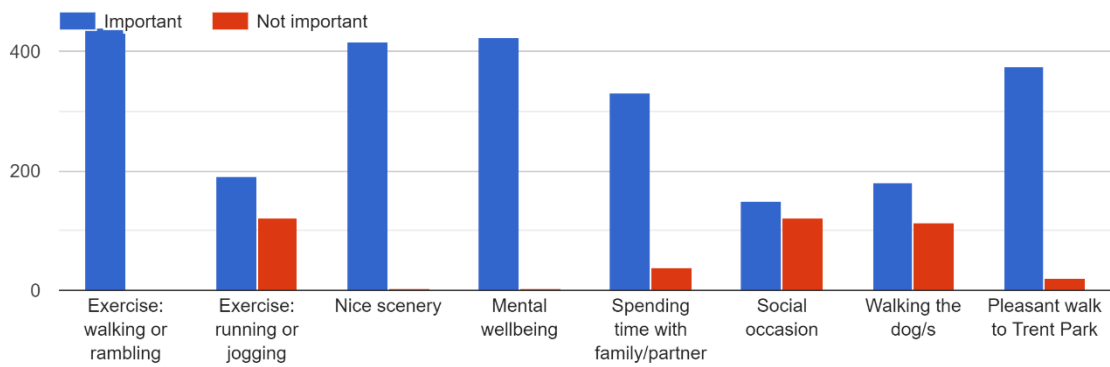
447 responses



8. What other open spaces do you visit? (tick all that apply)

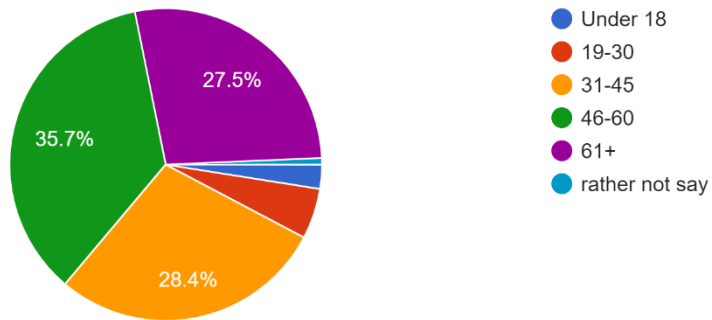


9. Which of the following explain why you visit the Merryhills Way (tick 'important' or 'not important' for each)



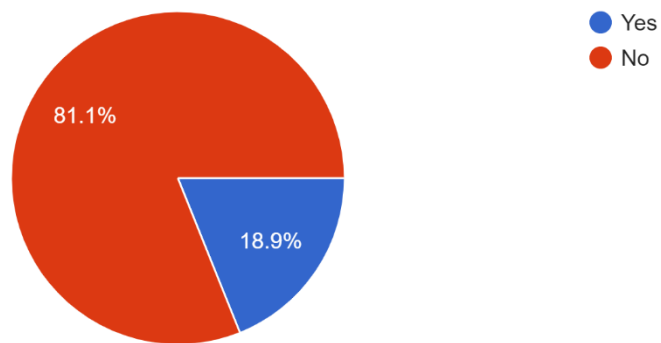
Your age range

440 responses



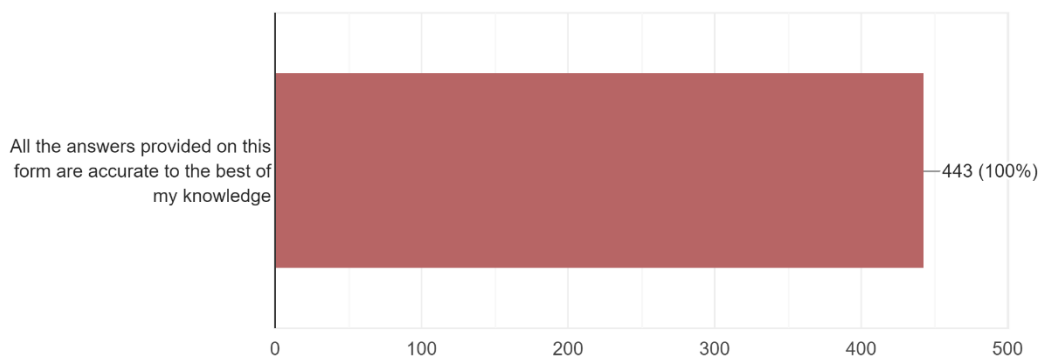
Are you a member of the Enfield Society?

444 responses



Verification

443 responses



Comments submitted by survey respondents

It was an incredible place to visit during first lockdown when we felt the parks were too busy. I will never forget the feeling of going there for a walk with my three-year-old son and five-month-old daughter after being stuck in the house for a month. All the open space and surrounding nature made us all feel so much better. We have been going on nature walks there ever since.

This route has been a lifesaver during the pandemic

I enjoy watching the birds, listening to the skylarks, watching the trees and grass change

Great Local walk, where I feel safe

I live in a built-up area and visiting the Merry Hills Way and surrounds helps me to relax and improves my mental health an enormous amount. I rarely drive (always avoid it if possible) so having open space within jogging distance of home is very important to me

Lockdown made me discover new places and opened my eyes to a healthier way of life. Without these areas, Enfield's physical and mental well-being would certainly decline.

I have been using the Vicarage Farm paths between The Ridgeway and Slades Hill since I was a teenager in the 1980s and it's just as beautiful now as it was then. Emerging from the woods on The Ridgeway to the open vista over rolling hills towards Cockfosters still takes my breath away the newer part of the path right into Trent Park is a wonderful addition which I use occasionally but husband and my 78-year-old father use far more frequently. During lockdown the fields off the Ridgeway became a favourite route for my 15-year-old daughter and her friends.

This green space is extremely important to me and my family. The children love walking through there.

The Merryhills Path is an integral part of community life. I have seen Red Kites, sparrow hawks, kestrels, wagtails, badgers and more. Losing access to it would be devastating.

Use for mental health reasons too as clears the mind seeing such beauty and open skies

During lockdown this area was vital for my families mental and physical health

I only discovered the footpath across the fields from Slades Hill just before the first national lockdown in March 2020. I am only sorry I didn't know about this fantastic green space before particularly if it is to be lost to development. It has been a God send during lockdown enabling me to meet my partner and friends outside when we could not meet inside. The scenery

and views are beautiful, and I have seen Muntjac deer in the woodland towards Trent Park and listened to wonderful bird song. I've walked all the way from Slades Hill to Trent Park on several occasions. It is a vital green lung for so many people both local and further afield whose mental and physical health benefits from visiting. Once gone cannot be replaced.

It is a lovely walk where you feel like you really are in the countryside.

We use it daily as part of the journey to school.

Invaluable area used frequently and used by the local scout group

It is rare to be able to escape from the noise of a built-up area and not actually be that far away from your home. It's an asset to the Borough and should be preserved.

This area was a godsend during lockdown when I needed to maintain my physical and mental health. I discovered it for the first time then. I haven't found time to visit very recently but wish to again soon.

Open space we need it as western Enfield is built up. Preserve our open spaces and green space. That's what makes Enfield a great place to live and work in.

I don't have a car and so it is much more pleasant to walk to Oakwood or Trent Park on the Merryhills Way than along the polluted and noisy main road.

It's a flattish walk that I can do if my disability permits – I'd use it a lot more often if it were more accessible. Though I live close, it's too far for me to walk and isn't accessible to my power chair, so I park close by. It's a wonderful, beautiful, peaceful place enjoyed by many and people have been very upset by the aggression shown from adjacent landowners.

I use the walk to take my children to school like a lot of other parents.

A beautiful area which we cherish

I've lived in the area all my life. I'm 53 years old and have always used these paths both as a child and as an adult more recently walking my dog.

Walk very regularly through the entire length of Merryhills Way. Many people use this path all times of year which you can tell by the wear and tear on the footpaths. During lockdown the usage increased dramatically and provided people with direct access to Trent Park and the woodland path leading to Fairview Road. Usage has increased and remains high compared to prior to Covid.

I walk in this area frequently, love the open space and the trees in Trent Park. In lockdown we went everyday it kept us sane!

Unspoilt countryside

This Green belt space is my sanctuary. Everyday, sometimes twice a day, I exercise my two dogs, often with my children and husband too. Trent Park can be very busy, which I find difficult to cope with as I suffer with anxiety. The open space has given me a lifeline of fresh air and room to breath.

Essential family access to Trent Park with kids on bikes as well as on my own for cycling/jogging and wellbeing/mental health.

The section I most often use is from Fairview Road to Jolly Farmers pub. Unfortunately it sometimes gets very muddy which limits when it is useable.

Educating my child about wildlife and conservation

I hope that access to Merryhills Way will be kept. We use it often not only for exercise but also to walk with our children to and from school. Access to natural green walking spaces support mental health and teach children about nature. I also think it is a disgrace what has happened with Merryhills Way since lockdown. It was an absolute life saver for so many families during lockdown and we were blocked off and harassed by the local farmer for passing a public footpath.

This space is important to us as a family as a safe space for some exercise - the kids love it, it's convenient from our home and we often go with friends

Feeling of freedom and clarity walking through the fields.

I keep fit regularly and live an active lifestyle and this area is hugely important as part of my fitness.

Green open spaces are VITAL to people's health and wellbeing, especially in the world today. Many do not have access to gardens and rely on public spaces

This is an amazing space and in a busy Town feels like you can escape to the country for a while and it's like being away.

It's such a unique area that gives a feeling of being away from everything.

Cannot believe the thought of a large estate being built on the green belt land!

I love that I can talk to my friends and family about this wonderful walk in the midst of a London Borough and the fact that the wonderful Trent Park can be accessed from our doorstep without a car and to invite them to share it with me. People who live in the countryside are always amazed with Merryfield, Hilly Fields, Forty Hill, and Trent Park open spaces, these places are like treasures to be passed on to future generations.

There are not many places here where you can walk to, but this is one that we can, we love this walk from Fairview Road. We look after my grandchildren and they love it there playing in the woods and the meadows and playing by

the stream, trying to catch butterflies and collecting lots of nature things they absolutely love it there, so much freedom for them. To take this away would be devastating to them and to us for nice long walks and it would be for others in the future.

I can't believe that anyone could contemplate closing this path or building on the lovely greenbelt countryside of Vicarage Farm. This is currently enjoyed by numerous walkers and families. Shame on Enfield Council if they are seriously considering the irreplaceable removal of this wonderful local asset.

Walking is my thing. Brilliant therapy for well ride after bereavements. Ideal exercise for all ages at no cost. I love this footpath.

This path is very popular especially since the pandemic but seems to have remained popular even though we have relaxed restrictions.

Such a great natural space to walk alone, with pets and with friends and children

It will be devastating if this is taken from members of the public.

I love this area. The peace and tranquillity. I love the wildlife including Kites and Bats (which I was under the impression were protected). The sound of the trickling brook. I had tears when I saw the proposed plans. I have lived here for over 8 years and when times are tough, this area is my lifeline. I also have views of this area from my bedroom windows. I love the green outlook, the feeling of being close to nature. I would be devastated to lose it. Very important to keep these facilities open

From the moment I moved to my current home I have used this space for regular walks, it was s one of the main reasons we moved to Farmlands. To lose this will terribly sad.

This is the only open space near to our house which we can easily walk to

Use it to take the children to school

I use the path to walk with my children to Merryhills school when the weather is nice.

Use this footpath to walk to my elderly mother's house.

An amazing piece of countryside on the outskirts of London. Easily accessed by tube or bus. I walk the Merry Hills way to and from Trent Park and then onwards sometimes incorporating the London Loop. It kept me sane during the recent lockdowns.

As a family with two young children, we often walk with class friends in groups. This has helped our children tremendously during lockdown whilst having to socially distance. Although they may have not been able to be close to friends, seeing them and picnicking a safe distance away has done the world of good. As a family we have come to love Merryhill fields and just wish

the path was a little more user friendly since the closure of some fields. This would be the perfect cut through for walking to school.

Between 1981 and 2016 we owned dogs and walked them on the Merryhills Way almost every day. Many dog owners did and still do walk their dogs there.

I have been approached by men in a car on fields near the path, telling me to keep off the land. Numerous attempts and aggressive fences/signs have been put up that make me feel unwelcome on the land. It feels like a deliberate attempt to lower the numbers of people using the paths and creating new ones.

We do not want to lose our public footpaths through our beautiful open spaces.

I would use the Merryhills path (sections E-G) more often as I regularly walk from The Ridgeway to Southgate. However, this has not been possible since the path has been blocked.

We (my family and I) use this walk /area every day, it is extremely important to our mental health. There are widely known, scientifically studied, benefits to health from being in nature. Having this land accessible in which to walk, run, sit and enjoy the scenery has become an essential part of both our physical and mental wellbeing. We would be devastated to lose it.

It is accessible on foot, which allows us to exercise, walk our dog, and get out in nature without using a car, which is important for the environment.

There is great biodiversity in this area, which is again, essential for the health of the planet. Wildlife here would be decimated if this land was developed. At what point are we as a species, going to stop devastating and destroying the natural environment? I understood this to be green belt land that Enfield was meant to protect.

Considering the dire predictions for climate catastrophe, increasing rates of species extinction, the loss of green spaces resulting in increasing carbon release further speeding up climate change, it seems like developing this area is short-sighted, and on the whole, unwanted.

Please protect this green belt land from development for the sake of the local wildlife and community, and the wider environment. Thank you.

We enjoy the countryside views away from habitation and traffic.

Nearest green space

I only discovered this walk during the first lockdown & it made a huge difference to my mental health being able to walk in such beautiful & peaceful surroundings. Also, I love the variety of wildlife I see each time I go.

I can't believe that we are still in Enfield when I walk through this space. It's like being on holiday & as I haven't been able to have a holiday for 7yrs, it's a massively important place for me to relax & exercise in.

This route is the single most important outside space for our direct and extended family and friends. The idea that we can access the route on foot for as long or short social walk or more strenuous run

Enjoy the horses & countryside views

This is an attractive open space which I have used for enjoyable walks a few times, in particular during the past 18 months.

Commute to and from work at Holborn. Important distress away from busy traffic on Enfield Road

1 Aug. Walking. This was my 1st visit, never ventured MW before; nearly always cycle within Trent Park from Cockfosters or Oakwood.

People live in Enfield because of closeness to London and also easy access to Green Belt land at the moment it looks like Enfield Council is trying to destroy all the countryside in and around Enfield in the process destroying Enfield

If equestrian land sold off, this area ruined

The area is in its current form - untainted by development - is necessary for ecological and conservational reasons as well as for the health of the public.

High quality countryside, skylarks even in early spring, beautiful mature trees, quieter entrance to Trent Park makes it a real treasure. Green lungs

Beautiful unspoilt countryside- with wildlife-very precious resource in Enfield that is near to homes for regular recreation and wellness and quiet reflection with beautiful Greenbelt views.

Green space, fresh air, wildlife.

I just cannot imagine dense housing in this area of natural space.

Beautiful place which needs to be preserved

It is so relaxing to be able to hear skylarks etc and also see many forms of wildlife

Scenic and peaceful path to walk

We should be proud how green Enfield borough is and make sure it stays this way.

Opportunities to spot the varied wildlife

It's a 10-minute walk to Merryhills Way and it feels like being in the countryside - as the start of the Green Belt, it feels like escaping the hustle of the town thanks to its lovely open scenery. I walk along there with my husband and children, often as a nice walk to Trent Park. Now we have a dog, we take him with us too. I also walk there often with a schoolfriend to combine exercise and a social occasion. I find being able to access the countryside views on foot is mentally refreshing and a good way of getting physical exercise too. My sons have been along the Merryhills Way on adventures with their local Beavers and Cubs groups. The Merryhills Way is also where my 11-year-old son got his inspiration from an ivy leaf for the design of an eco-friendly supercar which won overall first prize in a Blue Peter/Top Gear/McLaren competition in 2020. We would all be really upset to lose the natural environment along the Merryhills Way.

Invaluable during lockdown - Need to preserve for future generations

If I take a trip out of the borough it is always delightful to leave the M25 and see the rolling hills and woods surrounding Enfield. I know I'm nearly home.

The green spaces in Enfield are the USP of the borough! They are lost at our peril - and once gone are not something we can get back. It does feel presently that they are all under attack, which is short-sighted. As a psychotherapist, I am very aware of how important it is to prioritise our mental health and green spaces are so very important for that.

The main reason we came to live in Enfield was to enjoy and benefit from the green spaces and parks that we could access by foot. As we get older this is even more important for our general health and sense of wellbeing. We would not wish to live here if these valuable and irreplaceable green spaces were not protected. They are an essential part of the local history and character of this area and once lost would alter its unique identity forever.

This wild space is beautiful across the duration of the year and is a valuable area to connect with nature and open space. It is the green belt, an ecological area that we cannot afford to lose at the expense of developers and their interests. Losing this space will create a domino affect across our Borough, placing other similar areas at risk.

It's a huge part of our week, my daily commute and spending time with our family in such a beautiful part of our borough

Please don't let them take away our beautiful space

It is a very valued open space that allows time and space to recharge oneself. This walk gives a totally different perspective. It starts at Fairview Road in a wood and then opens up to farmland and great views. Without it I would be trudging along the main road. Also, the historic air raid battery site is of interest. More importantly Enfield should be encouraging walking not listening to those vested interests who want to use the land for their own monetary purposes.

This is a key walk, with beautiful scenery. There is no place like this in the rest of the borough to go for a family dog walk.

I love it there and it's a beautiful green space that my dog and I as well as my family enjoy daily

This path is very popular

Vicarage Farm was a productive root crop farm until a few years ago. There was careful use by locals using field edges to access Trent Park until this was discouraged by signage and crude obstacles in spring 2020.

These areas of green belt must be kept for the continued quality of life for London's urban communities

Lovely to see the wildlife

Mental health is most important and walks to Trent park from Enfield road is something I rely on, my dad does too who has severe mental health problems

I find this route is an interesting variation of local landscape and views. Quickly takes you off road to a very rural setting.

Given the new landscape we find ourselves in with the post COVID world it is more important than ever to keep Green spaces like Merryhills. The green belt in Enfield is one of its greatest assets.

Green Belt is hugely important and should never be built upon.

The path has been part of my life since I was young. It's so rare to feel like your really in the countryside when you live in London and this is one of the few places where I feel that. I commute to the city and need to live in a place where I feel back in nature and truly away from it all. I hope they don't go ahead with building on the green built. It's only a slippery slope once you start doing that. In the future it could happen more.

We should obviously be protecting this vital, pleasant footpath link between the Ridgeway and Trent Park, but we should also be extending it - perhaps securing more paths across this lovely valley to the wooded area of Trent Park. We should also be protecting the wildlife in the area, including the skylarks that frequently nest on the open grassland. I fear that some skylarks and their nests have been destroyed in recent times by irresponsible cutting of the grass.

It is an important right of way and good for a healthy and sustainable transport and public health system.

It is a unique landscape, one that I have been visiting for over 50 years!

This is a lovely green stretch of Enfield. I will certainly be back

It is a very peaceful location to visit, for walks, sitting in the sun and enjoying the countryside, there's so few places like this left in London, it's my favourite place to come when I need calm, away from traffic, parks became so busy since lockdown but via trents side this space is heaven, I love sitting with nature here, the butterflies and mountjack deers, it reminds me of growing up on a farm in my childhood, being at one with nature is good for the soul, please don't take this away from us, there is nowhere else like this left.

This is a lovely walk, feel so lucky to have this 5 minutes from where I live.

A quiet oasis in a busy world

Walking Merryhills Way is a major part of our life in our retirement. It gives us great pleasure, exercise and the feeling of making the most of our lives whilst we are able

This is a beautiful unspoilt area and should not be built on. We are experiencing excess water in our garden that we believe to be partly due to all the building work

Loss of this vital Green Belt space would be a disaster for the whole area.

Lovely wildlife and fauna.

Individuals who responded to the survey

All respondents consented to their names appearing in a public report. The names of respondents are as follows:

Andrew Lack, Dave Cockle, Simona Saat, Gill O’Mahony, Shelley Morgan, Robert Mark Callf, Carol Fisk, Deborah Cullingford, George Grant, Anne Vasey, Rachel Davies, Maria Hare, Helen Brown, Filomena Turner, Georgina Cadby, Linda Somerville, Caroline Cooper, Matt Burn, Alison, Mr L Michaelides, Emma Halstead, Helen Trobe, Suzannah Welby, Sinem Sirri, Claudette Woolfson, Lisa Wheeler, Lev Ucar-Batili, Janice Clarke, Sinem Hurer, Yeliz Ucar-Batili, Ediz Arkin, Paula Dutson, Rebecca Lysandrou, Sarah de Visser, John Dent, Stephanie Doyle, Tom O’Rourke, Susan O’Rourke, Ved, Joanne Bell, Olivia Boyce, Vanessa Mead, Sue Pritchard, Danielle Cooksley, Hasan Hurler, John, Arif Hurer, Elizabeth Elias, Claire Stares, Anthony Agrotis, Teresa Johnson, Sibel Taner, Pam Johnson, Irina Pavlov, Fernando Girandola, Kara McCrory, Claire Heywood, Cary, Labdon, Chris, Glenn Wilson, Dan Kelly, Francis Martin, Pamela Pettifer, Yasmin Christofi, Janet Whelpdale, Anne Scollen, Valerie Smeeton, Dawn Shephard, Renos Christou, Deborah Drummond, Keith Shephard, Amanda Newell, Victoria Mundy, Lynne Mattei, Sharon Dewhurst, Julie Rayson, Bernice Stronach, Harriet Strien, Sandra Tyler, Gemma Woolley, Rachael Redican, Natalie Fry, James Bailey, Joanna Stronach, Jennifer Summerfield, Jacqueline Smith, Errol Adem, Jayne, Linda Price, Mariella Corfield, Maria Nice, Ruth McGlynn, Allison, Griffith, Roy Nice, Faye Louise Serlin, Kareen Allan, Sharpe, Siobhan Lindfield, Alice Hanby, Claire Leck, Caroline Parsons, Jen Mattei, Loach, Kirsty Johnstone, Michael, Alison Yates, Ian D’Souza, Ann Hilary Rawlinson, Bruce Victor Cunningham, Neil Willey, Andrew Garrett, Roger Springett, Julia Langsam, SIMON WEDGE, Lesley Bement, Roberta Hood, Earl Foy, Bianca Brits, An Mestdagh, Lewis Woolley, Katy Allen, Aliz Badics, David Orchant, Jennifer Whale, William Douglas, Simon Pettifer, Wendy Garrett, Gillian Foot, Theo Hajoglou, Philip Johal, Manuela Canova, Norma Grimsey, Anthony Plewes, Jessica Hajoglou, Jonathan Xenophontos, John wright, Ilana Cornish, Steve Petrie, Margaret Findlay, Jen Poll, Savio Capodici, Jane Rayson, Emmeline Beazley-Williams, Julian Elliott, Monica SORIA GOMEZ, A Tellman, James Severn, Marianne Brown, Cinzia Noone, Joe Eldred, Mary, Vicki Tsamados, Claudia Canova, Rachel Gillan, Bizhan Nezhad, Sami Hurer, GAVIN DOUGLAS, Daniela Ritz, Tatiana Forechi, Radhika Banerji, Gavin Kay, Laura Kangellaris, Claire Wilson, Joanne Mohan, Caroline stevens, Diane Coxon, Charlotte O’Brien, Carol Medcalf, Nigel Brown, James Medcalf, Amanda Garner, Helen Zouvani, Lydia Crawford, Deborah Cheney, Pat Brooks, Jenny Wilson, Rachel Severn, John Dixon, Taiq Chowdry, Portia, Cathy Carrington, Costas Georgiou, Geoff Carrington, Kathryn Powley, Jodie Wheeler, Gill, Brigitte O’Gorman, Holly Cornwell, Sharon Barrett, Antonia, James Dixon, Wheeler, Cliff Bass, Nicola Gee, Nazan Husseyin, Julia Cully, Michael J Welch, Andrew Smith, Robert Cheney, Paula Davidson, Susan Hunt, MR KYRIACOS ZOUVANI, Clarke, Christopher Tsamados, Seema Golding, Jill Sandford, Louis Sallas, Mariette DeCastro, Gemma Marti, Jordi Cayuso, Alexandra Constantinou, Bina Radia, Alison Reeve, Hazel Stokes, Vanessa Elizabeth Millwood, Oliver Douglas, Christopher Cheney, Leonard Edmonds, Andrew McGee, J Farrell, Rachel Barrow-McGee, Natalie Elliott, Joanne van Schaardenburgh, Darren Luff,

Sibel Kazim, Anne Liddiard, Penny, Kemsley, Jacki Dean, Kasia, Lyndsey Thompson, Liz Mathurin, Sue Bryan, Norman Tellman, David Jack, Denise Chester, Roger Bryan, Christopher Goss, Sue and John Killey, Dawn Eyles, Ann Whitehead, Simon Mullooly, Mark Graver, Kim Athanasiou, Chris Athanasiou, Sharon Harris, Brian Dawes, Náo Hika Myers, Joanna, Janet Cutts, George, Carrington, Cem Oguz, Loraine Chowdry, Bertan Ali, Gabriella, Dawn Bailey, Sherrie Colye, Nayanna Shukla, Liz Hart, Carly Shipp, Christine Matthews, Colin Johnson, Alan Mooge, Peter Lambert, Ann Kent, Sheridan Dalton, William Merritt, Colin Saunders, Rosalind Sawyer, Neil Hancock, Shanaz Zaman, Mark Turnbull, Clare Corrigan, Peter Spindly, Lesley Buxton, Daren Metcalfe, Tony Sheen, Lucy Welch, Colin Biggs, Shirley Adams, Michael Hirschl, Caroline Dundon, Steve Jarrold, Paul Theobald, Patricia Pearce, David Curley, Mario Zaspel, Sue Macrowan, Milka Lukic, Sara Lukic, Elaine Eyles, Malcolm, Sally Meggison, Stephen Lloyd-Jones, Peter Baker, Nicola, Clare Jephcott, Ursula, Katharine Jenkinson, Jennifer Newton, Daniel Jones, Lucy Bragg, Matt Dede, Filiz Dede, Nyla Dede, Reya Dede, Simon Collyer, Simran Pandit, Joe Wood, Betty Harte, Tom Moore, Brian Woods, Danny, Andrew Abraham, Colin Lockwood, Richard Davies, Alix Liddle, Paula Larkins, Joe Lanario, Tessa Cleaver, Maria Christofi, Marcus Cornwell, Steven Salt, Ronald, Gregory Doyle, Teri Malakouna, Brian Dawton, Jacqueline Fountain, Sarah Walsh, Clare Merrifield, Randall Hyer, Jean Connolly, Diana Swadel, Natalia, Amber Jarrold, Lara Jarrold, Emral Jarrold, Adrienne Kirk, Bernadette Forde, Ian Abernethy, Richard Bunce, Mary Zazzi, Helen Wilkinson, Katya Kyriacou, Shirley Jee, Sean Davies, Ruth McBryan, Tim Mcbryan, Antoniou, Paulo Santos, Paul Russell, Joy Bebbington, David Haywood, Evagoras Mandrides, Simon Vaughan-Long, Sarah, Claire Vaughan-Long, Olga, Nora Cooper, Marcin, Laura Lloyd, Phillip Lloyd, Simon Nosworthy, Peter John Leedham, David Haws, Iain McJennett, Christina Yianni, Alison Parker, Adrian Lord, Natalie Smith, Shirley Johnson, Shivaun Meehan, Natalie Meehan Gooch, Karen Eden, Jeffrey Smith, Sunny Carter, David Meehan, Paul Meehan, Keira Grant, Linda Newman, Jane Fabian, Paul Birch, Sylvia Jakubowski, Laura Cummins Dale, Leonora, Meehan Gooch, Mya, Jake Garwood, Graham Renshaw, Richard Hersey, Fiona Hellen, Mirca Morera, Gemma Jameson, Luigia Moneta, Christine Bex, Jackie Smith, Julia Graser, Stephen Smith, Peter Harris, Don Gazara, Jeffrey Graeme Hopwood, Etty Devereaux, Gloria Jaramillo, Nick Finney, Derek Byron, Glyn Roberts, J van R, Lucy Humphreys, Chris Humphreys, Cheryl Humphreys, Justine Marlowe, Nigel Chapman, Jonathan Brown, Avril Brown, R Davies, G hickey, Vadim Mironov, Carole Todd, Anna Pearce, Mary cummins, Stephanie Lane, Adam Lewczynski, Elaine Thomas, Bill Harvey, Jade Tingling, Jan Latham, Elaine Barber, Anne DENNEY, Alev Jemal, Kelly Ruddy, Denise Anne Bowman, Jill sandford, Daniel Corbett, William Lockhart, Ayhan Gunsaya, L Davies, Kerry Willer, Ali Yilmaz, Robyn Lodge, David, Martin Woolley.

Usage Counts

In order to obtain a more accurate picture of the level of usage of the Merryhills Way, the Enfield Society undertook counts on a single day.

- The usage counts took place on Saturday 4 September 2021
- The weather was dull but dry and the temperature was around 18 degrees Celsius.
- Surveyors comprised volunteers from the Enfield Society.
- All surveyors signed the forms to verify the accuracy of the information collected.
- The day was divided into four shifts with a 'handover' between surveyors.
- The survey point was at location 'E' on the map in Appendix B above.
- Surveyors were given a proforma recording sheet and asked to record the time of people observed on the path and the number of people in each group.
- In order to avoiding skewing the results, the Society was extremely careful to avoid any publicity of the 'census', and only the surveyors knew of the survey in advance.

The results, by hour, are set out in the table below.

Time period	Number of Merryhills Way users		
	Adults	Children	TOTAL
08:00 to 11:00	45	0	45
11:00 to 14:00	72	6	78
14:00 to 17:00	78	30	108
17:00 to 19:30	56	9	65
TOTAL	251	45	296

The largest group observed was of nine people, with a number of groups of four or five individuals, but the majority were in pairs or single walkers. A number of users were observed jogging either alone or in pairs.

The data is limited in that it was only one day. The number of users is likely to vary considerably depending on the weather and the ground conditions (parts of the way can be muddy in winter). However the 'census' data does provide a useful snapshot and further evidence to corroborate the findings of the survey

Appendix D: Letter to the Council regarding the consultation process



The Enfield Society

Jubilee Hall, 2 Parsonage Lane
Enfield EN2 0AJ

020 8363 9495
info@enfieldsociety.org.uk

15 July 2021

Sarah Cary
Executive Director Place
London Borough of Enfield.

Dear Sarah,

**PREPARATION OF THE LOCAL PLAN:
CONCERNS REGARDING THE CONSULTATION PROCESS.**

The Enfield Society is currently preparing its response to the Local Plan. It will not surprise you to hear that the development of Green Belt land for housing and commercial purposes is a major concern.

We have been approached by many of our Members also expressing concern about the consultation process. We share that concern in respect of the way that the Council has approached the public consultation in respect of the emerging Local Plan.

The Local Plan proposes to allow development of housing, warehousing and industry on areas of exceptionally fine open Green Belt countryside, as well as proposing tall buildings in a number of locations across the Borough.

In the Local Plan, it refers to the Statement of Community Involvement (SCI) that was approved in 2020, but this only appears to commit the Council to a minimum of consultation and engagement. Given the importance of the Local Plan and its wide-reaching proposals we believe that the limited opportunities for comment and public engagement need to be extended.

Our main concerns are that -

- a) The SCI was agreed in 2020 before the release of the Local Plan papers in June 2021, when it first became apparent what the implications of the SCI would be for the Green Belt.

Formerly the Enfield Preservation Society
Founded in 1936 to protect Enfield's historic heritage,
defend the green belt and
encourage good design in new developments.

Registered Charity No. 276451
Registered in England as a limited company No. 312134
Registered Office: Jubilee Hall, 2 Parsonage Lane, Enfield EN2 0AJ.
Web: enfieldsociety.org.uk

- b) The process only commits to publishing the consultation responses in summary form 'in due course', we are keen that the community can see the responses that are made before the closure of the consultation period.
- c) The Society believes that the consultation process runs the risk of discouraging community engagement, for example by –
- Publishing over 4,000 pages of complex technical studies alongside the 300-page Local Plan without an effective summary or an explanation of the implications and
 - Implying on the 'Let's Talk' website that, to respond to the consultation, it is necessary for the public to register online and complete a 72-question online survey, this will discourage many respondents.
- d) While the Council undertook a number of public consultation events for the 'issues and options' stage in 2018/2019, there seems to have been a failure to do any public engagement sessions at all during the regulation 18 stage when the proposed Green Belt developments were revealed.
- e) We question the suggestion in the FAQ section of the 'Let us Talk' website that if the draft Local Plan is not agreed, the government will impose the Local Plan on the Borough. That is not our understanding of the process.
- f) The Local Plan strategy appears to be that it is choice between "necessary affordable housing" and "nice to have fields". This seems to oversimplify the choices that are available.

We welcome the extension of the consultation period that was agreed by the Council. However, we have talked to many people and other amenity groups about the Plan and the process and there is general agreement that the process still gives the unfortunate impression of being designed to ensure that the Plan is approved no matter what damage is done to the historic and natural environment of Enfield, or to local communities.

At an absolute minimum, the Society would like to see the Council publish responses to the draft Local Plan consultation promptly and in full, rather than simply publishing a summary together with Council responses on the eve of the Regulation 19 consultation. We also hope that there will be greater publicity and community engagement opportunities set up before the consultation period closes.

The Enfield Society is preparing a full response to the Local Plan consultation and will be submitting that in due course.

With best wishes,

Yours sincerely,

Appendix E: Letter from the Secretary of State to the Mayor

10 December 2020

Dear Sadiq,

London Plan

Thank you for your letters of 21 August and 9 December 2020 regarding the London Plan. As you will be aware, my officials have been in discussion with your officers during the intervening time and have worked constructively to find a way through the detail of ensuring that the London Plan will be consistent with national planning policy. I hope that there is now a common understanding of how my 11 Directions, issued on 13th March will be addressed and I attach a list showing where I accept your proposed wording and where you should keep to the original Directions.

We agree that moving towards adoption of the London Plan would help families and businesses in London to build back better. Since I directed you on your draft plan in March it has become clear that there are some further issues. Therefore, I am issuing two further Directions. Firstly, in light of the profound impact Covid-19 is having on London, and other towns and cities, I am issuing a further Direction in relation to Direction DR4, specifically regarding updated para 6.4.8. This is a modest amendment to my previous direction which will provide boroughs in the difficult position of facing the release of Green Belt or Metropolitan Open Land with a greater freedom to consider the use of Industrial Land in order to meet housing needs.

Second, I am issuing a new Direction regarding Policy D9 (Tall Buildings). There is clearly a place for tall buildings in London, especially where there are existing clusters. However, there are some areas where tall buildings don't reflect the local character. I believe boroughs should be empowered to choose where tall buildings are built within their communities. Your draft policy goes some way to dealing with this concern. In my view we should go further and I am issuing a further Direction to strengthen the policy to ensure such developments are only brought forward in appropriate and clearly defined areas, as determined by the boroughs whilst still enabling gentle density across London. I am sure that you share my concern about such proposals and will make the required change which will ensure tall buildings do not come forward in inappropriate areas of the capital.

Next Steps

I am pleased that you share my sense of urgency in getting the London Plan published. I would be grateful if you could re-submit your Intention to Publish version of the Plan with amendments that address the 11 previous Directions and the two additional Directions. I will then be in a position to formally agree to the publication of the London Plan.

Once published, the London Plan will be an important tool in helping to drive housing delivery, economic recovery and sustainable development across London.

You will recall that in my letter of 13th March I required you to commit to a range of activities to support future housing growth in London. I am pleased that the communication between our teams is ongoing and positive. I would like to see details of work on a strategy with the wider south east authorities.

I look forward to your reply detailing these commitments and to receiving your modified Intention to Publish version of the London Plan.

Appendix F: Review of the Areas of Special Character

Enfield's Local Plan

EVIDENCE BASE

Area of Special Character Boundary Review

March 2013

Area of Special Character Review

Contents

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3. Methodology	6
4. Recommendations	7

1. Introduction

1.1 The Council has carried out a comprehensive review of the Area of Special Character designation in the Borough to support the emerging policy in the Development Management Document. This report identifies and recommends proposed changes to the Area of Special Character currently designated on the adopted Enfield Policies Map (2010).

1.2 Enfield's Core Strategy adopted November 2010 is accompanied by a Policies Map to show the boundaries of designations relating to policies. The current Policies Map carries over designations from the 1994 Unitary Development Plan (UDP) as well as the strategic policies contained in the Core Strategy.

1.3 Core Strategy Policy 31 (Built and Landscape Heritage) states that the Council will implement national and regional policies and work with partners (including land owners, agencies, public organisations and the community) to pro-actively preserve and enhance all of the Borough's heritage assets. Actions would include:

- Reviewing heritage designations and their boundaries where appropriate, and continuing to maintain non-statutory, local lists and designations based on formally adopted criteria;
- Ensuring that built development and interventions in the public realm that impact on heritage assets have regard to their special character and are based on an understanding of their context. Proposals within or affecting the setting of heritage assets will be required to include a thorough site analysis and character appraisal which explicitly demonstrates how the proposal will respect and enhance the asset;
- Supporting appropriate initiatives which increase access to historic assets, provide learning opportunities and maximise their potential as heritage attractions, particularly at Forty Hall and the Area of Special Character in the north west of the Borough;

1.4 It is in this context that this review now details the map changes proposed as part of the Proposed Submission DMD.

2. Policy Background

2.1 The existing Policies Map shows an Area of Special Character (AOSC) which comprises of:

(a) The Enfield Chase Heritage Area AOSC in which the Council will seek to preserve and enhance the existing character of Enfield Chase as an area comprising woodlands, streams, designed parklands and enclosed farmland;

(b) The Lee Valley AOSC in which the Council will seek to preserve and enhance the essential character of the area, as being one of predominantly open landscape characterised by rivers, streams, canals, reservoirs and other water-related features.

A map of the existing and current AOSC designation can be seen on page 8.

2.2 The AOSC was designated through the 1994 Unitary Development Plan following recommendation by the Countryside Commission, English Nature, English Heritage and the London Ecology Unit based on its combined landscape, historical and nature conservation interests.

2.3 Following the adoption of the Core Strategy, the Council commissioned consultants to undertake a characterisation study to critically assess all urban and rural landform types and categorize into an identifiable character including areas of special character to ensure that Enfield continues to protect and enhance those features or characteristics that are essential to maintaining the historic and intrinsic visual quality of the area. Enfield's Characterisation study 2011 should be read in conjunction with this report.

3. Methodology

3.1 The basis for this piece of work is subsumed within the Characterisation study that was produced in 2011, and included the following stages of work:

- Detailed desk-top analysis of the borough including analysis of digital mapping, historic mapping, socio-economic data and planning policy;
- Extensive site visits;
- An extensive photographic analysis of the borough; and
- A workshop with stakeholders to identify key issues, characteristics and places in the borough;

3.2 The key output of the Characterisation study in relation to the Area of Special Character designation included a Landscape Character Assessment looking at:

- the Green Belt landscape, including Enfield Chase and the Upper Lee Valley;
- the relationship between topography and significant views and the impact of development pressures of all kinds on the landscape character and skyline; and
- the value placed on local landscaped areas outside of nationally designated areas, and the importance of landmark features and structures.

4. Recommendations

4.1 The following changes are recommended to ensure that the Areas of Special Character continue to reflect the important historic and exceptional landscape character traits that should be protected for their intrinsic quality.

4.2 It is proposed that the two existing areas of special character namely Enfield Chase and the Upper Lea Valley are separated into 9 distinct areas that have been based on Enfield's predominant landscape type and are listed below:

Salmons Brook Valley	}	Farmland Ridge and Valleys
Turkey Brook Valley		
Merryhills Brook Valley		
Theobalds Estate South		
Clay Hill		
Hornbeam Hills South		
Enfield Chase and Trent Park	}	Rural Parklands
Whitewebbs Park and Forty Hall		
Lee Valley Reservoirs	-	River Valley and Floodplain

4.3 The proposed areas of special character also show the deletion of:

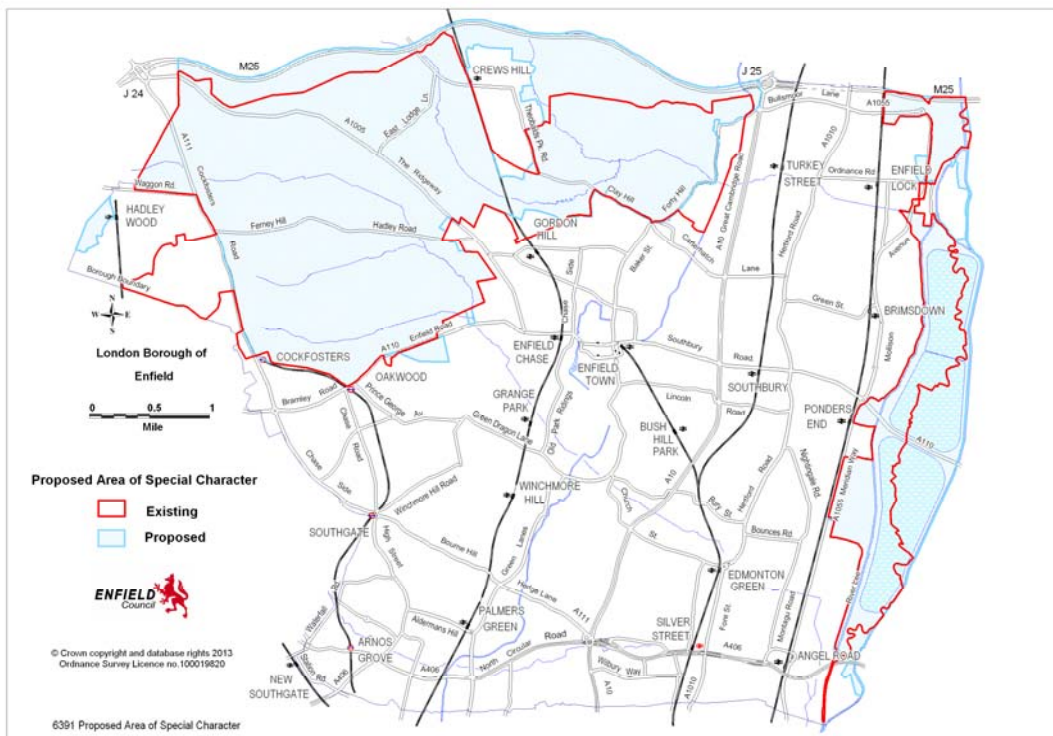
- Covert Way Field;
- Hadley Wood Golf club;
- Cockfosters Sports Ground;
- Lakeside;
- Lavender Hill Cemetery;
- parts of Strayfield cemetery;
- The Chace Hotel;
- area to the east of the Forty Hall Conservation area;
- Warwick Fields Open Space; and
- The southern extent of the River Lee Navigation (from Lee Park Way – to the borough boundary with the London Borough of Haringey)

4.4 Additional areas to be included with the proposed designation include:

- The area known as Hornbeam Hills South;
- Land south of Trent Park Cemetery;
- Land south of A110 Enfield Road;
- Vicarage Farm, Hadley Road;
- Wolverton the Lodge and Coach House, 50-54 Hadley Road;
- The northern most extent up to the M25;
- Area north of Whitewebbs Road up to the M25;
- Innova Park open space;
- Enfield Island Village open space;
- The William Girling and King George V reservoirs; and

- Land east of Harbet Road.

Existing and Proposed Area of Special Character



Farmland Ridge and Valleys

4.5 The largest and most widespread landscape character type in the borough is 'Farmland ridges and valleys'. This is a very attractive undulating agricultural landscape which is sparsely populated and has a geometric field pattern. It is an important area of high quality open landscape with a special character which is highly valued. Much of the landscape is in productive agricultural use and all of it is protected as Green Belt.

4.6 Most of the area of the Farmland Valleys and Ridges landscape type is of high landscape quality and is highly valued by the borough's residents. The landscape is well-maintained, it has a good network of public rights of way and permissive paths and is a productive agricultural landscape which has not become weakened by the introduction of alternative urban fringe land uses. It has a strong network of woodland blocks (many of which are Ancient or Semi- Ancient woodlands) and many large mature hedgerow trees which punctuate the landscape and provide the character of a well wooded landscape. There are many points (particularly from the Ridgeway and Stag Hill) where fine, long distance views across the rolling landscape can be enjoyed. Many of these feel very rural and remote in character and the area provides a valuable opportunity to enjoy a special rural landscape which is easily accessible from the adjacent urban areas.

Rural Parklands

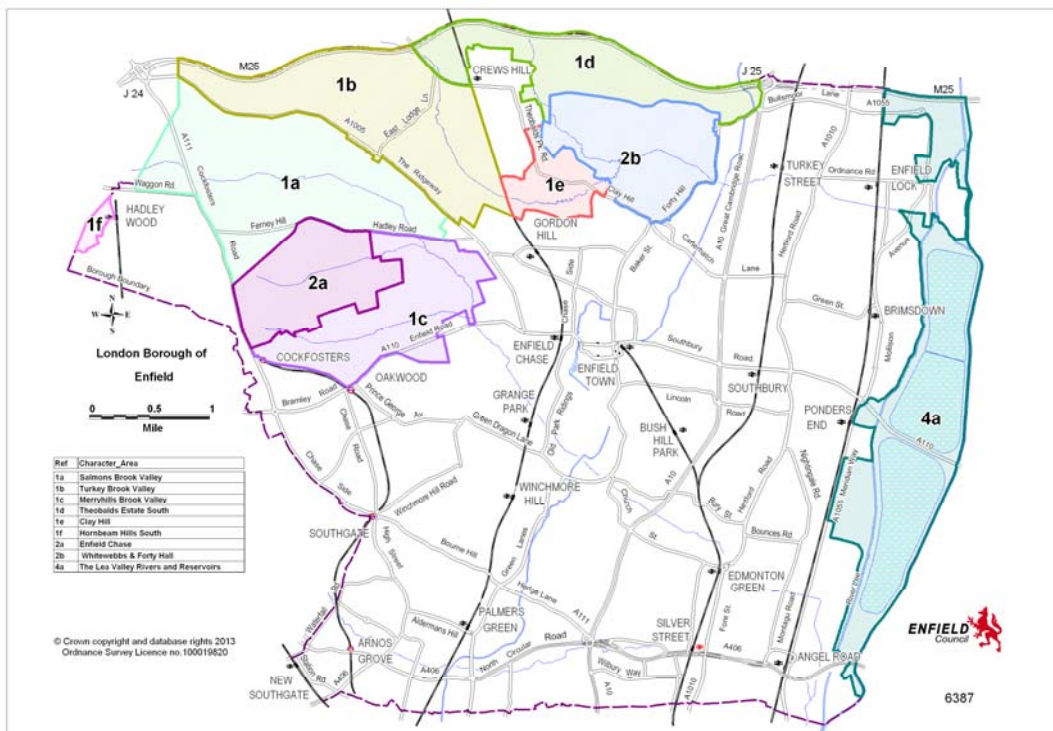
4.7 The rural parklands of the borough are popular destinations for recreational visits. They provide a range of opportunities for recreation including routes for cycling, walking, and riding, a golf course, nature walks, tea rooms and ornamental gardens and are well-used throughout the year. The undulating topography and complex pattern of woodlands, open areas, historic features and formal gardens creates a varied landscape full of interest and diversity.

4.8 Consultation was carried out as part of the Characterisation study identified Forty Hall and Trent Park as some of the most liked places in the borough. These landscapes are valued for the recreation facilities they offer and also for their visual qualities and the opportunities provided for contact with the rural countryside.

River Valley and Floodplain

4.9 The River Valley and Floodplain area is a landscape type commonly found in lowland England centred around the main watercourses. It is characterized by flat, low lying topography, fluvial soils, wetland vegetation and meandering, slow-flowing watercourses. In Enfield the key area of this landscape type is the valley and floodplain of the River Lee.

Proposed Areas of Special Character



Areas of Special Character

Salmons Brook Valley

4.10 The Salmon's Brook Valley is a rural farmed valley landscape with mixed arable and pastoral fields which follow a strong geometric pattern. The area has a well maintained network of mature hedgerows and large mature hedgerow trees. Mature oaks are a key characteristic of the area although in general, many are in decline. This area is generally secluded with few roads and little settlement other than scattered farmsteads. Despite it's proximity to the urban edge the area is quiet and rural and in some places remote. The area is drained by the Salmon's Brook and contains frequent small woodland blocks of mixed native species, several of which are Ancient or Semi-natural woodland which give the impression of a well tree-covered landscape.

4.11 Protected Characteristic traits: Frequent small woodland blocks | Valley drained by Salmon's Brook with undulating valley sides | Geometric fields of mainly pastoral farmland | Mature hedgerows with frequent large mature hedgerow trees (mainly oak) | Secluded with few roads | Views across the valley from Ferny Hill/Hadley Road and the Ridgeway | Views south towards Enfield Chase and Hadley Wood

4.12 Main Issues:

- The quality of this landscaped is achieved through the continued agricultural activities; and
- Long distance views across the landscape are valued and key views should be protected.



Turkey Brook Valley

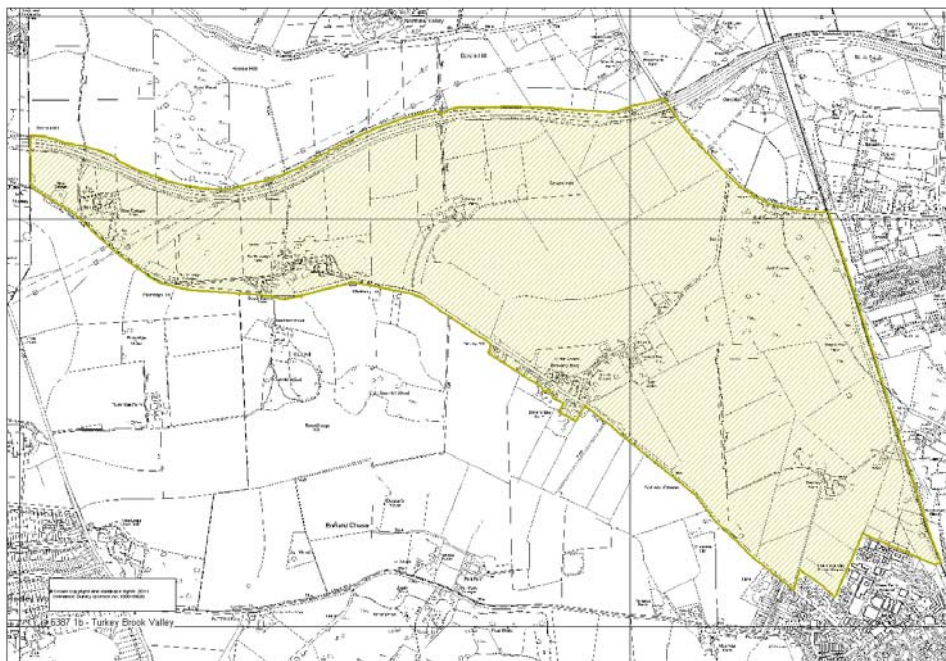
4.13 The Turkey Brook Valley is an area of open agricultural land with undulating topography. The area is characterised by large geometric field patterns most of which date back to the 1803 Enclosure Acts. Hedges are typically clipped, dominated by hawthorn with scattered hedgerow trees. The landscape is generally well maintained and regular farming activities provide seasonal variations in the appearance of the landscape. The area drops away to the north from the Ridgeway and is drained by the Turkey Brook and its tributary Holyhill Brook.

4.14 Although there are some Rights of Way crossing the area and way-markings indicating the London Loop and the Chain Walk, there is little settlement here other than the hamlet of Botany Bay and occasional scattered farms. Botany Bay is a relatively recent settlement established after the enclosure of Enfield Chase in 1777.

4.15 Protected Characteristic traits: Large geometric fields mainly arable, some pastures on eastern edge | Undulating landscape drained by Turkey Brook and its tributary Holyhill Brook | Secluded area with few roads or public rights of way | Mature, well-managed hedgerows with intermittent mature hedgerow trees (mainly oak) | The Red House – large and prominent private dwelling | St John’s senior school | The Ridgeway Water tower (built 1913 -14) | Botany Bay – small linear settlement | Crews Hill Golf course

4.16 Main Issues:

- Despite its proximity to the urban edge, the area has a strong rural character with a well maintained landscape; and
- Opportunities should be sought for increasing the accessibility of the countryside for the Borough’s residents into the Hertfordshire countryside.



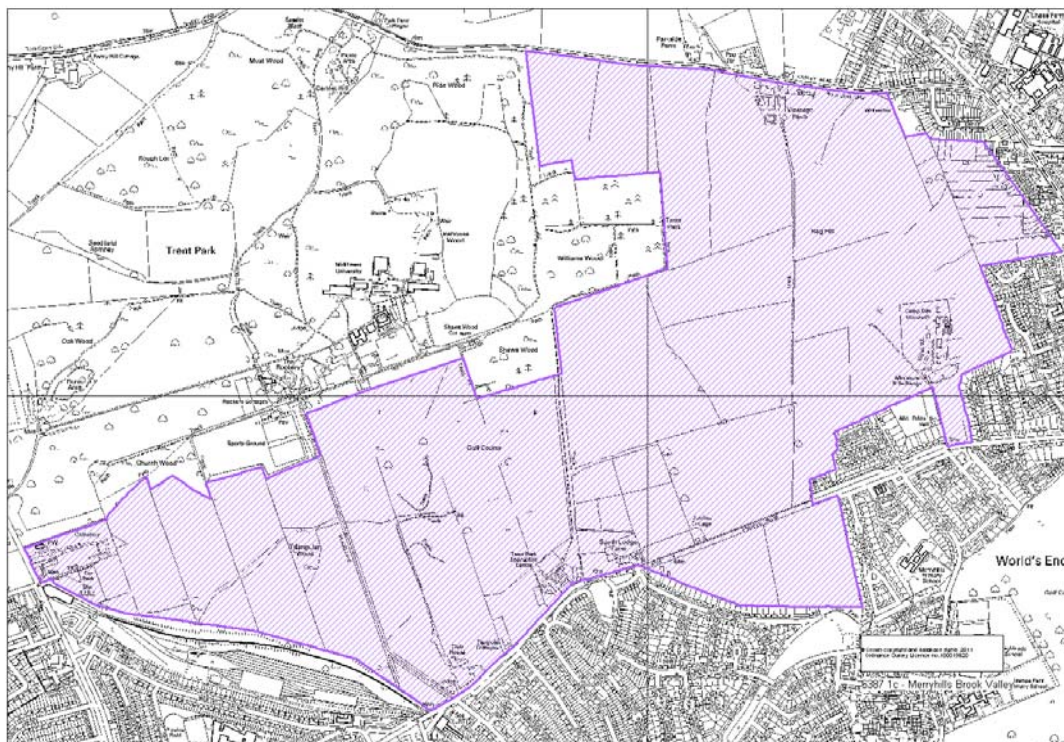
4.17 Merryhills Brook Valley

The Merryhills Brook Valley is a landscape of undulating fields and the Trent Park Golf Course. Hog Hill forms the highest point on the east side (60m AOD). The field pattern is geometric with large arable fields. Most of the fields are enclosed with mature hedgerows (mainly oak). Snakes Lane passes through the centre of the area and is lined by a fine avenue of mature oak trees which form a key site feature. The area is immediately adjacent to World's End and in many places there is a clear and well-defined boundary between the urban edge and the open countryside. The south-eastern and southern edge is strongly formed by the Cockfosters sidings Enfield Road and the rear boundaries to properties on Lowther Drive and Cotswold Way. Two fields extending to the south side of Enfield Road (near Boxer's Lake) perform an important function of extending the Green Belt up to the urban edge and creating a separation between Slades Hill (World's End) and Oakwood. This forms an important and valuable connection passing through the Green Belt.

4.18 Protected Characteristic traits: Undulating landscape drained by Merryhills | Brook and Leeging Beech Gutter | Geometric fields enclosed with hedgerows | Large arable fields to the east | Small pastoral fields to the west | Mature vegetation lining watercourses | Trent Park Golf course | Avenue of oak trees lining Snakes Lane | Trent Park cemetery

4.19 Main Issues:

- Further inappropriate development is likely to prejudice the future character of this area at the urban edge.



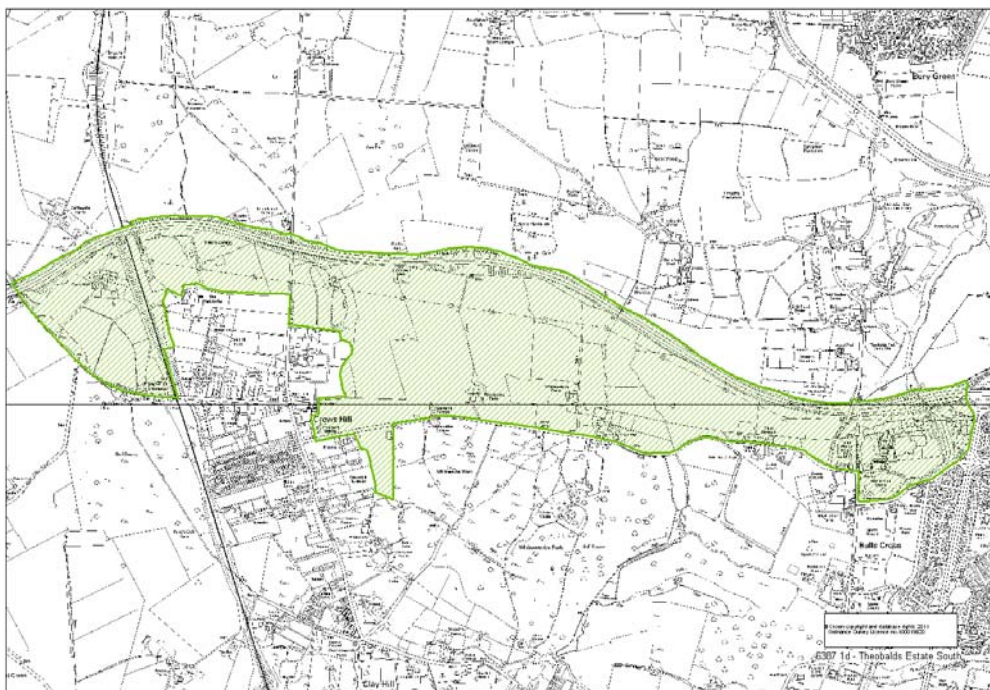
Theobolds Estate South

4.20 The Theobolds Estate is a large landscape character area which is identified in the Landscape Character Assessment for Southern Hertfordshire (HCC, 2000). It comprises the area which was formerly a hunting park known as Theobolds Park. The Park was created by James I and was attached to Theobolds Manor (which became a Royal Palace in 1604). In 1650, the park is recorded as covering 2,508 acres, containing 15,608 trees. After the execution of Charles I the estate passed into the hands of Parliament and the palace was demolished and the parkland deforested. The area was converted to a landscape of arable farmland and discrete woodland blocks. This general field and woodland pattern remains today albeit with the major intrusion of the M25 which severs this historic landscape in two.

4.21 Protected Characteristic traits: Gently undulating landform | Estate farmland | Geometric field pattern | Small woodlands | Mansions (e.g. Capel House) and isolated farms (e.g. Whitewebbs farm and Owls Hall Farm) | Low hedgerows | Owls Hall Farm and parkland.

4.22 Main Issues:

- Important historical landscape and connects with the Hertfordshire countryside to the north;
- Conversion of arable land to horse grazing, use of barbed wire fencing for boundaries, poor hedgerow management and abandonment of agricultural vehicles has had a detrimental effect on the quality of the landscapes in some places; and
- The two footpath routes (Burnt Farm Ride and PROW no.8) require protection and management.



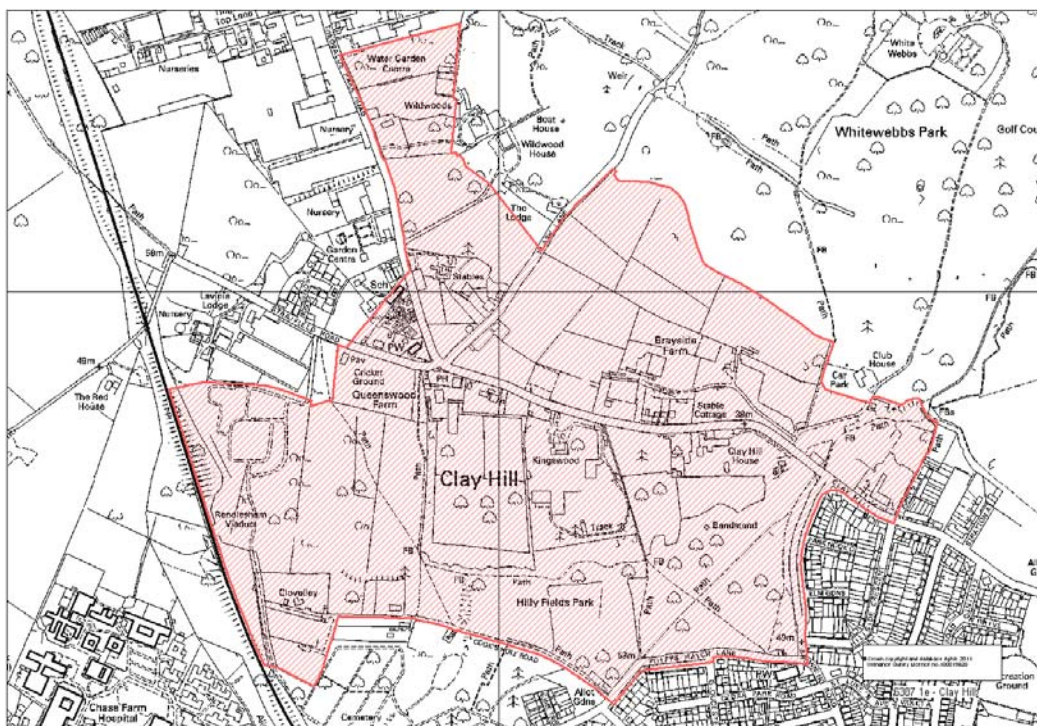
Clay Hill

4.23 The Clay Hill character area comprises an area of parkland and rural landscape with the small dispersed settlement of Clay Hill in the centre running along the ridge line. The village of Clay Hill is small comprising a mix of mainly large detached properties set back from the road in large private gardens often with high boundary walls. The village also includes two public houses (the Rose and Crown and the Fallow Buck) and the parish church of St John the Baptist and its associated primary school. The Rose and Crown is the older of the two pubs and is of local historic importance. It dates back to 1700 and was once owned by Dick Turpin's grandparents (it is also said that Dick Turpin used to use the pub as a hide-out). The church was built in 1858 originally as a chapel and is sited at a prominent site on the junction of Strayfield Road and Clay Hill road and forms a local landmark.

4.24 Protected Characteristic traits: M25 embankments | waymarked routes connecting under M25 to countryside to the north | St John the Baptist parish church (1858) | Hillyfields Park | London Loop waymarked path | Strayfields Road | Rose and Crown pub and the Fallow Buck pub

4.25 Main Issues:

- Area of particular vulnerability to development pressures due to its proximity to the urban fringe; and
- The area around the parish church, Fallow Buck pub and the southern end of Strayfield Road is the natural focus of the village and future village public realm improvements should be focused here to create an improved village centre.

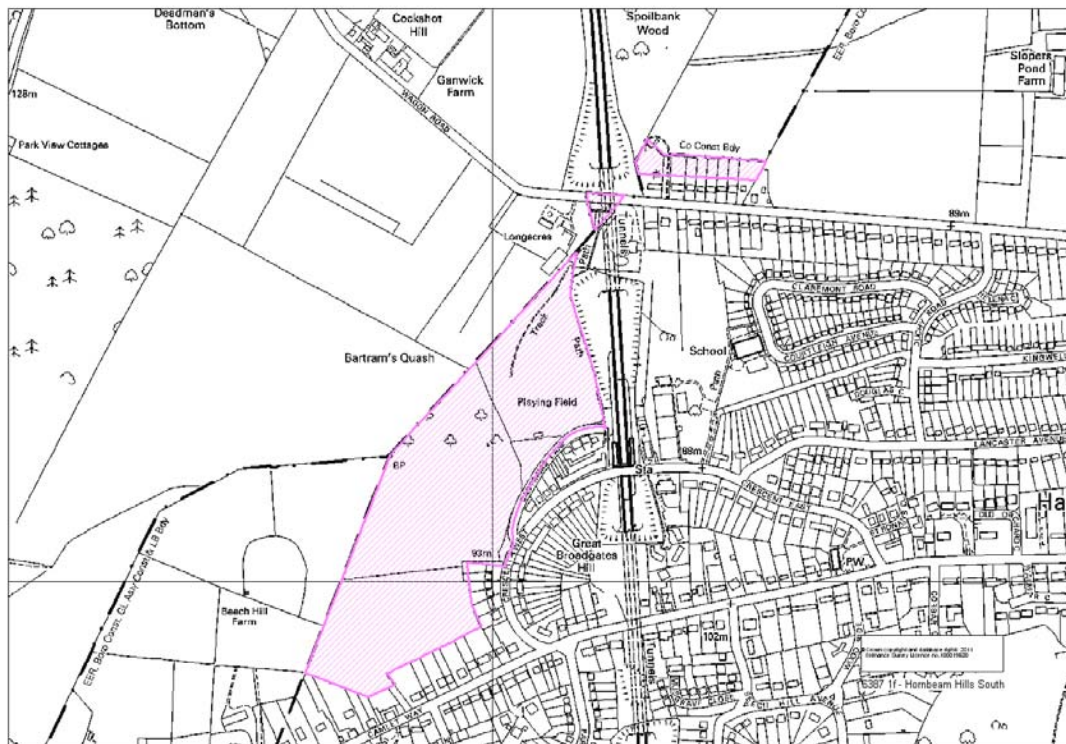


Hornbeam Hills South

4.26 The Hornbeam Hills South Character area is the south eastern corner of a larger landscape character area identified in the Landscape Character Assessment for Southern Hertfordshire (HCC,2000) The area has a strong undulating arable landscape with a geometric pattern of large fields. This area is similar to the wider area to the west and is an attractive landscape of agricultural land with long distance views to the woods of Wrotham Park to the west. The character area is part of a larger area of significant Green Belt which separates Potters Bar from Hadley Wood.

4.27 Protected Characteristic traits: Sloping valley landforms | Geometric field pattern | Mainline railway in cutting/tunnel | Potters Bar and M25 to North West | Limited rights of way.

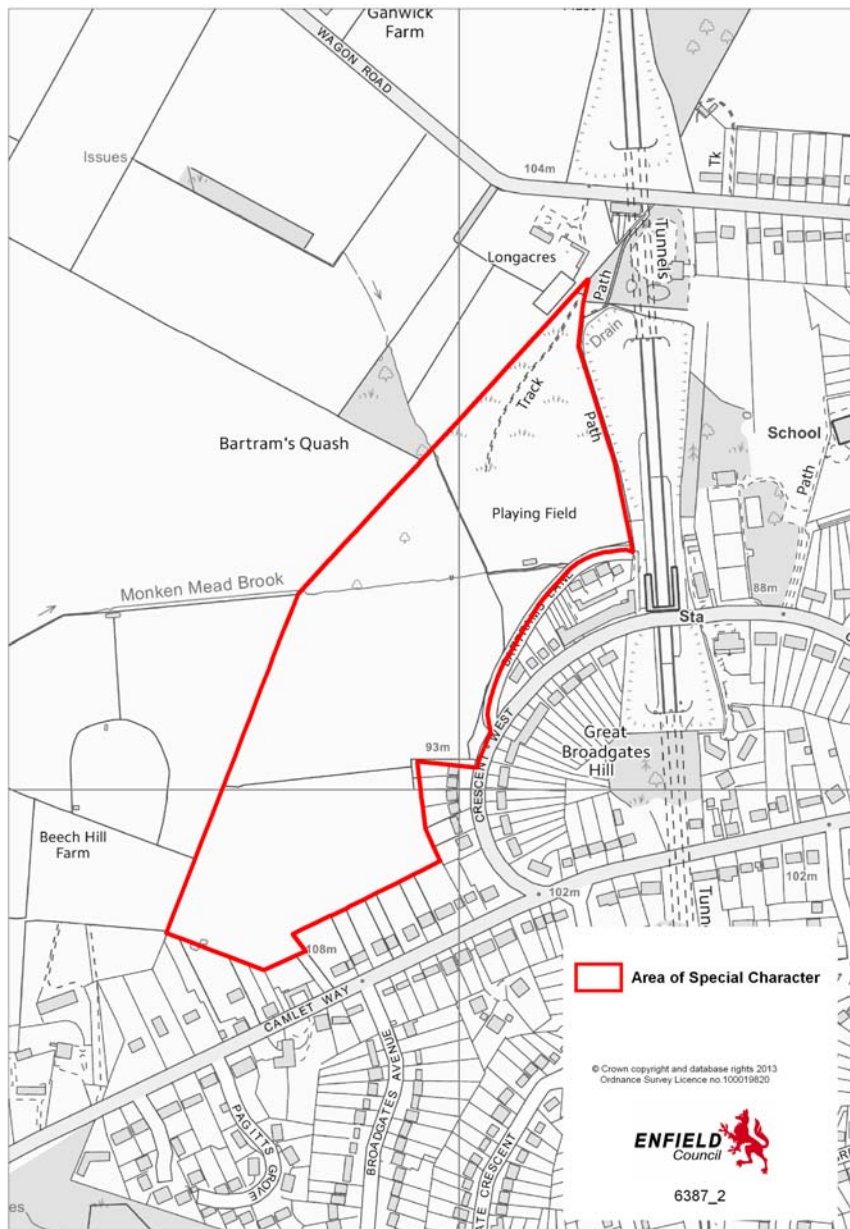
4.28 Map of Hornbeam Hills South ASOC – subject to consultation through the Draft DMD (May-August 2012)



Hornbeam Hills South Review Amendment

4.29 Following public consultation on the Draft Development Management (May-August 2012) it is proposed that the rear gardens of the properties along Waggon Road are excluded from the ASOC designation to provide consistency with the realigned Green Belt Boundary.

REVISED AREA OF SPECIAL CHARACTER



Enfield Chase/Trent Park

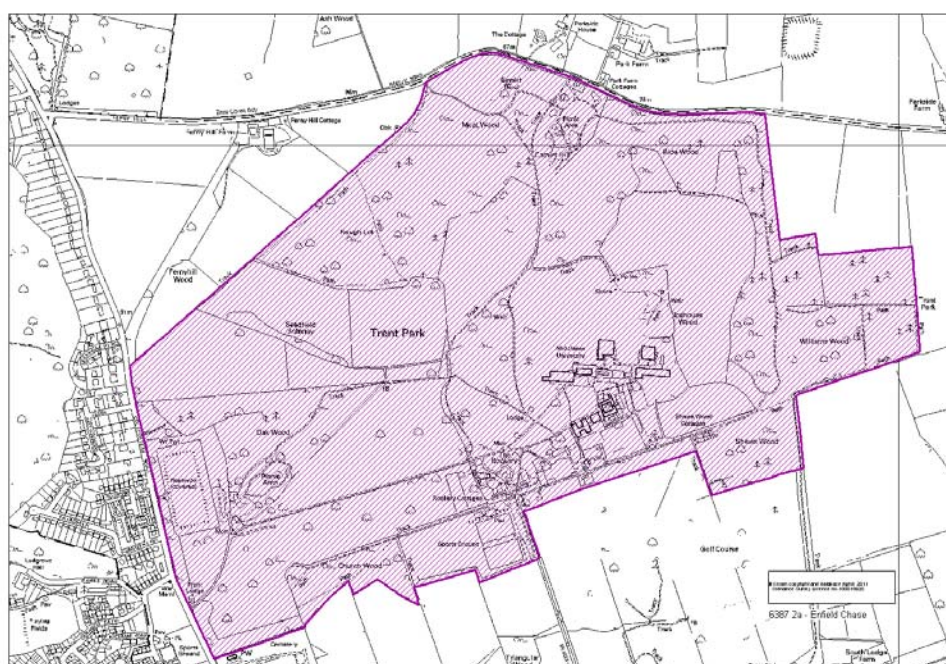
4.30 The Enfield Chase/ Trent Park character area is an area of undulating woodland and parkland containing Trent Country Park and part of Middlesex University. In the medieval times, Trent Park was part of Enfield Chase. A registered Historic Park formally part of the royal hunting forest. Camlet Moat on the northern side of the Park (now a Scheduled Ancient Monument) is believed to be the site of the medieval manor house but other than this, the area was uninhabited until the construction of the main mansion in its current location in the 1770's.

4.31 In 1947 a teacher training college was established and this gradually extended becoming Middlesex Polytechnic in 1974 and Middlesex University in 1992. The campus derives its current character from the historic mansion and formal landscape features, its spectacular landscape setting and the twentieth century buildings and infrastructure of the university. The mansion was well-sited originally to enjoy the fine views to the north over the parkland and these remain today with the ornamental lakes forming a focus in the centre of the view and the obelisk viewed in the distance beyond.

4.32 Protected Characteristic traits: Undulating landform | Mixed deciduous woodland | Pockets of arable farmland and grazing land | Network of public rights of way and informal footpaths | Trent Park mansion | Obelisk | Ornamental lakes | University campus buildings

4.33 Main Issues:

- A complex range of landscape, historic, ecological and recreation issues; and
- Progressive expansion of the university campus has put pressure on the site and has eroded the important historical character of the area.



Whitewebbs Park and Forty Hall

4.44 The Whitewebbs Park and Forty Hall character area is an area of undulating woodland, parkland and pockets of open fields drained by a criss-cross of watercourses. The area incorporates Whitewebbs Country Park and the historic gardens and parklands of Forty Hall and Myddleton House and much of it is publicly accessible open space. Each area has its own unique character and distinct identity but the boundaries between them are blurred and the area can be experienced as a single area.

4.45 Whitewebbs Park is the largest of the three areas and comprises a large area of woodland and an 18-hole public golf course. Most of the woodland is ancient or Semi-Natural woodland with a few pockets of Ancient replanted woodland. It includes a number of features including two ornamental lakes, Whitewebbs House (a large eighteenth century house – now a Toby Carvery), a club house for the Whitewebbs golf club and substantial public car park areas.

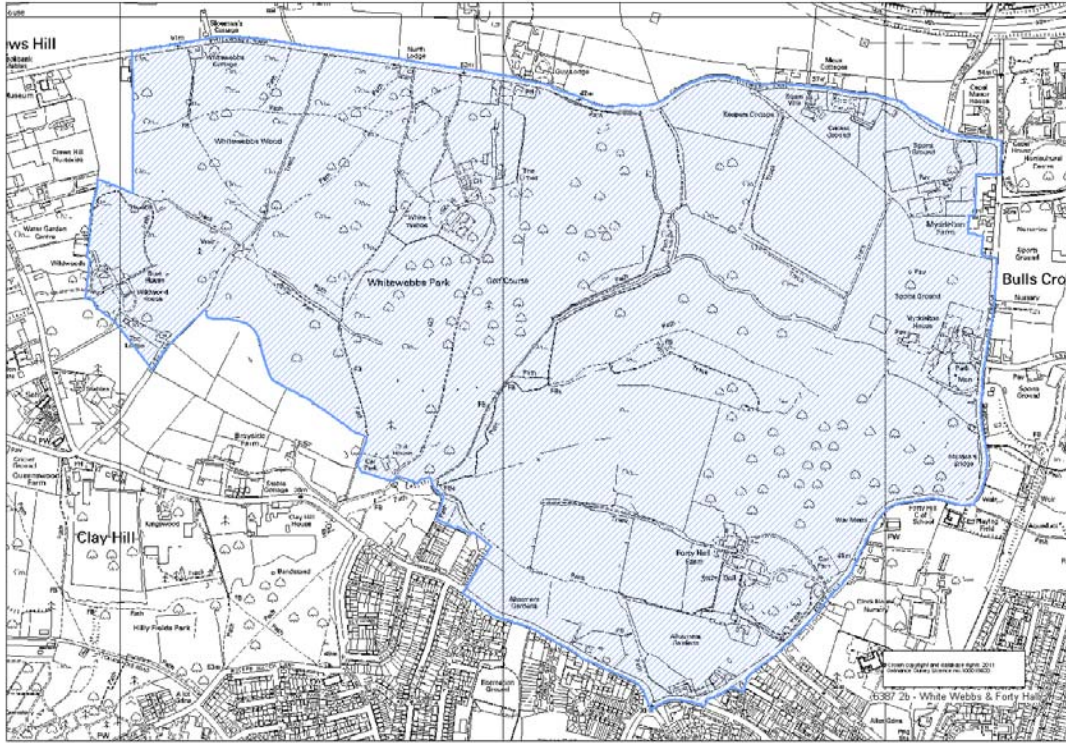
4.46 Forty Hall is an impressive historic designed landscape which acts as a gateway to the wider countryside beyond and allows views over the surrounding parkland and woodland landscape. The hall is a Grade I listed building built in 1629 and its 160 acre estate includes a working farm, fishing lake, parkland and woodland and a double lime avenue. The hall and its estate are an excellent example of a seventeenth century house in a designed landscape and are considered to be of outstanding national importance.

4.47 Myddleton House is smaller and more domestic in character than its neighbour Forty Hall but is also of historic importance. It is a large Regency house built in 1818 and set in gardens landscaped by E.A Bowles- the famous nineteenth century plantsman and includes a national collection of Iris plants. It is now used as offices for the Lee valley Regional Park Authority and the gardens are open to the public.

4.48 Protected Characteristic traits: Mature mixed species native woodlands | Network of small water courses including Turkey Brook, Cuffley Brook and New River (Old Course) | Network of waymarked routes, public rights of way and informal paths | Recreational activity hub including walking, cycling, riding and golf | Forty Hall and historic garden and parkland | Myddleton House and historic garden | Whitewebbs park golf course | Bulls Cross

4.49 Main Issues:

- This area plays a significant role in providing accessible countryside; and recreation for the urban areas of the borough. Progressive urbanisation of the landscape is weakening the qualities of this area.



The Lee Valley and Reservoirs

4.50 The Lee Valley and Reservoirs character area has a variety of uses and local areas of differing character. However, it is included as a single character area as it serves an important strategic body of open space for the borough providing recreation and wildlife. The Lee Valley is a single broad river valley which drains to the River Thames in the south. Its key features include King George V and William Girling reservoirs, the channel of the River Lee and the separate River Lee Navigation channel and pockets of marshland and open space. The Upper Lee Valley Landscape Strategy (2010) identifies two distinct sections of the Upper Lee Valley prevalent in Enfield:

- Forest and Green Belt – the area between the M25 and the southern edge of the King George V's reservoir characterised by the areas of farmland and woodland to the east and west; and
- Suburban Infrastructural – referred to as Central Leaside, this stretches from Banbury Reservoir in the south to the northern end of the William Girling Reservoir.

4.51 Protected Characteristic traits: King George V and William Girling (Chingford) Reservoirs | The River Lee and Lee Navigation | Marshland and Grassland | Lee Valley Leisure Centre | large scale industrial buildings | Mature Willows and Poplars lining the canal | Gunpowder Park | Enfield Island Village

4.52 Main Issues:

- Major asset although remain difficult to access; and
- Area around Rammey Marsh is of poor visual quality. Enhanced landscaped measures would greatly improve the noise and visual impacts of the M25 and surrounding roads.

