



Green Belt for the Community

Response to LBE consultation Draft Enfield Local Plan 2039

Main issues and preferred approaches

June 2021

<https://new.enfield.gov.uk/services/planning/draft-new-local-plan/>

1. INTRODUCTION

This is a response from the Friends of Trent Country Park, a community group dedicated to the continued preservation and enhancement of the park. We are a membership group with approximately 300 current supporters and an active social media presence. Our main goals are to:

- ensure that Trent Country Park is enjoyed by present and future generations
- work in partnership with Enfield Council to improve the appearance of Trent Country Park and to ensure that facilities and safety in the park meet the needs of users
- propose and facilitate projects which promote and improve the environment in the park and
- co-operate with the Trent Park Conservation Committee to ensure that the Green Belt and Conservation Areas are maintained.

This is our formal response to the Enfield's draft Local Plan 2039 under section 18 regulations which we will follow up at later stages of the process.

As a group concerned with the preservation of protected greenspace, we have concerns about several of the policies contained in the Plan that relate to the removal of areas of the Green Belt for development. We believe that the Green Belt is too important to lose because of the many benefits it provides towards health and well-being, environmental purposes such as controlling flooding, maintaining biodiversity and, in particular, helping to fight climate change, providing local food and local jobs, and diverse other benefits.

We dispute the argument that brownfield sites are being maximised and maintain that an alternative approach to meeting housing need would better serve the needs of Enfield's residents. Rather than promote sprawling executive homes in rural locations that use land inefficiently and increase car-dependency, the Plan should facilitate affordable homes on brownfield sites in areas that would benefit from regeneration. We refer you to the submissions of other groups such as Better Homes Enfield who are highlighting missed opportunities for brownfield regeneration in more detail. Overall there should be a greater emphasis on more low-rise family houses and medium rise (4 to 8 storey) flats on those brownfield sites. What Enfield needs are affordable homes in areas with existing public services and good transport links – Enfield homes for Enfield people - not Green Belt developments that most local people cannot afford.

2. CONTESTED POLICIES - STRATEGIC POLICY PL10: CHASE PARK



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This policy concerns us the most. The targeted land is the finest countryside in the borough and strategically important Green Belt. The Green Belt Assessment commissioned by LBE states that release of much of this land would cause major harm to adjacent Green Belt, which would include Trent Country Park.

The land makes an important contribution to the setting of Trent Country Park Registered Historic Park. Both the park and Vicarage Farm are remaining parts of historic Enfield Chase. There is compelling evidence that Enfield Chase is of not just local historic importance but also of national importance. Dr John Langton, Emeritus Professor St John's College, Oxford writes that *"Enfield is the only surviving example of a chase, within which rights to game and over vegetation varied slightly from those in forests. Thus, Enfield possesses an extremely rare and very valuable landscape asset"*.



Development up to the border of Trent Country Park [even with the proposed strip extension] would undermine the park's historic setting in the rural countryside.

We are also concerned about the impact on the environmental integrity of the park. Although designated as a Country Park, the richness of the various habitats has declined as human activity has increased throughout the park, especially over the pandemic. The fragile ecosystems cannot cope with the existing human pressure and the proposed development adjacent to the park adding thousands more users would exacerbate the situation. Wildlife has suffered from unrestricted access to habitats by people and dogs and by insensitive land management caused by the apparent lack of resources to follow the nature conservation measures outlined in the Habitat Survey produced by the Friends in 2017.

With Trent Country Park under pressure from increased use, Vicarage Farm's undisturbed natural habitats become ever more important as havens of biodiversity. Biodiversity on Vicarage Farm has



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received extensive, long term, and fully documented observation. The records reveal the farm to be biodiversity rich and thus ecologically important. It is a strategic oasis for exhausted migrant birds and supports a wide range of threatened nationally declining farmland species. Sensitive wildlife can survive only in quiet undisturbed areas free from human pressure. Developers' arguments that threatened species can go "elsewhere" are self-serving and untrue. "Elsewhere" is also under threat in the Plan and offsetting can never mitigate the loss of irreplaceable priority habitats lying within a non-recreatable historic setting. Enfield has a legal responsibility to preserve Biodiversity.

Development of Vicarage Farm would also destroy the amenity value of The Merryhills Way (a popular Public Right of Way from the Ridgeway to Trent Country Park) which would be transformed from a unique countryside experience to a walk along an urban path between buildings. The Merryhills Way currently provides an outdoor opportunity for residents living in an area of deficiency in access to nature, Highlands Ward being one of only two with no park. The Enfield Society survey provides evidence of the number of users and the variety of activities on the Merryhills Way.

Far from being 'deeply green' and a 'sustainable urban extension' as described in the plan, the proposed development would see infrastructure replacing farmland that sustains a wide range of resident and migrating birds and insects, in addition to other fauna and flora. The farmland, it should be noted, was actively farmed until only a few years ago, most recently growing rapeseed, and could again contribute to Enfield's local food and local jobs – and in so doing help to mitigate climate change. We refer you to the recent report *The Good Life and Low Carbon Living* by Professor Jules Pretty in which eating local food is shown to have a greater impact on an individual's annual carbon footprint than planting ten trees.

The proposed development would also cause a large increase in traffic and related congestion, especially at Oakwood and at the Slades Hill/Windmill Hill junction, bringing pollution.

3. CONTESTED POLICIES – POLICY DEG: TALL BUILDINGS

We include this policy for two reasons. Firstly, because tall buildings are being played off against the Green Belt in plan documents and information sessions. We dispute the contention that it is necessary to either build up or to build further out or that inappropriate tall buildings will spring up if the proposed plan does not pass. The Council decides where tall buildings may be built and how high they can be. The Council also admits that alternative building forms, such as lower-rise mansion blocks, can achieve a similar number of homes as tower blocks. *7.6.4 For instance, mansion blocks, terraces or stacked maisonettes can achieve the same number of homes or floor space*



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without excess height. These buildings can offer advantages in terms of better amenity and less costly maintenance. Secondly, with respect to Trent Country Park and the Conservation Area, locations proposed for tall buildings would impact the historic rural setting of the park and impact protected views.

4. OTHER CONTESTED POLICIES

We also have serious concerns about other proposals, in particular the following policies:

- *Strategic Policy SS1: The Spatial Strategy.* This policy protects Strategic Industrial Land at the cost of Enfield's Green Belt and historic landscapes such as Enfield Chase which are integral to the history and character of the borough. We believe Medium Growth Option 2 better serves the needs and future of the borough and that the pros and cons have been manipulated to produce the result favoured by the Council. We also 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.
- *Strategic Policy PL8: Rural Enfield – leading destination in the London National Park City.* This policy justifies the loss of large parts of the most beautiful and strategically important Green Belt countryside by proposing 'improvements' elsewhere on the Green Belt paid for by development. The improvements would make marginal difference to the rural area, would remove local commercial food-growing as a viable option and would fail to compensate for the Major Harm inflicted by development on the targeted Green Belt sites. We believe that the policy misappropriates and misrepresents the 'National Park City' concept to justify dedesignation of Green Belt and harmful development. The 'rewilding' of Enfield Chase ignores the fact that the Green Belt areas targeted for development are equally parts of historic Enfield Chase and are irreplaceable. While improving access to the countryside is a laudable goal, this policy appears to treat Enfield's Green Belt as a countryside theme park, rather than a functional eco-system, with a patchwork of habitats that are vital for wildlife and the potential to once again provide local food for local people.
- *Strategic Policy PL9: Crews Hill.* The proposed large-scale development in this area – described as a 'gateway settlement' is in effect sprawl. Despite the station, most travel would be car-dependent rendering it an unsustainable proposal. The added traffic would result in severe congestion at Botany Bay, Bulls Cross and Clay Hill and would severely harm



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the rural character of Whitewebbs Lane, East Lodge Lane and the Conservation Areas at Forty Hill and Clay Hill. Development of Crews Hill Golf Course – a successful golf club with a noted historic course - would spoil a popular Public Right of Way with far-reaching views across Enfield Chase. Despite nominal attention to ‘food-growing areas’ development at Crews Hill would remove another opportunity to grow local food for local people. It would also displace many small and large businesses, some supporting multiple generations, and overall employing a large number of people.

- SA54 (Land East of Junction 24) Industrial development here would ruin the green gateway to Enfield Chase, and traffic implications on the A1005 and A111 would be hard to mitigate.
- SA 45 (Land Between Camlet Way and Crescent Way, Hadley Wood) would bring sprawl into attractive open countryside.
- *Strategic Policy BG3: Biodiversity Net Gain, rewilding and offsetting.* We are concerned that this policy is being used to justify development that would be highly damaging to the environment. There are irreplaceable priority habitats within Enfield Chase lying within a non-recreatable historic setting. Development would destroy or fragment these important assets. No amount of developer contributions to ‘rewilding’ or offsetting can compensate for damage to these aspects of the countryside.

7. CONCLUSION

The Friends of Trent Country Park welcome the opportunity to comment on the Local Plan. We support the need for additional housing, especially for those on the housing list, and we applaud attempts to create a greener more sustainable Borough for all residents. However, we believe that the Council’s preferred option would be a disaster for Enfield’s residents, now and in the future. Despite the rhetoric, there are alternatives to building on the Green Belt, which is a community asset valued by residents all over the borough. The Green Belt provides benefits for everyone and will play an increasingly important role as we face more environmental and other challenges in the years ahead.

We are disappointed that the draft plan presents unnecessary stark choices between building on the Green Belt or skyscrapers, building on the Green Belt or rampant uncontrolled development, building on the Green Belt or government control. Instead it should present a creative vision for a borough that is made greener, cleaner and healthier for all residents by embracing and working with nature and the environment. This is no longer a luxury but an absolute necessity given the possible



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calamity of climate change. The vision should start with protecting and improving the environment including all the borough's existing green spaces, such as Trent Country Park, and then employ creative green solutions to meet housing, employment,, health and other needs.

By making the correct decisions now, Enfield can be a model for other local authorities and somewhere our children's children will be proud to live. That will not be the case if the Green Belt is developed.