

Enfield Draft Local Plan 2019-2039 Regulation 18 consultation

As a resident of Enfield my objections to the above plan are put forward below.
 I plan to apply to make representation at the Planning Inspectorate in late 2022.
 To the best of my lay ability, my comments represent my understanding of the various Plans
 and Reports submitted for the above project.

1. Enfield Council's Proposed Plan is Contradictory.

While attempting to address housing needs in line with the Mayor's annual quota, the Enfield Council's plan to build approx. 6,000 homes on Green Belt land at Vicarage Farm and Crews Hill Golf Course contravenes government manifesto commitment set out in the National Planning Policy Framework. For example, see Council contradictions inherent in "Spatial Development Strategy for Greater London" AND "Green Infrastructure and Natural Environment" (Chp.8). Mayor Sadiq Khan's statements that "he can deliver 66,000 new homes a year and *without impinging on the Green Belt*" (*OnLondon* 6/11/2019) has been flouted by Enfield Council in proposing housing developments *on the Green Belt*.

Local Plan statement (2.k) contradicts the National Planning Policy Framework, the Spatial Development Strategy for Greater London, and Green Infrastructure and Natural Environment.

Local Plan statement (2.l) is an unveiled threat; it casts doubt on its own Planning Permission and legal process as being at the mercy of developers, and as lacking in transparency regarding developers building "anywhere, including all over our Green Belt". It is well-known that Comer Bros. (billionaire property developers) have already approached Council to build upwards of 3000-5000 units specifically on Green Belt at the Vicarage Road site. Green Belt is not under Council 'protection' if Council is already in discussion with Developers.

2. Underutilisation of Brownfields.

Enfield Council's Local Plan contravenes "Green Infrastructure and Natural Environment" (Chp.8): where Council is encouraged to reuse "London's previously developed brownfield land" (G2 A2) . The Report, "The Whole Plan and CIL Viability"

(Table 9.1, p. 122) lists: 74 brownfield sites; 115.40 ha; 22.31% land use. (Refer also to “Space to Build, Enfield” Jan 2019 for located sites).

Council has a moral obligation to investigate all such brownfield sites and Previously Developed Land (PDL) before seeking to impinge on the health and wellbeing of its community, as stated in its own Plan (2.h). Utilising brownfields, which will “benefit from regeneration and investment” alleviates Council’s direct contravention of London Mayor’s climate change action plan to make London “at least 50% green by 2050” [8.4.3].

3. Enfield Council’s Proposed Plan is Short-sighted and demonstrates 19th c Industrial thinking:

London is finite. Although Southwark Council leader Peter John is no friend of Enfield’s Green Belt, he recognises that London can’t solve London’s housing problem stating “We have to see this as a wider south east problem” (Charles Wright, *OnLondon* 6/11/2019). Neither then, can Enfield Council solve the housing problem in the manner proposed. Enfield’s carrying capacity is also finite. Consideration needs to be given to the total population density that can be achieved while maintaining a standard of healthy living (mental and physical) for its constituents.

Furthermore, the Planning Report indicates that Council proposes a building density of 40 units per ha on Green Site 1 whereas the typical number is 30 units per ha (9.10; 9.11 p. 123). Clearly this is an attempt to increase the “Residual Value” of Green Sites #1 and 2, resulting in decreased air quality for the entire community. Lowering of liveable standards through densification or as an attempt to appease inverse logic and Ward envy (Re: Councillor Nesil Caliskan on Edmonton, 10 June) is a no-win situation for human and non-human habitation. As islands, green spaces reduce urban heat, a necessity in an increasingly heated world. The community is facing urban desertification. See: “Planning Report 2021” 8.37 (biodiversity net gain); and 8.38 (enhance wildlife habitats).

Should Council be disinclined to heed the warnings in Policy G2 A1 (“development proposals that would harm the Green Belt should be refused” [and] “The extension of the Green Belt will be supported, where appropriate. Its de-designation will not”) or should Council be disinclined to heed the IPCC findings on climate change (or their

party's concern for local and global communities, in warning that "the challenges of climate change, poor air quality and deficiencies in green space need to be tackled now" (8.5.3)), Council cannot still, in all conscience, believe that constructing housing estates on Green Belt represents progress in the 21st c in light of climate emergency. Neither do its proposed actions aid in species habitat creation, or help "flood storage." Such an act, however, will succeed (against its own party's advisement during a global human/nature crisis) in eliminating Green Space. Permanently.