

I write as a local Enfield resident, in response to the Council's current Regulation 18 Consultation on the proposed Draft Local Plan.

Firstly, let me set out that I support sustainable development, growth and increased density in Enfield, provided that it is well designed, accessible and provides high quality places for people to live, work and enjoy. I recognise the housing crisis and the need for significant new housing and agree that affordable housing should be a priority.

However, there are several policies in the draft plan which are deeply concerning and would leave a damaging legacy for the future of the borough. I set out my response in detail below.

Greenbelt preservation

I am opposed to Enfield council's plans to release Green Belt sites for development in the draft local plan. This will have a devastating impact on Enfield's communities and environment and would set a dangerous precedent for further erosion of not just Enfield's green space, but green belt across London and the Country. The policy justification tests for the release of green belt in Enfield have not been met and there are a number of alternative ways in which Enfield Council can meet its growth requirements without causing this destructive and irreversible damage. The greenbelt, once gone will be gone forever.

The National Planning Policy Framework states that the 'The essential characteristics of greenbelts are their openness and their permanence.' It provides the breathing space between developed areas and conurbations. By law, Green Belt is there to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns from merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In short, Greenbelt is there to protect our communities from exactly the type of development which the draft local plan is proposing.

The greenbelt sites in scope continue to meet these national set principles for a greenbelt designation as set out in national policy. As far as I'm aware, these circumstances have not changed.

In addition, the importance and community value of Enfield's greenbelt and open spaces has never been greater. Enfield's Greenbelt has provided sanctity for many during the covid-19 lockdowns, with many people discovering the greenbelt in their area for the first time and coming from all over the borough to walk with their families in open space and nature. It has proved its vital importance to the mental health and wellbeing of our communities as well as the important role it plays in air quality, biodiversity and tackling the climate crisis.

In addition, the Greenhouse uses at Crews Hill provide an important and much-loved resource in keeping with the rural setting and legacy for growing and agriculture. Other areas provide a break from built development and spaces for nature to thrive.

The NPPF states that once established Greenbelt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. There are political references to 4,500 residents on the housing needs register and high housing costs I don't dispute as vitally important issues. I am aware that there are many other constraints such as conservation considerations and flood risk and mitigation. However, I do not see how these are different from any other London borough or how they would amount to exceptional circumstances.

The Council has failed to adequately or transparently set out the case for exceptional circumstances with full evidence and justification. This fundamental policy test has not been met. Therefore, the Council's spatial and Strategic Policy SP SS1, which underpins the whole draft plan, is unsound.

It is my view that the planning authority should change course on these highly damaging and plans to release greenbelt for development.

Alternative options

Before concluding that exceptional circumstances exist to justify changes to the greenbelt, the planning authority needs to demonstrate that it has fully examined all other reasonable options for meeting its identified need for development.

As it stands, the council has not adequately explored brownfield options or effectively applied all available tools to increase the capacity and availability of brownfield sites.

Examination of the evidence base and handling of earlier stages of consultation imply that the Council has been biased towards the release of Green Belt from the outset. If released, it is 'quick fix' for a Council that isn't meeting its housing targets. Developers will race to develop profitable green belt land, it will be lost forever and the more complex and challenging brownfield sites, where investment is most needed to address inequalities, will stagnate. However, it is a principle of a green belt designation to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. It is the Council's duty, to exhaust brownfield options before green belt release is even considered.

The selection of Medium Growth Option 1, in the table at 2.2, which favours Green Belt release over and above limited SIL release, is misleading and deeply flawed.

Enfield has huge swathes of industrial land. I acknowledge that much of this land is covered by Strategic Industrial Land (SIL) or Locally Significant Industrial sites (LSIS) designations and I also appreciate the important role that industry and logistics in this area play in supporting London's economy and providing jobs. However, there is significant land that is low-density or under used. Enfield Council should revise its appraisal of the potential to accommodate intensification in these areas.

The Mayor of London responded to the council's last consultation and expressed concerns about proposals for loss of Green Belt. Enfield Council needs to be in dialogue with the mayor about significant intensification of industry in suitable parts of the SIL, that could preserve or even increase jobs and industrial capacity and that could then allow for the controlled release of a proportion of SIL or LSIS for mixed use development and housing. There are many innovative typologies that could be applied.

A further clear alternative is for the Council to accelerate the development at Meridian Water, which is directly within the Council's gift and control. I don't doubt that delivery at Meridian Water is

complex, but the Council should not be considering release of Green Belt in this plan, when it could invest in overcoming the barriers and delivering this scheme in full within the plan period. Acceleration of Meridian Water and the controlled release of the limited adjacent industrial site could meet the Council's housing requirement, without the need for Green Belt release. Plus, this would have the added benefits of being located where infrastructure is being provided and where investment is most needed by the local community.

Other alternatives, such as increased density in Brimsdown and other suitable Town Centre and accessible locations should also be revisited before Green Belt release is even considered. The Council should also be looking at use of its CPO powers to facilitate development of derelict or underutilised brownfield sites that could increase housing land availability. It should be working closely with credible developers to overcome barriers and get quality homes build on brownfield site.

As it stands, the Council has not adequately explored the brownfield options, the evidence based it has utilised to inform a decision on a preferred option is technically flawed and inadequate. For this reason, once again, the plan is unsound.

Housing targets

Whilst I do not dispute that significant additional housing is required in the borough, I query the soundness of the methodology that has been utilised to derive the housing target.

In respect of the Housing Needs Assessment, it is unclear whether the more recent impacts of Brexit and the pandemic and their ongoing implications have been considered in the trajectory or indeed other wider considerations.

In respect of the Strategic Housing Land Availability Assessment, as outline above, this should be re-run with a greater emphasis on unlocking brownfield sites. I note that the SHLAA only outlines a capacity of 14,265 deliverable and developable sites within the plan period. I further note that a capacity of 12,004 dwellings is estimated as being 'potentially developable' within greenbelt, 4,809 estimated as being potentially developable within Strategic Industrial Land and a further 7,366 at sites without Green Belt or SIL designation.

This raises a serious concern that the protection offered by a green belt designation has not been given appropriate weight in the council's assessment of strategic housing land availability. It also indicates that the Council has relied on developing an evidence base that promotes Green Belt release, rather than focusing on brownfield and potential other alternatives.

The housing target number and evidence base is in my opinion flawed. Furthermore, it is the Council's responsibility to review the availability of the 7,366 at additional capacity sites without Greenbelt or SIL designations.

Public consultation and participation

The public consultation process so far to reach this version of the plan has not been transparent or robust. I along with many others took the time to respond to the previous round of consultation held at the end of 2018. The consultation material at this point, suggested that the Council already had a bias in favour of greenbelt release. The consultation statement, which was not produced until May 2021 (over two years after the consultation closed), highlights that there were 1,712 responses received. However, it then grossly over generalises the consultation feedback. I quote:

- *Some respondents indicated that the need to deliver more affordable housing justified development in the Green Belt.*
- *Many respondents were against release of Green Belt land to meet development needs*
- *Many respondents expressed a preference for use of brownfield sites to meet the development needs of the Borough, with support for higher development densities. Other expressed a preference for lower density developments within urban areas.*
- *Many of the objections to potential development sites in the Green Belt were from those that lived in the immediate vicinity.*
- *Other respondents recognised the need to strike a balance between protecting the Green Belt and meeting future housing needs (in particular the need for more affordable housing)*

Enfield Council, please be transparent and tell us the numbers- how many of the 1,712 respondents indicated that development on Green Belt was justified? How many were against and how many supported brownfield sites? A quick glance through the responses, which can still be viewed on the consultation portal, demonstrates overwhelming challenge to building on green belt and nearly unanimous favour for alternative options. The summary is therefore entirely misleading.

There is also a huge volume of supporting evidence and reports without sufficient and unbiased summary, which makes it very difficult for the public to respond to the consultation.

A requirement of section 22 of the Town and Country Planning Act is for the provision of a summary of the consultation responses and a statement setting out how any representations have been taken into account.

So far, no such statement has been provided and I can see no evidence that the Council has taken into account the feedback from the previous consultation in developing its current draft local plan. The consultation responses are not referenced or addressed at all within the plan or represented within its content. This is a vital part of the evidence base and process of plan making, which has so far been entirely ignored.

Furthermore, there are a staggering 34,000 signatories to a change.org petition to preserve Enfield's Greenbelt. Yet still the Council and the draft plan have not acknowledged the views of citizens of Enfield.

I also note that for the 2018/19 consultation there were 6 drop-in sessions, the best attended of which was at the Civic Centre and was attended by over 100 people. Yet for this stage of consultation only 3 events were held, none of which were in the vicinity of Enfield Town or even the areas of Chase and Crews Hill that would be worst affected by the plan. Covid may be stated as a reason, but restrictions have lifted and online alternatives could have been offered.

There has been no attempt by the Council to engage the community in a meaningful and honest dialogue on the options, the evidence behind them and the trade off's involved. I do not see how a valid preferred option plan can be reached without this. For these reasons the plan and the consultation process are profoundly flawed.

Addressing inequality

I fully support the local plan's ambitions to address inequality. However, the strategy currently proposed would only result in worsening the inequalities of residents in the borough.

Firstly, in respect of building homes on Enfield's Green Belt, whilst this would increase overall housing supply, this would be in an area of the borough where house prices are at their highest. Most of the housing would be exclusive market housing for the wealthy. Despite the Council's policy ambition for 50% affordable housing (which I support), in practice the likely outcome is the value being skimmed by a few wealthy landowners, who will sell the sites on to developers at a premium, who will then utilise viability arguments to lower the affordable housing component to minimal levels.

The policy therefore amounts to a transfer of public benefit into the private hands of the privileged few and comes at a highly detrimental environmental and social cost.

The political arguments that this policy would address inequality are therefore completely falsified and misleading. How many people from the Council's housing needs register were re-homed in the recent Trent Park development?

If the Council is serious about its local plan addressing inequality, it should target investment directly in to the communities where need and inequalities are greatest. It should invest in social and physical infrastructure, education and support.

Sustainability and the London National Park City concept

If the Council persists with Green Belt release, all references to 'deeply green' and environmental and ecological sustainability should be removed from the plan. It is dishonest to decimate highly protected green belt with one hand and then to describe your policy objectives as 'deeply green' with the other. The climate emergency is our greatest threat. This should be prioritised in the plan.

I do not support the draft strategic policy SP PL8: Rural Enfield- a leading destination in London's National Park City. Firstly, it's a misappropriation of the National Park City concept. Secondly, it is a thinly veiled and misplaced attempt at compensating for the proposed green belt release. The loss of greenbelt cannot be offset in this way, it misses the point of what greenbelt is there to do.

I also challenge the desirability of creating a 'leading destination' in what is currently a largely tranquil area, particularly as this would attract additional car use, traffic congestion and air pollution. I do however, support plans for rewilding.

Strategic Policy SP PL1: Enfield Town

I support the development of a supplementary planning document to guide the development of Enfield Town. This should be subject to meaningful consultation with the community. I also support measures to improve the public realm and support the vitality of the High Street. However, greater emphasis should be given to reducing vehicle dominance and improving air quality.

Design quality

I support the development of high-quality buildings and public realm. I also support the development of a range of unit sizes including smaller units, mid and family sized homes. I support increased density including midrise blocks and taller buildings in suitable locations. If designed well, mid to high density development that is well appointed and includes balconies and generous open space and play space, can provide very good standards of accommodation.

However, Enfield does not have a good track record when it comes to design quality. The quality of the buildings and public realm developed recently at the Chase Farm Hospital site is poor. The record is even worse when it comes to tall buildings, the building behind Enfield Town Station is an unfortunate testament to this. I am encouraged to hear that Enfield is investing in its in-house design expertise and now has a design review panel. However, I would support more rigorous design policies, including greater requirements in relation to public realm, specific policy requirements for proposals that involve tall buildings and mechanisms by which developers can be held to account on design quality at both planning and implementation stage.

Conclusion

In summary, this plan amounts to a lose-lose for the community of Enfield.

The council should reconsider its course, drop the unsubstantiated release of Green Belt land for development and renew its efforts to target investment in brownfield sites, including industrial release. It should invest in the communities that are most in need and engage meaningfully and transparently with the community.