
Observations on the Draft Local Plan 2021 for The London Borough of Enfield.

1. The submission by The Enfield Society has my full support.
2. The submission by FERAA has my full support.
3. The submission by TPCC has my full support.
4. In addition I wish to make the following observations;-
 - 4.1 Ref. *Enfield Local Plan Integrated Impact Assessment. LUC Final Report June 2021*. The report mentions Enfield policies related to de-carbonisation of the borough in particular section 1.7. Nowhere in the documentation do they offer a tangible explanation of how covering a significant area of green belt, circa 30%, with concrete, tarmac and brick can compensate for the loss of natural de-carbonising space. The proposals for compensation are so minimal as to be risible. Enfield Borough is not an island and those green fingers of land reaching into the GLA conurbation and the Thames valley are import absorbers of atmospheric dust and planet warming gasses. Enfield Chase is one of the GLA's great green lungs; The Mayor of London confirms this, it needs the council's protection, every square meter of it.
 - 4.2 Section 1.3 dismisses development in the east of the borough with one sentence. *There are a number of environmental constraints to the east of the borough*. In the previous para 1.2 it concludes with *It (LBE) is also positioned within the London-Stansted-Cambridge Innovation Corridor*. The authors of the report have misrepresented the facts. The east of the borough is where the most attractive mixed development land lies with rail access to the said corridor. The land is currently part of the eastern industrial zone facing on to the river Lee and the Lee navigation. It is clearly brown field and the GLA has offered a hand in making such areas mixed development to encourage walking and cycling. It is also within walking distance of Brimsdown main line station. Other organisations have recognised the potential here. I therefore question why this option has been so scurrilously ignored?
 - 4.3 Section 2 cites the methodology used to make decisions and recent history of development in the borough. Section 2.29 then squarely puts the responsibility for selecting a specific option in the council's gift in table 2.1. Option 2C is chosen as the 'preferred option'. This is based on 25,000 new housing units on green belt land that is mainly either owned by property developers/speculators or is under option. It is land that offers the greatest profit margins as it has no

or little land reclamation element. This methodology and selected option is deeply flawed and creates a negative response to the overarching issues of climate change.

4.4 Throughout *section 2* the authors keep reminding the reader that benefits and harms are also affected by subjective assessment, whilst the report pursues a mechanistic numbers driven format. Firstly the forward data on population growth based on replacement birth rate and inwards immigration do not support such figures as those used to justify expanding this London borough. Historic extrapolation of population growth does not take into account the effects of current government policy and social trends. Secondly, delaying the assessment of the expandability of services (water, land drainage, sewage, power, transport, schools, local NHS etc.) until a later date, are issues that need longer term planning and investment than house building. These two matters need to be part of rolling plans that do not ignore physical and acceptable limits of development. The reminders of subjective judgements are very important. This will always have to involve the people of the borough and neighboring boroughs. Their intimate judgement of place must not be gerrymandered by elected councilors or their officials.

5. At a more general level I see documents with mistakes of fact and multiple contradictions as The Enfield Society report and others tactfully point out. I would go further and ask the council to withdraw the proposals until it is fully fact checked and contradictions removed unless clearly identified as other opinions. I also want to see references to 'Chase Park' removed from all documentation as this is a specific property developers renaming of an area correctly described as Vicarage Farm. The implications in the 'public eye' of renaming a contentious site by a property developer should not need spelling out to councilors and its officers.

I look forward to seeing these points set out in the consultation report and the council's response.

