

## **Response to Draft Local Plan Regulation 18 Consultation 2021**

I strongly oppose any plan that involves destroying green belt land and am also concerned that the plan contains some errors and inconsistencies as well as being misleading in places which will deter people from responding. My comments on individual questions/chapters/policies are set out below.

### **Chapter 2 Spatial Vision Policy Numbers SS1 Spatial Strategy and SS2 Making Good Places**

#### **1. Do you consider the Council has selected the right spatial strategy option as its preferred option?**

- **If yes, please explain why you think this.**
- **If not, which spatial strategy option do you think the Council should adopt.**

**Please explain why you think this.**

#### Response

I don't consider that the council has selected the right spatial strategy but table 2.2 on page 26 appears misleading and biased towards councils preferred option for the following reasons.

- a) Option 2 and 3 both provide 25,000 homes but the table states it "meets much of housing requirement" and is a pro for option 2 and "housing requirement not met in full" and is a con for option 3?
- b) The table also implies that Option 2 will provide more affordable housing than option 3 but it is difficult to understand why this is the case as all other things being equal housing on these green belt areas will be significantly higher than the median in the borough.
- c) The council's preferred option has a pro that it will result in the ability "to invest in green/blue infrastructure". The implication that destroying green belt land to help the environment is counterintuitive.
- d) I don't agree that future proofing is a pro for the council's preferred option. If we are now releasing 7% of the green belt land then there is more chance that future administration will use this a precedent to build on more green belt land in the future which will be bad for climate change, the environment and future generations.
- e) A con of the council's preferred choice is "requires green belt land" but this should be expanded as a con for sustainability, climate change, the environment, and affordable housing. I don't agree with the implication that building on green belt land gives you loads of pros and only one con.

If the table was changed to reflect the above points I believe "Option 3 Medium Growth 2" is better than "Option 2 Medium Growth 1"

#### **4. Has the Council missed any other spatial strategy options?**

#### Response

There appears to be no policy that incorporates increasing housing supply by utilising existing housing more efficiently. There are houses in Enfield that are empty and have been empty for some time. It should be possible for local and national government to introduce fiscal policies to change people's behaviour by making it less financially attractive to keep houses empty, and for people to live in larger houses than they require. The introduction of a 5p charge of carrier bags changed people's behaviours that had a large positive impact on the environment so I am sure something could be done to change people's behaviour to achieve a more efficient use of existing housing.

## **Chapter 3 Places**

**2. Are there any proposed placemaking areas we have proposed that you believe should not be included?**

### **Response**

I believe that all rural placemaking areas should not be included but think that the contents of this section of the document is confusing. Figure 3.1 on page 36 is not very clear and includes some errors e.g. Enfield Town is not on the western border of the borough and Southgate is not in Edmonton Green. In future versions of this plan it should be made clearer what rural areas are considered placemaking areas to encourage more people to be able to give an informed response.

## **Chapters 3.9 and 3.10 Policy Numbers PL9 Crews Hill and PL10 Chase Park**

**1. Does the vision for Chase Park/Crews Hill set out an appropriate vision for the future of this place? If not, what components do you think should be changed or are missing?**

**2. Will the proposed placemaking policy for Chase Park/Crews Hill help to adequately deliver the aspirations set out in the vision? If not, what proposed changes, omissions or additions are required in the policy to help deliver the vision?**

### **Response**

I think these policies should be taken out of the plan. It does not set out a vision that ties into the overall plan on affordable homes, the environment, and making Enfield sustainable. It worsens some of the statistics mentioned in the forward of this plan and the summer edition of the "Future Enfield" leaflet that was recently published by the leader of Enfield Council.

All other things being equal any development on Chase Park or Crews Hill green belt land will increase the Median House Price: Average Annual Salary ratio from 13.7 to a more undesirable figure. The paper does not appear to explain what mechanism is going to be put in place to make sure 50% of these properties will be affordable.

The fact that these properties will have a relatively high value will probably not directly help the 4,500 on the housing register. In fact the development will probably attract buyers from outside the borough and the forecast increase of 50,000 people in the borough by 2039 may be an understated.

This part of the policy will also have an adverse effect on sustainability, climate change and the environment. Green belt land absorbs carbon dioxide and therefore in isolation these policies will make it more difficult to achieve net zero carbon targets.

At the top of page 84 it states "Figure 3.11 development in the Crews Hill area" but Figure 3.11 shows Chase Park. There are also two page 87s in the document. There should be a key to the maps e.g. to show what the arrows mean on the maps. These small errors/omissions make the document more difficult to follow.

## **Chapter 4 Sustainable Enfield Policy Numbers SE1 to SE10**

### **SE1: Responding to the climate emergency**

#### **4.1.1 Are there any other measures that should be included in the Local Plan to help tackle the climate emergency?**

##### Response

Other measures that the council should include is to respect and protect green belt land and take building on these areas out of the plan. Green belt land helps to regulate temperature by cooling overheated urban areas, can reduce flood risk by absorbing surface rainwater and can provide important habitats for a wide variety of insects, mammals, birds and amphibians.

They also provide multiple benefits to public health, with studies linking green space to reduced levels of stress.

I don't know why the numbering of the paragraphs in the "Have Your Say" section from 1, 2..... format to 4.1.1, 4.2.1 .....format as it makes the document less easy to follow especially as there are other paragraphs also numbered 4.1.1, 4.2.1.... in the section.

### **SE3: Whole-life carbon and circular economy**

#### **4.3.1 Is this the right way to reduce embodied emissions and help to embed circular economy principles in new development?**

Yes this policy states we should prioritise re-use and retrofit of existing buildings so the plan should not include significant building on new sites such as green belt land.

The "have you say" section ask for responses on policies SE1-7 but not SE8, 9 and 10. Is this intentional or an oversight?

## **Chapter 14 Environmental protection policy number ENV1**

### **Do you agree with the draft policy? If not, what changes would you suggest?**

I agree with this policy but it appears to be contradictory to the wider plan that proposes building on Green belt land which absorbs carbon dioxide and causes lower levels of air pollution compared to areas that are built upon. Therefore to achieve this policy the building on green belt land should be taken out of the plan.

Finally I would like to ask the council to come up with an alternative plan that does not involve the borough losing any of its green belt land which is such a valuable asset for the borough and beyond. Thank You.