
Thank you for the opportunity to comment on the draft Local Plan.

Firstly I wanted to acknowledge the significant pressures that Enfield, like many London boroughs, is facing with regards both to population growth and to growing levels of housing need for affordable and/or social housing. I work in a role commissioning health services across a Council and the NHS in an inner London borough and so am aware of population forecasts showing a decrease in some parts of the population in inner London and the converse in outer London. So appreciate this Plan's ambition to address growth whilst minimising further pressures on built up and deprived areas in the East of the borough. Personally I have no objection to the plans around Enfield Town Centre, for example, assuming there will be careful implementation and oversight of design principles etc. I understand that sometimes there may be a strong argument for building on green belt land. However, I believe if we are to sacrifice green belt we have to be absolutely watertight in our plans and proposals for need and how the development will meet these. And it seems to me there are some flaws in this plan as it stands.

Firstly, there seems a surprisingly docile acceptance of housing targets that does not push back or challenge national and London thinking. Shouldn't we be working with national and London partners to try to tackle the housing crisis in inner London that drives people to move outwards, rather than facilitating that shift?

Secondly, the options appraisal at SP SS2 Table 2.2 doesn't seem to demonstrate many options and the analysis doesn't seem very evidence based in the level of detail within it. I would have expected it to contain much more detailed, modelled options such as the specifying 'if we build x thousand houses on brownfield sites a b and c we could deliver x number of houses but the risk to the borough would be x y z' and 'if we build x green belt we would potentially release £x SIL investment which we would use to do x y z'. Overall it reads that limited detailed analysis has been undertaken before the proposal to develop on green belt was reached. This does not make me think that there has yet been sufficient thought given to how revenue funding generated from these developments will be used to create sustainable, safe and healthy communities long term and that is my overall concern with this Plan.

Specific areas of concern for me in the plan: **Section 3.9 Crews Hill, SP PL9:**

1. Overall this section and the Topic Paper associated with it seems more based on an optimistic vision than a well modelled analysis of how this new community might develop, which feels very risky.
2. Has analysis on current footfall and usage of the businesses at Crews Hill been undertaken? The topic paper says on p31 that there is no defined centre but that misses the point that for many local families and older people in particular, Crews Hill is currently an attractive destination in its own right. People visit not just to buy garden plants etc but to visit the soft play, meet friends and family in the cafes and pub etc. It is part of what

makes living in Enfield special and I don't think the Council has given enough thought to the impact of the plans to the borough's overall character and attractiveness to current and future residents. I think there is scope to develop Crews Hill into a unique centre for active leisure and for small businesses/creative industries, attracting growth and investment into the borough. The excellent proposal for an east-west green corridor would help facilitate our neighbours in the East to access such a centre.

3. Leaving the above aside - if Crew's Hill is developed as a standalone community – how will it not be isolated like Enfield Island Village became? Appreciate the railway will help but the transport other than the railway in this area is not good. There is a risk that non-working parents, older people etc could become very isolated. Have you modelled transport implications both for the rail network, local bus and road routes? Have Transport for London seen these plans and agreed to plan transport accordingly?
4. With regards to employment opportunities – the Plan is very unclear on how new residents will access employment. Assumption that there will be opportunities for horticultural or agriculture employment seems flawed at the scale of the build. The removal of Crews Hill as a destination will likely mean fewer business in that area. Residents will need to travel for work and given the proposal is for higher density, significant affordable housing people's jobs may be more likely to be local to Enfield. How will already significant traffic on roads such as Clay Hill, Browning Road, Lancaster Road, Lodge Lane, the Ridgeway, Carterhatch Lane, the A10 etc not be increased as people travel to work and what are the implications for increased pollution? The Topic Paper talks about how the East West green corridor will help residents into employment opportunities within and outside the borough. Are you assuming people will cycle east and west to work opportunities – unless there are similarly identified routes north and south from that corridor to Enfield's main sites of employment that seems unlikely? "Connected in this way, and renowned as an active healthy community, the conventional expectation of vehicular traffic generated through the development of the allocation area does not have to be inevitable." From Crews Hill Topic Paper p30 – this seems again like an optimistic vision not underpinned by any realistic modelling of cycle usage vs car usage.
5. Whilst the Council has excellent intentions and ambitions – how will social infrastructure be guaranteed for the new community, does the Council have a clearly identified revenue budget available for the additional implications of care for CYP with SEND, mental health needs, older people's social care needs etc? There is very little about how the community will function and be supported by local services.
6. How will you protect against development creep outside the envisaged area? It seems highly likely that instead of being a 'gateway community' Crew's Hill could become an isolated arm of an urban sprawl from Enfield out to the M25.
7. What engagement has there been with local NHS services (thinking beyond primary care allocations) – how will you ensure sufficient capacity to meet new residents' mental, physical and disability needs. Health inequalities – already high in Enfield – must not be furthered by these builds and I am concerned they would be. Furthermore there is a high risk of the lower cost housing ending up being built outwards to M25, with increased risk of air pollution and associated health risks eg asthma for new residents
8. Is there any flood and/or water pollution risk to surrounding areas – for example, would we see an increased risk of pollution from water running downstream into Turkey Brook in Hillyfields where children frequently play – what are the implications for water quality?
9. There is nothing in the plan about any revenue infrastructure for parks maintenance with increased use of the existing green spaces around Crews Hill by greater number of people? Already Hillyfields has a lot of rubbish on and regularly has overflowing bins/refuse in the river that does not seem to get removed. Whitewebbs similarly albeit to a lesser extent. If the green spaces are not pleasant then people will not use them and this negates all the beneficial health impacts of those spaces.

Overall, I think the section and topic paper on Crew's Hill show laudable ambition but insufficient detailed thought to how the community would work in practice and without this, the proposal poses a high risk of unintended failure and negative impact on Enfield's character.

1. Enfield Roadwatch have already highlighted the impact on the environment in their response to you, which I have read on their website (I am not part of that group). I echo their concerns.
2. The Chase Park plan does seem to be further in its thinking on the needs of the community but my same questions about the revenue infrastructure apply as above. We know Enfield is under-resourced financially as is the local NHS and we need to ensure we can meet the needs of our new residents.
3. Unclear how the mix of housing proposed will be achieved – this area will likely be desirable for wealthier families/residents and sacrificing green belt to allow more high cost homes would only increase the borough's existing east west disparity whilst impacting negatively on the environment.

In conclusion – some parts of the Plan appear well developed (eg Angel and New Southgate regenerations, badly needed) but proposal relating to the green belt appear to have been hastily reached and require further analysis before being progressed, or risk destroying part of what makes Enfield an attractive place to live and helps promote positive health and wellbeing.