
I am a resident of Southgate. These representations are not to protect my own local area but are seeking the good planning of Enfield.

I fully understand the dilemma facing the council with the need to provide much needed housing but also seeking to protect undeveloped land and in particular the **character of Enfield**. It seems to me that if in providing for houses where people want to live one adversely affects the very character of the place (which is why people wish to live here) then one has probably not achieved the objective.

I do not consider that the evidence base as published properly assesses the implications of the suggested strategy. Hence I consider the draft plan as consulted on and the associated evidence base to be **unsound**.

My concerns focus on the following three issues:

Employment Land (Policies SP E1 and SP E3):

Whilst understanding that housing generally has to be provided in the borough where the need is, the case for employment is less compelling since people can and do commute to employment (ideally in a sustainable way). To protect employment land and as a consequence release Green Belt and open countryside land for housing without fully exploring the options for either not providing the alleged employment need or providing mixed use development on industrial sites seems fundamentally wrong. This is supported by the government's intervention in the London Plan where Robert Jenrick's amendment "*will provide boroughs in the difficult position of facing the release of Green Belt or Metropolitan Open Land with a greater freedom to consider the use of Industrial Land to meet housing need*".

Hence **a more thorough and holistic assessment of employment land is needed.**

Release of Green belt Land and in particular Chase Park (Strategic Policy PL 10).

The journey the council has gone on and the assessments they have made in proposing the location, type and scale of development at Chase Park is unclear and appears unsound. It is clear from the Green Belt and MOL Assessment that development at Chase Park will have a **very high level of harm** and this is clearly shown in Figures 6.1 to 6.6 of that document. Yet no attempt is made to mitigate this harm in a meaningful way. The only way that LUC consider this could be done is by reducing the size of the allocation.

Furthermore the Integrated Impact Assessment draws the staggering conclusion that "*Therefore, overall, Policy SP PL10 is expected to have a mixed minor positive and minor negative effect in relation to IIA13: Biodiversity.* and "*For these reasons outlined above, a minor positive effect is expected in relation to IIA 15: Landscape and townscape*" It goes on to state that the effects are uncertain as the design, scale and layout of development are unknown. It is difficult to understand how these conclusions could have been independently drawn for a scheme that develops land that is currently open countryside of high landscape quality.

Hence **the assessment of harm and how that harm could be mitigated (eg by taking a smaller area of Green Belt) has not been soundly assessed.**

Strength of Policies

If Chase Park and other areas of Green Belt are to be allocated (or reduced areas within the current draft allocation promoted) then it is essential that strong policies are put in place in the plan (and not just the subsequent SPD) to ensure generous levels of open landscape are preserved both to retain views and allow for recreation of new and existing residents. The current draft policies do not do this sufficiently.

Summary

I understand the challenges facing the council and agree with seeking to provide for housing needs where one can. However, NPPF does not support achieving housing projections at any cost. From the current draft plan and evidence base I do not believe the case has been made for development at Chase Park. I consider the very high level of harm of removal from the Green Belt cannot be mitigated (and LUC appear to support this conclusion). Hence the draft allocation should be removed or reduced in size to mitigate that impact. The conflict that this may create in satisfying housing needs can be addressed by a more holistic approach to employment land and by holding back detailed consideration of an allocation until a Local Plan review when the housing need and progress on delivery can be assessed.
