
Dear Enfield Council,

Thank you for the opportunity to respond to this important consultation.

I am writing to object to the following policies:

SP PL10, PAGES 80-87 and figure 3.11; Policy SP PL9, pages 77-80 and Concept Plan Figure 3.10; Policy SA45: Land between Camlet Way and Crescent Way, Hadley Wood, page 364; Policy SA54, page 374; Policy SA52 page 372 and Policy SA62 page 383 and SP CL4 pages 277-279 all of which propose the dedesignation of Green Belt for housing and other purposes.

Most of these sites are part of historic Enfield Chase which played an important role in the development of Enfield. The remaining parts of Chase are unique in the Southeast and a rare and valuable landscape asset. The loss of these sites would cause permanent harm not only to the Green Belt, but also to the very character of the borough.

Vicarage Farm is crossed by the Merryhills Way footpath, much used by Enfield residents and others for exercise and relaxation and the physical and mental health attributes of the footpath would be destroyed by development. The farmland could be put back in to productive use growing local food.

Crews Hill is equally important to the borough and should not be destroyed. Its garden centres and other businesses provide employment and a resource for people from Enfield and beyond. Instead of losing Crews Hill for housing, its horticultural activities should be encouraged and enhanced so that it can once again be a hub for food and plant production.

Whilst I support housing development and support the ambition to meet Enfield's housing needs, I strongly object to the proposal to release Green Belt for housing and other purposes. There are alternatives available to meet the housing targets. The Green Belt is a precious resource that should be protected and preserved for future generations. It is too valuable to lose for all the many environmental, ecological, economic, public health and mental health that has

been identified, particularly during the Covid-19 pandemic.

I note that within the Draft Enfield Local Plan, Point 12 stipulates that rural areas will largely be managed for ambitious nature recovery and rewilding and a mosaic of sustainable countryside uses including food production, forestry, eco-tourism, recreation, education, leisure, sporting excellence and natural burial. Rural development will be managed to exponentially improve the quality, accessibility and sustainability of rural areas for the benefit of all. What we have not seen however is how Enfield Local Authority plan on achieving any of this. Thus far, all we have seen is a proposal for more 'affordable living' and building on the Green Belt, yet housing within the EN2 post code is extortionate and far from affordable. From what I have observed from the developments that have recently taken place in the EN2 postcode is housing and flats at a starting price of £500,000 for flats only.

Quite simply, the local authority should prioritise affordable homes for Enfield residents where they are needed most and not encourage developers to get even richer by building executive homes on the Green Belt that only a few can afford which the Local Authority are clearly in support of and evidenced via the Local Plan. A prime example of this is the recent housing development at Chase Farm hospital where thousands of homes have been built at the cost of most of Chase Farm Hospital closing. A four bedroom house within Chase Farm hospital grounds is currently for sale at Locksley Place at a price of £735,000, a street away at The Greystock, a four bedroom house is priced at £790,000. How does this sit with Enfield Local Authority who approved these building works with the alleged 'Help to Buy' scheme within the same grounds, yet most key workers cannot even afford the deposit, this includes myself, despite being a key worker.

On the 27th May, the Enfield Independent quoted a Council Spokesperson who stated that the Meridian Water Development will provide 10,000 homes for Enfield residents, half of which will be affordable. Well, Enfield Local Authority, I ask that you explain to Enfield residents why only 5,000 of the homes on Meridian Water will be 'affordable' yet you allege to have a target to provide thousands upon thousands of 'affordable homes' and also seek to build on the Green Belt to achieve your targets of affordability in a housing crisis.

To make matters easy for the Local Authority to consider, I quote Ms Alice Roberts of CPRE London who has advised that Green Belt housing is typically well out of range of anyone on a low income. CPRE research shows that only a tenth of homes built on the Green Belt are 'affordable' and there are rarely for social rent. Additionally, people living in Green Belt developments have poor access to public transport are tied to owning and using cars in addition to 'being stuck' with the cost of commuting, creating additional financial stress for families on low incomes. Echoing Ms Roberts's research, Mr Paul Miner who is the Head of Strategic Plans and Devolution at

the campaign to protect Rural England stipulated that there is a housing crisis that must be addressed, but it cannot be solved by releasing more Green Belt land for development. The housing crisis is one of affordability, not simply supply. The year 2017 saw 425,000 houses planned for Green Belt land, of which more than 70% were unaffordable housing. Increasingly, it would appear that developers are ‘cherry picking’ the areas they wish to develop on purely for profit gain. I believe that the Local Draft Plan is purely for the profit and gain of property developers and those who support them. I require Enfield Local Authority to be transparent and provide details to their residents on how much a house or a flat built on the Green Belt will cost a prospective buyer and how many of the homes will actually be designated as ‘affordable housing’.

The questions one must also ask is whether Enfield Local Authority has taken any of the following points in to account and if so, how do they plan on:

- <!--[if !supportLists]-->A) <!--[endif]-->Providing sufficient affordable housing on the Green Belt and how much of the housing will be designated as ‘affordable’.
- <!--[if !supportLists]-->B) <!--[endif]-->What infrastructure will be implemented for commuting purposes and how does this tie into the Government plan of making the UK more ‘greener’
- <!--[if !supportLists]-->C) <!--[endif]-->What the financial implications will be for low income families living within the Green Belt area.
- <!--[if !supportLists]-->D) <!--[endif]-->The Local Authority have admitted that alternative building forms can achieve a similar number of homes as tower blocks without the necessity of building skyscrapers and as such, the Green Belt would not have to be built upon, why then are these alternatives which the Local Authority are wholly aware of not being utilised?
- <!--[if !supportLists]-->E) <!--[endif]-->The population projections provided by Enfield Local Authority are educated estimates at best. The number quoted by the local authority does not reflect the latest projections that have been provided by the office of National Statistics. Why then is the number of housing and proposals for building on the Green Belt based on a guess of Enfield’s future residents?
- <!--[if !supportLists]-->F) <!--[endif]-->Priority species and nationally scarce Stag Beetles are in Enfield’s Green Belt which is targeted for development, why do the Local Authority wish to destroy habitats for national scarce species?

Despite Enfield Council stating that there is a statutory duty to provide 1,246 dwellings each year, there is in fact no statutory duty to provide any fixed number of homes each year.

The Government's position is set out clearly, parts of the email that was received from the Department for Communities and Local Government I will highlight to you for ease, in the event that the local authority are somehow unaware of what the government policy advisor detailed:

'...Following consultation, in December, we changed the standard method of assessing local housing need to help deliver 300,000 homes a year by the mid 2020's, whilst preserving our countryside and green spaces and making the best use of brownfield and urban centre land. I would like to reassure you however that the housing need figure is not the target, but the starting point for local authorities. They still have to take account of constraints in the area, such as Green Belt when deciding how many new homes to plan for.

Furthermore, this government is committed to protecting and enhancing the Green Belt, in line with our manifesto. The framework outlines strong protections for green belt land and states that a green belt boundary may be altered only in exceptional circumstances through the local plan process. A local authority should consider releasing land from the Green Belt only if it can show that it has examined all other reasonable options for meeting its development needs. This means that the authority should have been using as much brownfield land as possible, optimising development densities and discussing with neighbouring authorities whether they could accommodate some of the development required'.

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In light of what the government policy advisor namely Mr Scott has detailed, I ask the Local Authority to provide details what the 'exceptional circumstances' are that require a Green Belt boundary is to be altered for housing, for I can think of none.

At present, there is evidently a sustained assault on the green belt as a result of the Local Authorities such as Enfield's draft plan. The local authority must look at how other councils have developed and encouraged housing. For ease, I have looked how in London, other councils have utilised existing land. Having reviewed the data, it must be noted that in the last ten years, fifty housing estates with over 30,000 homes have undergone regeneration schemes, delivering nearly twice as many new homes on the sites of London's demolished existing social housing estates. In 2014, it was estimated that in London, there was approximately 2,650 hectares of brownfield land in London suitable for developing on housing with a capacity of 146,530 homes. The Centre for Cities has even suggested that if every brownfield site was developed to its full capacity, there would be enough land for around 382,500 new homes in the Capital. Brownfield land is also a renewable source, the Green belt is not, brownfield land is also not going to 'run out', whereas Green Belt will. Whilst I note that the local authority are currently utilising brownfield land and planning permission has been granted for a number of developments, the question must therefore be asked, if brownfield developments are taking place, Chase Farm Hospital continues to be

developed with thousands of houses being built and planning approval was made by Enfield Council for a 29 storey tower block at the Colosseum Retail Park in Southbury, why is even more land being used and particularly that of the green belt being considered for redevelopment? In my street alone, two houses have been demolished and six flats are being built, this is going on everywhere in London, including Enfield, yet Enfield Local Authority claim that they must also use 7% of the Green Belt to be built upon. The mathematics of what the local authority states is required and what is and can actually be developed upon does not make any mathematical sense. Enfield Local Authority do not need to build on any part of the Green Belt to provide any form of housing, be it affordable or otherwise.

I also ask, if three thousand houses are built, what infrastructure with the local authority implement? One would assume that additional facilities would also be required, for example schools, nurseries, GP practices, additional public transport, policing. How does the local authority intend on dealing and managing with such an influx of people in one area which it has never had before? In January 2020, Enfield borough rose from the unenviable position of 12th to 9th position as being one of the most deprived London Boroughs. Between 2015 and 2019; 27% of households in the borough were deemed to be in poverty and one in three children were identified as living in poverty. How does the local authority intend on providing the necessary and required provisions for thousands more living in Enfield?

I also point out to you that the government are encouraging of people being 'more green', there are adverts on the television and on the radio stating that 'pollution kills', yet the green belt which is the lungs of our very society is being considered for potential development for housing, this is absolutely at odds with everything the government instils upon us, how does the local authority see fit to sever itself from what our government stipulates? With London's increasing pollution rates, particularly those in Enfield, the green belt serves to protect those who suffer from breathing difficulties and complications like Asthma. It has only recently been recorded by Coroner Philip Barlow that air pollution 'made a material contribution' to the death of nine year old child in Lewisham. I note from enfield.gov.uk website that despite Enfield's commitment to meeting the governments objectives on seven pollutants, Enfield has areas that exceed government objectives for Nitrogen Dioxide and PM10 at busy roadside locations. How then does the local authority expect to meet the objectives with additional housing, which will lead to more traffic and congestion which will inevitably cause even more pollution when they cannot meet the current government guidelines?

Consideration must undoubtedly also be given to the risk of flooding in the area should the green belt be built upon, at present, there is small, localised flooding in the area, my submission is that if the green belt is built upon, flooding will be a very real risk to not only the new homes that will be built, but also our own. It has been very well documented that where the green belt has been built on, areas that were

not prone to flooding and had never been flooded have suffered significant floods. Flooding is not only about climate change, concreting the countryside in such a reckless manner increases flood risks, the consequences of which are seldom suffered by the developers, or those who authorise such builds and in this case, that would be Enfield Local Authority.

To date, one cannot dispute that the green belt is relevant today more than ever, particularly with the relief it has brought for those who have sought refuge and a sense of peace and escapism during the Covid crisis and has helped alleviate mental health episodes and crisis for all and particularly the vulnerable.

My family and I strongly oppose the proposed building on the green belt and urge the local authority to protect our precious green belt which is meant to be protected.

The Local Authority has a duty of care for the Green Belt in accordance with the London Plan and that National Planning Policy Framework and any intentions to release parts of it should be taken out of the local plan.