

**To: Enfield Council – Strategic Planning & Design**

**10 September 2021**

**Re: Enfield Local Plan consultation**

**Draft Enfield Local Plan**

I am writing to object to proposals that would permit extensive house building on the Green Belt, in particular in the Crews Hill Area, where I am a resident. It is clear from the ELP (SP PL9) and much supporting documentation that the full situation in Crews Hill and its potential is misjudged, confused, misrepresented and unrealistic.

**In summary I am focusing on the following key topics:**

- 1) The absence of a consultation process with Crews Hill residents.
- 2) The Draft Enfield Local Plan (ELP) maps which are in many ways incorrect and misleading.
- 3) Burnt Farm Ride which is a private no through road with historic features including listed buildings and farmland still grazed today. The ELP incorrectly implies the land is all 'brown field'.
- 4) Contradictory statements in the ELP about whether the council proposes to preserve or destroy the Green Belt.
- 5) The infrastructure of Crews Hill, the inadequacy of both the road through Crews Hill and public transport to the area to support the proposed substantial increase in residential housing and the lack of essential amenities in the area.
- 6) The nature of the horticultural sector in Crews Hill
- 7) Other concerns about the viability and impact of the massive proposed increase in housing in the area.
- 8) The questionability of estimates for population growth and shortage of brownfield land in Enfield, necessitating the de-designation of Green Belt for house building.

**1) The Consultation process:**

There was insufficient consultation with residents in the Crews Hill area prior to the draft plan being presented and approved by the council. Though the views of certain public bodies and commercial landowners were elicited and quoted in the Topic paper for Crews Hill (not included in the main ELP documentation) a larger effort to inform and elicit views of local residents was not carried out. Given the potential impact of these proposals on Crews Hill this is a serious and unacceptable oversight by the council and is reflected in the ELP by the patchy understanding of land use, business activity, agriculture and heritage issues pertaining to the area.

**Consultation in Summary:**

The lack of consultation with residents is reflected in a patchy and ill thought through plan for Crews Hill.

## **2) The ELP Maps:**

The maps included with the documentation are in most instances inaccurate and misleading. Two are shown in the main body of the report document covering the Crews Hill Area.

2.1) The master map for the whole of Enfield, which does have a key, fails to distinguish correctly between different land uses in Crews Hill.

2.2) The detailed map of Crews Hill '3.10 Crews Hill Concept Plan' is unclear due to the omission of a key and is inaccurate in terms of its designation of parts of the area, particularly along Burnt Farm Ride which appears to be entirely designated, incorrectly, as brownfield land.

2.3) Whilst various maps included in the Topic Paper for Crews Hill (e.g. Figure 5 & 7) show the land correctly as agricultural or private green land, there is at best a mismatch between the headline proposals and the reality, or at worst a blatant misrepresentation.

2.4) There is also a map in the site allocation proforma section of the ELP (SA48) which is cursory but in the accompanying text there is mention but no itemising of 'heritage assets' which it states would 'delay any development by at least 10 years'.

2.5) There is also a reference to Burnt Farm Ride in the Green Belt and Metropolitan open land review indicating the risk of harm to the Green belt if the land around Burnt Farm Ride was de-designated as very high. This hardly matches the ELP.

### **Maps in Summary:**

- The inconsistencies in the documented maps show that the Enfield Council's plan is inaccurate and quite possibly designed to be misleading.
- The Heritage aspects making land unsuitable for de-designation particularly Burnt Farm Ride and associated land, are not detailed in the main ELP

## **3) Burnt Farm Ride:**

Most of the rural aspects of the Ride and its surrounding land have not been acknowledged in the ELP documentation, giving the impression that Enfield Council has no real understanding of the Ride and surrounding land.

### **Burnt Farm Ride Rural and Heritage Assets:**

3.1) The Ride is a private road, not owned by the council. It is a no through road at the southern end of the Theobalds Estate and is gated with no public access from just beyond the M25 bridge at Tile Kiln Kennels (Elmtree).

3.2) The Ride and surrounding land is a haven for wildlife. Cuffley Brook and the land up to Burnt Farm Ride with its series of wildlife ponds is a known habitat for endangered crested newts. Bats and Tawny Owls are roosting in trees along Burnt Farm Ride, Muntjac Deer roam the area. Rare bee orchids and pyramid orchids are found in the grass land and there is an abundance of wild life and wild flowers.

3.3) The largest proportion of the land on both sides of Burnt Farm Ride is open pasture still actively used agriculturally with sheep grazing in the fields on a rotation basis.

3.4) There is also other agricultural land with water meadows adjoining Cuffley Brook and water meadows along the East boundary of Meadow Brook House, which frequently flood.

3.5) The map of the site '3.10 Crews Hill Concept Plan' also shows no indication of the existence of the following:

**The east side of the Ride:**

- A substantial residential property on 7 acres, initially built as grooms' accommodation for the livery stables and then converted to one dwelling (Meadow Brook House).
- A 1650's Grade II listed farmhouse with two acres of garden, within the listed curtilage, called (Theobalds Farmhouse) - (mistakenly referred to as Glasgow Stud Farmhouse in the impact assessment section) and the Victorian annexe, (Theobalds Lodge) in which we live.
- The livery stables connected to the farmhouse, recently converted into residential properties (Graftonbury Mews).
- A commercial unit (Oakray), in what was the indoor riding school attached to the livery stables, with considerable heavy lorry traffic.

**The west side of the Ride:**

- A number of early Victorian cottages, built for stud farm workers in the mid 19<sup>th</sup> century, of local historic interest and two 1960's houses.
- A barn for rearing pheasants on Tile Kiln Farm that is now being run as a food storage/processing centre with a number of planning, health & safety and human rights infringements (modern slavery), previously and possibly still occurring on this site.
- This business now has almost constant heavy container lorries travelling along the Ride during the day and all through the night, already of great disturbance to residents who live on Burnt Farm Ride.
- Nearby is the Paddocks, a listed Grade II\* property with listed barns. Enfield Council recently granted a licence for the Donovan Haulage lorries to have access to the Paddocks via Burnt Farm Ride through Tile Kiln Farm.
- This has considerably added to the number of lorries on this private road.

**Burnt Farm Ride and the M25:**

3.6) The M25 crosses the Ride just beyond Tile Kiln Farm. All the land behind the Crews Hill garden centres to the North of Cattlegate Road also runs along the motorway rendering much of this land unsuitable for housing.

3.7) Motorway noise pollution along this section of land here is very high because the road surface is concrete. This is particularly evident in certain wind conditions.

3.8) The motorway is also a source of considerable air pollution. This makes it unsuitable for building housing nearby and very unlikely to be attractive to developers with both noise and air pollution.

3.9) The impact assessment documentation does refer to this in passing and whilst it proposes developments in mitigation, such as double glazing and insulation the proposals are totally inadequate for the pollution in this part of the Ride.

3.10) All properties would need noise insulation and triple glazing but gardens adjoining houses will still be subject to this high level of noise and air pollution. None of this makes for affordable housing.

3.11) In addition the London Mayor's plans for further measures against traffic pollution make this an even more unsuitable housing proposition

#### **Burnt Farm Ride - In Summary:**

- There is inadequate appreciation in the main body of the ELP of the existing rural and agricultural features of Burnt Farm Ride, the historic aspects of the properties, the adjacent land and its usage and the impact of proximity to the motorway, with noise and air pollution.
- Other information in supporting appendices and reports does pick up on some of the unique nature of the Ride but with insufficient detail as indicated above.
- No consideration has been given to the already existing natural habitats of the Ride, both flora and fauna.
- To stress the maps in the ELP with brown crosshatching imply mistakenly the Ride and all adjoining land is 'brown field'.

#### **4) Confusion and contradiction over whether the ELP is going to preserve or Destroy the Green Belt:**

Whilst there is recognition of the special nature of Crews Hill and its connection with horticulture there are confusing and contradictory statements concerning Green Belt.

- *'parts of the area are proposed to be removed from the Green Belt designation as part of the plan to ensure that green belt boundaries will last well beyond the period of the plan....'*
- It is then stated that it would be appropriate to permit development *'in connection with established uses or a change to open land or to temporary uses.'*
- Clearly if this is a long term plan to build houses on this Green Belt land, it is not a *'change to open land'*, and it is not *'temporary'* so that only leaves *'in connection with established uses'*.
- That would rule out building on agricultural open land such as much of Burnt Farm Ride and yet the map 3.10 has cross hatched shading in brown of the whole of Burnt Farm Ride regardless of any aspects of its current use and designation (see sections 2 & 3) above.
- The statement in the *'Place Vision'* section about *'Residential-led redevelopment of brownfield sites'* needs to be unambiguously adhered to. The plan currently with its inaccurate maps, doesn't appear to adhere to that vision and therefore is contradictory and unclear on its full Green Belt character.
- The *'Place Vision'* for Crews Hill also states *'Crews Hill will offer a healthy and inclusive environment supported by access to green space and nature.'* The ELP proposes to build on all the green space in Crews Hill along with the land occupied by Crews Hill Golf Course, removing all this green space and valuable amenity from public access.

#### **Green Belt in Summary:**

The ELP fails to match the vision and far from protecting the Green Belt sets a precedent for future de-designation.

## **5) Crews Hill Infrastructure - Transport and Amenities:**

### **Cattlegate Road**

5.1) Crews Hill is served by only one fairly narrow road, severely congested at peak times (rush hours and weekends). The area barely copes with the current volume of traffic without the substantial increase in usage that will occur when 3,000 plus houses are built.

5.2) Theobalds Park Road and Cattlegate Road are a cut through between M25 (Jct. 25) and A10 to the east and M25 (Jct. 24), Potters Bar and Cuffley to the west. This adds significant traffic levels to this narrow road which doesn't appear to have been taken into consideration in any of the documentation on infrastructure for Crews Hill.

5.3) Crews Hill is a major cut through whenever there is an incident either on the M25 or the A10 with additional heavy lorry and car traffic diverting off these major roads.

At times the area is at a standstill with a considerable increase in air pollution.

5.4) The increase in cars from additional housing will add further to the congestion and pollution of the area. The ELP acknowledges that the road through Crews Hill will be unable to absorb the increased traffic generated from the volume of housing planned for the area.

5.5) The road is too narrow for a cycle lane in addition to the footpath (currently in very poor state) and it has heavy lorry traffic which will not be mitigated by housing because much of it is travelling through the area between the major roads (see point 5.2 & 5.3) making it even more dangerous for potential cyclists.

5.6) Whilst acknowledged in the ELP (PL9 10) 'development will need to address limitations in the capacity of the existing road network'. The ELP appears to deal with this issue by expecting residents to abandon cars and use cycles. It is also planned in the ELP to provide housing with limited parking facilities in the area.

The appropriateness of this proposal in an area that is a substantial distance from schools and other amenities of Enfield Town is highly questionable

It is also questionable whether parents would feel safe sending their children to the Enfield secondary schools some 2 miles distant on heavily congested roads.

5.7) There are steep hills in Crews Hill, Clay Hill (the route to Enfield Town for essential amenities), and Hilly Fields. It is likely only the most serious and fittest cyclists would cope with the terrain in the area.

### **Burnt Farm Ride:**

5.8) Burnt Farm Ride is entered on the sharp bend at Sanders Corner (junction of Theobalds Park Road and Cattlegate Road). This is a blind bend and there have been a number of recent fatalities on this bend. Increasing the residential properties in the Ride and the resulting increased traffic on this no through road will lead to even greater risks and congestion on this difficult junction.

5.9) There are also private properties with licences for heavy lorries such as the Donovan site at the Paddocks which uses the main road and Burnt Farm Ride for access, Enfield Skips with the frequent skip lorries on Cattlegate Road, constant container lorries travelling to the food storage site at Tile Kiln Farm and other heavy lorry traffic.

5.10) The Ride is a narrow road with little room for passing vehicles when the lorries are on the road. There is no room for either a footpath or cycle lane along the Ride and this makes the ELP for more housing unworkable, particularly if residents are expected to abandon cars in favour of cycles.

### **Theobalds Park Road:**

5.11) The area to the south of Cattlegate Road is partly designated for a new industrial park in the ELP. This will further increase the heavy industrial traffic between M25 at Jct. 25 and A10 and M25 Jct. 24 making it even less safe for cyclists and pedestrians than it is currently.

How does this fit with the ELP for new housing in the area?

5.12) The ELP states that parking spaces for new residents will be limited to reduce car usage. This vision of new residents giving up their cars is not at all realistic given the location and infrastructure of Crews Hill.

5.13) This will also make the properties considerably less attractive when the housing is in Green Belt countryside some distance from amenities and residents will also want to travel out of Enfield.

5.14) It is hard to believe developers, intent on selling properties in the area, will design them without adequate parking.

### **Public Transport:**

5.13) A bus service has been recently introduced from the 'Bungalow Estate' on Theobalds Park Rd towards Enfield, whilst welcomed it is not without problems for residents on the estate.

5.14) The train service is not adequate with two trains an hour to compensate for the new residents giving up their cars as per the ELP. Even the services from Enfield Town and Gordon Hill have only two trains an hour outside the rush hour so how likely is it that the train network will significantly increase the service to Crews Hill as stated in the ELP (a key solution to the road infrastructure problems), to compensate for residents abandoning cars. This is unrealistic and not within the council's control and therefore will not be helpful in substantially reducing the traffic ensuing from the new housing.

### **Amenities Serving Crews Hill:**

5.15) Crews Hill is located in a rural part of Enfield some distance (3 miles) from the town centre and at least 2 miles from the nearest shops for food and essentials. The nearest medical practice is also 2 miles away (not 800 metres as stated in part of the ELP). There are insufficient local amenities to cope with the new numbers of residents proposed making it unsuitable to meet the housing requirements of the ELP.

#### **Crews Hill Infrastructure, Transport and Amenities in Summary:**

There are a number of reasons why the road system in the area is inadequate especially to meet increased usage and the addition of cycle lanes. There are also weaknesses in the public transport system (train timetables are not in the council's control) and a lack of essential local amenities to serve the high volume of planned new housing.

### **6) The Horticultural Industry in Crews Hill:**

The ELP fails to recognise the difference between Ornamental Horticulture, and food growing. The idea in the ELP that there is commercial food growing in Crews Hill is mistaken. It is at a minimal level or non-existent. The old glasshouse based industry ceased over 40 years ago! Local farms are largely pasture based with some arable. There is certainly 'no pick your own' fruit & veg facility.

6.1) Crews Hill is well known nationwide for having one of the largest concentration of garden centres in Europe attracting vast numbers of visitors to the area. Crews Hill brings valuable trade and revenues to Enfield and provides hundreds of jobs.

6.2) There are proposals in the ELP to introduce new business to create employment in the area reflecting Crews Hill's Horticultural tradition, however the plan for building on current garden centre sites is more likely to destroy jobs and businesses as it is unlikely, for reasons of space and land costs, that they could be relocated nearby in the so called 'industrial zone'. Further explanation on this issue is given in the submission by Claire Thompson of Thompsons, with which I concur.

6.3) The Horticultural Industry in Crews Hill encourages gardening and has proved particularly valuable to health and well being during the pandemic and lockdown. Nearby is the renowned centre for horticultural training: Capel Manor College. This industry should be supported by the ELP, not discouraged through de-designation.

6.4) Further research would be needed to assess serious potential for the development of commercial food growing in the area. Substantial land and glass house investment would be needed to produce sufficient volume of fruit and vegetables, to feed the new residents in Crews Hill. It would also need to be produced at a competitive price to compete with supermarkets, so this vision in the ELP is highly unrealistic.

#### **Horticultural Industry in Summary:**

The realities about the nature and benefits of the ornamental horticulture industry in Crews Hill need to be appreciated and valued. Commercial Food growing options need research but are likely to be unrealistic.

#### **7 Other concerns about the viability and impact of massive increase in housing in Crews Hill.**

Currently on Cattlegate Road and Burnt Farm Ride there are a very small number of residential properties. The ELP proposes to increase this by 3,000 or more. We share the concerns of many residents over the potential outcome of these plans.

7.1) The removal of Crews Hill Golf Club and its amenities is of great concern and seems completely counter to the London Mayor's and Government's plans for green space. Until recently the area had two golf courses with Whitewebbs but that is now closed. So as a result there will then be none in the area. There will also be issues with volume of traffic on East Lodge Lane, then Botany bay and the Ridgeway, as indicated in the submission by the Enfield Society.

7.2) There will be significant loss of valuable 'secondary' income from pubs, cafes and other retail if the garden centres and related business are closed, not to mention loss of jobs.

7.3) There is a mismatch between house and land prices in Crews Hill and the ELP's need for 'affordable' housing, given the current values of existing residential properties, businesses, agricultural and horticultural land.

7.4) The unrealistic notion that new residents will grow their own food to reflect the heritage of the area. This may be a worthy aspiration, but would require larger gardens and greenhouses for the new properties, making house prices in Crews Hill even less affordable. No suggestions were made in the ELP about allotments, which would require plenty of space but could be an excellent addition to the area for food growing by residents.

### **Other Concerns Summary:**

The removal of the Crews Hill Golf Club and amenities for housing, depriving Enfield of this valuable green space and amenity  
The resulting congestion on the road through Crews Hill and other roads nearby.  
The loss of income and employment for businesses linked to garden centres.  
The implausibility of offering 'affordable' housing especially with gardens and greenhouses as planned in the ELP.

### **8) The questionability of population growth and shortage of brownfield land estimates.**

8.1) There are also questions about population growth in the area as according to some data about school entry it is possible the population in Enfield is in decline. Any projections for population growth in the area need to be checked against the results for the recent 2021 census due in 2022 before basic assumptions in the ELP can be accepted.

8.2) The Green Belt land in Crews Hill is included as part of the ELP requiring its de-designation because the council claims there are insufficient brownfield sites in the borough to meet housing needs. The Better Homes Enfield and EnCaf reports reveal, with supporting data, serious discrepancies between the ELP and the London Plan and miscalculations and misrepresentations of brownfield sites suitable for housing, suggesting there is sufficient acceptable brownfield land available to meet targets.

8.3) Whilst a small amount of brownfield land in Crews Hill could be included in plans for housing without affecting the horticultural sector and agricultural and open green field sites, the scale proposed in the ELP is totally untenable.

### **Population Growth and Brownfield Land Summary:**

Checks are needed on population estimates using census.

The availability of suitable brown field land in the borough needs further investigation as other studies suggest the ELP has under estimated the figures.

All Brownfield options must be examined before there is any consideration of de-designating green belt land for building.

### **Conclusion:**

- I believe the ELP, especially for Crews Hill, needs to be rejected on the list of grounds outlined in my letter above.
- I concur with other major submissions from EnCaf, Enfield Roadwatch, Enfield Society, the Crews Hill Golf Club and the views of the CPRE, in respect of all the other areas in Enfield affected too. Crews Hill PL9 (and Chase Park PL10 (Vicarage Farm) are not "urban areas" and have no place in "accommodating growth". They are designated Green Belt and should not be de-designated as proposed. The "vision" for Rural Enfield is ill-conceived.
- The plan to build on green belt land is contrary to the policy of the London Mayor and the London Plan to preserve the Green Belt to improve quality of life.