

To Enfield Council Planning Dept.

Re: New Enfield Local Plan (ELP)

We are writing to object to proposals in the Enfield Local Plan (ELP) that would permit extensive house building on the Green Belt, in particular in Crews Hill Area.

We reside on Burnt Farm Ride and on a daily basis use Burt Farm Ride to access Crews Hill, Enfield the M25 and London. We frequently walk and jog along that route.

Our concerns and objections are as follows:

1. Lack of Proper Consultation: There has been insufficient consultation with residents in the Crews Hill and adjacent areas prior to the draft ELP being presented and approved by the council.

2. Burnt Farm Ride: Most of the heritage and rural aspects of Burnt Farm Ride and its surrounding land have not been acknowledged in the ELP documentation.

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 (). Given the very limited traffic (access is only for residents north of the M25) the Ride is popular with walkers, joggers and cyclists.

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. No consideration has been given to existing natural habitats of the Ride, both flora and fauna.

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. 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. The maps in the ELP with brown crosshatching imply mistakenly the Ride and all adjoining land is 'brownfield' when it is not.

The M25 crosses Burnt Farm 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.

Motorway noise pollution here is very high and is particularly evident in certain wind conditions. The M25 is also a source of considerable air pollution making land in its proximity unsuitable for building housing nearby and very unlikely to be attractive to developers with both noise and air pollution. The impact assessment documentation refers to this in passing but proposes developments in mitigation. 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. This does not make for affordable housing, not least given the London Mayor's plans for further measures against traffic pollution which make this an even more unsuitable housing proposition.

The Ride is a narrow road with little room for passing vehicles, especially lorries. 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.

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.

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

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.

5. Crews Hill Infrastructure - Transport and Amenities: 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 would occur if 3,000 plus houses are built.

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.

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.

The ELP appears to deal with limitations in the capacity of the existing road network 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. We question the

appropriateness of this proposal in an area that is a substantial distance from schools and other amenities of Enfield Town. We also question whether parents would feel safe sending their children to the Enfield secondary schools some 2 miles distant on heavily congested roads.

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?

Public Transport: The train service is not adequate with two trains an hour to compensate for the new residents abandoning their cars as per the ELP. 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? We suggest that 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: 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.

6. The Horticultural Industry in Crews Hill: Crews Hill is well known nationwide for having 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.

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'.

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.

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 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.

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 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.

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.

In Summary:

We believe the ELP, especially for Crews Hill, should be rejected. For the reasons given above it would be damaging for jobs and the environment to build in Crews Hill on that scale, and the available infrastructure cannot sustain development of that order and its consequences.

We concur with other major submissions from EnCaf, Enfield Roadwatch, and Enfield Society 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 maintain and improve the quality of life for residents. It is time for a rethink.

Yours faithfully,