

Chapter 2 Spatial Strategy 2.4 Policy SP SS1

Housing targets now in question

It was reported on 11 September that the government's proposed reforms 'Planning for the Future' have been abandoned, together with the mandatory house-building targets for councils.

<https://www.independent.co.uk/news/uk/politics/housing-planning-laws-reform-jenrick-b1918243.html>

<https://www.msn.com/en-gb/news/uknews/backlash-forces-ministers-to-soften-planning-bill-impact/ar-AAOjZRA?ocid=msedgntp>

<https://www.thetimes.co.uk/article/ministers-drop-shake-up-of-planning-laws-6k3cbq00w>

This calls into question the whole idea of targets (24,920 homes by 2039) for Enfield.

Besides, the population increase in Enfield has flattened off:

<https://new.enfield.gov.uk/services/your-council/borough-and-wards-profiles/borough-profile-2021-your-council.pdf> (p6)

Therefore the building targets need to be urgently reassessed.

Chapter 3 Policy SP PL9 Crews Hill & Paragraph 3.9.4

There are plans for building 3000 new houses with the potential for longer-term expansion up to 7,500 new homes, right up to the M25.

Building at Crews Hill would eat into the Green Belt, fragmenting the habitat for wildlife. Much of the Green Belt in this area is productive farmland, and this could become critically important for local food production in times of concern about distribution capacity and energy costs (food miles).

Eight nurseries would be earmarked for destruction. The customers for the nurseries on this site come from all over North London. The nurseries fulfil a Green-Belt friendly use of the land and help to encourage gardening.

The Crews Hill development is "predominantly limited" by the surrounding brooks e.g. Turkey Brook but this does not exclude expansion to the south. There remains a corridor between the Crews Hill and Chase Park developments, which in a future plan, could be expanded to meet each other, thereby cutting the Green Belt in two.

True accessibility is about a) maintaining frequency of public transport and b) confining urban sprawl so that urban residents do not have too far to get to a rural area. Therefore building on green belt actually works against accessibility.

In paragraph 1, it is acknowledged that there will be more development beyond 2039.

"The boundary of the placemaking area includes sufficient land to deliver more development beyond 2039 to enable the creation of a new sustainable development. Sites anticipated to come forward in

the next plan period will be removed from the Green Belt as shown on the Policies Map. These sites will be protected from development other than that which is necessary in relation to the operation of existing uses, change of use to alternative open land uses or temporary uses.”

This means that a housing development can roll out on Green Belt without infrastructure. When land is “necessary to the operation of existing uses” e.g. roads, power supply, schools, then more Green Belt land can be subsumed.

To quote from Explanation Para 3.9.4

3.9.4 “Development at Crews Hill has potential to deliver a new sustainable urban extension during the current local plan period and the next. The parts of the placemaking area that are expected to come forward in the next plan period are proposed to be removed from the Green Belt designation as part of this Local Plan to ensure that Green Belt boundaries will last beyond the end of the Local Plan period. This is in accordance with national planning policies which states the intention for Green Belt boundaries to have permanence in the long term.”

This says that land must be removed from Green Belt designation because Green Belt is intended to be permanent. Or, the less land is designated as Green Belt, the easier it is to keep it permanent. Or is this a new definition of permanence?

Chapter 3 Policy SP PL10 Chase Park & Para 3.10.4, Figure 3.11

Building 3000 new houses on the Green Belt at Chase Park would eat into the Green Belt around Trent Park, fragmenting the habitat for wildlife and leading to a loss in biodiversity. It will be a high-density development, quite a contrast with 1930s houses whose back-to-back gardens provide a green corridor for wildlife.

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We must not lose any areas of woodland as these are already the remaining fragments of Enfield Chase. No amount of town-scaping, place-making or high quality, but high-density, design will compensate for a loss of habitat for wildlife. Re-wilding and re-planting should take place without a loss of area.

Chapter 6 Green Belt Strategic Policies BG4, BG5, BG6, BG9

Loss of Green Belt

This Enfield plan relies on building more than ten thousand homes on Green Belt. As a survivor of breast cancer and a member of Trent Park Running Club, I have found the Green Belt in Enfield absolutely critical to maintaining my health. Trent Park and the Green Belt around it has been a source of physical and mental well-being to the people of Enfield during the Covid pandemic. Green spaces and trees help to clean urban air and it is well documented that polluted air contributes to poor outcomes from Covid-19. It also affects children's learning abilities and increases the risk of cardiovascular and respiratory diseases and dementia.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6700631/>

The retention of ALL Green Belt (GB) land is crucially important for maintaining air quality and unspoiled space for recreation. A reduction in Green Belt cannot be justified by a label of "London National Park" where some of the land could be taken up by built-on leisure facilities.

It is well known that building on Green Belt is more profitable for developers than building on brownfield as there are no de-contamination costs and selling prices are higher.

<https://www.propertyreporter.co.uk/features/cost-contamination-and-perception-why-greenbelt-development-is-outpacing-brownfield.html>

The word "sustainable" can obscure the fact that green space is being lost for the growing of food and for wildlife. The word "sustainable" as used in this plan appears to mean that development can encroach on Green Belt every time there is a new plan.

Chapter 7 Policy DM DE6 Tall Buildings & Figure 7.4

Tall buildings, by their nature, are visible several kilometres away, and will greatly affect the rural feel of Trent Park and surrounding Green Belt.

From Figure 7.4, typical heights are from 31 m to 51 m, which represent roughly 9 to 16 storeys.

Tall buildings ruin the privacy of the gardens in surrounding 1930s homes. They dominate the immediate area and make it feel quite claustrophobic, often inducing a wind tunnel effect, as in Tally Ho at North Finchley.

Chapter 8 Strategic Policy SP H2

To date, housing on Green Belt has made little contribution to the social rent sector because developers can command higher prices on Green Belt.

Developers can avoid their commitments to build affordable housing on the grounds of financial viability. (Enfield Plan Para **8.2.10**).

In <https://researchbriefings.files.parliament.uk/documents/CBP-7671/CBP-7671.pdf> it is stated that *“While the government has sold enough public land for developers to build 131,000 homes, only 2.6% of those homes will be for social rent.”*

Chapter 8 Policy DM H7

The building of high-density Build to Rent homes which are then sold to equity or investment companies who rent out the properties, is not going to solve the shortage of homes for social renters or first-time buyers. Blocks of flats are often used as investment opportunities for equity companies and large landlords. <https://www.vestaproperty.com/> Private landlords including companies, prefer not to rent to social tenants since housing benefit is not paid direct to landlords (except in difficult cases). <https://help.openrent.co.uk/hc/en-gb/articles/360002485431-Can-the-council-pay-my-benefits-to-the-landlord-directly->

Summary - Enfield Draft Plan is not Legally Compliant or Sound

This Enfield Plan is not justified, sustainable or consistent with National Policy.

Contravention of London Plan 2021 Policies G2, G3, G8

De-designation of the Green Belt and Metropolitan Open Land, especially on such a large scale, has not been justified by exceptional circumstances (Ref **Policies G2, G3**), given that housing targets need to be re-assessed (see above statement on Strategy SP SS1). As stated in the Enfield Plan **Policy SP BG5** “the onus is on the applicant to prove that the exceptional nature of the proposal outweighs the harm that it would cause to the Green Belt”.

Policy G8 (Food Growing) has been contravened, because food growing in the Green Belt area will be compromised, not only with the loss of eight nurseries at Crews Hill, but also the rural environment around Parkside Farm Pick Your Own (PYO) will be badly affected by the proposed Chase Park development which is just across the Hadley road. Parkside Farm PYO is a very successful business, a wonderful destination for residents from all over North London, offering a respite from urban living.

Contravention of NPPF 2021 Section 13 on Protecting Green Belt Land Unsustainable development

By removing land from Green Belt, the Enfield Plan is contravening National Planning Policy Framework paragraphs 137-150. The plan is unsustainable because losing Green Belt on this scale compromises the ability of future generations to meet their own needs.