

Dear Enfield Council

**Re: Local Plan Consultation Response**

Thank you for the opportunity to respond to this consultation on Enfield's draft Local Plan. While it may be necessary to plan for future housing needs (guided by the London Plan), I feel strongly that these attempts to address housing needs are misguided. This draft Local Plan poses a very serious threat to Enfield's Green Belt land, its historical value and to the character of the borough of Enfield as a whole.

**I am strongly opposed to this Local Plan, specifically to the following policies, all of which propose the de-designation of Green Belt for housing and other purposes:**

SP PL10	pages 80-87, and Figure 3.11
SP PL9	pages 77-80 and Concept Plan Figure 3.10
SA45	Page 364 Land Between Camlet Way and Crescent Way, Hadley Wood,
SA54	Page 374 Land East of Junction 24
SA52	page 372 Land West of Rammey Marsh
SA62	page 383 Land at Tottenham Hotspurs Football Club Training Ground
SP CL4	277-279 Promoting Sporting Excellence

The areas of Green Belt land proposed as placemaking areas in this draft Local Plan have for many years served a vital role as clearly articulated in the **NPPF**:

- a. to check the unrestricted sprawl of large built-up areas;
- b. to prevent neighbouring towns merging into one another;
- c. to assist in safeguarding the countryside from encroachment;
- d. to preserve the setting and special character of historic towns
- e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

This Local Plan contradicts the policies outlined by the London Mayor and the London Plan to preserve the Green Belt. Sadiq Khan himself, is opposed to any development on the Green Belt and identifies the Green Belt as a vital environmental aspect, acting as the "lungs of the capital". The Green Belt is a precious resource that should be protected and preserved for future generations to come. It is too valuable to lose for all the many environmental, ecological, economic, public health and other reasons that have been identified, especially during the recent pandemic, when the Green Belt was utilised for personal well-being. The council has a duty of care for the Green Belt. Although a lot of the land is privately owned, it remains a community asset for all to enjoy and should continue to remain that way!

Most of these Green Belt sites are part of historic Enfield Chase, (one of the last surviving chases), which played an important role in the development of Enfield. The remaining parts of the 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. Also, Vicarage Farm is crossed by the Merryhills Way, a popular footpath that would be destroyed by development and the fields are rich in biodiversity, providing habitat for many different bird species and resting grounds for migrating birds.

### **Crews Hill – A tourist attraction on our doorstep**

Crews Hill is well established as one of the largest garden centre hubs in England if not in Europe and is visited by people from far and wide. It supports many businesses, trade and employs hundreds of people, with some garden centres being owned and managed by generations of the same family. Speaking to workers in Crews Hill, they are saddened by what the council is proposing and see this as a direct assault on their jobs and livelihoods. Both Vicarage Farm and Crews Hill should be producing sustainable local food for local people, but agriculture and horticulture receive minimal attention. It is unforgiving to think that the council is willing to destroy such a rich asset, rather than investing in the area for the benefit of the local economy.

Crews Hill has many historical features including listed buildings and farmland which is still grazed today. The area of Crews Hill does not have the infrastructure to sustain any large development as proposed in the plan.

The country roads in the area will not stand up to the number of car users that will be accessing it. The local train station (with only two trains an hour) will not have the capacity to serve the number of potential users and certainly cannot accommodate anyone with a disability. There are no local amenities to support the scale of residential development being proposed.

Following the controversial closure of Whitewebbs Golf Course, which has caused tremendous upset for the community; to now read the intended plans to close Crews Hill Golf Course with the loss of green space and leisure opportunities in favour of development, is an exceptionally poor decision and affects job security and the local community.

Crews Hill should be seen as one of Enfield's great success stories and celebrated, rather than destroyed as the plan intends.

### **Firs Farm**

I also object to *Policy DM BG10 Burial and Crematorium Spaces* which allocates three Metropolitan Open Land [MOL] sites for potential new crematoria, specifically SA58 Alma Road Open Space, SA59 Firs Farm Recreation Ground (part) and SA61 Church Street recreation ground. These sites are very important for the health and welfare of residents.

### **Tall Buildings**

I also object to *Policy DEG: Tall Buildings*. Tall buildings are being played off unnecessarily against the Green Belt in the plan documents. Tall buildings are out of character for the borough and should be allowed only in a few specific locations and only at moderate height. Our historic town centres are not appropriate places for skyscrapers and over development. I have also heard from many Councillors that if Enfield does not build on the Green Belt, then skyscrapers are inevitable. The decision for high rise buildings rests with the Council which has the power to decline such plans. The Council admits that alternative building forms, such as mid-rise mansion blocks, can achieve a similar number of homes as tower blocks. *7.6.4 For instance, mansion blocks, terraces or stacked maisonettes can achieve the same number of homes or floor space without excess height. These buildings can offer advantages in terms of better amenity and less costly maintenance.* Tall buildings should not be used as a defensive argument for building on the Green Belt, that's just tactical and unacceptable scaremongering.

### **Affordable Homes on the Green Belt**

Building on the Green Belt does not provide affordable homes. Enfield Council's perception that it does is wrong and short sighted. Referencing the document produced

by Better Homes Enfield: <https://betterhomes-enfield.org/2021/09/05/building-in-green-belt-areas-will-not-deliver-the-affordable-housing-enfield-council-claims/>

The plan details a “*desperate need for more affordable houses*” and states “*We currently have over 3500 families in temporary accommodation, and on average a home costs 13.7 times household income.*” The proposed Chase Park development, as described in [comer-homes-vicarage-farm-vision.pdf \(enfieldsociety.org.uk\)](#) as “*3000-5000 quality homes*”, seems unlikely to be the kind of development that will help those in temporary accommodation. Additionally, there is little evidence that a large new development such as the proposed Chase Park will do anything to reduce house prices – see for example [Building more houses cannot solve the housing crisis | UCL Grand Challenges - UCL – University College London](#) – in particular the comment “*Building more houses under the current economic system cannot reduce house prices and may in fact lead to worse affordability in many areas.*”

The market value for new houses on the Green Belt is out of reach for the majority of working families. Developers charge a premium for the luxury of superior homes built on virgin Green Belt land. The development by Barclay Homes on the former Middlesex University site within Trent Park is a prime example of this. Exactly how many of these homes were affordable? Targets between the council and developers are agreed at the outset, but once planning permission has been granted and the build has started, developers renegotiate their target number for affordable homes and the council is powerless to hold them to account.

### **Brownfield sites**

There are brownfield sites available that could accommodate the projected housing needs within the borough. One notable example is the Meridian Water site, which is promised to eventually bring 10,000 homes to Enfield. In 2019, Enfield RoadWatch produced their [Space to Build](#) report that concluded “*There is no need to review Green Belt in Enfield: there is enough Previously Developed Land (PDL) to accommodate needs - specifically we have identified:*”

- *space to build at least 37,000 homes on space which is currently inefficiently used*
- *additional space which could be intensified for commercial / industrial use.*”

Why has the Council not taken into account the conclusions of this report when preparing this draft Local Plan? What investment has the council made in the identification of these sites before deciding that it has adequately explored brownfield sites and has no option but to build on Green Belt.

### **Exceptional Circumstances**

The council might try to claim exceptional circumstances to develop on the Green Belt, but it has not proved its case. A trip to other parts of the borough will take you to brownfield areas that are crying out for regeneration, that would bring necessary greening, improve public services and provide homes and more employment. There are no exceptional circumstances, just what appears to be idleness and uncreative planning.

The NPPF (revised Feb 2019) states that “*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified*”. It also states that “*the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.*” In a similar vein, The London Plan states “*Exceptional circumstances are required to justify either the extension or de-designation of the green belt*” – such exceptional circumstances simply do not exist at the proposed Chase Park site. Why then, does the Council feel that the NPPF and the London Plan should be ignored in

preparing this draft Local Plan?

Enfield's own [Detailed Green Belt Boundary Review](#) (produced in 2013) was supposed to "*provide robust and defensible boundaries over the Core Strategy plan period, (next 15 to 20 years)*". It is therefore incomprehensible why this draft Local Plan (only 8 years later) is looking to deplete Enfield of at least 10% of its Green Belt through radical changes to Green Belt boundaries?

### **The consultation process**

Reading the Local Plan, it appears that this highly important document, that could have a lasting and devastating effect on Enfield's Green Belt has been developed by people who either haven't visited these sites in person, or perhaps don't even live in the borough. The plan looks like a desktop exercise that has gone dreadfully wrong. Anyone really familiar with the borough will know that its green spaces are valued by residents from all over Enfield.

There was insufficient consultation with residents in the Crews Hill area prior to the draft plan being presented and approved by the council. However, the views of certain public bodies and commercial landowners were sought and quoted in the Topic paper for Crews Hill. Little or no effort to inform or seek the views of local residents was carried out, which is harsh and unbelievably unfair. Given the potential impact of these proposals on Crews Hill, its landowners, its workers and community, this is a serious and unacceptable oversight by the council and is reflected in the Local Plan by the patchy understanding of land use, business activity, agriculture and heritage issues relating to this area.

The consultation has not been properly publicised and relied too much on internet access. The leaflet from the council did little to explain the plan properly or make it easy for people to respond. Expecting residents to read and understand even the consultation document and its hundreds of pages, let alone all the evidence base documents is unrealistic and undemocratic. The LetsTalk survey was equally hard to navigate with different questions in some areas from the consultation document itself, a varying number of questions for different policies which didn't seem to relate to the overall importance of the policy and a variable number of characters permitted for different answers. It took hours to complete and finally abandoned in favour of an email.

If this consultation is truly a 'listening exercise' then listen to all the people who are responding to tell you that you are totally on the wrong track. Bring the communities of Enfield with you, don't fight them with your continued unwillingness to work with them!