



The countryside charity
London

9 September 2021

Dear Sirs,

Enfield Local Plan Regulation 18 consultation response

CPRE London is a membership-based charity with 2500 members across London, concerned with the preservation and enhancement of London's vital green spaces, as well as the improvement of London's environment for the health and wellbeing of all Londoners. We have many members in Enfield and work closely with a number of them to support the protection and enhancement of green spaces.

Strategic Policy SS1

The presentation of options at Table 2.2 fails to take account of the availability of Brownfield land and so in our view renders the key analysis of Strategic Options void.

Failure to take into account substantial brownfield opportunities

The options fail to take account of the substantial opportunities to regenerate and intensify brownfield sites even though evidence shows there is enough brownfield land to accommodate development needs – but this is not reflected in the analysis.

This omission makes it impossible for us to support any of the options set out. We would, however, strongly support development, regeneration and intensification of brownfield sites and we are concerned these have been omitted or not properly assessed:

- Our own report 'Space to Build', on the availability of brownfield sites in Enfield, was submitted to the Call for Sites and to the previous consultation
- Additionally, the report set out by Better Homes Enfield [here](#), gives details on how brownfield sites can accommodate development.
- Also, we understand that developers have discussed with Enfield Council a major proposal for mixed-use development at Brimsdown which would reprovide SIL – in fact significantly add to industrial floor space – while also delivering somewhere between 4,000 and 7,500 new homes and a mixed use neighbourhood which could support surrounding industry with people and amenities, while also delivering additional jobs. It seems extraordinary that this was not

included as an option given that the London Plan indicates that intensification of industrial sites is to be supported.

We do not believe that accommodating development on brownfield means there is a need for high rise blocks and we do not support high rise housing development. Evidence shows that the family and affordable homes needed in Enfield can be accommodated within medium-rise blocks with attractive shared open space and outside space and, as many development in the UK and Europe have shown, these can be attractive places to live for families or other households.

There is no justification for releasing Green Belt sites for housing or other development needs:

- Green Belt release is not justified in relation to Green Belt purposes. All sites which are proposed for release fulfil most or all of the Green Belt purposes. The analysis in the Green Belt Review appears to have been conducted with a view to finding sites to develop, rather than genuinely to assess whether the sites contribute to the purposes. The analysis can, in our view, be easily challenged. Even a cursory look at some the large sites proposed for release (Chase Farm, Crew's Hill) shows they meet the purposes.
- RTPI research has shown that building around train stations like Crews Hill in Green Belt does not mean they will be sustainable in transport terms – they still generate very significant additional car journeys because the vast majority of trips will not be made radially in/out of London by rail, few other public transport options exist, and amenities are too far away to walk or cycle to. Most journeys end up being made by car and this very significant impact is in direct contradiction to Enfield's own goals as well as the Mayor's Transport Strategy.
- The damage inflicted by enabling urban sprawl will be significant. Even outside of Crews Hill, the other proposed Green Belt allocations would inflict damaging impacts of urban sprawl including increased car journeys, congestion and pollution; as well as increased costs of travel and isolation from amenities and social centres, and further expansion of utilities.
- Substantial harm to Green Belt is unjustified. Significant harm would be done to the Metropolitan Green Belt by allocating the proposed sites for development. The harm is not just to the Green Belt's openness and permanence, but also to London's ability to tackle climate change and make adequate provision for recreation, nature and local food production. It would be impossible to offset the loss in any way as it is unique, historic landscape.
- The benefits of releasing Green Belt are significantly over-played: the claim that affordable housing can be achieved is misleading given many infrastructure costs of building into green fields have not been taken into account, so little or no funds would be available for affordable housing. CPRE research shows Green Belt development only delivers 10% affordable, if that.
- Alternatives to release of Green Belt have not been properly investigated or have been excluded without good reason (or sometimes without any reason). It is our long held view, backed up by evidence which we submitted some time ago, that Enfield has enough brownfield land to deliver its development needs.
- Delivering on brownfield would be a much more sustainable outcome for Enfield. These are available and the Local Plan evidence should have reflected this option.

Green Belt sites cannot deliver affordable housing

Another key reason we feel the proposals cannot deliver the plan's objectives is that the proposed Green Belt development cannot deliver affordable housing. Evidence shows that housing developments in Green Belt have historically delivered only 10% affordable homes and these are not even genuinely affordable.

Section 3 (Place)

The Local Plan does not have a Strategy Policy section for Brimsdown – this is a significant omission. The Brimsdown Industrial Area is delivering significantly less benefit than it could and much of it is not even in use for industrial purposes and plots are being occupied by retail (e.g. Matalan retail). Given this site is so big and so important to Enfield, in our view the plan could not be regarded as sound without substantial proposals to make better use of this site and to support improved performance as an industrial site and include potential for part to become mixed use..

BG10

We do not support option F which would involve allocation of three public parks / open spaces / recreation grounds for burial: these sites perform an important public amenity function and should continue to do so. It would be better to allocate an appropriate Green Belt site (for example the 'Land opposite Enfield Crematorium') where burial is an appropriate use, providing openness is retained. The three sites currently proposed as allocations for burial – Alma Road Open Space, part of Firs Farm Recreation Ground and Church Street Recreation Ground – are all providing important public amenity and should be safeguarded for future to ensure green space standards and sports pitch requirements can be met now and in future, given population is set to increase.

- We feel it is extraordinary that the 'pros and cons' analysis does not mention loss of amenity in relation to the proposed allocations of the three parks. No 'cons' are listed at all.
- It also seems extraordinary that a piece of Green Belt land called 'Land opposite Enfield Crematorium' which is currently simply attracting fly-tipping, and which could be allocated for burial, has been proposed as an allocation for homes / mixed use development, rather than expansion of the crematorium or for natural burial.

Misleading, leading and confusing statements

- In the summary leaflet, the council says "Enfield Council is already maximising housebuilding on brownfield sites." – a statement we feel is not supported by evidence, or even by the council's own documentation
- During the consultation, the council issued a comment published in an [Enfield Dispatch article](#) where a council spokesperson is quoted as saying "*insufficient urban land means a stark choice between packing people into small units in dense towers with a lack of access to open space and supporting infrastructure, or using a small amount of rural areas for high-quality affordable housing with access to gardens and extensive public space*". It is our strong view that this presents a false choice using emotive and inflammatory language designed to prejudice consultation responses
- Wording such as the strategic objectives to be "Deeply green" and to deliver the 'National Park City' are insupportable where substantial harm to greenfield sites and habitat is proposed (such as per the preferred option to allocate Green Belt sites for development)
- There are also errors and omissions in the document which is long, complex and hard to follow / requires a great deal of cross referencing. Firs Farm for example is proposed as a site for elite sports as well as for burial (both of which ignore its status as public amenity space).

Site Allocations


A very large number of green field sites, all of which (but one) are Green Belt or Metropolitan Open Land, are allocated for inappropriate use or for change of use without justification. We have the following specific comments on site allocations:

Site	Designation	Our comments
SA1: St Anne's Catholic High School for Girls, Enfield		Any disposal or building on playing fields or open space should consider the local playing pitch needs as per the playing pitch strategy.
SA27: Land at Crews Hill	GB	<u>We do not support this allocation. This site should be removed from the Site Allocations.</u> This land is Green Belt and meets all the Green Belt purposes. We strongly dispute any analysis which indicates this site does not meet Green Belt purposes and that little harm would be done to the Metropolitan Green Belt if it were to be developed; significant harm would be done. Furthermore, there are enough brownfield sites in Enfield to accommodate development needs.
SA28: Land at Chase Park	GB	<u>We do not support this allocation. This site should be removed from the Site Allocations.</u> This land is Green Belt and meets all the Green Belt purposes. We strongly dispute and analysis which indicates this site does not meet Green Belt purposes and that little harm would be done to the Metropolitan Green Belt if it were to be developed; significant harm would be done. Furthermore, there are enough brownfield sites in Enfield to accommodate development needs.
SA35: Land at Former Wessex Hall Building – Green Belt	GB	This site is Green Belt so the allocation for housing is inappropriate given that there is enough brownfield land available to meet development needs in Enfield. It forms part of a green chain and this development would narrow this stretch of the chain. Given it is not needed for development, it could be enhanced to provide nature value.
SA40: Brimsdown Sports Ground	MOL	While the Site Allocation page cites this as being for 'community uses alongside a limited amount of other enabling uses' – the Table 8.1 at page 184 states it would be allocated for '50 homes and community uses' and Table C-1 says 'Mixed use' (presumably mixed residential and community). <u>We do not support this allocation. This site should be removed from the Site Allocations as a site for 'enabling' or '50 houses' or 'Mixed use' in particular because (1) it is Metropolitan Open Land and no justification is given for removing the designation (2) enabling development is not an appropriate justification for developing on MOL and, in any event, CIL funds will be available from other nearby developments to restore the grounds.</u>

Given new homes planned in the immediate neighbourhood, as well as the potential for 7,500 homes to be built nearby in Brimsdown, at an absolute minimum this site should be safeguarded to ensure green space needs can be met now and in future.

This site should not be lost. It should be brought back into use using funding from nearby major developments.

Any consideration of use of this site should refer to MOL status, green space standards (i.e. referencing the amount of green space available per head of population) including needs as set out in the Playing Pitch Strategy.



Existing Site Information							
Address	Land known as Brimsdown Sports Ground EN3 7LL, EN3 7QZ, EN3 7RN						
Site Area	8.06ha						
Existing Use(s)	SG, C3, F 2, D2						
Site Considerations							
Flood Zone	1						
PTAL	1a						
Heritage Considerations	None						
Impacts an Archaeological Priority Area	None						
Proposal							
Land Use Requirements	<ul style="list-style-type: none"> The site could be appropriate to provide renewed community uses alongside a limited amount of other enabling uses. Any net loss of open space would need to be supported by a masterplan approach 						
Implementation							
Timeframe for Delivery	<table border="1"> <tr> <td>0-5 years</td> <td>5-10 years</td> <td>10+ years</td> </tr> <tr> <td>-</td> <td>X</td> <td>-</td> </tr> </table>	0-5 years	5-10 years	10+ years	-	X	-
0-5 years	5-10 years	10+ years					
-	X	-					
Estimated capacity by proposed Land Use							
Growth Scenario / Spatial Strategy	<table border="1"> <tr> <td>Baseline / Urban Area only</td> <td>Medium / Urban area + Green Belt</td> </tr> <tr> <td>Community uses</td> <td>Community uses</td> </tr> </table>	Baseline / Urban Area only	Medium / Urban area + Green Belt	Community uses	Community uses		
Baseline / Urban Area only	Medium / Urban area + Green Belt						
Community uses	Community uses						

SA44: Land Opposite Enfield Crematorium

GB

Given proximity to Enfield Crematorium, and given this piece of land is not delivering any public amenity, it would be better to allocate this site for burial. It is odd this hasn't been assessed as a suitable location for burial. This is allocated for Mixed Use but it is Green Belt and this would be inappropriate development on Green Belt given there are enough brownfield sites in Enfield to accommodate development needs.

SA45: Land Between Camlet Way and Crescent Way

GB

This land is Green Belt. It meets all the Green Belt criteria and therefore should not be included for development. We strongly dispute any analysis which indicates this site does not meet Green Belt Criteria. No justification can be made for including this site for development in particular because there are enough brownfield sites in Enfield to accommodate development needs.

SA48: 135 Theobalds Park Road

GB

This site is Green Belt and should not be allocated for inappropriate development. This will simply add to inappropriate development in the vicinity which has not been (but should be) enforced and continue to erode the area's openness and further damage the Metropolitan Green Belt.

SA52: Land West of Rammey Marsh

GB

This site is Green Belt. There is a site directly to the south (Innova) with extremely poor layout which makes very poor use of space and that site should be intensified before there is expansion into Green Belt. It performs a strong Green Belt function, in particular because development of this section of Green Belt would lead to the merging of urban development and further encroachment will compromise the status of connected Green Belt. For these reasons we oppose the inclusion of this

		site for development. Green spaces such as this may not provide recreation amenity but they can still make an extremely important contribution to London's ability to adapt to extreme weather events and mitigate climate change – for example through use of sites such as this for urban forest.
SA54: Land East of Junction 24	GB	This site is Green Belt and entirely inappropriate for development of the type proposed. It meets all the Green Belt criteria and therefore should not be included for development.
SA55: Land to the North West of Innova Park	GB	See comments relating to SA52. The poor layout of the Innova Park should be resolved – so better use is made of the land, before any encroachment into this green space. Green spaces such as this may not provide recreation amenity but they can still make an extremely important contribution to London's ability to adapt to extreme weather events and mitigate climate change – for example through use of sites such as this for urban forest. Brownfield land is available to meet development needs and so other more appropriate enhancement of this land should be considered e.g. woodland to help combat and adapt to climate change.
SA56: Land at Picketts Lock	GB	This is Green Belt and should remain so to avoid erosion of the stretch of Green Belt in the area which is the Lea Valley Regional Park. We support the removal or reduction of surface car parking (in line with sustainable transport objectives) but do not support development which would be inappropriate: the land should remain open. The allocation should be explicit that any 'new sports, recreation and leisure facilities' would need to comply with Green Belt policy.
SA57: Whitewebbs Golf Course	GB	It is not clear why this site is included as a Site Allocation when the proposal is 'to provide nature recovery uses'. This is part of a public park and the Local Plan should be clear that it exists for public amenity and this should be referenced in the site allocation and remain a public park, for public amenity. It could ALSO provide nature recovery uses – but this should sit alongside its public amenity purpose.
SA58: Alma Road Open Space	MOL	This should not be allocated for burial use because this is an area deficient in open space for public recreation. It is also an area which is likely to see population densification so it should be safeguarded to ensure adequate green space provision for the area, with reference to green space standards and the Playing Pitch Strategy. A better alternative would be site SA44 (Land opposite Enfield Crematorium) which currently provides no public amenity but is Green Belt and so should <u>not</u> be allocated for development as currently proposed.
SA59: Firs Farm Recreation Ground	MOL	This should not be allocated for burial use because this is an area deficient in open space for public recreation. It is also an area which is likely to see population densification so it should be safeguarded to ensure adequate green space provision for the area, with reference to green space standards and the

		Playing Pitch Strategy. A better alternative would be site SA44 (Land opposite Enfield Crematorium) which currently provides no public amenity but is Green Belt and so should <u>not</u> be allocated for development as currently proposed.
SA60: Sloemans Farm	GB	This proposed allocation is appropriate use for Green Belt so we would <u>support</u> this allocation.
SA61: Church Street Recreation Ground	MOL	This should not be allocated for burial use because this is an area deficient in open space for public recreation. It is also an area which is likely to see population densification so it should be safeguarded to ensure adequate green space provision for the area, with reference to green space standards and the Playing Pitch Strategy. A better alternative would be site SA44 (Land opposite Enfield Crematorium) which currently provides no public amenity but is Green Belt and so should <u>not</u> be allocated for development as currently proposed.
SA62: Land at Tottenham Hotspurs Football Club Training Ground	GB	This is Green Belt which is performing an important function. It should not be subject to inappropriate development. It should certainly not be removed from Green Belt. This does not appear to be a genuine allocation for development of “professional sport, recreation and community sports/leisure uses”: rather, it appears to be an allocation aimed at enabling the expansion of the football club’s training facilities. There is no need to allocate this site within the Local Plan – and indeed <u>this allocation is inappropriate and it should be removed</u> . If Tottenham wish to expand the appropriate route would be via a planning application.

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