- 1. I am writing to object to the following Policies: SP PL10, pages 80-87, and Figure 3.11; Policy SP PL9, pages 77-80 and Concept Plan Figure 3.10; Policy SA45: Land Between Camlet Way and Crescent Way, Hadley Wood, page 364; Policy SA54, page 374; and Policy SA62 page 383 and SP CL4 pages 277-279 all of which propose the dedesignation of Green Belt for housing and other purposes. These sites are part of historic Enfield Chase, which is unique in the southeast and played an important role in the development of Enfield. It is a rare and valuable landscape asset and its loss would cause permanent harm not only to the Green Belt, but also to the very character of the borough.
- 2. I also object to Policies SA62 page 383 and SP CL4 pages 277-279 because they transfer part of Whitewebbs Park, a public amenity, into private management. I reject the Council's analysis that Whitewebbs Golf Course was losing money and call for its reinstatement. In the event that this should prove impossible I refer the Council to the terms of the 1931 999year Lease which provided for the return of the land to public open space. The current proposal that the majority of the open space be assigned to a multi billion dollar corporation registered in the Bahamas would be a dishonourable betrayal of Enfield's long term interests by the Councillors and Officers involved.
- 3. I am also objecting to Policy SA52 page 372, which would remove part of Rammey Marsh, a wildlife area and public amenity, from the Green Belt. 4. I am also objecting to the tall building policies on pages 156-160, Figure 7.3, Figure 7.4 and Policy DE6, and SA2 Palace Gardens Shopping Centre page 321 which propose areas for and the acceptable height of tall buildings which, in many cases would mar the landscape and are unnecessary because other lower-rise building forms could provide the same accommodation, as stated in the policy.

The quality of this draft local plan is questionable on so many levels and for so many reasons. The responses from FEEMA, Enfield Road Watch, Residents Association and other informed bodies detail these inadequacies.

Some of the expressed aims are laudable but there is no evidence that Enfield is capable of delivering them in a timely and efficient manner.

### Summary of my key concerns

- a. London, which includes Enfield, is a magnet for population growth. Unless the "pull" factors of London are countered there will be a "housing crisis" just as there has been for the last hundred years and more.
- b. To provide more attractive housing on Green Belt land will merely increase the pull factor and do nothing to alleviate the housing crisis.
- c. To build on the Green Belt will enrich land owners and land owning speculators. It will set precedents for further speculation and development. It will put even more strain on our existing health, education, social services and transport infrastructure.
- d. Allowing building on the Green Belt will be in direct conflict with the Council's stated policies and aims for climate action, environmental protection and biodiversity. Token planting schemes, habitat banks and suchlike efforts will not undo the betrayal of commitments to the protection of nature.
- e. Green field development has the illusory prospect of greater infrastructure payments for Councils and for the provision of "affordable housing". In reality there will be massive profits for developers, destruction of environmental quality, loss of amenity land for residents and the long term prospect of further building.
- f. In the market economy there is no such thing as "affordable housing" unless it is of such low quality that no-one will want to live there unless absolutely desperate. This would bring with it more social deprivation and a greater demand on the health and social services.
- g. The public transport system works at capacity. To improve this would require huge investment.(HS2, the Elizabeth Line....., any motorway) While this might create a slight improvement in journeys to the centre of London it will do little for internal journeys for

Enfield and nothing for East – West journeys in the suburbs.

- h. People like their cars and the whole structure of life and commerce has changed over the last 70 years to reflect this. For the vast majority cycling is not an option. It is for short journeys at best and for recreation. London is too large and too hilly.
- i. COVID has shown us that long events can force us to re-evaluate and make changes to the way we live. Patterns of work can change as can shopping patterns and leisure activities. The local plans could and should build on this. Enfield's local plan could and should factor in these opportunities. Other major events in the future can wreck the best of plans.
- j. The plan should concentrate on improvements to what we have. There is a lot of housing stock that could be improved at modest cost to provide better and more spacious accommodation. Just look at the number of private homes that are being extended horizontally or vertically in response to changes in work / life balance. Home offices, study areas and garden improvements are being made often using money saved on commuting costs.

The changes in shopping patterns are affecting land use in our urban centres and in our retail parks. Use freed land and redundant buildings to create homes that will meet the needs of individuals and families over the next twenty years. Please, no tower blocks for families. Well designed terraced neighbourhoods with gardens and facilities will do the iob.

Accept that the car is here to stay, though smaller ones would be a good idea. Make provision for parking and electrical recharging.

- k. The "brown field" issue has been covered in detail elsewhere. While developers like nice green sites as they can make money this is no excuse for Councils to take short term easy options. It has been shown that there is a great deal of land in Enfield that could be used for housing. Use this resource not the Green Belt.
- I. The prediction business is notoriously difficult. Town planning is a slow business frequently overtaken by events, political change, economic change and social factors. Government both local and national can set general rules and guidance zonal policy, quality of building, minimum standards, environmental protection. They also have the responsibility to enforce them, not be taken in by the empty promises of developers. Developers are here today and gone tomorrow. They do not have to live with the repercussions of their schemes. We have seen too many, often tragic, examples of this.

#### **Further observations**

## **Green Belt and development**

The purposes of the Green Belt are several. As well as providing recreational areas, environmental protection and access to open space for all Londoners it imposes a discipline upon developers and planning authorities. The one purpose it does not have is to enrich land owners and property developers beyond the dreams of avarice.

The Council's consultants make clear that the advantage of green field development is that developers have the opportunity to work to very high margins. This they point out, allows developers to make higher contributions to infrastructure funds and S106 payments. In fact, it is the buyers of the properties who make the real contribution not the developers. They also point out that a higher proportion of the properties will be "affordable".

Whatever the plan is, market forces and events will determine the outcome. The term "affordable homes" is meaningless unless the Council can control demographics, social aspirations, the economy, technological change, world events and personal decisions.

I am 73 and have lived in London for nearly 70 of those years. In my lifetime there has always been a housing crisis in London. Solutions have included the clearance of perfectly acceptable

housing which could have been modernised at a modest cost; system built flats and tower blocks which could not be constructed properly on site, leading to enormous repair bills and human misery; vast soul less estates on the edge of the city; unrealistic plans with huge cost overruns; greed and massive corruption at all levels.

Housing prices will rise to meet demand. If more and more people want to live in London the metropolitan area will get so big that the infrastructure will fail (it's not that good at the moment) and London/ Enfield will cease to be a functioning and attractive city.

If more housing is built then the "pull" factor will be stronger and even more people will move to the area, thereby increasing demand yet again.

# The Green Belt is restrictive, but that is one of its purposes. We must continue to look at other solutions.

Certain things are not going to change: the public transport system has limited capacity and the scope for improving this is limited. COVID has shown that acceptable changes in the patterns of work are possible and that they can ease the pressure on transport. COVID has also changed shopping patterns, this has affected where we shop and how we shop. The town centre managers and the trading estate owners and retailers are reviewing the longer term effects. This could result in major land use and zoning alterations.

Changes in patterns of work will have to be reflected in housing accommodation — provision of broadband obviously but accommodation must adapt to provide workspace. What can be done to enhance existing housing stock. Roof extensions are cheaper than new builds, redundant shops could become work centres for those not wishing to commute every day, equip park cafes and other public buildings with good quality broadband.

The debate over "brownfield" sites is covered in other responses but it is clear that there is much more that could be done.

It is not enough to build more units of housing, existing stock needs to be improved and new builds must reflect the changing needs of society not just developer profits.

## **Transport**

- 1. Capacity on trains is limited and increasing it is either impossible or incredibly expensive and disruptive.
- 2. Cars whatever various lobby groups say the social demand for personal motorised transport is ingrained in society and is going to remain as an aspiration for all. There is an argument for not having a car in central London but in Enfield and the other suburbs this is not the case. Even at the most mundane level in Enfield we are expected to take our bulky household waste to one recycling centre. This requires a car. Distances in the suburbs are much greater than those in the West End, we have a society and economy in which access to a car is seen as a virtual necessity. I can no longer drive, for medical reasons, and I see all sides of the arguments. My social and work freedom is restricted by the loss of a car. Alternatives are slow, inconvenient and expensive. Regrettably provision for cars and lorries is essential. It doesn't matter whether they are petrol or electric, although I can see a case for limiting car size in our crowded streets.

If we provide more housing for people, especially in Green Belt areas, then the level of traffic in Enfield will increase.

Cycling is, essentially, a leisure activity. Save for a very few it is not the primary means of transport. I have cycled in London throughout my life. Amsterdam is flat and compact, North London is full of steep hills and not compact.

## **Housing quality**

1. The housing stock in many parts of Enfield has been allowed to deteriorate, providing poor quality accommodation. It should not be a case of how many people can be crammed into an area but what accommodation is required to meet acceptable current and future standards? If an area cannot provide acceptable standards then people have to look elsewhere. This is true of the private sector. Nobody has the absolute right to live in a particular street or area on demand. Market forces are the

main determinant. London's population and that of the whole country and the world is more mobile than ever before. Should I might want to move to the USA I cannot demand that I am assigned a flat overlooking Central Park in New York anymore than I can demand to live in Park Lane in London

- 2. The chances of us solving the "housing crisis" are so remote (see above) that we should concentrate on providing good quality housing. Much of Enfield's housing is 100 years old or more. There is a case for "Housing MOTs" where property is inspected every 7 years to ensure that owners are maintaining them to an adequate standard. Owners benefit from the general rise in value and this would be a way of them recognising this unearned reward. Private and public landlords should be under the same obligation. Standards of housing would be maintained / improved and a lot of jobs would be created. Back in the 1980s there was a scheme that subsidised house improvements and raised the standard of our existing housing stock.
- 3. On the evidence to date there is no evidence that Enfield is capable of managing and delivering housing schemes effectively. Negotiations over contracts and funding take years