

To Enfield Council Planning Dept.

Re: New Enfield Local Plan

We are writing to object ALL proposals that would permit any building on the Green Belt, in particular in the Crews Hill Area, where we have been residents for many years . It is clear from the 'Local Plan' that the full situation in Crews Hill, is not only horrifically Damaging, but completely unrealistic. We are in the 'Green Lung' of Enfield.

The LP maps which are incorrect and misleading.

Burnt Farm Ride which is a private no through road with historic features including beautiful listed buildings and farmland – which is still grazed today. The ELP incorrectly implies the land is all 'brown field'

The nature of the horticultural sector in Crews Hill.

Contradictory statements in the ELP about whether the council proposes to preserve or destroy the Green Belt.

The infrastructure of Crews Hill, the inadequacy of both the road through Crews Hill and public transport to the area to support the proposed substantial increase in residential housing and the lack of essential amenities in the area.

Other concerns about the viability and impact of the massive proposed increase in housing in the area.

The questionability of estimates for population growth and shortage of brownfield land in Enfield, necessitating the de-designation of Green Belt for house building.

The LP Maps:

The maps included with the plan is inaccurate and misleading. Two are shown in the main body of the report document covering the Crews Hill Area.

The detailed map of Crews Hill '3.10 Crews Hill Concept Plan' -NO KEY & LISTING DESIGNATED GREEN BELT AS BROWN FIELD?!

There is also a map in the site allocation proformas section of the ELP (SA48) which is cursory but in the accompanying text there is mention but no itemising of 'heritage asset's which it states would 'delay any development by at least 10 years'.

There is also a reference to Burnt Farm Ride in the Green Belt and Metropolitan open land review indicating the risk of harm to the Green belt if the land around Burnt Farm Ride was de-designated as very high. This hardly matches the ELP.

Maps in Summary:

- The inconsistencies in the documented maps show that the Enfield Council's plan is inaccurate and quite possibly designed to be misleading.
- The Heritage aspects making land unsuitable for de-designation particularly Burnt Farm Ride and associated land, are not detailed in the main ELP

Burnt Farm Ride Rural and Heritage Assets:

- 3.1) 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 Elmtree.
- 3.2) 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 goldcrested 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-without this would have a huge detrimental impact to our wildlife and livelihood.
- 3.3) 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.
- 3.4) 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 east side of the Ride:

- A substantial residential property on 7 acres, initially built as grooms' accommodation for the livery stables and then converted to one dwelling (Meadow Brook House).
- A 1650's Grade II listed farmhouse (with two acres of garden, within the listed curtilage, called (Theobalds Farmhouse) - (mistakenly referred to as Glasgow Stud Farmhouse in the impact assessment section) and the Victorian annexe, (Theobalds Lodge).
- The livery stables connected to the farmhouse, recently converted into residential properties (Graftonbury Mews).
- The west side of the Ride:
 - A number of early Victorian cottages, built for stud farm workers in the mid 19th century, of local historic interest and two 1960's houses.
 - A barn for rearing pheasants on Tile Kiln Farm that is now being run as a food storage/processing centre with a number of planning, health & safety and human rights infringements (modern slavery), previously and possibly still occurring on this site- With NO PLANNING PERMISSION.
 - This business now has almost constant heavy container lorries travelling along the Ride during the day and all through the night, already of great disturbance to residents who live on Burnt Farm Ride.
 - Nearby is the Paddocks, a listed Grade II* property with listed barns. Enfield Council recently granted a licence for the Donovan Haulage lorries to have access

to the Paddocks via Burnt Farm Ride through Tile Kiln Farm. This has considerably added to the number of lorries on this private road.

Burnt Farm Ride and the M25:

3.6) The M25 crosses the 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.

3.7) Motorway noise pollution along this section of land here is very high because the road surface is concrete. This is particularly evident in certain wind conditions.

3.8) The motorway is also a source of considerable air pollution. This makes it unsuitable for building housing nearby and very unlikely to be attractive to developers with both noise and air pollution.

3.9) The impact assessment documentation does refer 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. None of this makes for affordable housing.

3.10) In addition the London Mayor's plans for further measures against traffic pollution make this an even more unsuitable housing proposition

Burnt Farm Ride - 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.

Other information in supporting appendices and reports does pick up on some of the unique nature of the Ride but with insufficient detail as indicated above.

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

To stress the maps in the ELP with brown crosshatching imply mistakenly the Ride and all adjoining land is 'brown field'.

4) Confusion and contradiction over whether the ELP is going to preserve or Destroy 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.

'parts of the area are proposed to be removed from the Green Belt designation as part of the plan to ensure that green belt boundaries will last well beyond the period of the plan....'

It is then stated that it would be appropriate to permit development *'in connection with established uses or a change to open land or to temporary uses.'*

Green Belt in Summary:

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

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'. Further explanation on this issue is given in the submission by Claire Thompson of Thompsons, with which we concur.

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.

Further research would be needed to assess serious potential for the development of commercial food growing in the area. Substantial land and glass house investment would be needed to produce sufficient volume of fruit and vegetables, to feed the new residents in Crews Hill. It would also need to be produced at a competitive price to compete with supermarkets, so this vision in the ELP is highly unrealistic.

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.

7.1) 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.

7.2) 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.

7.3) The 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.

7.4) The unrealistic notion that new residents will grow their own food to reflect the heritage of the area. This may be a worthy aspiration, but would require larger gardens and greenhouses for the new properties, making house prices in Crews Hill even less affordable. No suggestions were made in the ELP about allotments, which would require plenty of space but could be an excellent addition to the area for food growing by residents.

Other Concerns Summary:

The removal of the Crews Hill Golf Club and amenities for housing depriving Enfield of this valuable green space.

The resulting congestion on the road through Crews Hill and other roads nearby.

The loss of income and employment for businesses linked to garden centres.

The implausibility of offering 'affordable' housing especially with gardens and greenhouses as planned in the ELP.

8) The questionability of estimates for population growth and shortage of brownfield land in Enfield.

8.1) There are also questions about population growth in the area as according to some data about school entry we understand the population in Enfield may be in

decline. Any projections for population growth in the area need to be checked against the results for the recent 2021 census due in 2022 before basic assumptions in the ELP can be accepted.

8.2) 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.

8.3) Whilst a small amount of brownfield land in Crews Hill could be included in plans for housing without affecting the horticultural sector and agricultural and open green field sites, the scale proposed in the ELP is totally untenable.

Conclusion:

- We believe the ELP, especially for Crews Hill, needs to be rejected on the variety of grounds outlined.
- 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.