

## To whom it may concern, my responses are in red.

### Have your say on... Chapter 2

1. Do you consider the Council has selected the right spatial strategy option as its preferred option?

ABSOLUTELY NOT. THE PROPOSAL FOR RE-DESIGNATING A HUGE QUANTITY OF GREEN BELT IS NOTHING SHORT OF ENVIRONMENTAL AND ECOLOGICAL VANDALISM. I EXPLAIN MY REASONS THROUGHOUT MY RESPONSES TO THIS CONSULTATION.

- If yes, please explain why you think this.
- If not, which spatial strategy option do you think the Council should adopt.  
Option 2 Medium Growth 1

Please explain why you think this.

Because the green belt is preserved and the various other serious problems and issues with the selection the Council has proposed (Option 3 Medium Growth 2) are avoided. The Council's preferred option sacrifices a huge area of green belt designated land when it doesn't need to do so and when this would be in conflict with so many other statements and provisions in the spatial plan not to mention the policies of the Mayor of London and UK Government. I also suspect that there may be an ulterior motive in play by this council in proposing to drastically increase affordable housing in this part of the borough. This could have the effect of distorting the balance of social characteristics in the area and I am concerned that this may be a deliberate attempt to change the likely electoral make-up over the longer term.

I expand on this answer at the end of this response.

2. Are there any changes you would suggest to the proposed key diagram?  
Please refer to my responses to question 1.
3. Are there any changes you would suggest to the proposed Spatial Strategy policy wording?  
The Council has developed a term "Chase Park". This is a proposal not a fact and this should be clearly stated wherever the term is used.
4. Has the Council missed any other spatial strategy options?  
Undoubtedly, there are many other options within the borough for housing development on brownfield land.
5. **Have your say...**

3.14 In relation to the proposed place making areas:

1. Have we included all appropriate place making areas in the urban area to accommodate growth?

I am at a loss to understand why there is no “place” in the north-east of the borough which is considered worthy of consideration. Also, Enfield Town is too narrowly defined in terms of area occupied and there is no obvious plan to revitalise it and return to it the flagship status it deserves.

2. Are there any proposed place making areas we have proposed that you believe should not be included?

No comment.

### Have your say on Rural Enfield...

1. Do you support the designation of Rural Enfield as a leading transformative destination within London National Park City?

The spatial plan proposes downgrading the area which is proposed as “Rural Enfield” by building homes on around a quarter of the space. This will further blight most of the surrounding area during and after the build in terms of noise, traffic congestion, air pollution, carbon emissions, loss of amenity and so on. I do not believe that visitors should be encouraged to see any part of the borough in this light so NO I do not support this policy while there is the threat of building on green belt land. I object to SP PL8.

2. Do you feel the policy covers the right area of the Borough? If not, what changes would you make?

See my response to question 1.

3. Do you feel the policy could be improved?

See my response to question 1.

4. Do the vision or policy miss any significant matters?

See my response to question 1.

### Have your say on Crews Hill....

3.9.9 In relation to the proposed Crews Hill placemaking area:

1. Does the vision for Crews Hill set out an appropriate vision for the future of this place? If not, what components do you think should be changed or are missing?

This part of the borough is one of the most beautiful and pleasant to visit. It needs little if any intervention from the Council. The closure of the golf facilities is a big mistake (I am not a golfer) and the need for “re-wilding” is vastly over-estimated. Re-wilding happens on its own in time. Building thousands of new homes in the area will be extremely detrimental, destroying the character of the area and severely damaging its future. I object to SP PL9, Figure 3.10, SA27 and all other associated policies and provisions. I also object to SA62 and SP CL4.

2. Will the proposed placemaking policy for Crews Hill help to adequately deliver the aspirations set out in the vision? If not, what proposed changes, omissions or additions are required in the policy to help deliver the vision?

Don't build thousands of homes. Restore the golf course. Intervene less.

## Have your say on Chase Park...

3.10.9 In relation to the proposed Chase Park placemaking area:

1. Does the vision for Chase Park set out an appropriate vision for the future of this place? If not, what components do you think should be changed or are missing?  
"Chase Park" is not a thing, it's simply a proposal. If thousands of homes are built it will not be a park, nor will it be a place that anyone wants to know about or visit other than to see a resident, it will be an estate. Preserving a few walkways will not make it a desirable area to visit and walk through, far from it. I object to SP PL10, Figure 3.11, SA28 and all other associated policies and provisions.
2. Will the proposed placemaking policy for Chase Park help to adequately deliver the aspirations set out in the vision? **NO**

If not, what proposed changes, omissions or additions are required in the policy to help deliver the vision?

Don't build thousands of homes on green belt land which the Council is calling "Chase Park". This will prevent the destruction of wildlife, vistas, wonderful open countryside enjoyed by hundreds perhaps thousands of people every week; at the same time increasing traffic congestion and pollution, worsening carbon emissions and so on.

## Have your say on chapter 4...

### SE1: Responding to the climate emergency

*4.1.1 Are there any other measures that should be included in the Local Plan to help tackle the climate emergency?*

Building thousands of homes on green belt land will harm, not help any efforts to combat carbon emissions so don't do that for a start.

### SE2: Sustainable design and construction

*4.2.1 Is this the right way to support sustainable design and construction? Have we addressed the necessary key considerations?*

No comments.

### SE3: Whole-life carbon and circular economy

*4.3.1 Is this the right way to reduce embodied emissions and help to embed circular economy principles in new development?*

Refer to my answer to 4.1.1.

#### **Question SE4: Reducing energy demand**

*4.4.1 Is this the right approach to reducing space heating demand and in-use energy consumption?*

No comments.

#### **Questions SE5: Greenhouse gas emissions and low carbon development**

1. *4.5.1 Is % over Part L the right measure for reducing greenhouse gas emissions?*
2. *4.5.2 Is this the right approach to incentivise on-site renewables?*

No comments.

#### **Question SE6: Renewable energy development**

*4.6.1 Is this the right approach to properly managing the potential impacts of renewable energy development?*

No comments.

#### **Question SE7: Climate change adaption and managing heat risk**

*4.7.1 Does this policy set out a robust framework for managing heat risk?*

Obviously not when it advocates building thousands of homes on green belt land.

### **Have your say on chapter 5...**

1. How best can the ELP provide for our future community needs to secure a sustained high quality of life and well-being having regard to future growth?  
The Council must focus its efforts on growth without sacrificing green belt land.
2. Are there any specific issues regarding educational provision that you consider need to be addressed with respect to new development?  
Educational provision should be built in to any new developments such that the developers absorb an appropriate proportion of the costs.
3. How do you consider that health issues should be addressed in the Local Plan?  
How can new development encourage healthy lifestyles?  
Developers should make a proportionate contribution to any additional healthcare facilities needed for residents in new dwellings. LTNs have not helped with healthy lifestyles, they cause more pollution to be generated elsewhere as congestion increases. Building on green belt land will reduce the ability of the

natural environment to combat pollution while simultaneously generating more pollution.

4. Do you have any other issues/comments?

No

## Have your say on Chapter 6...

### Policies BG1 to BG9

How best do we protect and enhance our blue and green network in the face of increasing growth and development pressures?

Simply ring fence it and protect it from harm.

Can you give us practical examples of how we work with other stakeholders, funding bodies and developers to identify opportunities to promote and enhance the natural environment, and incorporate net gains for biodiversity?

Developers are not renowned for seeking opportunities for promoting and enhancing the natural environment. How about talking to residents in areas that the Council intends to radically change? I have seen no local politicians from the ruling party nor council officials doing so.

Whatever little things are done around the borough, it will never compensate adequately for the destruction of the natural environment that building thousands of homes on green belt land will entail.

Do you agree with our approach to encourage food production?

No. How can building on green belt farmland encourage food production?

### Policy DM BG10: Burial and crematoriums

Is Policy BG10 the right approach to meet our needs?

Do you think it is acceptable to plan for a shortfall of space within the Borough boundary and promote cross border expansion instead?

If you think we should meet local needs, where should it be?

- More burial space in the urban area – where?
- Intensification of suburban areas?
- Build on some public open space?
- Release of Green Belt land on the edge of the Borough?

Definitely not.

- If other, please specify

I suggest burials should be even more strongly discouraged by whatever means are necessary so that the need for new sites is minimised.

## Have your say on chapter 7...

- Do you have any other issues/comments?

No comments.

## Have your say on Chapter 8...

### Policy H2: Affordable housing

- Do you consider that, if supported by viability evidence, the target for providing affordable housing on housing sites should be increased? If so, what percentage of affordable housing should the council be seeking?

The funding of affordable housing needs to be made more transparent. My understanding is that developers are required to offer a proportion of homes at a reduced cost, thereby loading additional costs on to other homes in the same development. Using any percentage over c10% risks an enormous cost skew making other homes seem expensive.

- Should the council seek to use the threshold for affordable housing of 10 dwellings on site? Are there occasions when it may not be appropriate and if so, what should the thresholds be?

I fear unrealistic affordable homes quotas are being driven by a desire among the ruling party in the council for social characteristic change in the area proposed for re-designation. If true, this is appalling.

### Other policies within this section of the plan: H3, H4, H5, H6, H7, H8 and H9

- Do you agree with the draft policy approach set out in H3, H4, H5, H6, H7, H8 and H9?

No comments.

- If not, what changes would you suggest?

### Policy H10: Gypsy and Traveller accommodation

Do you agree with the draft policy approach set out in H10 on accommodating gypsy and travellers accommodation? If not, please give details as to why not or how the policy could be changed.

Brownfield sites that do not impact local residents should be chosen.

Should the Council meet its full gypsy and traveller needs of 21 pitches and/or provide a transit site to manage unauthorised encampment activity across the borough?

The council should do the minimum legally necessary to accommodate gypsy and traveller needs.

Should the Council wait until the Mayor of London has undertaken his London -wide gypsy and traveller and be allocated a gypsy and traveller

pitch target?

The Council should form its own policy to support the best interests of local tax paying residents.

In meeting its gypsy and traveller needs should Enfield engage with its neighbours and provide a joint scheme/ site or should the Council accommodate its own gypsy and traveller needs within the Borough boundary?

The latter.

If possible, do you think that the Council should allocate all its identified need on a number of new sites? Should this be a large site or range of large and smaller sites?

Brownfield sites that do not impact local residents should be chosen.

- **Have your say on Chapter 9...**

- **E1: Employment and growth**

- Is this the right approach for promoting jobs and inclusive business growth?

- **E2: Promoting jobs and inclusive business growth**

- *Is this the right approach for promoting jobs and inclusive business growth?*

- **E3: Protecting employment locations and managing change**

- *Is this the right way to protect industrial businesses in the Borough?*

- **E4: Supporting offices**

- *Should we encourage the provision of new offices in town centre locations?*

- *Should we use what planning powers we have to resist the loss of offices?*

- **E5: Transforming Strategic Industrial Locations and Locally Significant Industrial Sites**

- *Do you support intensification as a means of making better use of our industrial areas?*

- **Yes**

- *Should the plan encourage better placemaking and environmental improvements in our industrial areas?*

**No.**

- **E6: Redevelopment of non-designated industrial sites**

- *Is this the right approach for non-designated industrial sites?*

*Brownfield sites should be designated and re-designated to suit the best available long term use suiting the existing local community.*

- **E7: Providing for workspaces**

- *Is this the right way of supporting the delivery of the range of workspaces that our businesses need?*

- **E8: Local jobs, skills and local procurement**

- Do you agree with the draft policy? If not, what changes would you suggest?

### **E9: Fostering a successful evening and night-time economy**

- *Is this the best way to manage the evening and night-time economy?*
- *Yes so long as they are fairly and consistently enforced whilst encouraging enterprise.*
- **E10: Creating a smart and digitally connected economy**
- Do you agree with the draft policy? If not, what changes would you suggest?  
*The proposals are far too weak and non-enforceable to be effective. The Council should look for better, statutory ways to improve connectivity. It should also set a leading example in its use of technology.*
- **I object to SA32 which removes a decent supermarket serving local people from a well connected location. Alternative supermarkets are too far away or the journey is too complicated by public transport for travel other than by car.**
- **I object to SA52 which removes a natural habitat from protection.**

### **Have your say on Chapter 10....**

- **Policy TC1: Promoting town centre**
- 1. Does this policy set a positive framework to promote our town centres?
- **Policy TC2: Encouraging vibrant and resilient town centres**
- 2. Is this the best framework for supporting the borough's centres?
- **TC3: floorspace above commercial premises**
- 3. How else can we make the most of town centre properties?
- **TC4: Markets**
- 4. Is this the right way of protecting and managing markets?
- **TC5: Meanwhile uses**
- 5. Is this the right way to encourage meanwhile uses?
- **TC6: Managing clustering in town centres**
- 6. Does this framework properly manage the impacts associated with hot food takeaways, betting shops, pawnbrokers, pay day loan shops, amusement centres, casinos and banqueting suites?  
*The framework needs to be fairly and consistently enforced which is not the case at the moment.*

### **Have your say on Chapter 11...**

#### **Policies: RE1, RE2, RE3 and RE4**

1. Do you agree with the draft policy approach set out in RE1 to RE4?  
*The policy is for the most part quite reasonable so why is the Council seeking to go against its own policy by destroying swathes of green belt and all that goes*



with it?

2. If not, what changes would you suggest?

Just implement it fairly and consistently INCLUDING by the Council.

## Have your say on Chapter 12...

### Policies: CL1 to 6

Do you agree with the draft policy approach set out in CL1 to CL6?

The policy is for the most part quite reasonable but the Council should follow its own guidance by not shutting facilities and not devaluing rural Enfield with a huge swathe of thousands of homes. This will not encourage leisure pursuits and visitors.

If not, what changes would you suggest?

Just implement it fairly and consistently INCLUDING by the Council.

## Have your say on Chapter 13...

### Policies: T1 and T2

Do you agree with the draft policy approaches set out in T1 and T2? If not, what changes would you suggest?

The Council should stop pretending that its LTNs are helping to promote walking and cycling. In fact they increase congestion and pollution outside the LTNs and are simply operating as cash cows for the Council. Almost every other Council has largely abandoned them because the over-whelming majority of the public do not want them and they disadvantage the elderly and disabled.

Apart from my other comments, I object to SA42 which was put in place to compensate shoppers including disabled and elderly for the introduction of cycle lanes.

The dream of walkable communities will not be brought about by road closures and enforcement. Softer encouragement and a more active but sensitive policing presence will do more to encourage and preserve community spirit.

So much has been wasted on very under-utilised cycle ways, some of which are not even properly maintained (e.g. Enfield Road to Oakwood). The council should only build cycle lanes where they are practical and sure to be well used. Where

their use has not reached minimum benchmarks set for them, remove them.

Building thousands of new homes in a concentrated area (Chase Park, Crews Hill) will only exasperate the level of car traffic and consequent congestion and pollution that the Council says it is trying to reduce in an area where the road network cannot handle it with little or no prospect for enhancement of the transport infrastructure. Don't re-designate this vital green belt.

Provision for electric cars needs to be given much higher priority. The street charging facilities are often very over-priced and some have time penalties for using a charge point for more than an hour or so which is nowhere near enough to charge a vehicle. Permission to install should be given only to companies operating fairly priced charging facilities.

## Have your say on Chapter 14...

### Policy ENV1: Local Environmental Protection

*Do you agree with the draft policy? If not, what changes would you suggest?*

## Have your say... on Chapter 15 Delivering and monitoring the plan

*15.1 How best do you think the Local Plan can be effectively delivered in the face of limited resources?*

*15.2 The Council will continue to work in partnership with the private, public and voluntary sector plus neighbouring authorities to secure funding for key infrastructure projects?*

*15.3 Set out priorities for project delivery? What do think these priorities should be and how should any phasing be applied?*

*15.4 Increase the Community Infrastructure Levy tariffs to fund future projects?*

*15.5 Do you have any other issues/ comments?*

Developers should be forced to pay an appropriate contribution representing the actual cost of the local health, educational and social needs which will arise out of any new developments.

### Supplementary information

This short note sets out why I strongly believe that Councillors and council officials should conclude that this proposed Draft Enfield Local Plan 2019 – 2039 should

be re-written because it does not comply with several of the Strategic Objectives set out in the (same) Local Plan nor the London Plan nor strict Central Government guidance on Green Belt designated land, and that a plan that is less damaging for the interests in respect of the Strategic Objectives, of residents (including blight for >8 years for those within a few miles of the vicinity of the proposed Green Belt developments) and is more financially beneficial for local tax payers should be drawn up.

For many reasons the proposals for development on greenfield sites fail the strategic objectives set out in the Plan. Specifically:-

*Reduction in air pollution:* The reverse is true for everyone currently living within a few miles of the proposed Enfield developments. The proposed development named as “Chase Park” is bounded by just two single track roads – London Road (A110) and Hadley Road. London Road is already very busy at certain times of the day. Whenever single alternate line traffic operates (e.g. for roadworks), queues in each direction of up to a mile long are the norm. The same is true whenever there is a blockage on the nearby M25 stretch. Extended queuing happens on 30 to 60 times a year, i.e. around once a week on average. This is a strategically important link between Enfield and Barnet, used by, among other things, emergency vehicles such as ambulances to and from Barnet General Hospital. There is a natural hollow at “Frog's Bottom” at the lowest point on the road where air pollution is discernible by local residents whenever the road is badly congested. Adding the traffic from over 4,000 new dwellings would make the traffic congestion and resultant air pollution intolerable. This will become a human rights issue.

*Reduction in flood risk:* The reverse is true. Salmon's Brook borders the proposed “Chase Park” development area and has already been the subject of several measures by the local water authority to alleviate the risk of flooding according to the numerous notices issued. Building so many new homes in this area would all but eliminate ground water absorption with resultant much increased pressure on the small local waterways such as Salmon's Brook. Around 40 years ago, several homes in the vicinity of Frog's Bottom were flooded by an overflow from Salmon's Brook during a previous relatively small round of home building.

*Enhancing and increasing habitat and wildlife:* Clearly, building on such a large swathe of green belt can only have a seriously adverse impact on habitat and wildlife.

*Improving the perceptions of the borough as aesthetically pleasing:* This is exactly what building on green belt land, or even threatening to do so, will not do.

*Amelioration of high summer temperatures arising from urban heat island effect:* High summer temperatures will only be exasperated by large new developments such as those planned.

*Increasing tree canopy across the borough:* An area containing thousands of trees will be laid to waste if these proposals are agreed. Planting a few more elsewhere will not compensate.

There are other matters to consider, for example loss of amenity. I enjoy regular walks with my wife using the public footpaths that connect London Road with Trent

Park and with the Ridgeway. In a typical walk of around 45 minutes, I regularly encounter 20 or more other people doing the same thing as me. This practice will not be rewarding or worthwhile if we are walking amidst a sea of new houses.

I understand that the current London Plan which sets rules about the release of Green Belt land for homes will make these proposals impossible to implement. As this London Plan is valid until 2029 these proposals will be in conflict with it for at least the next 8 years. Central Government policy on the Green Belt is also aimed at preventing urban sprawl and encroachment into the countryside through re-designating green belt land such as would happen under these proposals. If Councillors vote again to pursue this plan the immediate impact will be a blight on all property owners within a few miles of the development for at least the next 8 years. Why are Councillors in the ruling party intent on bringing HS2 like issues to Enfield? It is my belief that passing such a plan would reflect far worse on the Councillors and the local council administration than taking more time to find a viable alternative which is capable of providing more homes earlier than c10 years and with far less impact on the environment, countryside and residents. The Plan is after all, already 2 years late. A short further delay is unlikely to have grave implications.

An aspect not covered in the consultation is the very significant proportion of the proposed ex-green belt homes which are planned to be designated as "affordable". I suspect that there may be an ulterior motive at play in the council in proposing to drastically increase affordable housing in this part of the borough. This could have the effect of distorting the balance of social characteristics in the area and I am concerned that this may be a deliberate attempt to change the likely electoral make-up over the longer term.

Lastly I would like to raise my concern about the financial aspects of this proposal. My understanding is that the bulk of the land now comprising Vicarage Farm (the site for most of the proposed "Chase Park" development) was sold by Enfield Council to private ownership several years ago. Apart from calling that decision into question, it would surely provide much better value to local tax payers if any proposals for development are centred on Council owned land so that the Council's finances are improved rather than the unwarranted enrichment of private land owners.

I can only implore anyone involved in this review process to reject this proposed Draft Enfield Local Plan 2019 – 2039 and to request that local officials instead plan something which a) complies with i) the Strategic Objectives set out in the Local Plan, ii) the London Plan and iii) the strict Central Government guidelines on development on Green Belt designated land, b) is less damaging for the interests of residents (including blight for >8 years for those closest to the proposed Green Belt land developments) and c) is more financially beneficial for local tax payers.