

To: Enfield Council – Strategic Planning & Design
13th September 2021
Re: Enfield Local Plan consultation
Draft Enfield Local Plan

Dear Sirs,
Ref: ELP (SP PL9)

Please register my objection to the above referenced draft Enfield Local Plan as part of the consultation process.

My objection is based on two key principles;

- 1) The ELP if implemented would result in a devastating and unnecessary destruction of essential green belt and land that contributes to environmental balance and is contrary to the critical environmental policy of governments world-wide attempting to minimise the detrimental affect of human activity on the environment.
- 2) The draft proposals are inaccurate and omit key factors which are at best misleading, and at worst misrepresent the facts of the proposed development areas, specifically relating to the Crews Hill area.

I am a resident of Burnt Farm Ride and, although not resident in the Enfield district, would suffer material harm and disadvantage from the proposals to create the number of houses envisaged in the Crews Hill area. The private road that serves my house and other residents at Burnt Farm connects with and provides rail station access and access to the place of my wife's grave (Strayfield Road Cemetery) and would be materially impacted by road use, congestion and the consequent pollution. The impact on the Crews Hill businesses and the Crews Hill Golf course, both of which I and my family use on a weekly basis, would be to remove these invaluable services. The extensive house building on the Green Belt, in particular in the Crews Hill Area, appears to be an unwelcome and unnecessary land grab proposed on the basis that the land area is "brown belt". This is factually incorrect and should be corrected in the plan. This correction alone would then ensure that the essential and valuable nature of this green belt land should not be included in the final ELP.

In summary my objection is based on:

- 1) The Draft Enfield Local Plan (ELP) has material omissions and errors which make the draft report incorrect and misleading.
- 2) The environmental damage from the proposal of such a large number of dwellings in an area of natural beauty and historical significance.
- 3) The mistaken view that the proposed site at Crews Hill is brown belt and of little use when it is in actual fact a thriving local economy with substantial business and employment in retail, leisure, agricultural and farming use.
- 4) The proposals would result in significant blight for residents in the areas affected and destroy historic green belt areas unnecessarily (as alternative sites would offer far better and less damaging options for housing developments).

- 5) The impact on wildlife and flora that has carefully been protected over the 10 years that I have lived at Burnt Farm, would be lost forever and the environmental impact and social impacts of the proposals have not been considered.

Aspects of the draft ELP that I believe are important to consider include the following;

- 1) Burnt Farm Ride, which is a private no through road with historic features including public footpaths, bridle ways and listed buildings (including my own) together with operating farmland for both arable and livestock would be materially blighted. The ELP incorrectly implies this land is 'brown field' when it is in fact the essence of what the green belt planning guidelines aim to protect.
- 2) The ELP makes statements that the council proposes to preserve the Green Belt when the proposals clearly destroy green belt land and requires de-designation.
- 3) The Crews Hill road system is acknowledged to be inadequate for current use in peak times and in particular when there are any congestion issues on the nearby M25. This would be exacerbated with the proposed new housing.
- 4) The importance of both the horticultural sector in Crews Hill which is one of Europe's most important retail estates and the farming community which provides essential employment and food is omitted in the ELP.
- 5) The lack of any reliable evidence to support estimates for population growth and shortage of brownfield land in Enfield, necessitating the de-designation of Green Belt for house building. This would result in an irreparable development potentially having little demand and proving to be unsupportable in terms of local access, amenities and services.
- 6) Maps included in the ELP are often inaccurate and misleading including those showing the Crews Hill Area for example;
 - The master map fails to distinguish correctly between different land uses in Crews Hill.
 - The detailed map of Crews Hill "3.10 Crews Hill Concept Plan" is inaccurate in terms of its designation of the area, particularly along Burnt Farm Ride which appears to be entirely designated, incorrectly, as brownfield land.
 - Whilst various maps included in the "Topic Paper for Crews Hill" (e.g. Figure 5 & 7) show the land correctly as agricultural or private green land, the headline proposals are inconsistent with that designation.
 - There is also a map in the site allocation proforma section of the ELP (SA48) which provides an accompanying text that mentions, without specifying the detail, 'heritage assets' 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". This states that the risk of harm to the Green Belt from development around Burnt Farm Ride and consequent de-designation is very high. This contradicts the ELP which claims to be protecting the Green Belt.

Rural environment blighted by the ELP:

- Burnt Farm Ride is a private road and no through road at the southern end of the Theobalds Estate, gated but providing public access to public footpaths and bridle paths.

- Burnt Farm Ride surrounding land is a haven for wildlife. Cuffley Brook and the land to Burnt Farm Ride with wildlife ponds is a known habitat for endangered crested newts. Bats and Tawny Owls nest here. Muntjac and Fallow deer freely roam the area. Rare bee orchids and pyramid orchids are found in the grass land, and there is an abundance of wildlife and wild flowers throughout the estate. The land also currently supports at least 4 pairs of Red Kites following their reintroduction into the UK countryside.
- The agricultural land with water meadows adjoining Cuffley Brook also supports the largest area in Greater London of pheasant and partridges.
- The area provides an essential location for public walking and horse riding contributing to community wellbeing and exercise.

Heritage assets blighted by the ELP:

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)

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 a food storage/processing centre

The Paddocks, a listed Grade II property with listed barns.

Burnt Farm estate including 3 Grade II listed residential dwellings.

Conclusion:

This ELP as applied to Crews Hill should be amended to reflect the unique and essential nature of the green belt and highly valuable contribution to environmental aims and goals for the community, region and national interest.

I am in agreement with other submissions from EnCaf, Enfield Roadwatch, Enfield Society, the Crews Hill Golf Club and the views of the CPRE. 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 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 improve quality of life.

This type of land use plan goes against the concerns and evidence of global warming and environmental sustainability principles, and should be reevaluated to reflect those priorities of protecting the environment and well-being for the community