

Dear Enfield Council

Response to the Draft Local Plan Reg 18 Consultation 2021

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

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; Policy SA52 page 372; and Policy SA62 page 383 and SP CL4 pages 277-279 – all of which propose the de-designation of Green Belt for housing and other purposes.

I will start by saying that I am not against housing development, I would have actively welcomed a 'bed-zed' eco-social and affordable housing development on some greenfield land that was integrated into the landscape sensitively.

I am against housing development - despite the Council's assertions and stated objectives in the Draft Local Plan - that will not reduce inequality in the Borough in terms of affordable housing and access to green space or contribute to climate change mitigation in the slightest. This, while concreting over the irreplaceable Green Belt for executives homes, unaffordable even for immediately local people in West Enfield, let alone people in the East side of the Borough who are in the greatest housing need. I reference here your own leaflet's glowing reference to "well designed beautiful terraced family homes" and Comer Homes' constant reference in its Chase Park scheme to "quality homes" with one passing mention of "Housing renewal scheme projects providing new affordable homes within the area".

Green belt land is meant only to be used in 'exceptional cases'. An exceptional case *might* be the provision of mass, truly affordable housing.

However, clearly this is not the case with the proposed 'quality' development at Chase Park, to give an example. The Council's Whole Plan Viability Assessment says that "up to 50%" affordable housing could potentially be delivered on some greenfield sites, but also says that this estimate will depend on individual site assessments and, further, that the assessment does not include the infrastructure costs associated with building on Green Belt sites and that these costs could impact the deliverability of housing on these sites.

If the shared ownership homes at Trent Park are an indicative example, they require a deposit of at least £6,000 and annual incomes of £56,000 - £90,000 + solicitors fees. The only way therefore to meet the Draft Local Plan's stated aim of meeting

'Enfield's housing need and government housing targets (to provide) find decent and affordable homes in Enfield' is if there are adequate suitable brownfield locations off the Green Belt where this 'up to 50%' decent and affordable homes can be built.

If those sites *are* available, the 'exceptional case' for the Green Belt falls apart. If they are *not* available, then there is marginal benefit to the wider Enfield borough in terms of affordable housing delivered with the huge loss of Green Belt land, the only benefit being to the Council itself using the planning gain to plug the gaping hole on its balance sheet and the Comer Brother's huge profit.

From an environmental perspective, these landscapes are invaluable and irreplaceable. The remaining parts of Enfield Chase are unique in the southeast and a rare and valuable landscape asset from a biodiversity and heritage perspective, with rare birds, butterflies and other fauna regularly seen on the site, not to mention badgers which are protected. The loss of these sites would cause permanent harm not only to the Green Belt, but also to the very character of the borough. The ancient right of way Merryhills Way footpath, much used by Enfield residents and others for exercise and relaxation and the physical and mental health attributes of the footpath would be destroyed by development with houses proposed immediately either side. The various farmlands could be put back into productive use growing local food for local people. Crews Hill is incredibly important to the borough and should not be destroyed. Its garden centres and other businesses provide employment and a resource for people from Enfield and far beyond as research by the Enfield Society and Enfield RoadWatch shows. Instead of losing Crews Hill for executive housing, its horticultural activities should be encouraged and enhanced so that it can once again be a hub for food and plant production, generate income and jobs that actually would 'level up the inequalities' between East and West.

In addition, the arguments made that Chase Park will be sustainable and meet climate change targets, are built on sand. In the Comer Homes' plan, it is intimated that walking and cycling will be the main modes of transport and gives walking times which are frankly ludicrous. I have walked over the entirety of the site and the 5 minutes to Oakwood, 15 minutes to Enfield Chase and etc, might be true if you were standing on the far edge on each of the sites nearest those stations. Manifestly untrue for the vast majority of the development. Add to that the lack of provision of amenities, quote "The delivery of a primary school and other local amenities such as doctors and shops *if required*" (my italics), would see a huge use of personal vehicles or retail delivery vehicles for people to use the site. Clearly, not in line with carbon emission reduction targets. It is beyond belief that people will walk out the 30+ minutes to a local station to then start a commute, particularly in winter. Add to that the change in land use (and associated heating effects) and emissions through build and ownership of homes and it is clear that the development of this Green Built site - which is **not** developed on three sides contrary to Comer Homes' statements - will actively *contribute* to the climate crisis.

While I support housing development and support the ambition to meet Enfield's housing needs, I strongly object to the proposal to release Green Belt for housing

or other purposes. I believe that there are alternatives available to meet housing targets and that the Green Belt is a precious resource that should be protected and preserved for future generations. It is too valuable to lose for all the many environmental, ecological, economic, public health and other reasons that have been identified, especially during the recent pandemic. The Council has a duty of care for the Green Belt, in accordance with the London Plan and the National Planning Policy Framework [NPPF], and any intentions to release parts of it should be taken out of the local plan.

The comments provided in this response to the consultation are my own views.