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**Re: Response to Draft Local Plan**

Following the opening of Enfield Council's consultation on the local plan, I would like to make the following representations in my role as MP for Enfield North.

The document is broad and covers the borough in its entirety as a result I have limited my initial comments at this stage to those areas of most pertinent to my constituents.

I have engaged with a significant number of residents on the issue of the local plan and while my response considers their input, I have encouraged them to make their own representations to the council. My response reflects my own views on the current iteration of the draft local plan available for consultation.

**Spatial plan: Report section 2.4**

The need to produce an up-to-date local plan is a requirement of central government with the council having the responsibility to identify suitable developable land to enable it to satisfy the government's annual housing requirement. The current target sits at more than 1200 homes annually.

This target is not merely a goal but represents the most fundamental responsibility of a local authority, to provide quality homes for its residents. The local plan seeks to address this and needs to be ambitious to do so.

I do not accept the position held by some that no further housing is needed or that housing need can be simply addressed by identifying brownfield sites in the south and east of the borough.

Some of the points raised to this effect fundamentally misunderstand the challenges of urban and sub-urban regeneration and do not appear to recognise the dire housing need. The single biggest issue raised by my constituents relates to finding affordable housing locally.

It is essential that suitable sites for homes are identified within all parts of the borough including my own constituency.

**Green belt development:**

I do not believe that current restrictions placed on green belt development should be cast aside without a clear and compelling rationale presented.

National and regional planning policy is clear; Green Belt land should remain undeveloped to protect against urban sprawl. On a personal level I do not support the development of any of the protected, high quality, green belt sites within the local plan proposals.

It is true that significant areas of green belt are historic classifications, that do not reflect the current use or quality of the land in question and in some cases, there can be an argument made for a better use of this space.

This decision can only be reached through proper informed dialogue between Central government, local stakeholders, and the Council. I am disheartened that a more productive discussion on the potential to make better use of this land was not undertaken prior to the publishing of the draft plan for consultation. I do believe that some of the issues being raised by constituents in relation to the Local Plan could have been addressed by a proper dialogue between interested parties.

The draft Local Plan identifies several potential sites that sit within Green belt designated land. It is my view that without a genuine assessment of the nature of this Green Belt allocation and a clear and unambiguous case being made that supports the declassification of these areas as

green belt then development of this Land should not be a consideration of the Local Plan.

Without this exercise taking place any development proposal for these parcels of land will inevitably be refused by Central government or the Mayor of London who have made their position on the issue abundantly clear. As a result, the inclusion of this land represents a waste of the Council's Regeneration and Planning resources as these sites have no realistic chance of being successfully brought forward.

Green Belt is protected in National planning policy and unilateral action, despite being motivated by the desire to deliver new homes, is not sufficient to overcome this fact and will, ultimately, not achieve the desired goal of the provision of new homes.

Significant areas proposed for development are not in Green belt or are occupied by existing commercial or industrial uses. Their proximity to the Green Belt has no bearing on whether they are suitable for consideration at this stage of the planning process, and it is valid for the local authority to consider these areas in the long term as a potential location for new homes.

Communication relating to this has not been robust enough and an opportunity for a genuine discussion relating to these sites has been lost.

### **Transport provision and infrastructure.**

I support the councils desire to improve air quality and reduce car dependency as I believe it is one of the most significant issues facing all residents in the borough. However, as with other developments such as the on-going redevelopment of Chase farm, I am extremely concerned that the challenges relating to the lack of transport infrastructure to support access to these sites, let alone growth on this scale, has not been considered fully or given appropriate weight

The risk assessments within the Draft infrastructure delivery plan highlight several critical transport infrastructure projects that sit entirely outside of the council's control. These are critical to deliver the kind of growth that is being proposed at some locations. The current funding position both within TFL, Central government and at the local level leave a significant question mark over the delivery of these major infrastructure improvements.

Of particular concern to me is the highways section within section 3.6 of the same report that describes "key priorities" relating to improving air quality, encouraging modal shift and improving the safety and accessibility of the borough's hierarchy of streets. Within the planned provision of major projects, highlighted in the report, including the M25 improvement scheme and the Northern Gateway access project, many are unfunded or in some cases make the situation worse and bring greater volumes of traffic into the borough and onto residential roads. Little information is given to indicate how these key priorities will be achieved, failure to do so will only increase car dependency further.

I am concerned that the new proposed sites at Chase Park and Crews Hill focus too much on the proximity to rail stations while doing little to address the poor local transport connections which will still result in the majority of journeys being conducted by private vehicle.

While some improvements could be delivered by CIL and transport contributions from new development the lack of clarity regarding the major infrastructure improvements needed to deliver development of this scale causes me concern that this deficiency is not being given sufficient weight, even at this early stage.

This is reflective of my on-going concerns relating to the long-term redevelopment at Chase Farm Hospital where local transport provision for schools and the new homes have not been fully considered and adequately provided for resulting in further traffic issues due to the prevalence of private vehicles.

With regards to the potential intensification of development across the existing Southbury retail parks I remain gravely concerned that the air quality impacts caused by the proximity to the Great Cambridge Road have not been fully accounted for when identifying the area as a significant residential and placemaking location. I am not convinced that the scale of mitigation needed to make this a welcoming and healthy space would be possible at this location due to the extremely poor air quality along the A10, which will only be further exacerbated by the current

changes to the M25, that will bring further traffic onto this already busy road.

The plan identifies principles relating to mitigation against poor air quality but there is little concrete within the plan or supporting documentation to secure this. Air quality improvements need to be secured while ensuring mitigation measures are not used by developers to reduce the provision of public realm and affordable housing within the site. The Colosseum retail park development consented in 2020 is an example of this with extremely poor public realm proposed and no provision to ensure air quality on the site was improved.

I do welcome the commitment to deliver a greater provision of electric charging points to encourage the shift away from petrol vehicles. But greater public transport provision to key development locations is the only solution to reduce car dependency locally and development to date has done little to address this.

**Feryal Clark**

**Member of Parliament for Enfield North**

