

Dear Enfield Council,

I wish to raise the following objections to Enfield' the Draft Local Plan.

Strategic Policy SP SS1: Spatial Strategy

- Vicarage Farm (rebranded in the Draft Local Plan as 'Chase Park'), should NOT be included as a placemaking area for the following reasons:
 - It is as unsuitable location for a large-scale new housing development due to its poor connectivity to public transport, as has been correctly stated in the council's Transport Assessment.
 - The development would result in several thousand additional vehicles using local roads, which would have a significant negative impact on air quality.
 - Vicarage Farm and the network of footpaths, provides valuable and accessible open greenspace for residents living across Enfield, and notably for residents residing in Town and Highlands ward, both of which were identified in the council's recent Blue & Green Strategy Audit as having a significant deficit of greenspace.

Strategic Policy SP PL5: Meridian Water

I object to SP PL5 because:

- (Point 3) A 30% open public space target as a minimum is inadequate for such a large-scale high-density development and would not deliver the greenspace needed or meet the standards set by the council's recently adopted Blue & Green strategy. Open public space should be measured as a ratio of greenspace to population e.g. 2.15 ha per 1,000 residents not as a percentage of the land developed.
- The CPRE's vision for a new substantial park at Meridian Water "Banbury Reservoir Park", which would help reduce the deficit of greenspace in the area and make use of unused and fenced off green belt land has been completely ignored but should be included.

Strategic Policy SP PL8: Rural Enfield – a leading destination in London's National Park City

I object to SP PL8 because:

- The aims of London National Park City have been misunderstood and misrepresented (for more information see - <https://enfielddispatch.co.uk/environmental-charity-slams-councils-misleading-green-belt-rationale/>). This makes it very hard to take anything said within this policy seriously and at face value.

- Other terms are also misunderstood and misused e.g. rewilding
- The “vision” is harmful to the local farming community, reduces the opportunity to grow food locally and would harm the local ecology.

Strategic Policy SP PL10: Chase Park

I object to SP PL10 because:

- It is an area of outstanding beauty, that is accessible to local people living in urban environments.
- Vicarage Farm and the surrounding network of footpaths provides valuable and accessible open greenspace for residents living across Enfield, and notably for residents residing in Town and Highlands ward, both of which were identified in the council’s recent Blue & Green Strategy Audit as having a significant deficit of greenspace.
- It is an unsuitable location for a large-scale new housing development due to its poor connectivity to public transport, as was correctly identified in the Transport Assessment
- The development would result in several thousand additional vehicles using local roads, which would have a significant negative impact on air quality.
- The site supports a variety of priority listed habitats such as deciduous and wet woodland, hedgerows, running water and veteran trees and is part of a wider network of similar habitats, and offers unique habitats within the borough. Therefore it is considered to be of key importance at a strategic level. Given the rarity of these habitats, and the unique circumstances that allowed these habitats to develop and establish themselves, it is considered that these habitats are irreplaceable if they were to be lost.
- This site is of key importance to local residents given the range of habitats and historic culture associated with it, and it is important at a strategic level as it forms part of a wildlife corridor which extends north into more rural settings.
- The proposed development would expose woodland and veteran trees to disturbance and trampling.

- The historic landscape associated with the valleys of Merryhills Brook and Salmon's Brook and some of the associated hedgerows are irreplaceable but would be obliterated by the development.
- A highly successful businesses of national significance would be lost (i.e. the Trent Park Equestrian Centre).

Strategic Policy SP H1: Housing development sites

I object to SP H1 for the following reasons:

- The number of homes that could be built on sustainable brownfield sites has been significantly undercounted (see - <https://betterhomes-enfield.org/2021/08/26/enfield-councils-draft-local-plan-undercounts-the-number-of-homes-that-could-be-built-on-brownfield-sites/>)

Strategic Policy SP H2: Affordable housing

I object to SP H2 for the following reasons:

- The overall 50% target for affordable housing is logically impossible to achieve given the other sub-targets set for different types of housing i.e. sub targets are set at 50% or below, none are above 50%. Furthermore, some of the strategic sites identified in the plan already have planning approvals in place and practically all of these will deliver far less than 50% affordable housing i.e. there is already a significant shortfall against the target. This means forthcoming developments would need to deliver far more than 50% affordable housing to make up for the existing shortfall, but this is very unlikely to happen. (The GLA Planning Datahub shows that over the last 10-years, 26% of new homes in Enfield have been affordable, so it seems highly unlikely that 50%+ will suddenly be achieved)
- The targets of 50% affordable housing in all areas of the Green Belt, will not be met and is not supported by the evidence because, amongst other things, significant infrastructure costs have not been accounted for (for more information see - <https://betterhomes-enfield.org/2021/09/05/building-in-green-belt-areas-will-not-deliver-the-affordable-housing-enfield-council-claims/>)
- The policy allows too much of the affordable housing that may be delivered to be shared ownership, which is generally unaffordable to current residents in Enfield and does not reflect local housing needs of existing residents. Controls are needed to ensure a mix of intermediate housing products are delivered and to control the proportion of shared ownership homes delivered.

Policy DM H3: Housing mix and type

I object to DM H3 for the following reasons:

- Enfield needs far more homes with 3+ bedrooms, yet this policy does not put applicants/developers under any pressure to deliver these. Policies are needed that require applicants to show that they have properly assessed the delivery of 3+ bedroom homes and explored appropriate designs that would deliver these. DM H3 as it stands will simply see a continuance of the current issues we experience e.g. applicants come forward with a tower block design and planners say tower blocks aren't suitable for families so very few 3+ bed homes are delivered. What is needed is a policy that puts local housing needs (e.g. family housing) at the very start of the design process, not as the end. Policies are required that encourage or mandate a '**needs first**' approach to design and application process.

Policy DM H4: Small sites and small housing development

Whilst I largely agree with the aims of this policy, it is clear that the Draft Local Plan does not actually properly account for small sites and small housing development (for more information see <https://betterhomes-enfield.org/2021/08/26/homes-built-on-small-sites-serious-discrepancies-between-the-london-plan-and-enfield-councils-draft-local-plan/>). As a result this policy is just words without meaning.

Policy DM BG10: Burial and crematorium spaces

I object to DM BG10 for the following reasons:

- The following sites; SA59 Firs Farm Recreation Ground (part) and SA61 Church Street recreation ground, should not be used for crematorium space as there are more appropriate sites e...g in green belt.
- Far more detail and policies are needed about new burial spaces (e.g. SA58 Alma Road Open Space) in regard to accessibility, public access and urban greening.