

Consultation Draft Local Plan – Enfield

Thank you for the opportunity to comment on the draft Local Plan for Enfield. I must however say that I felt the very lengthy Draft Plan read more like a policy document than one intended for public consultation.

Due to where I live, my main focus and comment will centre on the proposals for Vicarage Farm ([Policy SP PL 10, pages 80-87, and Figure 3.11](#)); and, to a lesser degree, Crews Hill ([Policy SP PL9, pages 77-80 and Concept Plan Figure 3.10](#)).

Vicarage Farm

I saw the Vicarage Farm proposal published by Comer Homes Group in March 2021. I was dismayed that any development on the Green Belt would even be considered. The National Planning Policy Framework ([13. Protecting Green Belt land - National Planning Policy Framework - Guidance - GOV.UK \(www.gov.uk\)](#)) states that, “**13. Protecting Green Belt land (Paragraphs 137 to 151)**

137. The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

138. Green Belt serves 5 purposes:

- (a) to check the unrestricted sprawl of large built-up areas;**
- (b) to prevent neighbouring towns merging into one another;**
- (c) to assist in safeguarding the countryside from encroachment;**
- (d) to preserve the setting and special character of historic towns; and**
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”**

The Comer Homes Group proposal actually states “**Vicarage Farm is already surrounded on three sides by development. The location and topography of the site enables development with reduced visibility thus reducing the effect on the countryside and purposes of including land within the Green Belt**”. The very fact that the site is surrounded by development, as stated by Comer Homes, is the very reason it should be preserved in its current state and the very reason why the Green Belt was created in the first place. The document also states that there is a provision for between 3000 and 5000 homes to be created on this site, so even if we start at 3,000, chances are in the coming years it will actually end up being closer to the 5,000.

I was astounded when in June, the Labour administration at Enfield Council passed the motion that building on the green belt should go to public consultation.

The Government response to the local housing need proposals in “Changes to the current planning system” ([Government response to the local housing need proposals in “Changes to the current planning system” - GOV.UK \(www.gov.uk\)](#)) states “**More broadly, we heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places. But harm or homes is not a binary choice. We**

can plan for well designed, beautiful homes, with access to the right infrastructure in the places where people need and want to live while also protecting the environment and green spaces communities most value". It further states, "Many respondents to the consultation were concerned that the 'targets' provided by the standard method were not appropriate for individual local authority areas. Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in [Paragraph 11b of the NPPF](#) or our strong protections for the Green Belt."

This would suggest that even with the Planning reforms proposed by the current Conservative Government, there is still a requirement to protect the Green Belt. This is despite what has been alluded to by the current LBE administration.

I sent emails to many of the LBE elected councillors in June 2021 to express my views and opposition to this proposed development at Vicarage Farm. My email started, "I have lived in Enfield all of my life. I was born in Kestrel House on the Alma Road Estate (now demolished). I then lived in Aberdare Road on the Welsh Estate, followed by Worcesters Avenue in the Forty Hill area and then to my current home in Windmill Gardens. I worked for 25 years for the London Borough in Enfield in the Housing Department and was based in Edmonton. Working in housing, especially in the Edmonton area, I saw first-hand the deprivation and housing need in the borough."

I also contacted the London Mayor, Sadiq Khan about the development. I received a prompt reply from his office which reads,

"Dear Nicola, The Mayor strongly supports the continued protection of London's Green Belt. Through his London Plan 2021 the Mayor recognises the importance of the capital's Green Belt which makes up 22 per cent of London's land area. The Green Belt performs multiple beneficial functions for London, such as combating the urban heat island effect, growing food, and providing space for recreation. Protection of the Green Belt drives the re-use and intensification of London's previously developed brownfield land to ensure London makes efficient use of its land and infrastructure, and that inner urban areas benefit from regeneration and investment. The draft Enfield Local Plan, which will soon be out for public consultation, will set out the parameters for future development proposals in the area for the next 15 years. Consultation and engagement with the Local community is an essential part of the preparation of Enfield's Local Plan, so it is important that you make your views known to the council when presented with that opportunity in the coming weeks. The Mayor expects Enfield's Local Plan to align with the policies in the London Plan, and all planning applications to comply with the London Plan, in terms of the continued protection of the London's Green Belt.

Regards,

London Plan and Growth Strategies Team

GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA"

There has, in recent years, been large scale housing development in this area with properties built on the site of the old Highlands Hospital, followed by building at the Chase Farm Hospital and more recently the current development in Trent Park on the site of the old Middlesex University. The development at these locations took place on sites where previous development had already been evident. The developments at both Chase Farm and Trent Park are marketed as “executive” homes and do not fulfil the shortage of affordable housing. Properties in Trent Park are currently marketed at £565,000 for a one-bedroom property up to £1,985,000. That doesn’t reflect affordability does it? This new development proposed for Vicarage Farm will be no different as developers will want to maximise their profit margins.

Next I want to pass comment on the London Borough of Enfield Scrutiny Workstream report for the Meridian Water development date June 2020 ([Meridian Water Scrutiny Workstream - Report June 2020 \(enfield.gov.uk\)](https://www.enfield.gov.uk/scrutiny/meridian-water-scrutiny-workstream-report-june-2020)). I can remember when I was still employed by LBE that this development plan was in its infancy. It was hailed as ground-breaking and a means of resolving the housing shortage in the borough. However, the reality after reading this cross-party report is quite different.

I shall highlight the points that I found particularly poignant.

2.1.5. The local “Demand versus Supply” analysis conducted showed that the largest undersupply was for homes priced below £350,000 (2). The lowest priced homes at Meridian Water would be £345,000 and most are far higher (3). On this basis, the flats proposed for Meridian Water will not address the local need across Enfield, let alone in Edmonton.

2.1.6. Median household incomes in the local area are between £26,000 and £30,000 (4), whereas the lowest priced open market flat at Meridian Water would require an income of £59,000 whilst a 25% stake in the lowest priced shared ownership flat would require an income of £44,000 (see Section 2.3). Furthermore, the majority of the homes at Meridian Water would be open market, so it is unclear how local people would be the main beneficiaries if they could not afford to live in the majority of the homes created.

2.1.18. The demographic profile appears not to reflect the housing that would be delivered at Meridian Water; Those classified with the ‘Urban Cohesion’ category are unlikely to want to move whilst those classed as ‘Municipal Challenge’ cannot afford much of the housing proposed and; ‘Rental Hubs’ are unlikely to have the household income necessary to privately purchase or rent at Meridian Water (14). Which raises the question, who are these homes actually for?

2.2.4. Servicing asset debt: The Council’s peak borrowing levels would reach £2 billion in the latter part of this decade with Meridian Water related borrowing levels contributing to over a quarter of that.

2.2.5. Increased PWLB interest rate: The Public Works Loan Board interest rate was increased by 1% in October 2019. Any such increases will have a serious detrimental impact on the level of the Council’s debt payments.

2.2.23. CIL towards MW: Although it has been a long-standing policy of the Council to distribute all Community Infrastructure Levy (CIL) contributions towards Meridian Water and the Workstream welcomes the re-evaluation of that position, nonetheless the Workstream remains concerned that a high-level of CIL could still go towards Meridian Water to the detriment of the rest of the Borough. High reliance on these contributions may be perceived as influencing planning decisions related to undesirable developments across the borough in order to maximise CIL.

2.2.24. Impact on other wards: Channelling a significant proportion of the CIL towards Meridian Water could potentially compromise the needs of residents elsewhere across the Borough.

2.2.25. Social costs: Reduced funding of services and capital investments in all wards are likely to impact the wellbeing of residents not just in Edmonton but all across the borough.

2.3.1. The median household income in Enfield is £34,000. Appendix A2.2 lists the gross annual income of all existing households in Enfield. With the average house price in Meridian Water around £440,000, very few local residents (including most key workers) would find homes affordable to buy or rent there.

2.3.5. The median household income in Enfield is £34,000 (3), so the homes would be unaffordable to the majority of local people, especially those without a large deposit (e.g. from the sale of a current home). Two-thirds of renters in the private rental sector in Enfield claim some element of housing benefit, so it is unlikely they will have the deposits or income required (4).

2.3.16. To be eligible for shared ownership would require a household income of around £56k together with a £11k deposit (see table 6) - which does not reflect what the vast majority (95%) of people currently living in the rented sector in Enfield can afford (see Appendix A2.3).

2.5.3. There are currently 2,600 people employed at Meridian Water (1); 1,500 of these jobs will be lost as a result of the redevelopment (2). 2.5.4. The Employment Strategy sets an ambitious target of creating 6,000 new permanent jobs at Meridian Water, with a minimum of 1,500 jobs coming from local labour (3). This means the potential job gains for local people are closely aligned with the actual job losses (3a).

2.6.6. The Workstream questioned why Planning Panels had not been held for Phases 1 and 2 of the development and felt these would have been a good opportunity to engage with the public and to demonstrate transparency.

2.6.7. The Workstream are concerned about the media reports (1, 2, 3, 4) regarding the Planning Committee meeting for Phase 2, which was held without the public being able to attend despite the application being the largest the Council has ever made.

There were many points I could have highlighted. Such as the size and type of accommodation not meeting identified need. However, the points I have raised seem to clearly indicate that these large-scale developments do very little in the way of creating affordable housing. The lasting job opportunities at Meridian Water are not as promised and the project has created a huge debt which will undoubtedly impact the Council's ability to provide other essential services to residents of the borough. So, I ask myself, based on how your existing housing development has been conceived and implemented, do we want another Meridian Water at Vicarage Farm? It must be a resounding no.

This new proposed development at Vicarage Farm would put an unbearable strain on already stretched local infrastructure.

Enfield Road, Slades Hill and the Ridgeway are already very congested with traffic. This is very evident during the rush hour; school drop off and pick up times and most especially when there are temporary lights allowing for utility works (which does seem to be quite frequent). What happens when there are 3,000 – 5,000 new homes also needing to use these already congested roads? Each proposed household on the Vicarage Farm development could potentially have a minimum of 2 adults who own cars. That is 2 adults needing to get to work, do the school run, shop, and attend leisure activities. You can put in as many footpaths and cycleways as you like, most people will either

drive all the way to work or to the nearest train station. Similar with the school run, shopping and attending leisure activities. This is potentially a huge amount of additional traffic and pollution on already busy roads. TFL have recently stated that they are struggling as commuter levels are approximately a third of what they were pre-pandemic. However, car usage is back to pre-pandemic levels even with some people still working from home. If the current trend of driving as a preferred mode of transport remains, the roads in this local area will become grid locked.

Employment opportunities in this area are limited. The Draft Enfield Plan mentions Chase Farm as a local employer. I wasn't aware that they had a huge jobs vacancy and able to provide job opportunities for many of the proposed residents at Vicarage Farm? Perhaps we should look at Enfield Council as a potential employer, are there job opportunities at the Council for the thousands of proposed new residents? If not, this means that they will be commuting on already congested roads.

In 2017, Enfield Council commissioned a report on industry in Enfield ([industry-in-enfield-report-aecom-planning.pdf](#)). The report highlighted the type, location, size, and employment statistics for many of the industrial businesses within the borough. The report advises, **"The Socio Economic Assessment (2017) prepared by AECOM shows that three industry groups are well-represented compared with the average for Greater London and have experienced growth rates of over 15% between 2010 and 2015 in Enfield: retail, property, and health. In contrast, several industry groups are less represented within the Borough compared with the average for Greater London, but have experienced a positive percentage change and have a reasonable share of the employment market, such as accommodation and food services, information and communication, and property. Several industries are similar to the Greater London average, but have experienced notable drops in employment between 2010 and 2015. In particular lower value industries such as construction (-11.7%) and office-related sectors including business administration and support services (-15.7%) have been affected. At 90 employees per hectare, the study area's employment density is above the Londonwide average (68 employees/ha)¹ recorded for industrial land. However, this density varies greatly across the study area, with some pockets reaching density levels of over 357 employees per hectare (cluster Claverings Industrial Estate) and other areas falling below 2 employees per hectare on average (cluster Aztec 406). The area's building stock is primarily industrial buildings ranging in age from the pre-1945 era to post-2005 construction, with a majority of buildings built between 1945 and 1995 (21%)."**

We are aware that the pandemic has had, and continues to have, an impact on the way people shop, work and travel. These industrial areas, or brownfield sites, are usually well served by transport links and will already have utility services and telecommunications on site. Surely it would be better to analyse these areas post pandemic. Are these companies still trading? What percentage of employment is made up of local residents? What is the income generated by these businesses and would this land be better served as housing development land? Could the profitable trading businesses be relocated on an alternative industrial park to free up land? What about the decline in retail evident on every high street up and down the country? Surely this land can be utilised for development instead of a shop unit sitting empty which does nothing but attract anti-social behaviour? I understand the current Conservative Government are keen to encourage local authorities to exercise the change of use policies available to them on existing brownfield sites.

There is already a national drain on public services. There is a shortage of GP's and hospital waiting times for routine treatment are at their longest since records began. As we have already established, this proposed development is likely to mainly be the provision of executive homes which will be unaffordable for many people who currently reside in Enfield. It will instead attract people from

outside the borough. We can only conclude the wait times for a GP appointment or for routine surgery are going to get even longer.

Vicarage Farm sits on green belt land. I would perhaps, controversially so, state that all Green Belt Land is not created equal. Some green belt areas are literally waste scrub land. Vicarage Farm is not like that. It is a beautiful green area of fields, trees, and wildlife. It is well used by local residents for walking, running, and exercising dogs. It also provides a perfect route into Trent Park for those wishing to travel that bit further. I, on average, will use the fields five to six times a week. Sometimes just to walk, but predominantly as part of my regular run route. Local residents also love to visit the Shire horses kept in the fields. It is fantastic that residents have the opportunity to get up close to these gorgeous animals. I am sure the owner would be devastated to lose the facility when the horses have known this area as “home” for a number of years.

In March 2013, the London Borough of Enfield produced a report titled Enfield’s Local Plan Evidence Base – Sites of Importance for Nature Conservation Citations

<https://new.enfield.gov.uk/services/planning/planning-policy-information-review-of-enfields-sites-of-importance-for-conservation-march-2013.pdf>

Page 43 of this report covers a large area of the proposed development at Vicarage Farm. It states, **“Royal Enfield Rifles Site and Woodland at Vicarage Farm Grade: Borough Reference: EnB15 Grid reference: 530800, 197200 Size: 25.2 hectares Access: Free public access (part of site) Main habitats: Scrub, semi-improved neutral grassland, broadleaved woodland, running water Citation The site comprises a former military camp from the Second World War, semi-improved grassland, the Salmon’s Brook and associated vegetation and two blocks of broadleaved woodland. The former military camp was occupied by the army in the Second World War. It is now an extensive area of rough land, with pillboxes and the remnants of military buildings still present. The site has a varied topography and vegetation structure, and flora includes red clover (*Trifolium pratense*), wild roses (*Rosa* sp.), bracken (*Pteridium aquilinum*), Yorkshire fog (*Holcus lanatus*), false oat-grass (*Arrhenatherum elatius*), red fescue (*Festuca rubra*) and occasional sheep’s fescue (*F. ovina*). The area is likely to be particularly important for birds, insects, mammals (including bats) and reptiles. To the south of the camp are two grazed paddocks bounded by native hedgerows. The hedgerows comprise common hawthorn (*Crataegus monogyna*), elder (*Sambucus nigra*), apple (*Malus domestica*) and crack willow (*Salix fragilis*); male-fern (*Dryopteris filix-mas*) and ivy (*Hedera helix*) grows in their shade. The Salmon’s Brook runs through the site and is a broad shaded shallow watercourse in this location. Exposed shingles are a feature of the watercourse. Bankside vegetation includes pedunculate oak (*Quercus robur*), alder (*Alnus glutinosa*), field maple (*Acer campestre*), tall fescue (*Festuca arundinacea*) and yellow flag (*Iris pseudacorus*). To the east of the farmland are two blocks of woodland. The private grounds of Woolverton PreSchool Nursery, used by the nursery for teaching purposes, contains a dense stand of pedunculate oak / ash (*Fraxinus excelsior*) with native scrub understorey. Southeast of the nursery is a block of pedunculate oak and hornbeam (*Carpinus betulus*) with unofficial public access from the road to the east. This woodland suffers from an invasion of cherry laurel (*Prunus lauroceracus*) and fly tipping at the margins, ground flora includes violets (*Viola* sp.), and ferns including the male, and the broad buckler-fern (*Dryopteris dilatata*). To the south of the wood is a semi-improved paddock dominated by Yorkshire fog and common knapweed (*Centaurea nigra*) with abundant meadow vetchling (*Lathyrus pratensis*) and hoary ragwort.”**

The report refers to this area being important to birds, insects, mammals, and reptiles. When I have been running across this area at dusk, I have seen numerous bats along the waterway. I have also seen kites (birds of prey) amongst a whole host of other wildlife. The bats and kites I understand are

protected species. Your own report highlights the biodiversity and eco system that is already in existence, naturally. I do not agree that by erecting a huge housing estate in the middle of this area, that any form of man-made biodiversity measures will come anywhere close to what is already in place.

The recently published UN Convention on Biological Diversity advises that the best ways to help restore biodiversity are:

- **Reduce consumption**
- **Sustainable production**
- **Cut pollution**
- **Climate change action**
- **Conservation restoration**

Strangely, it makes no mention of erecting a huge housing estate and creating a man-made form of biodiversity.

I note today that I received a leaflet through the door inviting residents to attend “**A Taste of Enfield’s Big Green Climate Festival**” to be held later this month. I really cannot believe the hypocrisy on display here. On one hand Enfield Council wish to highlight the climate emergency we are facing and yet, on the other hand, are actively seeking to compound it. This festival is being run in conjunction with EnCaf who, if you view their website, are firmly AGAINST your green belt development proposals. Also against your proposals are CPRE (The Countryside Charity London), Enfield Roadwatch Action Group, The Enfield Society, Better Homes Enfield and Mayor Sadiq Khan (as the proposals go against the London Plan), the locally elected councillors for this ward and many local residents. The labour MP for Enfield North, Feryal Clark, has also expressed concern at the proposals. Yet still you push ahead.

We have for many years had a reputation as being one of London’s greenest boroughs. What about conservation? What about the decline in native species of insects, mammals, trees, and flower meadows? What will happen to the insects in the fields at Vicarage Farm? They will certainly reduce if not deplete almost in entirety. This will impact the bird and mammal population that feed on them (including the bats and other at risk or protected wildlife). Without the mammals and smaller birds, what will happen to the birds of prey such as the kites? What will happen to the foxes that will be forced to look for food around bins and in people’s gardens? The whole existing natural ecosystem will be broken and gone forever. The developers planting a few more trees or putting in a green grass area for the new residents to enjoy will do nothing to support the existing wildlife dependent on this area.

My next point is air quality. There is currently a widening development on the A10/M25 junction, largely due to the heavy flow of traffic which causes a pollution blackspot. We are of course aware, now more than ever, of the impact the way we live is affecting the planet for future generations. My husband and I worked hard to be able to buy our home. Both my son and I are asthma sufferers. We wanted to live in a “clean” environment, as much as anywhere can be in these current times. We found that where we live generally scores better for air quality than other areas. I believe this is not a coincidence and directly relates to the green open spaces surrounding our home. The case of Ella Adoo-Kissi-Debrah highlights the importance of having clean air to breathe. I do not want my family or me to have to breathe in polluted air. I do not want to sit in endless queues of traffic trying to get

home or worse, walking along Slades Hill and Enfield Road whilst breathing in the polluted air emitted from even more vehicles.

The proposing of this green belt development scheme will, I am in no doubt, open the floodgates for even more development on this precious land. In a recent meeting someone said that we are just the current custodians of this land, it really belongs to future generations. I whole-heartedly agree. Whilst we need to provide affordable and sustainable housing development, it should not be at the cost of the green belt.

Crews Hill

Most of the points I have raised regarding the development at Vicarage Farm are also applicable to the development proposed for Crews Hill. The infrastructure is not in place to cover a development of this size. The garden centres are well known and attract many visitors year-round. Many of the garden centres have multi-functions including the usual horticultural offerings but also clothing, aquatic fish and equipment, gifts, and places to eat. I know many people who live outside of the borough who travel a distance purely to go to Crews Hill. It is quite unique in that there is a choice of garden centres in a relatively small area that offers the consumer multiple retail outlets, each with their own specialisms. The area is very popular at Easter, Halloween and Christmas for the unique gifts and experiences that are on offer. As much as this area is lovely, it already groans under the weight of vehicular traffic caused by visitors. What will happen when you put in thousands of new homes? Another area that will become grid locked.

The loss of yet another golf course would be a real detriment to local residents who enjoy the activity. The golf course at Whitewebbs has already been lost. A couple of years ago we had a family function at Crews Hill golf course. Everyone commented on how beautiful the outlook was.

The LBE banners I have seen in Trent Park and on the back of buses have slogans along the lines of live local, eat local, shop local and play local. Once again, I am struck by the hypocrisy of this when the proposed development at Crews Hill will remove local employment, will remove local eateries, will remove local shops, and remove a leisure facility.

To avoid repetition, I will not rehash the comments I made about Vicarage Farm, but I wish to make clear that many of the points raised there are also applicable here.

The London Plan asks that Green Belt land should provide a useful function. Whilst it already protects us against pollution and climate change, we could also look at sustainable farming which would create local food production and local jobs. Planting of flower meadows and the creation of nature reserves would encourage insect activity and enhance the natural biodiversity already in existence. Perhaps the creation of a carbon neutral classroom at Vicarage Farm that can teach our school children about climate change, sustainability, and biodiversity but in an interactive, hands-on way? Inspiring the next generation to take control of the future and make real change. The classroom could also be used to teach the rich history of the area relating to the Second World War, with the history relating to Mansion House at Trent Park also being taught (military hospital used to spy on German POW's).

Please let us show that we are a forward-thinking borough, that we can buck the trend of decimating green open spaces, that we care about the environment and value our wildlife, not only for the good of the animal population but also for the health, especially the mental health, of the residents that live here.

Please do not approve these developments. Instead look for the cleaner, greener, and less impactful developments to fulfil the housing need within the borough.