

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:

**THE GREEN BELT**

**De-designation of Green Belt for housing and other purposes** -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

1. These sites are part of historic Enfield Chase, which is unique in the southeast and played an important role in the development of Enfield. It is a rare and valuable landscape asset and its loss would cause permanent harm not only to the Green Belt, but also to the very character of the borough.
2. I also object to Policies SA62 page 383 and SP CL4 pages 277-279 because they transfer part of Whitewebbs Park, a public amenity, into private management. I reject the Council's analysis that Whitewebbs Golf Course was losing money and call for its reinstatement.
3. I am also objecting to Policy SA52 page 372, which would remove part of Rammey Marsh, a wildlife area and public amenity, from the Green Belt.

Most of these sites are part of historic Enfield Chase, which played an important role in the development of Enfield. The remaining parts of the Chase are unique in the southeast and a rare and valuable landscape asset. The loss of these sites would cause permanent harm not only to the Green Belt, but also to the very character of the borough. Vicarage Farm is crossed by the 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. The farmland could be put back into productive use growing local food for local people. Crews Hill is equally 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 beyond. Instead of losing Crews Hill for housing, its horticultural activities should be encouraged and enhanced so that it can once again be a hub for food and plant production.

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.

**HOUSING AND AFFORDABILITY**

Generally I found that the concept of affordability of housing is vague as it is not clear what the council means by the phrase "genuinely affordable". For instance the 8.2

Strategic Policy SP H2: Affordable housing p 194 is non-committal:

- “The Council will seek to maximise the delivery of affordable housing in the Borough and aim to secure 50% of all new homes across the plan period as genuinely affordable.”

There are no specific targets for affordability in developments of 10+ homes (8.4 Policy DM H4).

Chapter 8 is entitled “Homes for All” but there are no policies in Enfield’s Local Plan that explicitly deal with homelessness; the homeless are barely mentioned.

**Tall buildings.** I am also objecting to the tall building policies on pages 156-160, Figure 7.3, Figure 7.4 and Policy DE6, and SA2 Palace Gardens Shopping Centre page 321 which propose areas for and the acceptable height of tall buildings which, in many cases would mar the landscape and are unnecessary because other lower-rise building forms could provide the same accommodation, as stated in the policy. Would these be really affordable, knowing that it is not possible to obtain a mortgage for a flat above floor 7? There is no consideration given to issues related to climate change and carbon emissions in the proposals to build high rise buildings. The Local Plan, by virtue of 68 mentions and policy DE6 Tall Buildings, commits to “tall buildings”. Nowhere in the local plan is there an analysis of tall building design for adaptation to climate emergency, or reflections on concerns such as: • lifts use electricity • how shade is provided in tower blocks 13 • how 100 degree heat is mitigated in tower blocks • air conditioning: which consumes electricity, emits heat and employs refrigerants that are greenhouse gases (GHG) more potent than carbon dioxide.

## **CLIMATE CHANGE, CARBON EMISSIONS & THE EDMONTON INCINERATOR**

I have many concerns about the council’s commitments to enact policies designed to mitigate for and adapt to the challenges of climate change. For example there is not enough emphasis on upgrading and expanding existing buildings, instead of new buildings as well as damaging the existing green belt, which provides important climate change mitigation functions.

Most shockingly, there is no discussion on the carbon emissions implication of the replacement, with a much larger construction, of the waste incinerator in Upper Edmonton, of which there is no mention in **PL4 Angel Edmonton**.

This incinerator is the very opposite of renewable energy (SE6) and the antithesis of a circular economy (SE3) because of the embodied carbon associated with demolition and reconstruction. As stated in SE3 “up to a fifth of carbon emissions associated with UK building stock comes from embodied emissions associated with new builds”.

There are also the carbon dioxide emissions which are not listed by London Energy as emissions, though carbon dioxide emitted by incineration of waste broadly matches that of oil, gas and coal fired power stations. **The policy to replace the incinerator blatantly ignores SE5 Greenhouse Gas emissions and low carbon energy supplies which says** “Any new energy networks should prioritise non-combustible, non- fossil fuel energy as the primary heat source. Temporary fossil-fuel primary heat sources must only be installed for a maximum of five years prior to connection to an approved low carbon heat source and interim emissions should be reflected in energy statements and subsequent calculations and offset payments”. However, the incinerator is burning fossil fuels, in the shape of plastics.

## **AIR QUALITY, HEALTH AND GREEN SPACES**

The Air Quality Appraisal report <https://new.enfield.gov.uk/services/planning/air->

[quality-appraisal-vol-1-wsp-2021-planning.pdf](#) draws important conclusions. It says “Monitoring undertaken by the Council suggests that pollutant concentrations within the borough should now meet the objectives in most locations, although the monitoring coverage is limited.

The Air Quality Appraisal goes on “Modelling undertaken by the Greater London Authority for 2016 right across London highlights likely pollution hotspots within the borough. Particularly notable are areas alongside the M25, the A406 North Circular, the A10 Great Cambridge Road and the A1055 Bullsmoor Lane. These hotspots have been identified by the Greater London Authority as Air Quality Focus Areas”. The A406 North Circular is the site of the proposed enlarged waste incinerator in Upper Edmonton. Increasingly questions are being asked about microparticle emissions and their impact on health including guidance from DEFRA to Directors of Public Health which states “There is no safe level for particulate matter (PM10, PM2.5), while NO2 is associated with adverse health effects at concentrations at and below the legal limits”. The Local Plan fails to mention this, or the increased vehicular movements associated with the intention to import waste from beyond the boundaries of the North London Waste Authority. The conclusion of the Air Quality Appraisal is also concern:

It was found that an estimated 14,806 residential units across 18 site allocations would potentially be exposed to relatively poor air quality; about 60% of proposed units. 38 sites near Air Quality Focus Areas are, potentially, at risk of a “significant negative effect” from air quality. It goes on, “Site allocations with potentially poor air quality would require measures to protect new residential population from poor air quality.”

It isn't clear what these measures might be, but I would expect, under the circumstances, the Local Plan to at least address the potential impact of the proposed incinerator on health. It doesn't.

Heatwaves, or heat and hot weather that can last for several days, can have a significant impact on society, including a rise in heat-related deaths. “Heatwaves are among the most dangerous of natural hazards.”

The lack of woodland and appropriate green space for shade in the East of the borough is a major health concern given the changes in climate and the mid-summer temperatures that we're already experiencing. The urban heat island (UHI) effect is considerable in those areas and areas of green space and woodland of sufficient size are known to alleviate the issue and lower temperatures.

The **Integrated Impact Assessment Appendix A 4.26** explains the UHI and illustrates how Enfield is affected by summer heating in comparison to the rest of London. It concludes that the east of the borough is more adversely affected by heat and, that since poorer Londoners will be more adversely affected by UHI, and that heat is more of an issue in the east of the borough, LBE will “need to carefully consider the spatial distribution of development, it's impacts on heat and the social and economic east/west divide in the borough”...

It's well established that UHI is exacerbated by dark surfaces and that increasing the proportion of white surfaces (eg on roofs) can alleviate the heating effect. The draft Local Plan does not address these sorts of solutions that are being adopted elsewhere, for instance regarding the impact of tarmac in large quantities or the increase in the UHI arising from two massive housing developments in Chase Park PL9 and Crews Hill PL10. These areas currently have relatively low land surface temperatures and should remain that way.

Reporting that the Met Office is predicting hotter and drier summers with London being located in the driest region of the UK, the IAA considers that drought is as significant a concern as flooding. Whilst the policy response to flooding in the draft Local Plan is admirable, drought isn't mentioned at all.

The environmental impacts of drought may include low flows in rivers and impacts on wetlands. This can also cause a reduction in water quality and damage to aquatic ecosystems. Further with a rising population the water resource gap could be over 100m litres per day by 2040.

The IAA objective in respect of climate change is

- to ensure resilience to climate change particularly mindful of the likelihood of climate change leading to problematic high temperatures, worsened flood risk and increased risk of drought.

It appears to me that the draft Local Plan does not do this.

For example, reports from Better Homes for Enfield reveal, on the basis of data provided by Enfield, that “Meridian Water will deliver a lower proportion of open green space than Hong Kong” and in “Meridian Water – Greenspace, Health, and Inequality” that the redevelopment will have a detrimental impact on the existing local community's greenspace provision.

The Local Plan could address this by planning for green space and woodlands where they are most needed to address health and social inequalities ~ in the east of the borough in the form of “tiny forests” e.g. in existing parks and playing fields (e.g. Durrants, Jubilee, Albany, Bullsmoor Lane, Bellmore playing fields, school playing fields, in the two new small parks (Edmonton Marshes and Brooks) or as a continuous swathe across Lee Valley to Epping Forest. CPRE proposes Banbury Reservoir Park as one of Ten New Major Parks for Enfield, adjacent to Meridian Water.

The above are the only objections/criticisms and concerns I have managed to work out, given the massive amount of written material that had to be looked at. I have no doubt that this vast quantity of pages is not just off-putting to many Enfield residents but it also prevents them from participating in this very important consultation. Given this, I shall not be surprised if the council will be claimed that very few people objected to the plan...

