

Dear Sirs/madam

**Response to the Draft Local Plan Reg 18 Consultation  
2021**

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 dedesignation of Green Belt for housing and other purposes.

The key reasons for my objections are as follows:

**Historical importance**

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.

**Current use of the green belt land**

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.

In particular, Vicarage farm's footpaths are used on a daily basis by many of Enfield's residents and I see 100s of people of all ages using this space on a daily basis. During the periods of lockdown this was used as an outlet for people more than once a day and was immensely valuable for local residents.

Building on this particular part of the green belt will take away its benefits from the greatest number of people. Whilst I disagree with building on the green belt, I am also concerned that this is the least suitable part to be built on and the ONLY reason why the council has allocated this piece of land is because it is owned already by developers who have expressed their wish to develop the land. This is very lazy on the council's part and will lead to the maximum amount of disruption to local residents.

**The rights of Enfield's Residents**

Within the Foreword by the Leader of the Council within the plan it states:

*The pandemic has reminded all of us how important our open green spaces are for health and wellbeing. The Local Plan is an opportunity to provide more accessible green spaces for residents across our Borough, including in our more urban areas; this will address existing poverty and inequality.*

I'm glad that the Council's leader recognises that green space is important but it is false to say that the Local Plan is an opportunity to provide more green spaces for residents across the Borough. By building on these green spaces you are taking away this very enjoyment and right for the existing residents of Enfield and merely shifting them along to the NEW residents of Enfield that will move into this green space. It should be the job of the council to serve their EXISTING residents and by building on the green belt you are simply harming those you are meant to serve.

The primary reason for my family and I living in EN2 is because of the cleaner air we can enjoy at our home in comparison to other areas within London. My eldest son has severe asthma and most nights he will suffer from coughing fits. This is despite him living on the doorstep of the green belt and the medication he takes. Should there be 3,000 homes built in our back garden it would pose a great risk to his health and we would be forced to move. We are unlikely to be the only ones, with approximately 12% of the population of the UK being diagnosed with asthma.

#### **Party politics**

On the evening of the 9<sup>th</sup> of June 2021. Cllr Calsikan stated

“if it is ok for there to be density around Edmonton Green train station then it is ok for there to be density around other stations”

I believe that this is the politics of hate and envy by the Labour party and a policy to import voters into other parts of the borough. Edmonton Green is Edmonton Green and every single resident of Enfield Green would have moved there knowing it is densely built. Nothing has changed for them other than the constant improvements and investment by the council to improve the area.

On the other hand, the areas where the council proposes to build has had a lower level of investment per head and the residents have moved to those parts of Enfield for the green spaces and additional health benefits. My grandparents came to England and initially settled in Hackney and Finsbury Park. They aspired to move to the borders of Hertfordshire for their children and grandchildren to improve the quality of their family's lives and this is a common story. Enfield Council is now proposing to chase these families out of Enfield or to at least move from their current homes where they are settled in order to continue to enjoy their same standards of living.

Cllr Yusuf also proudly stated in a previous council meeting that “there are parts of the greenbelt which are a disgrace”. It is clear that the green belt holds little value to members of the Labour Party and that Enfield's current residents should no longer have access to this “disgraceful” land.

There does seem to be some similarities between with what this current Labour Council proposes when compared to what the Conservatives worked to achieve in Westminster at the time when their council was under the leadership of Dame Shirley Porter.

## **The number of houses to be built in Enfield**

The council had the opportunity to write a plan to accommodate one of three options.

Option 1: Baseline growth by accommodating 17,000 new homes with some other land uses, including limited nature recovery and green and blue infrastructure investment.

Option 2: Medium growth by accommodating 25,000 new homes with a full range of land uses, including extensive nature recovery and green and blue infrastructure investment.

Option 3: High growth by accommodating 55,000 new homes with a full range of land uses including some nature recovery and green and blue infrastructure investment.

The draft local plan has failed to give sufficient reasons why the option for 25,000 homes has been selected for development.

Has the impact of Brexit been carefully thought about? Does the 25,000 include the expected population growth for residents alone or is this what you expect from outside of the borough.

Within London if you were to build 100,000 homes in Enfield and you will fill those homes but the annual requirement will then grow exponentially due to the population uplift. If you build 17,000 homes then you will fill those homes also but it will create a smaller pressure of growth for future generations.

The local plan has not made it sufficiently clear to explain it will address the homeless issues and home affordability issues by building on the green belt but simply claims that it will. Building does not solve these problems but by increasing the population of Enfield you will only be increasing its issues and have more residents that require help. We need to address inequalities and homelessness by other means and not just building homes for additional people to flock from outside of Enfield into.

Meridian Water is set to deliver an additional 5,000 homes shortly after the local plan's timeline. How has this been accounted for?

The private sector, without any form of partnership with the council, delivers around 500 new homes a year in Enfield through smaller scaled projections. This does not seem to have been taken into account as a large portion of the homes which the council claims to need to be delivered will be done so outside of the local plan drawn.

There are 1000's of homes in Enfield where planning applications are either at the stage of awaiting applications or the applications have been approved but works have not begun. In fact, the Local Government Association states that 2.78m homes have been approved in England since 2010-11, with only 1.6m built.

### **Vicarage farm**

A land registry search shows that the land at Vicarage Farm is owned by Lindentree Properties Ltd which is incorporated in the British Virgin Islands. The address of the company is stated as 1 Comer House, 19 Station Road, Barnet, EN5 1 QJ.

The purchase price is stated at £2,750,000 and was registered on 25 July 2005.

REGISTER EXTRACT

Title Number	: NGL434706
Address of Property	: Vicarage Farm, Hadley Road, Enfield (EN2 8LA) and 3 and 4 Vicarage Farm Cottages, Hadley Road, Enfield (EN2 8JZ)
Price Stated	: £2,750,000
Registered Owner(s)	: LINDENTREE PROPERTIES LIMITED (incorporated in the British Virgin Islands) (UK Regn. No. Y) of 1 Comer House, 19 Station Road, Barnet, EN5 1QJ.
Lender(s)	: None

By allowing this build it will be playing into the hands of developers which buy speculative green belt land and sets a dangerous precedent of the future of the farmland in Enfield. This will encourage a rush of developers buying the land to be put out of use and banked in order to wait for the day the council has another council leader which is happy to give up Enfield's green belt.

Whilst the local plan proposes up to 3,000 new homes on the site, Comer Group have previously published plans for 5,000 new homes on the site. It is likely that any agreement with the council will be breached as with their development of Princess Park Manor. Comer Group were found to have built 83 homes on part of the site rather than the 64 that they had permission to build. This resulted in a £4m fine payable to the council.

We can not trust the Comer Group to stick to any plans agreed with the council.

**Environmental factors**

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.

Climate change in recent years has led to an increase in flooding. Salmon's Brook has required vast amounts of investment in recent years to prevent flooding in Enfield and further investment is still required. By building all over this key area is likely to increase the risk of flooding in this part of Enfield.

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.

In order to reduce the carbon footprint of London, Enfield Council should work with its many local farmers to support them to farm foods which will feed Londoners and help play an important role in reducing the carbon footprint of London as well as creating local jobs.

### **Brownfield and other sites**

The council does not appear to have considered all of the brownfield sites available and has not engaged sufficiently with commercial land and building owners to discuss how their properties can be redeveloped.

Following a consultation, the government has introduced a new permitted development right (“PDR”) allowing the conversion of Class E uses (commercial, business and service uses) to Class C3 residential use without the need for planning permission. Since the introduction of cycle lanes and the sell off of many council owned car parks we have seen the number of boarded up retail units on our high streets increase and is now a common sight throughout Enfield. It is now likely that many of these sites will be turned into residential units, but this plan does not appear to have taken this into account.

There are many reasons why the local plan proposed by Enfield Council should be rejected and in summary my recommendations are:

- Reduce the planned number of builds to 17,000;
- Protect Enfield’s green belt and do not include it in the draft local plan;
- Deliver Meridian Water project within 10 years;
- Include a provision for current rate of annual private developments; and
- Develop a plan which does not harm its residents but will enhance their quality of life.