
I am writing formally to object to a number of proposals contained in the Draft Local Plan and also to aspects of the consultation process. I apologise for being a day late - I've had a difficult issue to deal with over the past few days which delayed finalisation of my draft. I hope in any event that you will accept these representations, none of which will surprise you as I have been in touch raising these issues in different ways in my capacity as a Member.

To deal with process first.

There is little escaping the fact that significant time was lost following the Council adoption of the Draft for consultation in June, time which was important if only because the bulk of the time allocated for this consultation was during the school holidays when most families are busily preparing for or actually enjoying holidays, particularly this year given the Covid problems.

The other criticism is about communication. It is clear that not everyone knew of these proposals and were not delivered of the leaflet informing them. Moreover the leaflet was late being sent and was almost certainly an afterthought after I had personally raised the lack of one with the Chief Executive towards the end of July. Finally, the Drop In centres only covered three corners of the Borough, Ordnance Road in the north east, Edmonton, and Palmers Green in the south. and Large numbers of residents of the western wards including my own, Grange, Town., Chase Highlands and Cockfosters did not have the advantage of that facility. Moreover the existence of the three centres was not widely publicised.

Substance

Turning to the substance of the Draft Plan, for me there are several main issues - housing needs projections and supply, release of green belt land, development of historic sites, development of supermarket car parks, and lack of transport and social infrastructure, all of which I will deal with in turn.

Housing Needs Projections and Supply.

SP S51 projects the need for 25000 new homes over the Plan period. It is not entirely clear how this figure has been arrived at - it would certainly seem to be at odds with ONS population growth projections, and they were produced pre pandemic and pre Brexit.

These latter phenomena have between them produced a particularly sharp exit of people from London, and must logically have included Enfield numbers. It follows that the 25000 target is almost certainly too high.

To meet this number the Draft Plan proposes substantial development of housing in the Green Belt and other much prized sites within the Borough, while too little emphasis is given to brownfield sites. Equally, it has to be noted, and I'm certainly on record both in the Council Chamber and outside of it in criticising the Administration for its poor housing delivery over the last eleven years, and in particular its handling of the Meridian Water development which has proceeded at the proverbial snail's pace with the result that a very large housing scheme initiated in 2007/8 with a potential to provide 10,000 homes, will by 2023 have provided only c740!

The Proposed Release of Green Belt land

The Draft Plan proposes the release of approximately 10% of the borough's Green Belt,

and this despite the clear strategic policy contained within the Mayor's London Plan, published in its final form 2 March this year, which specifically plans the delivery of housing units to meet London's needs **without releasing any of London's Green Belt**.

Moreover, paragraph 141 of the NPPF specifically states that Green Belt should only be released if there are "exceptional reasons". For myself, I can't see any reasons that could be regarded as "exceptional" within the meaning of the NPPF. More importantly the Mayor certainly was of the view that exceptional reasons did not exist and confirmed the inclusion of the above statement in the adopted London Plan. Thus this part of the Draft Plan if approved in its present form would render the whole Plan inconsistent with the London Plan and would be in contravention of section 24, Planning and Compulsory Purchase Act 2004. As such I object to the proposed release of Green Belt Land, which is very much a part of Enfield's character and provides much needed relief from the urban sprawl, which is of course its *raison d'être*. There are related concerns for some of the sites proposed insofar as infrastructure is concerned, which I will turn to later.

The Enfield Green Belt contains a number of farms, two of which have been identified in the Plan as being suitable for housing in substantial numbers. We know that since Brexit government policy as evidenced by the Agriculture Act 2020 has been to encourage and enhance productive farming. The July 2021 version of the NPPF at para 174(b) encourages planning policies that contribute and enhance the natural environment by recognising the economic and other benefits of the best and most versatile agricultural land. The loss of any farming land and horticultural land in Enfield is in conflict with the NPPF's policy aim and will result in a major loss of such land, when what we should be doing is using policies and powers to encourage the use of these sites for productive agriculture and horticulture.

The loss of any Green Belt land involves the removal of natural carbon storage which helps to cool the heat created in built up areas and help to provide flood protection., and what is to replace the flood protection afforded by sites such as Crews Hill Golf Course after they've disappeared following redevelopment. The Plan is silent on this which leads one to ask, was it considered. Such losses will decidedly **not** help us to become carbon neutral by 2040, Enfield's stated aim.

Development of Historic Sites

I very much object to sites in Enfield which clearly have historical connotations and are part of the charm of the Borough being designated for development. These sites are part of what makes Enfield a fine place to live and work. If they are developed that attraction will be gone and self evidently can't be recovered. Once again it appears that those drafting the Plan have not had regard to the NPPF, para 190. The proposal for Chase Park to be developed to provide 3000 new homes completely ignores the history of the site and as such also runs contrary to London Plan policies.

Development of Supermarket car parks

I find the proposal to develop supermarket car parks for housing almost as incongruous as some of the earlier proposals discussed. In saying that, there is nothing inconsistent with my views about the need to use brownfield sites in preference to Green Belt - by definition supermarket car parks are not brownfield sites inasmuch as they are still in use and will continue to be used by customers of the supermarkets. I appreciate that there has been a major shift to online shopping, but this tends to apply more to non-food retailing than food.

It appears to me that this proposal is part of the agenda designed to virtually remove cars from our roads - an agenda which is quite simply unreal. There is of course very real concern about climate change, but the motor industry and regulators have between them taken sufficient initiatives to ensure that what is often dubbed the "love affair with the car" continues to blossom, but by using zero carbon vehicles thereby not further

contributing to climate change.

That being the case it would be madness to build over car parks, but realistically it can only happen if the supermarket companies are willing participants- otherwise it would require compulsory purchase to achieve it and that would be a thoroughly bad policy.

Lack of infrastructure planning

It is noticeable that while the Draft Plan waxes lyrical in its desire to tread its development tracks where few have gone before, very little consideration seems to have been given to the requirement for good and revised physical and social infrastructure to support these developments.

The planners are obviously aware that the road network in Enfield in normal times is severely stretched. They are also aware that the Borough accesses the M25 at two junctions within or just on its boundary, to say nothing of the three major routes, A10, A111 and A406 running through the Borough, but unimproved relative to the volume of traffic carried. This brings significantly added pressure to Enfield's Local roads particularly when accidents occur on the M25 and motorists decide to turn off at either of the two junctions into the Borough, 24/25. In addition, traffic moving west/east and north/south to destinations both within and outwith the Borough bring yet more pressure on capacity with resulting consequences. The Draft Local Plan seems almost oblivious to this. It's proposals for Chase Park, Vicarage Farm and Crews Hill to name but a few, are all in areas in close proximity to, but not adjoining the major roads mentioned. Traffic created by development in these locations, whether occupiers' vehicles or delivery vehicles all have to use the present narrow roads and lanes to access major routes, or more particularly to access town centres or other in Borough destinations. These roads, though maintained, are largely unimproved and in a number of cases moreover, cannot be improved without destroying the rural and semi rural character of the areas in which they are located. This inevitably means more cars and other vehicles using the same road infrastructure, causing more congestion, pollution and not reducing carbon, and thus probably negating climate change initiatives. The Crews Hill proposal is particularly striking in that regard, where the existence of a railway station is curiously held up as an argument supporting redevelopment. I say "curiously" because TfL grade the public transport accessibility level for the area at zero, and moreover have no plans to increase it, which means that a housing development in that area will inevitably bring with it a sharp increase in car use, if for no other reason, the fact of car dependency!

It is another reason why these proposals are in total so objectionable and why I have no hesitation in objecting for those reasons. That apart, what provision has been made for schools, hospitals, doctors' surgeries/ clinics, nurseries etc, because all of these are essential to the developments envisaged by the Plan.

For all of the above reasons I cannot support the proposals in the Draft Local Plan.

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Councillor for Grange Ward