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Strategic Planning & Design
London Borough of Enfield
Civic Centre
Enfield

**SUBMISSION TO THE LONDON BOROUGH OF ENFIELD ON NEW DRAFT
ENFIELD LOCAL PLAN BY CREWS HILL RESIDENTS ASSOCIATION**

The basis of this follow-up submission from Crews Hill Residents Association to our previous email submission is the many changes LBE has made to its consultation documents some weeks after it the first version was published on its public consultation website.

These original errors, or errata as the council termed them, were, we contend, substantive and prevented anyone reading them to form full and accurate interpretations of the proposals.

The corrections have, however, done nothing to change our view that the proposal to de-regulate large parts of the Metropolitan Green Belt to permit large scale residential development – removing the legal, environmental and legal purpose of the Green Belt - is nothing short of a land grab by a council already heavily in debt aimed at a soft target thereby increasing revenue through council taxes on each of the new homes and businesses and Section 106 and other similar agreements with developers.

We believe that the payments the developers would make to the council would merely be added to the cost of the developments, which would then be passed on to the purchasers of the new homes, putting them even further beyond the financial reach of most of the people of Enfield, especially those most in need of a new home such as those in emergency accommodation and temporary housing.

We do not believe that the payments made in Section 106 agreements would in fact be spent by the council on the works for which they were intended, and will merely be swallowed up in general administration costs.

The council does not offer anywhere in the plan offer any means of sufficiently compensating for the loss of environmentally important areas beyond a brief mention of “grass verges”.

In its latest form we continue to believe that it is still not possible to understand the contents of the plan and form a clear picture of what is actually proposed. It presents what are effectively two versions, arguing the pros and cons of each suggestion whereas it should provide a clear path of what is proposed. Residents can work out the downsides for themselves easily enough.

There is no clear evidence that the council has done accurate and meaningful research into the true numbers and sizes of available brownfield sites in the borough, nor provided an accurate assessment of how many homes can be provided on individual sites, preferring instead to use an abstract figure which it admits is just that. With such figures, how can any

proper assessment be made of how many new homes can in fact be built on brownfield sites, comparing that figure with the number of new homes the borough is targeted with delivering over the time period of the plan.

Proper analysis of the brownfield sites situation has been carried out by the CPRE, which has also provided accurate estimates of the number of new homes that can be built on these sites. The result is that these sites can provide more than the total number needed, and so obviating the need for the council to find other locations for residential development. This result negates the need to de-designate any parts of the Metropolitan Green Belt.

The Draft Plan does not pay sufficient attention to the environmental impact that large scale residential developments in the Green Belt would have on the air quality of the general area and the health of its residents. Its argument that concreting over thousands of acres of green fields and replacing this catastrophic loss with more roadside verges is not sustainable. The grass in the fields and the trees on the land play a valuable role in absorbing carbon and other greenhouse gases in the air, storing it in the ground. This cannot happen if there is neither grass nor fields.

To build new homes on brownfield sites will obviously mean that they will be part of an existing community and all of its infrastructure, from schools to shops, GP surgeries, hospitals, pharmacies, leisure and recreational facilities. All residential developments need this same infrastructure and without it the development is not sustainable. It is simpler to add to an existing community and its infrastructure than to have to create a whole new infrastructure for a new development some distance from the existing community. To adopt the latter approach would enormously increase the cost of such new communities.

In creating a whole new separate community which cannot, due to distance, make use of an existing community's infrastructure would mean that the new residents would be totally dependent on using their own cars to get to work, to get their children to school, to go to the shops, the hospital, shops, GPs', pharmacy. This would create a considerable quantity of carbon and other greenhouse gases and contaminants, further polluting the atmosphere in the borough to the detriment of its residents. This would run counter to the environmental tenets of the countryside absorbing those gases and helping to purify the air that those same residents would breathe.

There are parts of the Green Belt which are not technically brownfield sites but are occupied by garden centres and related businesses, particularly in the Crews Hill area. These sites are, in fact, Green Belt with permission for horticultural use, a clear distinction in the legal status of the land. That the sites are in commercial use should not, because of their legal status, be used to legitimise an attempt at gaining planning consent for residential development. Under current legislation there is a presumption against residential development in the Green Belt unless there are very special circumstances. Nowhere in the whole Draft Enfield Local Plan are any special circumstances state to justify why this presumption against residential development should be overruled. Given that, the whole plan falls.

That there a number of current unlawful uses of sites in the Green Belt is due solely to the almost total absence of enforcement action by a chronically under-staffed council department, which in early 2020 admitted it had 35 actions pending but even in September 2021 not yet enforced, in Crews Hill alone. The state of the Green Belt is therefore the fault of the lack of enforcement.

Green Belt land is considerably more expensive than brownfield sites, a cost which when added to the cost of providing the infrastructure that would be needed would make new homes financially unaffordable to most of the "people of Enfield" whom the council professes are its intended occupants of the new homes. Developers, needing to make a profit on each development, would be reluctant to provide any "affordable", shared

ownership or other types of social housing, meaning that the “needy” people of Enfield would on economic grounds have to continue to live in emergency accommodation. The importance of the countryside and the Green Belt to the overall environment is well understood by the Mayor of London, who has publicly announced that he personally will not allow residential development in the Green Belt. He says that his own studies have shown that within the whole of London there are more than enough brownfield sites to provide more than the number of new homes required.

The draft Local Plan however does not present details of all the brownfield sites in the borough, only a selected few, nor how many new homes can actually be built on the sites, so we are denied the information as to how many homes can be built on those sites, and how that figure compares with the target numbers.

From this and numerous other instances in the plan of only some of the facts and figures being given we are tempted to think that we the council taxpayers should neither be told nor know what the truth is, nor be able to assess those figures against alternative research. This would, we believe, artificially skew the responses from the public to the consultation in that responders would be commenting on the abridged version which the council is presenting to them, rather than on a full and accurate document showing the real situation. We are again tempted to think that, for reasons not revealed, that this is part of a device to secure the result the Administration wants, rather than a fact-based analysis of the borough’s needs and solutions.

We note that the draft Local Plan includes a full review of all of the Green Belt land within the borough of Enfield. The new National Planning Policy Framework says clearly that in preparing a local plan it is not necessary to prepare a review of the Green Belt. Why, we wonder, has the council commissioned a review of the Green Belt, and not a very accurate review at that. Could the reason be that to curry favour with the electorate in its own heartland of eastern Enfield which it has neglected for more than a decade to make any meaningful improvements to the housing situation and to its air quality, hoping to distract the electorate’s attention at the ballot box by putting forward a utopian picture of a future that the Administration already knows it will be unable to deliver, and certainly within the timescale of the plan given the appallingly low rate of new homes delivery in the borough. It brings to mind the words attributed to the late Abraham Lincoln: “You can fool all of the people some of the time, and some of the people all of the time, but you cannot fool all of the people all of the time.” We are not fooled.

In short, the plan is nothing more than an electoral confidence trick intended to secure the Administration’s continuance in office, and having little connection with the reality on the ground.

The plan’s suggestion of taking large amounts of land out of the Green Belt and building on it was rejected by the residents, when no hands were raised in favour of it, at the Annual General Meeting of this association on September 9th 2021. More than 100 residents were at the meeting.

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