

'Draft Local Plan'
 Strategic Planning and Design
 Enfield Council
 FREEPOST
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23rd August 2021

Dear Councillors,

In response under the Regulation 18 consultation process regarding the draft Enfield Local Plan for development for the period up to 2039, I register my disagreement with the emerging New Local Plan's spatial strategy options. These options include proposals for "growth" (house building) in the Green Belt, and an apparent acceptance that an area of housing with increased density occupation is not detrimental to quality of life.

Copied from online at Gov.UK

National Planning Policy Framework.

Protecting Green Belt land – paragraphs 137 – 151.

Last updated 20/07/21.

Paragraph 140

Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.

I agree with the broader principles underlying the draft 'New' Enfield Local Plan, to make improvements to biodiversity and access to nature across the borough. I disagree with development on 7%t of the Green Belt. I do not agree with the proposed plans in the draft Enfield Local Plan for altering the boundaries and building-on the Green Belt, as they do not qualify for 'exceptional circumstances'. I believe that the harm arising from this proposal outweighs any 'very special circumstances', ie the proposal for building of so-called "affordable homes".

Quoting from the **Topic Paper: Chase Park Placemaking Study. Prepared by Hyas Associates working with Enfield Council** May 2021 (This study has been prepared by Hyas Associates Ltd, working with the London Borough of Enfield).

"In order to meet housing needs, a preferred strategic plan-led approach to the release of Green Belt land forms part of the Local Plan's emerging spatial strategy approach to 2039 and beyond. The emerging spatial strategy proposes two large-scale strategic allocations within the Green Belt in North Enfield - on land at and around Chase Park and at Crews Hill."

"The area comprises typical urban-edge open landscape, with extensive areas of pasture and some areas of trees and planting. There are several active recreational facilities in close proximity and the landscape is also well used by locals for informal recreation such as dog walking."

The Green Belt is a valuable resource for the whole of London, not just the boroughs which contain parts of it, adjoin it and are near to it. Its formation was protected by Act of Parliament, in the Green Belt Act 1938. It was proposed that the Green Belt for London would be up to 6 miles wide. The original aim of protecting this Green Area was to provide health benefits for the London population. Protecting the Green Belt in the face of an increasing 'need' for housing resulted in the development of the Garden cities, eg Welwyn Garden City. Over the years many changes and amendments have been made to the original act. Over time, population size has not only increased but also with greater density in some areas. Despite an increasing need for Green Belt, its size has been decreasing. Parts of the Enfield Green Belt are now no more than 3 miles wide, possibly less. More building on the Green Belt, resulting in further loss of Green Belt 'green space', would again add to the burden of a compromise on climate mitigation, and ecological recovery would be threatened. Our air would be dirtier, wild life would disappear, as well as there being fewer places for people to enjoy the outdoors. Significant health and well-being benefits would be lost.

I think it should be possible to protect all of our Green Belt from a risk of 'uncontrolled development' without having to lose more, another 7% for development as proposed in this Plan, in order to do so.

A report on the responses to the previous consultation 2019 of the Enfield Local Plan states that "Many of the objections to particular potential development sites in the Green Belt were from those that lived in the immediate vicinity". I am aware that I might be viewed as nothing but a NIMBY (Not In My back Yard). My view of this issue is greater than just my address. I have lived in London Borough of Enfield since 1989, and I worked as a full-time employee of London Borough of Enfield for 25 years. As a Systemic & Family Psychotherapist, I worked alongside NHS staff in provision of services to support the families with 'child & adolescent mental health' difficulties, throughout the Borough of Enfield. I know the different areas of the borough quite well. The recent experiences of London Borough of Enfield, as with the whole nation, during Corona Virus Covid 19 (and Variants) crises (the Pandemic), the impact on people's health and particularly mental health, with restrictions requiring 'social distancing', 'social isolation' and 'lockdown', has highlighted the importance of people's need to access, and benefits for them of access to green spaces, and direct involvement with our natural environment.

Perhaps many of the residents (from other areas?) of the borough are unaware of Green Belt issues but this does not detract from the value of the Green Belt. Now more than ever before, we can see the essential value of protecting the Green Belt land. I believe it is one of this borough's responsibilities and our duty to Greater London, including London Borough of Enfield, to protect and maintain the Green Belt. In my area, we regularly see many people in family groups get off the buses along The Ridgway to go to avail of the Green Belt – going to the Pick-your-own-farm and or to walk through the green spaces long the many public footpaths. I think it is not only a metaphorical life-line for London and Enfield residents, but also an essential actual life-line.

The Leader of the Council, Cllr Nesil Caliskan, is reported to have said "..... if it is OK for there to be density around Edmonton Green then it is OK for there to be density built around other stations". I fail to understand her use of Edmonton Green as an example of "OK" for "density of population". Edmonton Green is known for its strong and vibrant communities, its multi-cultural vitality but its reputation is better known for being an area with a high level of violent crime, and with many families unfortunately living with high levels of deprivation and extremely needy. Such difficulties are more likely to happen in the areas of high-density population. Creating more areas of occupation with high density population is surely not in anybody's best interests.

I disagree that there is a need for even more new housing in this Borough. I am aware there are many housing needs for families – some socially very vulnerable, first-time buyers and homeless people, etc but I believe that building more new houses does nothing to improve the resources for their needs in the longer term. ‘Affordable homes’ are affordable only immediately, and all future sales would be at the market values – so it is not a solution in the longer term.

Building new houses is a short term solution which benefits nobody except for financial gain of builders and property developers, and others who gain from the construction side of building new houses - few people who possibly have no allegiance particularly to the welfare of the residents of London Borough of Enfield. I am aware of residents in the road in which I live, who have already been offered vastly inflated prices for their homes, as speculators anticipate the demands for land, access to land – willing to invest on their speculation for their own financial gain. This demonstrates that already there are major financial gains expected from these proposals by some people. Whilst financial gain is not a crime in itself, I am concerned about the possible influence put on people making or contributing to decisions about our Green Belt, whose main interest is financial gain.

With regard to housing needs of homeless people and families in the Borough, research by charity organisations repeatedly points out the many houses which lie vacant, unoccupied and or are in poor condition and need refurbishment. I suggest that London Borough of Enfield consider spending and investing more money for regeneration, particularly in the deprived and needy areas of the borough, to improve the quality of life for many residents in these areas. If further houses need to be built, alternative building sites in the local authority area have been suggested. There are also other housing developments, including the Meridian Water development, which could be completed

Quoting again from the **Topic Paper: Chase Park Placemaking Study. Prepared by Hyas Associates working with Enfield Council** May 2021

“Strategic Policy Context

2.3 The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor’s vision for Good Growth. It is legally part of each of London’s Local Planning Authorities’ Development Plan and must be taken into account when planning decisions are taken in any part of Greater London. Enfield’s Local Plan must be in ‘general conformity’ with the London plan, ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably. A ‘good growth’ approach underpins the whole of the London Plan 2021 which sets out six good growth objectives:

(I quote one of the 6 good growth objectives here)

GG2: Making the best use of land, accommodate growth while protecting the Green Belt, more efficient uses of the city’s land, directing growth towards the most accessible and well-connected places, making the most efficient use of the existing and future public transport, walking and cycling networks”.

Our Borough/local planning authority’s planning decisions have to take into account (they are legally obliged to do so) The London Plan 2021 , Spatial Development Strategy for Greater London. Enfield planning will have to make plans in ‘general conformity’ with the London Plan 2021, and observe the Good Growth objective no.6 - ie accommodate growth while protecting the Green Belt.

In the introduction to the draft Enfield Local Plan, The Leader of the council, Cllr Nesil Caliskan, promises us that the new plan makes “Improvements to biodiversity and access to nature will be delivered across the Borough The pandemic has reminded all of us how important our open green spaces are for health and wellbeing.” However, the proposal in the Draft Enfield Local Plan

means destroying part of the existing 'protected' Green Belt, despite the 'good growth objective' set in the London Plan .

"More accessible green spaces" appears to be based on plans to develop and enhance areas already existing, rather than creating extra, new spaces, which I agree with in principle. 'More' in this instance does not seem to be in evidence as 'additional' space in the plans. The Hyas report (quoted earlier), lists "Underpinning assumptions (for borough carbon neutrality)" which includes "around a 25% net increase in green infrastructure" - an intention to replace the 'loss' of 7% of Green Belt by "... providing more accessible green spaces for residents across our Borough, including in our more urban areas;....".

The actual size of each complete unit of 'green space' effects the impact level of and effectiveness in offsetting damage to the environmental quality of urbanisation. So the intention of recreating more 'green spaces', probably set out in smaller 'chunks', is going to be less beneficial than the essential "openness of the Green Belt"

When these "more accessible green spaces" are developed , they will not have the same level of protection as the existing Green Belt does by virtue of a n Act of Parliament- the proposed newer green spaces could be vulnerable to further changes at the whim of any future planning decisions.

I am puzzled by the statement that the 'provision of more accessible green spaces..... will address existing poverty and inequality'. Poverty crosses all boundaries, it does not recognise any difference in green space and urban. Further investment in regeneration of the existing high density areas is required, important for our heath & wellbeing.