

Enfield Council Draft Local Plan 2021 Response

7 Sept 21

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EMAIL

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.uk

Subject: Response to the Enfield Draft Local Plan Reg 18 Consultation 2021 ("the Plan")

Thank you for the opportunity to respond to this important Draft Plan.

My response is in four parts:

- 1) Overall comments on collected policies and related material
- 2) Detailed comments on individual policies and related material
- 3) Comments on the format and presentation of the Plan
- 4) Openness in the consultation process

Note that this is a lengthy response, but I make no apology for that, given that the Plan I am responding to is also lengthy and complex.

These are my own views based on:

- A reading of the Draft Local Plan
ELP 2039 Reg-18 for consultation-Planning.pdf
("Enfield Local Plan, Main issues and preferred approaches, June 2021"
downloaded from
in August 2021),
- information obtained from other sources,
and
- my own local knowledge.

Yours faithfully,

Comments follow:

1 Overall comments on collected policies and related material

1. I object to the following Policies and Site Allocations in the Plan:

- **SP P19**, pages 77-80 and Concept Plan Figure 3.10; **Crews Hill**
Proposed housing and other developments.
- **SP P110**, pages 80-87, and Concept Plan Figure 3.11; **Chase Park** (Land to the west of Trent Country Park).
Proposed housing.
- **SA45**: page 364; Land Between Camlet Way and Crescent Way, **Hadley Wood**
Proposed housing.

– all of which propose removing Green Belt protections from these areas for the purposes of erecting houses and establishing industrial sites.

These sites in the Green Belt are all part of the historic area of Enfield Chase, which has played an important role in the development of Enfield and is unique in the southeast. The Chase is an essential part of the character of Enfield Borough and is a rare and valuable landscape and environmentally green asset. To lose it or even mar it through housing development (especially high density and/or high rise construction) would permanently harm the Green Belt, and the distinctive character of the borough, leaving London poorer as a whole.

I strongly dispute the basis on which the decision to build houses on these Green Belt areas has been made.

The Plan presents options for the number of houses required in the Borough (2.4.4 p25, Table 2.2 p26, Table 8.3 p188), but I could not find any obvious place in the text that explains the basis or justification for the numbers quoted. And based on the chosen figure of 25,000 new homes over the 20 year period from 2019 to 2039¹, there is a blanket, *unjustified* assumption in the Plan that over 6,000 of these homes must be built on the Green Belt, *and that there is no alternative to this way forward*. Yet the independently produced, very professionally undertaken and documented survey of Enfield's housing needs "Space to Build"³, published and sent to the Council in 2019, identifies (and lists in great detail) enough Previously Developed Land (PDL) to accommodate Enfield's housing needs. The survey has identified enough space to build at least 37,000 homes on sites that are currently inefficiently used (see page 3 of the survey document³). This is well within the 25,000 figure over 20 years that is assumed in the Plan. Therefore the intention to build houses extensively on Enfield's Green Belt is without firm, properly justified foundation; in short, the Council has not done its homework properly.

The Plan does not demonstrate that the Council has adequately investigated all available brownfield sites, and other options for addressing the Borough's housing needs. Building houses and locating new industrial sites on the Green Belt should be the very last consideration in providing these resources within the Borough when all other options have been exhausted, not the default "easy" approach to make up for the Council's previous shortcomings in addressing these issues.

The Council has stated that Enfield's population will grow by 50,000 people by 2039². But this population projection is at best an educated guesstimate and could very well be a big over-estimate;

it does not reflect the latest estimates from the Office of National Statistics and does not account for uncertainties such as changing migration patterns and the impact of Covid-19 on where people chose to live in future. It could well be a big over-estimate, and the problem with this is that taking a substantial portion of the Borough's land out of the Green Belt in anticipation of a need based on an overestimate, unnecessarily makes it easier for third parties to develop on the land purely for commercial gain at the expense of the environment. Why sacrifice the Green Belt for a guess? It would be better to wait for the 2021 Census results to become available in 2022 and use them to get a more accurate handle on the Borough's projected population growth.

Ref¹ Figure quoted in the Enfield Council newsletter "Future Enfield" dated Summer 2021, and also stated as the preferred option C (Medium Growth) in the table for Strategic Policy SP H1 on page 190 of the Plan.

Ref² Figure quoted in the Enfield Council newsletter "Future Enfield" dated Summer 2021,

Ref³ "Space to Build", available at https://www.london.gov.uk/sites/default/files/ad_84_space_to_build_enfield_report_final.pdf)

Affordable homes – the Green Belt is not the solution

The Plan's forward states (page 3) "Our Borough has ... a desperate need for more affordable houses." And in Table 2.1: Strategic objectives (p19), item 4 says "[Strategic objective] To maximise the supply of affordable housing, by ... securing 50% of all new homes as genuinely affordable."

And in section 8.2.9 p196 "...The Council will expect housing developments on Green Belt land, in particular the rural place making areas of Crews Hill and Chase Park to deliver 50% affordable housing. The justification is based on the findings of the Whole Plan Viability, which demonstrated that 50% affordable housing on Greenfield land in higher value areas was achievable."

I strongly dispute this 50% figure; building homes on the Green Belt will not contribute significantly to the availability of affordable homes.

Firstly, developers in the Green Belt areas will find ways to reduce the level of affordable homes in their proposed developments, as they have frequently done in the past. Private developers have every commercial incentive to build high value properties (and therefore by definition not "affordable" ones) on out-of-town green-field sites, which are seen and promoted as prestige developments. They will therefore seek, by whatever means possible, to increase the proportion of such houses on these sites at the expense of any stipulated affordable accommodation.

Secondly, people whose economic circumstances mean they require "affordable" accommodation will not generally be attracted to live on these proposed green belt estates, because they will be too far from their places of work (mostly eastern Enfield), and public transport between work and home is very unlikely ever to be adequate enough to serve their needs in terms of convenience and cost (particularly in the case of Crews Hill). For many, it would be an uneasy choice between living within their means in overcrowded accommodation that is close to their poorly paid, unsocial hours job, and getting better "affordable" accommodation in (say) Crews Hill, but then being poorer and more stressed because of higher rent, high transport costs and longer travel time to get to and from work. They may also risk losing their job because of the difficulty of getting to work on time at unsocial hours. My guess is that most people in that situation would stay where they were.

So even if 50% of the homes built on the Green Belt were affordable, I doubt whether anything like that percentage would benefit the people who really need them, because the homes would be in the wrong places.

This idea of putting "cheap" accommodation in green areas on the edge of towns and cities has been tried in the past – notably in the 1960s and 1970s in places such as Birmingham, Manchester and Glasgow. It has frequently resulted in a new tranche of urban poverty – low-income families effectively abandoned on the edge of town, separated from their workplaces by long distances and faced with high travel costs and job insecurity, and even long term unemployment because of lack of local jobs. In Enfield, the geographical separation and poor communication between the eastern side of the borough (where the majority of "affordable homes" candidates live) and the proposed Green Belt housing sites is a perfect recipe for another social disaster of this kind. Indeed, the Plan itself refers in numerous places to this separation and the difficulties it presents.

The reality of building large numbers of houses on the Green Belt is that most of this accommodation will (despite the Council's intentions) be high to very high value properties, offering high profit margins to the developers. These properties will attract buyers into the Borough who would not otherwise come here (sell your £2 million small house in Islington and settle in a bigger house in the leafy fringes of Enfield); thus adding unnecessarily to the Borough's population without benefiting those existing low-income residents who need better, cheaper homes near to where they work.

Environmental impact of building on the Green Belt

The Plan's proposals to build on substantial portions of the Green Belt are at odds with the Council's intentions, statements and policies regarding climate change and protection and enhancement of the Borough's green infrastructure; for example, Strategic Policy SP B61 on page 112. Regardless of statements in the Plan about the proposed Green Belt housing developments being "deeply green", the reality is that no amount of "greenness" in hard building development can make up for the loss of the greenfield site it is built on – including the loss of farms that could produce food locally and green habitats that are helping to fight against climate change.

A recent BBC survey⁴ found that more than a third of English councils support policies that could increase carbon emissions despite having declared a "climate emergency". Enfield Council, with its intention to build on the Green Belt must surely be classed as one of them.

Areas of the Green Belt that are targeted for development are home to endangered species and rich mosaics of biodiversity, which cannot be replaced. It is not acceptable to claim this can be compensated for by mitigation policies that seek to "enhance" biodiversity in other areas of the Borough – once it's gone it's usually gone; you cannot compensate in any meaningful way for the loss of a rare habitat/species in one place by "enhancing" a different habitat or establishing a different species somewhere else.

Many of the Plan's "green/sustainable" policies and stated aims regarding the development of housing on the Green Belt are not tenable on close examination, and are mere greenwash intended to disguise the reality of the environmental damage done by the proposed developments. The Plan is not "deeply green"; it is rather deeply flawed, particularly with regard to the Green Belt development policies listed above.

Despite intentions in the Plan to improve public transport infrastructure to the proposed housing sites, there would be increased vehicular traffic on inadequate roads, particularly in the Crews Hill

2. I object to Policies SAg2 page 383 and SP CL4 page 277 section 2; Whitewebbs Lane "Land at Tottenham Hotspurs Football Club Training Ground" – Proposed sports use (for additional land to the north of the existing training ground – Whitewebbs Lane up to the M25 and for part of Whitewebbs Park). Additional land to the north of the existing training ground – Whitewebbs Lane up to the M25: I object to the removal of Green Belt protections in this area for the purposes of building and operating sports training facilities for use by a private enterprise.

This plan to build houses on the Green Belt will not, despite its superficially laudable aims, serve the people of Enfield well, either in the short term or the long term.

The Green Belt has successfully protected Greater London from urban sprawl for over sixty years. Now, in the twenty first century its role in tackling pollution and climate change, supporting local food production, wildlife habitats and providing areas for recreation is more important than ever, and Enfield's Green Belt has a big part to play in that. Building on it would be to the detriment of those crucial features, both for the people of Enfield and London as a whole.

In summary, building on the Green Belt is the lose-lose option. The only people who benefit from it are the developers and people (mostly from outside the Borough) who can afford costly homes in areas with poor transport access. In exchange, the Borough and London as a whole loses a substantial proportion of the Borough's Green Belt, with all the long-term environmental damage that entails, and with little benefit to citizens who require affordable homes.

Building on the Green Belt is the lose-lose option.

The London Plan's and the Mayor's view on Green Belt development

I also note that the Mayor of London is opposed to the Council's plans to build on the Green Belt, and his London Plan⁵ of 2021 strongly supports the continued protection of London's Green Belt. *It is therefore surprising that Enfield Council is prepared to go against this plan for reasons that are not properly justified.* I fully support the Mayor's views on this matter.

Ref⁵ Mayor of London, The London Plan, March 2021
https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

Ref⁶ "Council policies 'inconsistent' with climate goals"
<https://www.bbc.co.uk/news/science-environment-58102578>

area, and this would also adversely affect surrounding existing areas, such as Clay Hill. It is likely that road widening and straightening would be required, at great expense and to the detriment of the surrounding areas. None of this is good environmental news.

Industrialisation of this site is also likely to result in more heavy goods vehicle traffic along the Ridgeway and through Crews Hill and Enfield Town as the operators of the warehousing and distribution facilities seek shortcuts across to industrial destinations in Eastern Enfield, by-passing

green buffer between Hertsmere/the M25 and the rest of Enfield. residents apart from some business rate income. The down side would be the loss of another travelling into Enfield from Hertsmere borough, and there would be little benefit to Enfield I would say that the vast majority of jobs in the businesses on the site would be done by people on the other (eastern) side of the Borough, and have no connection this proposed industrial site. Therefore any Enfield resident who did choose to work here would most likely have to commute by car, adding to traffic pollution. This would be in contradiction to Enfield Council's green policies, which promote less car travel and people living closer to their work.

The existing businesses of this nature within Enfield, and their workforces, are mostly located far from the Green Belt, but it is not incumbent on Enfield Council to provide extra land within the green belt to facilitate Hertsmere's development intentions. Development of this site for industrial purposes is very unlikely to provide jobs for those Enfield residents who would be inclined to work in the sort of businesses that would occupy the site. Due to their proximity to M24 Junction 24, such businesses are most likely to be warehousing and distribution facilities low-paying rates for employees.

Clearly Hertsmere Council can do what they like to the west of this area since their borough is outside the confines of the Green Belt, but it is not incumbent on Enfield Council to provide extra land within the green belt to facilitate Hertsmere's development intentions. Development of this site for industrial purposes is very unlikely to provide jobs for those Enfield residents who would be inclined to work in the sort of businesses that would occupy the site. Due to their proximity to M24 Junction 24, such businesses are most likely to be warehousing and distribution facilities low-paying rates for employees.

3. I object to Policy SA54, page 374; Land East of M25 Junction 24 (Holly Hill Farm)

Proposed industrial development on 1.1 ha of existing agricultural land. "Provide a minimum of 30,550 sq m employment floorspace (light and general industrial, storage and distribution, and related sui generis uses) floorspace within LB Enfield. Seek to deliver the redevelopment of the wider site (in LB Hertsmere) to provide a coordinated employment offer." This would remove this area from the Green Belt for the purposes establishing an industrial site for no good reason.

See also my comments on "Housing and Mixed-Use Site Allocations Policy SA62" in section 2 below.

● Part of Whitewebbs Park (northern half of the now-closed golf course): I object to the transfer of part of Whitewebbs Park, a public amenity in the Green Belt, into private management. I reject the Council's analysis that Whitewebbs Golf Course was losing money and call for its reinstatement. I object to the proposals by the transferee (Tottenham Hotspur Football Club) to damage the fragile habitat of the area and drastically reduce its biodiversity by building grass and plastic football pitches and associated hard infrastructure, and to restrict public access to that part of the park. See also my comments on "Housing and Mixed-Use Site Allocations Policy SA57" in section 2 below.

- the busy M25 section between J24 and J25. It should be noted that the exit signs for J24 on the M25 do not mention Enfield as a destination or mention the A1005 Ridgeway, in order to discourage HGVs from turning off the motorway as a shortcut into Enfield. It would be perverse to subvert this laudable intent by providing a site off J24 to which HGVs would legitimately travel, and thence down the Ridgeway to clog up North Enfield, Crews Hill, and Enfield Town.
- The site should remain as Green Belt land, forming one of its intended purposes of preventing urban and industrial sprawl from outside the Greater London area into Greater London. *That is why it's called the Green Belt.*
- 4. I object to Policy SA52 page 372, Land West of Rammeys Marsh. SA52 page 372**
Proposed industrial use.
- “Redevelopment should provide at least 70,200 sq m of new employment floorspace (light industrial, general industrial, storage and distribution, and related sui generis floorspace)”
- This proposal would remove part of Rammeys Marsh, a wildlife area and public amenity, from the Green Belt and destroy its habitat for no good reason. There are plenty of existing brownfield sites in the eastern half (Lea Valley area) of the borough that can be used for industrial development. There is no pressing need to place new industrial facilities in the Green Belt, including here.
- 5. I object to the tall building Policies, which propose areas for and the acceptable height of tall buildings, and are detailed:**
on pages 156-160, Figure 7.3, Figure 7.4, in Policy DM DE6,
and in particular Site Allocation SA2 Palace Gardens Shopping Centre page 321
and at Crews Hill (shown in Figure 7.4 Appropriate locations for tall buildings, page 158),
in many cases tall buildings resulting from these policies would mar the landscape. Such tall buildings are unnecessary because other lower-rise building forms could provide the same accommodation, as stated in the policy (7.6.4 page 160).

2 Detailed comments on individual policies and related

material

Crews Hill section 3.9 page 75, Policy SP P19, pages 77-80 and Concept Plan Figure 3.10

3,000 new houses in a 'sustainable settlement' at Crews Hill with the potential for longer term expansion.

Concept Plan Figure 3.10 (p76)

What is this Concept Plan supposed to show? It's a map with hatched areas on it and lots of curly and angled two-ended arrows in green and grey, some barred and some solid. *But there's no key to explain what the hatchings and arrows mean.* (If there is a key somewhere in the rest of the Plan I certainly can't find it by searching the PDF). There is no explicit explanation of the map anywhere else in the text that I can find.

If it's supposed to show something important or provide clarification/context for the policies that follow, only those who drew the map in first place know what that is.

3.9.2 (p75) "Development comprises number of sites predominantly in use for horticulture/ garden centres/ nurseries, storage of building supplies etc with occasional residential properties all of which have come about in a piece meal fashion."

This reads as an attempted justification for allowing (indeed promoting) further extensive building development in Crews Hill on the implied grounds that it is a despoiled area of low-quality land within the Green Belt and therefore can be removed from the Green Belt with no loss. This is a (deliberate?) misreading of the situation. Many of these properties and businesses pre-date the onset of the Green Belt and its planning constraints (they are pre-war and immediately post-war). Also, some businesses in Crews Hill have morphed or started up in contravention of Green Belt related planning constraints, and Enfield Council has historically failed to enforce those constraints, allowing the businesses to continue operating. *These historical reasons for the current character of the Crews Hill area do not and should not allow the area to be treated as "low-quality" green belt in which removal from green belt protections and further development are deemed acceptable – they are not.*

3.9.3 (p75) "Road access to the area is of limited capacity"

Indeed it is, and yet the Placemaking Vision immediately below the section of the Plan starts with: "Crews Hill will become an important gateway to north Enfield's part of the 'London National Park City'" There's a gross contradiction here: How can Crews Hill become a "gateway" and residential site when, as stated in the Plan, it has such poor road (and rail) access? Is there an intention to build new roads and/or widen existing ones that link to Crews Hill? If so, the Plan should explicitly say so and not hide the intention in phrases like "important gateway". However, any such intention would be disastrous for the character of Crews Hill and the suburban and rural areas immediately adjacent to it.

Crews Hill Placemaking Vision (p75)

"Crews Hill will become an important gateway to north Enfield's part of the 'London National Park City'"

It is hard to make sense of this travelogue style sentence. I am reminded of Peter Seller's spoof travelogue sketch of the 1950's: "Balham (pronounced mid-west American style with the emphasis on the "ham") Gateway to the South!"

In what sense could Crews Hill ever be a "gateway" to anywhere? It has poor road and public transport connections to the rest of the Borough, and though the M25 runs to the north and northwest of the area, there is no connection to it. There is only one narrow back road (Cattlegate Road) out into South Hertfordshire. People only come to Crews Hill to shop at the Garden Centres – and most of these retail businesses will go if the garden Centres are developed for housing.

White van drivers use Crews Hill and Clay Hill as a short cut from South Herts to Eastern Enfield to avoid the traffic jams on the A10. And that's about it. Very few people use Crews Hill as a "gateway" to access the recreational green parts of the Green Belt – Whitewebbs Park, Forty Hall Park and the London Loop path. The London Loop path does not even run through Crews Hill (it's much further south). And there is no obvious reason why building more houses in the area would turn it into an access "gateway" or tourist "gateway" either.

SP P19 (1) (p77) "The boundary of the placemaking area includes sufficient land to deliver more development beyond 2039 to enable the creation of a new sustainable community."

This is unnecessary and unacceptable. It is bad policy to over allocate land by removing it from the Green Belt in anticipation of development over such a long time scale. Nobody knows or can even sensibly predict what the housing situation will be more than twenty years hence. Once this "surplus" land has been de-designated, and as a result is much more likely to become prey to inappropriate development intentions from third parties, it will be much harder for The Council to resist such intentions than if the land continued to have the protection of its Green Belt status.

This is a disaster in the making.

"Sites anticipated to come forward in the next plan period will be removed from the Green Belt as shown on the Policies Map."

This is not acceptable – see comment below on Explanation 3.9.4 of p79

Explanation 3.9.4 (p79) "Development at Crews Hill has potential to deliver an expanded community during the current local plan period and the next. The parts of the placemaking area that are expected to come forward in the next plan period are proposed to be removed from the Green Belt designation as part of this Local Plan to ensure that Green Belt boundaries will last beyond the end of the local plan period."

I take this to mean that the council want to take more land out of the Green Belt at Crews Hill than they think will be developed for housing during the period of this (proposed) Local Plan, so that when the next planning round starts, they won't have to go through the pain and inconvenience (for the Council) of trying to take a bit more of Crews Hill's land out of the green belt.

It is simply not acceptable to "grab" green belt land simply for unspecified future use in order to avoid bureaucratic and political inconvenience. Once this land has been removed from the Green Belt it will no longer have all the important protections that such status gives it.

"This is in accordance with national planning policies which states the intention for Green Belt boundaries to have permanence in the long term." I think this is an extremely dubious justification for what is proposed; it seems to say "let's de-designate as much of the green belt as we can get away with now so we can claim in the future that we've kept (what's left of) the green belt boundaries permanent."

(Analogy: "National climate change mitigation policies state the intention to become permanently carbon neutral in the long term" interpreted as "we'd better burn as much fossil fuel as we can now, so there won't be much left to add to global warming in the future".)

"However, this land will continue to be safeguarded from development during the plan period through the London National Park City designation..."

This is just greenwash. The London National Park City designation has no legal status; it is just a set of recommendations and guidelines put forward by a charitable organisation to encourage green thinking and practices by London local authorities and other organisations. Once the Crews Hill area is removed from Green Belt protection, Enfield Council has no legal obligation to follow any "green" recommendations from the London National Park City organisation with respect to the designated area. It's a hollow promise that undoubtedly would be dropped or ignored if it becomes politically expedient to do so.

I also note that this "safeguarding" statement is not part of the actual policy statement, so has no real (legal) weight within the Plan at all.

SP P19 (4) (p77) "Land to the south of the Crews Hill built up area can support horticultural and food producing land uses and reinforce the separation of development from Gordon Hill to the south."

This is just placatory nonsense. There is very little, if any, land to the south of Crews Hill (south of the areas proposed for housing) that would be suitable for horticulture and food production. None of it is used for food production right now, and, as privately-owned land, it is very unlikely to be. And what genuine horticultural and food production capacity there currently is within Crews Hill itself will disappear (in this Plan) under housing. So a net environmental loss there, despite the placatory words, there would be a net environmental loss.

SP P19 (6) (p77) "The context of varied and utilitarian glasshouse building form and horticultural land use should inform innovation in architecture and public realm such as through the potential for covered public spaces, winter gardens and glass house space for every home, creating a unique lifestyle related to the identity of the place."

Placatory pipe-dreams. Where do affordable homes sit in all this? Is it remotely likely that any genuinely affordable homes built in Crews Hill would a) have space for glasshouses, and b) have (lower-income) residents who could afford such things? The above paragraph describes the characteristics of an estate of up-market executive homes, which is what any developer building in Crews Hill will be aiming for, and would be highly likely to achieve, whatever the Council's planning ideals are.

SP P19 (7) (p77) "Development should take a consolidated and compact urban form in order to ensure a sustainable form of development where new residents are within easy reach of, and connected to, the railway station and existing and proposed green and blue infrastructure networks."

It's hard to unpack all this jargon (especially "green and blue infrastructure networks" which has no definition anywhere in the Plan document). Does it mean that the Council wants to see small houses built (with small gardens to keep the development compact)? Flats? Multi-story flats? (Never!). Small houses but with glass houses in their tiny gardens? (See **SP P19(6)**). And the residents in the affordable homes, are all going to commute on the once every half an hour train service? To where? Not to where their jobs are located in Eastern Enfield.

SP P19 (8) (p78) "Development at Crews Hill should improve the functionality and connectivity of the east-west green corridors across the north of the Borough in order to minimise the reliance of the development on vehicular access."

It's hard to understand what this is trying to say. What does the "functionality" of the "east-west green corridors" actually mean? It looks like to me like a roundabout, jargon-ridden way of saying that Whitebbs Lane, Cattlegate Road, Theobalds Park Road, and Clay Hill will have to be "improved" to cater for the increased traffic that development at Crews Hill will bring. But if you don't want there to be more cars, then you have to ensure really good public transport links to Eastern Enfield (which is where the residents of those affordable homes are most likely to work). I would say this is unlikely to happen, since it is Transport for London who have the final say on the matter.

Yes, there is now a half hourly 456 service of small capacity vehicles serving part of Crews Hill, but it's a tortuous route and hardly likely to provide acceptable journey times to the eastern side of the Borough for people to get to work. Any new proposed new bus service from Crews Hill to eastern Enfield via Whitebbs Lane and Bullsmore Lane would be a) hard for TfL to justify given the effectively zero passenger pickup along the substantial length of Whitebbs Lane, and b) very unreliable because of frequent long traffic jams at the Bullsmore Lane/A10 junction (often tailing back to Whitebbs Lane itself).

SP P19 (9) (p78) "A greater intensity of development at Crews Hill may be appropriate where it is able to deliver new or improved links across the railway as well as facilitating additional stopping train services at Crews Hill station to enhance the area's sustainability and its role as a gateway to the rural north for visitors and tourists."

The whole idea of building new housing at Crews Hill seems to be based around the mistaken idea that because there's a station there it constitutes a "transport hub", *it does not – not in the sense that the station could have a really frequent train service.*

Here's the reality – subtle but important:

The Great Northern line from Stevenage/Herford to Enfield Chase, Finsbury Park and Moorgate is, during the peak periods (and outside Covid pandemic times), a high-loading service. The trains are limited in length to six coaches because of platform length restrictions in the tunnels between Drayton Park and Moorgate. The peak frequency of service is limited by the fact that there are only two platforms at Moorgate to turn the trains around. Morning peak period trains into Moorgate are easily filled to capacity by passengers at the suburban stations (Gordon Hill southwards) combined with the Hertfordshire originating commuters. The line is two tracks only (one up, one down), and because of the viaducts and tunnel on the route, widening to four tracks would be prohibitively expensive. Therefore, the train operating company (currently Thameslink) have to restrict the peak hour services from the much more lightly used Crews Hill station, and other similar stations on the line, in order to allow semi-fast trains through. The semi-fast trains allow a better loading profile and faster turnaround, so that passengers at the busy suburban stations get an acceptable peak period service.

Given the anticipated growth in the use of rail services over the coming years, it is unlikely that the loading pattern on the Herford/Moorgate will ever ease enough for the train operating company to be able to increase the number of peak period trains that call at Crews Hill. They will not want to anger existing commuters further south (or north) on the line by making their work journeys worse just to accommodate a relatively few more commuters from Crews Hill. I would therefore anticipate

that requests from the Council to improve the service frequency at Crews Hill for the times that matter would, quite reasonably, fall on deaf ears.

The upshot is that there's little benefit for anyone in moving to Crews Hill if they need to commute into London by rail. And people living in the "affordable" homes are unlikely to be commuters into London; they will need to travel to Eastern Enfield, on a tortuous, lengthy bus journey that will probably involve a change of bus. The result? Those residents of "affordable homes" who can also afford to run a car will use one to get to work easily, especially if they have to work unsocial hours. The majority of the rest of the residents will have cars for convenience and to save time. They won't be living in Crews Hill to live the green life – they'll just want a nice house near the country. Work from home? Not if the internet connections are no good. They're pretty bad in North Enfield – I doubt if Crews Hill is or will be any better for a good while to come.

Work in one of those Crews Hill "green" businesses? If (at a proposed minimum), 3,000 houses are built at Crews Hill (a population of say 10,000 people), is a significant proportion of those people going to be employed locally to Crews Hill? This is highly unlikely – I would estimate 500 at the most. So it seems pretty obvious to me that any housing development at Crews Hill must inevitably be a commuter development, and mostly commuting by car at that. *This outcome would be very much at variance with the Council's professed green strategy and policies.*

SP PL9 (10) (p78) "Notwithstanding the requirement for improvements to walking and cycling, the development will need to address limitations in the capacity of the existing road network, particularly in accessing land to the west of the railway and including the road passing under the railway near Crews Hill station,"

I presume this means widening and straightening existing roads, and building new access roads, thus wrecking the rural character of the area. Hardly "green" is it? And what about the surrounding roads that give access to Crews Hill?

Whitewebbs Lane is quite a charming back road, unfortunately marred at times by heavy trucks and tradesmen's vehicles using it as quick cut through from South Herts to Eastern Enfield. Development at Crews Hill would only make this worse unless there was expensive and environmentally destructive remodelling (widening and/or straightening) of this long lane.

The other main route into Crews Hill from Enfield is Clay Hill/Theobalds Park Road. This route already suffers from the same sort of traffic problems as Whitewebbs Lane, and this has a deleterious effect on the suburban neighbourhood of Clay Hill through which it passes. The "hill" part of Clay Hill (from Browning Road up to Theobalds Park Road) is attractively rural in appearance but narrow and twisting. It is already overloaded and dangerous at peak periods; this would only get worse with the increased traffic resulting from housing development at Crews Hill. Widening and straightening this section of the Hill would be very expensive and would destroy the character of the area.

Furthermore, the section of Clay Hill from Browning Road eastwards to Baker Street is lined with houses and Grade II listed properties and there is therefore little scope for widening or straightening.

Increasing housing at Crews Hill to the extent proposed will cause intolerable deterioration in the environment of residents of Clay Hill and other surrounding suburban roads because of the inevitable increased traffic.

SP PL9 (11) (p78) "Development should create a mixed and inclusive community, by providing a diversity of employment opportunities, housing sizes, types and tenures and environments.

Upskilling and specialist skills and knowledge in horticulture, land sciences, food production and the arts associated with food and the culture of food and growing can underpin the unique identity and function of Crews Hill in the landscape. Retention of existing rural uses is considered important, including equestrian and horticulture uses, which should be re-provided in suitable alternative locations if existing sites prove unsuitable for retention. This will deliver a sustainable development, distinct from the majority of the built form of Enfield Borough where opportunities for living, working and leisure provide for the day to day needs of the majority of residents.”

This is just a fantasy wish-list that is completely at odds with the Plan’s proposal to build 3,000 houses on the majority of the land in the Crews Hill area. All the sites for doing the proposed things are already there with a bit of enhancement – for example, land for a (now sadly closed) riding school and former horticultural nursery sites – but building houses on those sites will lose them forever, and I can’t see where there would ever be “suitable alternative locations”.

SP P19 (17) (p79) “Development proposals should facilitate a shift towards a net zero carbon future, with innovations in local horticulture, supply chain and support for household and community growing, facilitating people to produce or buy their food locally.”

This is another wish-list that cannot be fulfilled if Crews Hill and other parts of the Green Belt are covered with houses.

SP P19 (18) (p79) “Development and associated green infrastructure should contribute to the delivery of strategic flood mitigation, contributing to the performance of downstream locations across the Borough. New development should be designed to have the capacity and means of retaining storm runoff which would otherwise be dealt with at on site locations downstream and in more constrained urban infill locations.”

Concreting over the majority of Crews Hill will not “contribute to the delivery of strategic flood mitigation” if by that is meant there will be a reduction of flood potential and of actual flooding. The best that can happen is that the resulting increase in surface water runoff from the urban development is smaller than it would have been without flood mitigation being built into the development. However, given the scale of the proposed development, there will inevitably still be an increase. If you build all over a hill, the places below the hill will get more runoff, unless you can divert the water further downstream – which is what you definitely don’t want to do here, since Eastern Enfield at the other end of the Turkey Brook is already prone to flooding.

SP P19 (19) “Establishing a functional flood plain and diversity of habitats along the Salmons, Turkey and Cuffley Brooks as well as along other smaller watercourses and in other green spaces in the area, can increase the ecological potential of the area and serve as a Borough-wide resource.”

This is just greenwash-style offsetting to compensate for building on Green Belt land. It hardly matters in the overall context of what is proposed for Crews Hill as a whole.

It should be noted that Turkey and Cuffley Brooks are already functional flood plains, merely by their setting in the local topography. But then I presume that whoever wrote this has never visited Hilly Fields Park (Turkey Brook) or Whitewebs Park (Cuffley Brook) in the winter and seen the flooding after a few days heavy rain.

SP P19 (20) (p79) “Appropriate noise mitigation from the M25 for development to the north of the Crews Hill area should be considered, such as bunding (subject to other landscape and visual sensitivities) or setbacks in order to protect sensitive uses, such as schools, nurseries and publicly

accessible open space. The design of all residential properties should mitigate the blight of motorway noise in their layout, design and location of outside space.”

The section of the M25 from J24 to J25 that forms the north western and northern boundary of the proposed housing development has concrete carriageway. This causes very high noise levels that can frequently be heard all over the Crews Hill, Clay Hill, Whitewebs and Forty Hall areas of North Enfield. So there's no "should" about the requirement for noise mitigation – it would be a "must".

Not to mention the levels of air pollution next to the motorway.

Frankly, I don't think anyone would want to live in the area to the north of Cattlegate Road unless they really had to – right next to the one of the busiest motorways in Europe, miles from the rest of the borough. Presumably that's where the bit of "affordable" (aka "social") housing would go, because the developers are not going to put the executive style homes that give them the bulk of their profit right next to the M25. And once again (repeating pattern) we would end up with low-income households dumped on the edge of town, far away from their places of work, with poor transport infrastructure, and an insanely busy road (that they can't use) right next to them. Green vision or not, that's what is likely to happen once reality bites, and it's not a pleasant prospect for anyone.

Figure 7.4 Appropriate locations for tall buildings (p158)

On this map **Crews Hill** is shown as an appropriate location for tall buildings. *It most definitely is not an appropriate location.*

There is no precedent for erecting tall buildings in this area – there are no such structures at present, and to erect even one would destroy the essential rural character of this Green Belt area and make a mockery of any pretensions in the Plan to make Crews Hill a green gateway into Enfield.

The map also shows **Gordon Hill** as an appropriate location for tall buildings. There are already several blocks of tall flats between Lavender Hill, Blossom Lane and Cedar Road; these were erected in the 1960s/1970s, at a time when there were less enlightened attitudes towards visual landscapes on the edge of rural areas. Because they are on a hill, these unattractive tower blocks can be clearly seen from much of the Green Belt area to the north, such as from Whitewebs Park. In the 21st century we should not be adding to such eyesores by further high-rise development in the Lavender Hill area, even if there were space available to accommodate such buildings (which there isn't, unless Network Rail could be persuaded to sell off space right next to the railway line – though maybe I shouldn't suggest that possibility).

Draft Plan Master Map – Crews Hill area

On the Master Map, a large area between Crews Hill Golf Course and the railway line is marked for housing ("an indicative location for housing led areas in the Green Belt").

Why? Building houses here would be disastrous. The area is right next to a site of metropolitan importance for nature conservation (presumably the golf course itself), which could only lead to a deterioration of this nature conservation area. The area is physically isolated from the rest of the Borough by the railway line. The only access would be via a road from Cattlegate Road Crews Hill, and then along a particularly hazardous steep stretch of Cattlegate Road to the west of the railway bridge – impractical and dangerous for pedestrians and cyclists. It would be highly expensive and environmentally damaging to build an access route from Theobalds Park Road, which would require a new bridge across the railway line. This is completely incompatible with the aim of creating green, pedestrian and cycle friendly residential areas.

There are the same issues concerning access to and from the area marked to the west of the railway line and north of Cattlegate Road.

"Housing and Mixed-Use Site Allocations" Policy SA48 (p368)

Land at 135 Theobalds Park Road. Existing use: Residential dwelling, detached barn, and former horticultural.

"Deliver employment (light and general industrial, storage and distribution, and related sui generis) floorspace. Provide retail floorspace commensurate to its out-of-centre location."

"storage and distribution" NO. There is already enough problem in the Crews Hill and Clay Hill areas with intensive traffic from skip trucks travelling from the skip depot on Theobalds Park Road into North and East Enfield. And Whitewebs Lane suffers from the same problem – it is not a suitable road to take the sort of large, heavy trucks uses in the distribution business.

For more about "improving" (straightening and widening) road in the Crews Hill area and surrounding areas, see my comments on **SP PL9(10)**.

"Housing and Mixed-Use Site Allocations Policy SA57 (p378)

Whitewebs Golf Course, Beggar's Hollow, Enfield

"The site should provide nature recovery uses"

The term "nature recovery" is not defined anywhere within the Plan, neither is "nature recovery use" or the provision thereof, so it's difficult, if not impossible, for the reader to accurately determine what Enfield Council mean by these terms.

As far as Whitewebs Park is concerned, the site does not need to "recover" in the sense that it might need urgent attention to increase its biodiversity and natural habitat. Large chunks of the park have been happily re-wilding through benign neglect for years, and it is already surprisingly bio-diverse – including the (now closed by the Council) golf course. So in terms of Strategic Policy SP S22: "Making Good Places", the park is already environmentally a "good place".

It will however become significantly less so, if the Council's plans to lease a substantial part of the park out to Tottenham Hotspur Football Club go ahead. The northern part of the former golf course (which is currently re-wilding nicely) will be buried under manicured grass and plastic football pitches and associated hard infrastructure such as new building, access roads and floodlighting poles. This is hardly green or pertaining to nature recovery.

This page of the Draft Plan is disingenuous to say the least, and looks more like greenwash.

Note: The Land Use Requirements listed are incomplete, since they do not mention the professional sport, recreation and community sport/leisure uses inherent in any leasing of the northern part of the golf course to Tottenham Hotspur Football Club as per SA62. See comments on SA62. This looks like an attempt to bury bad news, and is not acceptable. The Plan must be explicit and unambiguous in recording such an important and controversial intention to change land use in this Green Belt parkland area.

"Housing and Mixed-Use Site Allocations" Policy SA62 (p383) and SP CL4 (pp 277–279)

Note: THFC = "Tottenham Hotspur Football Club"

"Land at and within the vicinity of Tottenham Hotspur Football Club Training Ground, Hotspur Way, Whitewebs Lane (42.5 hectares)".

is this meant to be ironic? There is one less golf course in the Borough now – it's called *Whitewebbs*. Who removed it? The Council who produced this Draft Plan.

• golf courses (e.g. *Whitewebbs Park*).
access to sporting attractions, including

"Located within easy reach of the open countryside and central London, Enfield offers unrivalled

Explanation 12.4.1 (p278)

land use in this Green Belt parkland area. See my comments on SAS7. be explicit and unambiguous in recording such an important and controversial intention to change Whitewebbs Park. This looks like an attempt to bury bad news, and is not acceptable. The Plan must no mention of this intended change of land use in SAS7, which does include a full map of and it is only hinted at in the Existing Use(s) section: "...including golf course". Furthermore, there is site allocation of this part of Whitewebbs through granting of a lease is not made sufficiently explicit golf course that is proposed to be leased to Tottenham Hotspur Football Club. The inclusion in this Note: The map in SA62 is incomplete, since it should also include the northern part of Whitewebbs

smokescreen.

likely about generating leasehold income for the Council. The health and wellbeing angle is merely a sporting facilities (as in the proposal to lease a big chunk of Whitewebbs Park to THFC); it is far more This is not really about the health and wellbeing of Enfield residents through the provision of

other side of the A10 with no public transport access.

they wouldn't easily and cost effectively be able to get to it because the site is marooned on the able to benefit from any facilities offered by an expanded training ground in *Whitewebbs Lane*, since Many diverse communities in Enfield (for example in the eastern half of the Borough), would not be away with.

private use, with the public gradually granted the minimum access to facilities that THFC can get disadvantaged Enfield residents. The bulk of any facility built here will inevitably be for THFC's altruistic purposes of providing, at doubtless great development expense, sports training facilities for seeking organisation with powerful financial backers, wants to acquire this land primarily for the grounds and associated infrastructure. I don't think for a minute that THFC, as a commercial, profit- Whitewebbs Park to THFC for the building of more environmentally damaging football training corporate training facilities? There is already the proposal to lease a good chunk of green belt land at fascination with THFC's voracious appetite for acquiring land in the Borough to expand their it is obviously all about giving up more green belt land to THFC. Is there no end to Enfield Council's NO. This proposal is damaging to the green belt.

"ancillary related facilities."

"The site should provide professional sport, recreation and community sports/leisure uses, including

outlined in red on the site allocation map for SA62.

Specifically in this comment, land north of Whitewebbs Lane opposite the Spurs training ground, as

3 Comments on the format and presentation of the Plan

I make these comments both as a member of the public invited to comment on the Plan, and as a former professional technical writer.

The format, presentation and written style of the Plan document and associated master map fail to meet the accessibility, clarity and transparency needed for a public-facing document of such importance, and in this respect the document does the public a disservice. The Plan document is long and rambling, unnecessarily so, and frequently mind-bogglingly opaque. It would benefit hugely from some professional editing to reduce its size and make it easier to read.

There is little point in the Council urging members of the public to comment on the Plan if the Plan document is so difficult for ordinary citizens (i.e. not town planners) to comprehend. At best it is naive to expect most citizens to do so, and at worst it looks like an attempt by the Council to effectively suppress public comment on this controversial Plan while appearing to meet the legal requirement for public transparency. Either way round, this does not put the Council in a good light. The Plan's authors have not clearly identified the all the audiences for the content and tailored the written style and structure accordingly. The document reads as though it is only intended for the (relatively small) group of planning professionals and elected politicians who wrote it. This does a disservice to the democratic process, because the content, cannot easily be absorbed and understood by the public in order for them to comment thoughtfully on it.

The document is full of technical planning jargon, and unnecessary and confusing management speak. This makes the content difficult, and in some places impossible, to comprehend. In such an important public-facing document as this, technical terms should not be used unless absolutely necessary, for example for legal reasons.

Although there is a glossary, it is buried at the end of the document (page 392 onwards) and is therefore hard to find. The glossary should be the *first* thing in the document (cf the positioning of technical terms information in Insurance Policy documents). And the fact that the glossary is thirteen pages long and defines approximately 270 terms, is indicative of the Plan document's unnecessarily obscurely presented content. Any document that has that many technical terms in it is going to be very difficult, if not impossible, for members of the public to read and fully comprehend.

Examples of obscure jargon with no definitions given are:

"Rural place-making areas" (e.g. As shown in the key of Map Figure 2.1 on P 24 PL 8, PL9, PL10) This would appear from its context to just be a euphemism for building houses on the Green Belt, and it isn't helpful.

(And the document doesn't spell the term consistently: "placemakeing" vs "place-making")

"Green and blue infrastructure networks" This is totally impenetrable. If it's a planning term well known in the planning profession, there should be a clear explanation of its meaning. If it's a term that has been devised by Enfield Council, then it should be removed and replaced by a meaningful plain English phrase. Such planning/management speak helps nobody (not even the Council planners and councillors who have to work with the Plan), and should be avoided.

Plan context

The Plan document also needs a structure chart showing how it relates to other planning documents above and below it in the planning hierarchy.

The Master Plan PDF

The Master Plan PDF is virtually unreadable. Huge in size (physically and in the size of its PDF file) it is almost impossible to navigate in a PDF reader such as Adobe Acrobat, and almost impossible to print (it took 25 minutes to flatten and spool as an 8 page poster on A4 sheets, using a 3.5 GHz semi gaming PC with solid-state storage!)

The background map on which it's imposed is too faint for users to be able to relate planning features to real locations.

There are too many different types of information competing for attention on the map. The colours and hatchings of the different information types are too similar to each other.

The map key needs to be in a separate document for readers to have any chance of using it to understand what the map features mean.

All in all, the map is a visual mess and fails to communicate effectively. I certainly don't know how elected and official members of Enfield Council can work with this map and correctly comprehend what it's trying to depict, let alone members of the public trying to comment on it.

I suggest that the map should be split up into several smaller maps by area, with only a few types of information on each map. And the colours need a radical rethink. A good graphic designer could easily assist with all this. Without the services of such a professional, I suspect that the map will remain a mess and therefore a source of confusion for all concerned.

What others say about the Plan's format and presentation

I am not the only person who is concerned about the poor presentation of the Plan. I quote from the Enfield Society's publication "Enfield Society News No223 Autumn 2021":

"The Plan is contained in a single document, available from the Council's web-site, running to 413 pages and is not being made available in hard-copy format. It is not an easy read; there is no summary and the maps presented are of very low quality which sometimes makes it difficult to understand. The text is not written in plain English and at the time of writing, there are no public engagement events organised."

4 Openness in the consultation process

The article about the Plan in The Enfield Society's "Enfield Society News No223 Autumn 2021" also says:

"Normally during a consultation the responses are made public, but the Council has only said it will look at this at a later date. There is an impression these are deliberate tactics to dissuade debate and the Society is very concerned about the Council's commitment to a full, open and transparent consultation process. We have written to the Council to express these concerns."

I fully agree with the Society's concerns about the lack of openness in this planning consultation, and I urge the Council to go about this planning round with the open, fully democratic intent that it deserves.

The Council's job is to administer Enfield Borough on behalf of its citizens and it is therefore incumbent on the Council to be fully open and transparent with those citizens about planning policy matters as important as this Local Plan. The format and wording of the Draft Plan, and the difficulty of accessing it (hard to find on the Council's web site, huge size of the document and supporting map) are significant barriers to effective comment by the public. The Council's lack of commitment to make plan responses public is also deeply troubling.

These deficiencies must be addressed going forward, and in future iterations of the Plan.

-- END --