

11 September 2021

Dear Sirs

Subject - Draft Local Plan Reg 18 Consultation 2021

1. I am writing to object to the following Policies:

References are to Enfield Local Plan "Main issues and preferred approaches" dated June 2021

- 1.1. SP PL10, pages 80-87, and Figure 3.11; This refers to the development of Vicarage Farm and Rectory Farm given the name "Chase Park". Refer also to Appendix E Chase Park Placemaking Study May 2021 ("Appendix E")
- 1.2. I object to Policy SP PL9, pages 77-80 and Concept Plan Figure 3.10; This refers to the development of Crews Hill Garden Centre Area and surrounding Fields
- 1.3. I object to Policy SA45: Land Between Camlet Way and Crescent Way, Hadley Wood, page 364;
- 1.4. I object to Policy SA54, page 374; This refers to a development at M25 Junction 24 (Part New Cottage and Holly Hill Farm) EN6 5QS
- 1.5. I object to Policy SA62 page 383 and SP CL4 pages 277-279 because they transfer part of Whitewebbs Park, a public amenity, into private management. I reject the Council's analysis that Whitewebbs Golf Course was losing money and call for its reinstatement.
- 1.6. I am also objecting to Policy SA52 page 372, which would remove part of Rammey Marsh, a wildlife area and public amenity, from the Green Belt.

All the above propose the dedesignation of Green Belt for housing and other purposes. These sites are part of historic Enfield Chase, which is unique in the southeast and played an important role in the development of Enfield. It is a rare and valuable landscape asset and its loss would cause permanent harm not only to the Green Belt, but also to the very character of the borough.

- 1.7. I am also objecting to the tall building policies on pages 156-160, Figure 7.3, Figure 7.4 and Policy DE6, and SA2 Palace Gardens Shopping Centre page 321 which propose areas for and the acceptable height of tall buildings which, in many cases would mar the landscape and are unnecessary because other lower-rise building forms could provide the same accommodation, as stated in the policy
- 1.8. Durants Park should be highlighted as an area to be improved. This Park has been scandalously neglected compared to others in the borough. The plan does not promote improvement of these eastern areas in any way but focuses on sprawling development in the west.
- 1.9. SA 58 Alma Road Open Space use as a cemetery is inappropriate in view of the shortage of recreational space in the Brimsdown area. The plan should be promoting access to the Lea River from the Durants/Brimsdown/Alma area. For example currently there is an almost total lack of signage towards the canal path area. Money has been spent on west canal bank

pathways and activities near Brimsdown but these are already falling into neglect through under use.

- 1.10. Overall the Plan possesses a dearth of detail, a total lack of imagination in concrete objectives but a wealth of worthy platitudes and planning boilerplate.

2. I object to Report on Meeting of 9 June 2021 on Draft Regulation 18 Enfield Local Plan: 2019–3039 as follows:

Paragraph 37 The baseline housing target option should be the selected option This is in view of the likely long term effects of the pandemic, general trend towards movement out of London and uncertainties over the future of central London jobs.

Paragraph 84 “as it would not help the council ... deal with the on-going flow of piecemeal poor quality planning applications”. Such applications will continue whether or not the green belt is built on. The inference is that the large projects proposed will allow the council planning department to further neglect small (and brown field) developments.

I object to the conduct of the consultation by the Council which has been prejudicial

a)The consultation was only brought to the attention of residents by a leaflet sent to residents approximately half way through the consultation period in July 2021.

b)Issuing an invitation to comment only on the council website itself did not constitute proper notice

c)The council possesses the email addresses of the majority of residents through online communications such as Enfield Arena. As a minimum the council could have advised residents to visit the main council website .

d)Reference documents, that is all Appendices and Background papers (pages 16 and 17),were not given electronic reference in this report. They could only be found by contacting the council by email. This obstructed access by interested citizens.

e)The extreme length of documents ,the illegibility of many drawings (and their lack of legend eg Appendix E figures 13 and 15) the lack of proper summary, the extensive padding with meaningless platitudes and unspecific statements of intent combined to put obstacles in the way of citizen response.

f)The consultation should be repeated with appropriate timing (eg post local election), the inclusion of appropriate document summaries, legibility of drawings/plans and adequate prior notice.

g)The timing of the consultation during holiday/school closure period was chosen to minimise public response. Also it is timed in order to prepare a final report immediately before election of a new council in an attempt to tie their hands.

3. Objections to Enfield Local Plan Appendix E Chase Park Placemaking Study

Quotes from the “Study” are in italics. The study should be amended to include all the comments below.

Page 10 Appendix E Blue and Green Strategy 2021-2031, May 2021

“Reducing the longstanding gap between affluent (in the west) and deprived (in the east) wards in terms of access to open space and nature will have narrowed”

A statement should be added stating that the gap will be narrowed by reducing access to open space and nature in the west of the borough but there will be no improved access to open space for the east of the borough. The access will be reduced by the proposed Vicarage Farm and Rectory farm developments which will be interposed between current access points and the open spaces.

“The arc of open countryside to the north and west of the main built-up area will be transformed into a publicly accessible parkland landscape, with over 300 hectares of new native species woodland (known as “Enfield Chase”). No definition of this new area is given. It should be added. Enfield Chase refers to a much larger area of historic parkland.

3.24 The vision in the Enfield Blue and Green Strategy outlines that by 2031 Enfield will be London’s greenest borough, forming the cornerstone of London as a national park city. It also highlights the opportunity to minimise the gap between east and west in terms of access to open space; identifies opportunities to maximise green tourism activities, increase food production and increase active participation. The strategy also outlines the opportunity to shift investment from grey-to-green infrastructure; improve accessibility and connectivity of the existing network, better connect spaces with communities, create new spaces, expand the woodland estate, and create an urban forest

This paragraph is typically full of platitudes with no explanation of how building on one side of the borough assists green development on the eastern side. This explanation should be added.

3.22 The creation of a Trent park Conservation Management Plan would be beneficial in ensuring that the fragile historic ecology and historic form of the park can be best protected

The study should state that both will be adversely affected by building up to the woods of Trent Park especially when added to the existing intensive housing development already underway within the park. The public utility and the ecology of Trent Park are dependent on the buffer of farmland surrounding it on all sides and a statement to that effect should be included in the document.

3.28 In this paragraph it should be stated that new public and private transport with corresponding negative environmental impact will be required

Figure 5 should be deleted. It is meaningless.

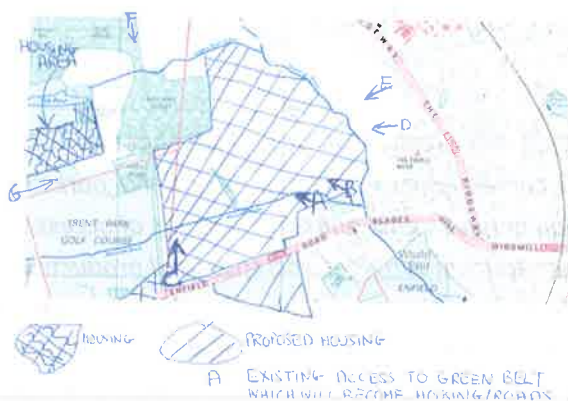
Character Response to Contex Paragraphs 3.12 to 3.20 These paragraphs are vacuous platitudes and Enfield Council should not be paying outside consultants to produce such thin material.

3.20 Chase Park is a natural extension to the existing North West urban edge of Enfield, and the scale of development that can be accommodated is determined by the boundaries of Trent Country Park and the restored Enfield Chase. Potential development zones within the Chase Farm area are in turn shaped by the brooks and landscape and will relate to the adjacent (existing) urban areas. A typically contentless set of platitudes and jargon. The phrase “restored Enfield Chase” is used on several occasions but no definition of the area to be restored or how is included. Both must be added.

Page 27 Under weaknesses the reference to Air Quality Action Plan is unclear. The reference should clearly state that building new houses and transport on the green areas identified as HIC 5 HIC 9 and HIC11 will replace open green areas with built up areas degrading air quality. This area immediately

abuts existing housing to the south and east and the increased pollution levels will have maximum effect on them.

Page 27 Strength "Areas of existing open space are accessible from to the west of the site, and it is in close proximity to Trent Park". To Weaknesses should be added Building will directly abut the eastern fringe of the park (at Williams Wood and Shaw Wood) detrimental to the Parks usefulness for nature and recreational use. Direct access to green spaces is presently made from Merryhills Way, Trentwood Side and Farmlands. The proposals will force access from existing housing to the west and south to be through the extensive new buildings of "Chase Park" and not directly through



farmland as at present.

The new housing in this development obstructs access to Trent Park from surrounding existing access. Points A-F. A statement to this effect should be added to weaknesses.

Page 27 This development abuts Trent Park woodland and will adversely affect the flora and fauna themselves. In particular the North West corner is less than 150meters from an area in the park already overdeveloped with new housing. This should be added to weaknesses

Page 27 A110 is already subject to frequent traffic congestion and pollution which will worsen. This should be added to weaknesses

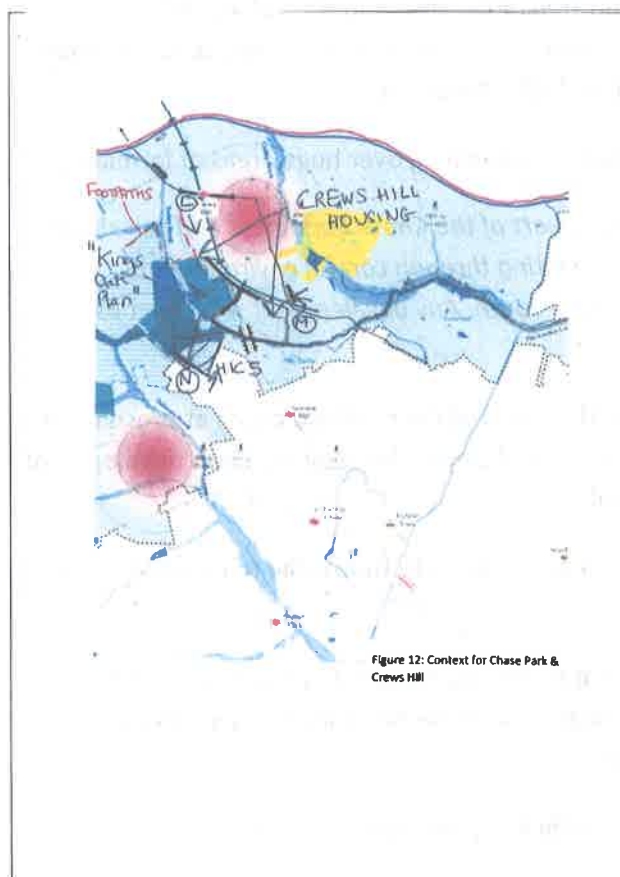
Page 27 This development destroys the views over natural countryside from Enfield Road north and south. As an outer London borough far from the best resources of the capital's centre it is important that the vestiges of countryside which project into the urban area are preserved to provide green access and visibility. This should be added to weaknesses

Page 27 New bus services will be required and increased car use as much of the proposed development is an extensive walk from existing public transport. A statement to this effect should be added to weaknesses.

Page 27 Enfield is at a disadvantage to more central boroughs in the journey times and travel cost to the work and cultural resources of the centre. At present this is offset by easier access to large scale open space and better air quality reduce urban noise provided by those spaces. The open space on both sides of Enfield Road is a dramatic statement of Enfield's special character. Houses to one side fields leading up to woodland on the other visible from the public transport passing from Oakwood to Enfield. This plan proposes obliterating this and replacing with urban sprawl as far as the eye can see to the North and South. A statement to this effect should be added to weaknesses.

Figure 12 and 15 of Appendix E are illegible and undecipherable as no legend is given. Fig 15 is in essence a sales drawing for the Vicarage Farm development. It does however appear to show a

further green belt encroachment marked as “Kings Oak Plan”. This is not referred to anywhere else in the Plan documentation and discussion of this green belt development should be added. Points N, L and M are popular start points for local walks through farm and countryside which will change to built up areas.



3.36 Health inequality between the east and west of the borough is stark.

The Plan should state how building on green space in western Enfield will improve health in the East of the borough.

3.37 The struggle of poorer households face trying to find decent, affordable housing is the single greatest challenge identified by the Enfield Poverty and Inequality Commission. The Enfield Children and Young People’s Mental Health Transformation Plan (2015-2020) found higher numbers of children and young people live in areas of deprivation.

The housing to be built will not be bought by economically struggling citizens of Eastern Enfield. To Threats/Challenges a statement should be added stating that the new houses will be unlikely to be affordable to anyone seeking help from the local authority. For example the “Affordable Homes” available at the Trent Park development range from £440,000 to £550,00 2 bedroom flats with 25% deposit and balance at rate of 2.75% - ie at open market price, and requiring household income in the range £56,000 to £70,000. The Plan or Appendix E should state the proportion of those requiring assistance from the council who could afford these properties either for purchase or Rent.

{Refer to webpage [Pricelist-Trent-Park-Enfield-Chase-Collection-Shared-Ownership-Legal-And-General-Affordable-Homes-Week-34-August-2021.pdf](https://www.landgah.com/Pricelist-Trent-Park-Enfield-Chase-Collection-Shared-Ownership-Legal-And-General-Affordable-Homes-Week-34-August-2021.pdf) (landgah.com)}

3.38 Rewilding opportunities exist through woodland creation from Salmons Brook to Whitewebbs Park, and with naturalisation of farmland areas adjacent. Natural flood management features (e.g., ponds and wetlands) at Salmons Brook will build on Enfield's river and wetland restoration programme, restoring and renaturalising urban rivers through works such as rain gardens, river planters, and reedbeds. The naturalisation and restoration of the river corridors along Salmons Brook, Turkey Brook and Pymmes Park in particular, can enhance the borough's habitat and wildlife resources, including through wetland creation and flood risk alleviation.

The plan should state that this can be achieved without also building over huge areas of farmland.

3.39 The Merryhills Brook flows east-west through the heart of the Chase Park area, and can shape the future development, which in turn can enhance its setting through careful environmental interventions along its course. Salmon's Brook runs north-south. Any development would act as a gateway to these enhanced blue-green areas.

The development is between existing urban areas to the south of Enfield Road which at present have a direct access ("gateway") to green areas and this access will under the Vicarage Farm development be through almost a kilometre of new housing sprawl.

Figure 6 .The legend is illegible. With no reference points marked it is impossible to make sense of this Map.

Figure 9 It should be stated that the proposed improvement in access would be best achieved directly through existing farmland by arranging permissive access with the landowner without building houses through which it would have to pass.

3.41 The Enfield Blue and Green Strategy identified insufficient food-growing spaces

Vicarage farm (HIC 11)and Rectory Farm (HIC5) were crop growing until 2019 when this stopped - presumably looking forward to the house building opportunities imminently to be facilitated by Enfield Council. It should be stated that under the Plan HIC11 and HIC5 will no longer be available to make up for the insufficiency of food-growing spaces.

These comments are my own views and provided in response to the Draft Local Plan Reg 18 Consultation 2021