Strategic Planning and Design,
ENFIELD COUNCIL, FREEPOST, NW5036,
EN1 3BR

6th September 2021

Dear Enfield Council

Thank you for the opportunity to respond to this important consultation.

I am writing to object to the following Policies: SP PL10, pages 80-87, and Figure 3.11; Policy SP PL9, pages 77-80 and Concept Plan Figure 3.10; Policy SA45, : Land Between Camlet Way and Crescent Way, Hadley Wood, page 364; Policy SA54, page 374; Policy SA52 page 372; and Policy SA62 page 383 and SP CL4 pages 277-279 – all of which propose the de-designation of Green Belt for housing and other purposes.

The Green Belt must be protected – this means **do not build** on Green Belt. Green Belt is for the benefit of everyone living in and visiting the Borough. Building on Green Belt will increase the risk of flooding, overload all infrastructure (roads, schools, hospitals etc), increase pollution and dramatically change the character of the environment and have a negative impact on Biodiversity. Building on Green Belt does **not** comply with the London National Park City principles. Contrary to the statements made in the draft plan document, the Council has a duty of care for the Green Belt in accordance with the London Plan and the National Planning Policy Framework [NPPF], and there are **no** exceptional circumstances to warrant a Green Belt review therefore any intentions to release parts of it should be taken out of the local plan.

Supporting evidence regarding protection of the Green Belt is provided by the following extract from a letter issued on behalf of the Mayor of London to the Planning Policy team at Enfield Council on 28 February 2019 - *"Whilst the Mayor supports the majority of the draft Local Plan's objectives* ***he does not support the release of the Green Belt as set out in Draft New London Plan Policy G2. The National Planning Policy Framework (NPPF) does not require a review of the Green Belt.*** *The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The retention of the Green Belt is also to assist in urban regeneration by encouraging the recycling of derelict and other urban land."*

Regarding SP PL9 SA27 Land at Crewes Hill, the same letter issued on behalf of the Mayor of London to Enfield on 28 February 2019 states the following:
"The Draft Local Plan describes Crews Hill station as a sustainable location for growth. The settlement is highly constrained by Green Belt and is served by a train station with three trains an hour at peak time, giving the area public transport accessibility levels ranging between 0 and 1b. In addition, the nearest substantial town centre, Enfield Town, is not within reasonable walking distance and there are no bus services serving the area. ***On all three counts the Mayor, including Transport for London, does not consider Crews Hill to be a sustainable location for growth as stated in Enfield's Draft Local Plan."***

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 spoil the landscape and are unnecessary because other lower-rise building forms could provide the same accommodation, as stated in the policy.
Extract from the same letter, mentioned above, issued on behalf of the Mayor of London to the Planning Policy team at Enfield Council on 28 February 2019 - *"Enfield's housing target*

is based on the borough's capacity as set out in the London Strategic Housing Land Availability Assessment 2017, which Enfield fed into; and a methodology for small sites. Enfield is encouraged to prepare design codes to guide small housing developments in line with draft London Plan policy H2 to promote the delivery of small sites in the borough. Higher density development does not mean tall buildings. Enfield should note that well designed higher density schemes will bring a range of social and built environment benefits to an area."

I am also objecting to following proposed developments: SA31: Cockfosters Station Car Park page 350; SA43 page 362 Lodge Drive Car Park, Palmers Green; SA42 page 361 Fords Grove Car Park. Removing Car Park capacity impacts negatively on promoting mobility and engagement with local businesses and therefore is bad for the economy.

I am also objecting to proposed development SA60: Firs Farm Recreation Ground Page 372, which proposes to develop extremely important recreation space that has become even more valuable to the community and environment with the wetlands development, and is a space that must be protected in line with the New London Plan for greening of urban areas in line with the stated biophilic design for our cities.

Whilst I support housing development and support the ambition to meet Enfield's housing needs, I wish to raise a fundamental issue regarding the assumptions used to define the future housing needs described in the Housing Topic Paper 2021.The stated population growth of 50,000 by 2039 for the Borough of Enfield is not supported with evidence therefore the basis for the Draft Local Plan to deliver 25,000 new homes is flawed. In addition, the future number of homes required in Enfield needs to take account of other Central Government National development initiatives that promote migration of population such as, along the Oxford-Milton Keynes-Cambridge corridor, and a focus on brownfield urban sites in West Midlands and North of the Country, away from rural and semi-rural communities in the South East such as Enfield. Central Government Directive also states that there is a need to consider re-purposing retail and office spaces no longer required in a new post pandemic society as we come to terms with new social practices such as on-line shopping and hybrid working styles.

In addition, considering the effects of Brexit, a more up to date and continuous projection review process for population growth is required in the Borough. It is more likely that population growth in Enfield will be lower that the projected 50,000 stated in the draft policy plan. A lower population growth needs to be matched by a more considered step by step approach for the overall planning options. Moreover, any increase in the number of homes needs to be supported with a proportionate increase in services and infrastructure capacity and of course an increase provision of school places for primary, secondary and higher education; improved healthcare provisions - hospitals, A&E, GP surgeries, increased capacity for multi-modal travel including private vehicles, whilst also meeting the aspirations of a truly Sound Local Plan.

The comments provided in this response to the consultation are my own views.

Regards